

ATWOOD MULTIPURPOSE TRAIL PROJECT
INITIAL STUDY / PROPOSED MITIGATED NEGATIVE DECLARATION

PREPARED FOR:

**CITY OF PLACENTIA
401 EAST CHAPMAN AVENUE
PLACENTIA, CALIFORNIA 92870**

PREPARED BY:

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SECTION 1.0

PROJECT DESCRIPTION

The California Environmental Quality Act (CEQA), as established by statute (Public Resources Code [PRC] §§ 21000 *et seq.*), requires that the environmental implications of an action by a local agency be estimated and evaluated before project approval. The City of Placentia (City) proposes to implement a bicycle corridor improvement, with funding from the Orange County Transportation Authority (OCTA) through the Federal-aid Congestion Mitigation Air Quality (CMAQ) Program, for the preliminary engineering and environmental analysis phase of the Atwood Multipurpose Trail Project. The California Department of Transportation (Caltrans) is the administering agency for this program, and as such, this project requires the design and environmental certification be completed to the satisfaction of the Caltrans based on the Caltrans Local Assistance process and Caltrans environmental procedure. The Atwood Multipurpose Trail Project (proposed project or proposed trail) would include the construction of a 1.0-mile-long trail from the BNSF/Metrolink railroad tracks, approximately 600 feet from Jefferson Street, to Lakeview Avenue to expand the City's trail network and enhance pedestrian and biking connectivity. The trail would include a paved multiuse path; new midblock crossings at Richfield Road, South Van Buren Street, and Fee Ana Street; a trailhead at Parque de Los Niños (PDLN); new street signs and striping; and wayfinding signage. The City is still considering three project elements:

1. Trail fencing along the edge of the channel,
2. A trail extension from Jefferson Street to the BNSF/Metrolink rail line, and
3. A bridge or grade separation crossing over the existing BNSF railroad tracks.

Of the three elements, the potential trail extension and the bridge or grade separation crossing, a 0.1-mile length, are considered "Optional To Be Determined" (OTBD) by the City and Caltrans (see Section 1.10, *Project Description*), and neither is a part of the project's limits of work.

The purpose of the proposed project is to connect the various parts of the city internally and externally to the surrounding region by providing innovative nonmotorized, safe, and sustainable transit modes that meet the needs of all users. The proposed project would also provide a continuous trail that largely separates pedestrians and cyclists from vehicular traffic. The proposed project would result in the City's expansion of its recreational amenities; enhance safety; and increase connectivity of the City's parks, schools, and neighborhoods while aligning with the City's overall mission to provide a safe family atmosphere with superior public services and policies. The proposed project would help increase the number of pedestrians and bicyclists to public transportation while providing community and recreational opportunities to the disadvantaged communities in the area including the City's Veterans Village and the Atwood community.

This initial study was prepared by the City pursuant to CEQA (Division 13, PRC) and the State CEQA Guidelines (Division 6, California Administrative Code). The proposed project would ultimately result in the construction of improvement projects on public lands, some of which may involve the expenditure of public funds, and thus constitutes a project pursuant to CEQA. The City is the Lead Agency pursuant to CEQA, and Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to the National Environmental Policy Act (NEPA). The analysis includes a desktop review of trail design and approach, roadway engineering, quantity calculations, environmental surveys, permit applications to other agencies (U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board), Right-of-Way (ROW) engineering, utility coordination, hydraulic and hydrology analysis, geotechnical engineering, and topographic and boundary

surveying. The design team will review the proposed project and study the hydrologic effects of the proposed trail along with additional examination of potential water quality improvements. This initial study and supporting environmental analysis will support the decision-making process to be undertaken by the City, in their role as the Lead Agency pursuant to CEQA, in considering the proposed project for approval.

1.1 PROJECT TITLE

Atwood Multipurpose Trail Project

1.2 LEAD AGENCY

City of Placentia
401 East Chapman Avenue
Placentia, California 92870

1.3 PRIMARY CONTACT PERSON

Kyra Tao, Transportation Manager
City of Placentia Public Works Department
401 East Chapman Avenue
Placentia, California 92870
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1.4 PROJECT LOCATION

The approximately 2.4-acre proposed project site is located within the community of Atwood in the City of Placentia (Figure 1.4-1, *Regional Vicinity Map*, at the end of this section). The neighboring cities include Brea to the north, Anaheim to the south, Fullerton to the west, and Yorba Linda to the east. The City is surrounded by State Route (SR) 91 on the south, SR 57 on the west, and SR 90 (Imperial Highway) on the east side running in a northwest to southeast direction. The proposed project area is bound by Orangethorpe Avenue to the north, BNSF/Metrolink railroad tracks to the west, Lakeview Avenue to the east, and Miraloma Avenue to the south. The proposed trail location is nestled within an urban community that would stretch from BNSF/Metrolink railroad tracks to Lakeview Avenue adjacent to the PDLN and the newly constructed Veterans Village facility along the Atwood Channel (Figure 1.4-2, *Local Vicinity Map*, at the end of this section). The project site can be accessed from three freeways by way of Orangethorpe Avenue: SR 57 (approximately 3.4 miles to the west), SR 90 (2.6 miles to the northeast), and SR 91 (1.4 miles to the southeast). The project site is accessible from Orangethorpe Avenue approximately 0.11 mile and 0.07 mile away from the trailheads along N. Van Buren Street and Richfield Road, respectively.

The project site resides within the City's Council District 3 per the newly adopted 2022 City Council district boundaries (ordinance O-2022-02) at the southernmost area of the City Council district and southeastern most area of the city boundary. The project site is also located on 11 Assessor's Parcel Numbers (APNs): 346-162-03, 346-164-19, 346-171-02, 346-013-16, 346-015-04, 346-241-03, 346-241-02, 346-331-09, 346-331-10, 1300794985, and 130145688. Two of the parcels, 346-162-03 and 1300794985, correlate to the Trail Extension and bridge features that are OTBD by the City and Caltrans. The first nine parcels are within the Orange County Flood Control District (District) easement. Of the remaining parcels, one is part of the District easement (APN 1301456881) and is adjacent to Lakeview Loop on the east end, and the other (APN 1300794985) is on the opposite

end as part of the BNSF/MetroLink railroad tracks, abutting the District easement on the east side (Figure 1.4-3, *Parcel Map*, at the end of this section). The proposed project site appears on the U.S. Geological Survey (USGS) 7.5-minute series Orange topographic quadrangle (Figure 1.4-4, *Topographic Map*, at the end of this section).¹ The elevation of the proposed project site ranges from approximately 258.3 feet above mean sea level (AMSL) near the east end of the trail at Lakeview Ave to 243.0 feet AMSL near the west end of the trail, just east of the BNSF/MetroLink railroad tracks. The site is relatively flat with an approximate 15.3-foot rise in elevation between the west end and east end of the 1.0-mile trail length as identified in the trail improvement plans (see Section 1.10, *Project Description*, below).

1.5 PROJECT SPONSOR

Orange County Transportation Authority
 550 South Main Street
 Orange, CA 92868

OCTA serves as the main sponsor for the proposed project. On June 10, 2019, OCTA approved the City's request for federal funds as part of the Bicycle Corridor Improvement through the Federal-aid CMAQ Program. OCTA awarded funding to begin the preliminary engineering and environmental analysis phase to connect the District maintenance access roads to future installed City sidewalks. The administering agency for this program is Caltrans. The design and environmental certification for the proposed project would satisfy the Caltrans Local Assistance process and environmental procedure requirements.

1.6 GENERAL PLAN DESIGNATION

The land use designations surrounding the 2.4-acre project site and its immediate vicinity are Low Density Residential, High Density Residential, Industrial, Commercial-Manufacturing, Parks, and Railroad (Table 1.6-1, *Summary of Existing Land Use Designations*; Figure 1.6-1, *General Plan Land Use Designations*). The proposed project would be located on land owned and operated by the City and the District. The project site is located within City boundaries and would not require any changes to the General Plan land use designations.

**TABLE 1.6-1
 SUMMARY OF EXISTING LAND USE DESIGNATIONS**

Location	General Plan Designation	Existing Use
Project Site	Low Density Residential	Paved and vacant
	High Density Residential	
	Industrial	
	Commercial-Manufacturing	
	Parks	Park
	Railroad	Railroad
Source: City of Placentia General Plan. October 2019. City of Placentia General Plan Update. https://www.placentia.org/166/General-Plan-Update		

¹ Department of Conservation. 2015. Seismic Hazard Zone Report for the Orange 7.5-Minute Quadrangle, Los Angeles, Orange and San Bernardino Counties, California.

The City's Low Density Residential designation is intended as Single-Family Residential classification that provides for single-family residential uses in areas where a lower density housing is desirable and designates a maximum development of six dwelling units per acre. The residential land use designations surrounding the project site are not owned by the District. There are 520 single-family residential designated parcels located within a quarter-mile buffer of the project site. Worth noting are two parcels (346-013-14 and 346-013-17) directly adjacent to the project site between S. Van Buren Street and Richfield Road that contain no single family or other residential units. However, these parcels, which are designated as parks, are not anticipated to include residential development. The project site is paved, primarily vacant land that is maintained (weed clearance); there are no residential uses within the proposed project site.

The City's High Density Residential designation is intended to accommodations for multiple family residences such as apartments. The High Density Multi-Family classification provides for medium high-density apartment living with substantial space for common-use facilities and open space. It designates a maximum development of 25 dwelling units per acre. High end residential occurs on the northeast and northwest ends along the proposed project site. Examples within the City and near the proposed project site include the Placentia Veterans Village on the east end north of the proposed project site at Lakeview Loop and Veteran's Way and Placentia Heights Development² (also known as the Hudson Townhomes)³ on the west end north of the proposed project site at S. Van Buren Street.

The City's Industrial designation provides for industrial uses that are high traffic generators with adequate access. This designation is required to include buffering for providing protection to nearby sensitive uses. Industrial uses occur along the southern portion of the proposed project's immediate vicinity.

The land use Commercial-Manufacturing designation provides for uses that combine both commercial and industrial characteristics. The designation also allows for commercial uses that require large display or storage areas. Commercial-Manufacturing occurs at the east end of the proposed project area near Lakeview Loop.

The Parks land use designation is intended as recreational resources and open space that have common uses. Some types of recreational resources and opens spaces include neighborhood, community, city, and subregional parks; parkettes; special use facilities such as school, sports complexes, and golf courses; bikeways, trailways, community and private-owned recreational facilities; and open space easements or corridors intended for passive and active uses.^{4,5} The PDLN and a parkette occur on the north and south sides, respectively, along the proposed project site between S. Van Buren Street and Richfield Road.

The City's Railroads designation is a type of ROW that operate within the City's boundaries. It includes freight and passenger railroads. It intersects the proposed project at the west end of the

² City of Placentia. October 28, 2021. City Administrator's Weekly Briefing. <https://www.placentia.org/Archive.aspx?ADID=4590>

³ City of Placentia. N.d. Hudson Townhomes. Available at: <https://placentia.org/964/Hudson-Townhomes> (accessed March 31, 2022).

⁴ City of Placentia. October 2019. City of Placentia General Plan Update: Land Use Element. <https://www.placentia.org/166/General-Plan-Update>

⁵ City of Placentia. October 2019. City of Placentia General Plan Update: Open Space and Recreation Element. <https://www.placentia.org/166/General-Plan-Update>

project site limit, and the tracks connect northerly to another line running parallel and along the Orangethorpe corridor.

Relevant General Plan Goals and Policies

The City's General Plan identifies goals and policies under the Mobility Element, Conservation Element, Open Space and Recreation Element, and the Health, Wellness and Environmental Justice Element that promote opportunities for the city to enhance the bikeway network.

Mobility Element

- **Goal MOB – 4:** Encourage bicycle travel as a primary mode of transportation
 - Policy MOB - 4.3 Review the existing Class I, II and III bikeways and modify as needed to comply with the California Manual on Uniform Traffic Control Devices (CA MUTCD)
 - Policy MOB - 4.4 Provide direct, continuous bicycle routes for commuter and recreational cyclists that also improve the safe passage of cyclists.
 - Policy MOB - 4.5 Support the safe and efficient movement of cyclists through and across intersections, including compliance with bicycle detection requirements in the CA MUTCD
 - Policy MOB - 4.7 Support bikeways that minimize cyclist/motorist conflicts, such as constructing the planned replacement of the Golden Avenue Bridge to link directly to Segment D of the OC Loop Project to further link multiple bikeways into a 66-mile branded facility throughout northern and central Orange County as well as implementation of the Go Placentia Loop linking the Placentia Metrolink Station to major destinations near and around Placentia.
 - Policy MOB - 4.10 Support efforts to maintain, expand and create new connections between the Placentia bikeways, the bikeways in neighboring jurisdictions and regional bikeways
 - Policy MOB - 4.11 Support policies, programs and projects that make bicycling safer and more convenient for all types of cyclists
 - Policy MOB - 4.13 Support projects and programs to facilitate safer travel by bicycle to key destinations within the community and the larger region, including the new Metrolink station, when completed.
 - Policy MOB - 4.16 Work with the Orange County Flood Control District under the City and District's cooperative agreement to develop and utilize District facilities within Placentia as off-road recreational bike trails and loop connections to other existing or planned on-street bicycle facilities

- **Goal MOB – 5** Support and prepare for the imminent emergence of autonomous vehicles in a way that strengthens the City's transportation and land use goals to create a more walkable, bikeable, transit-oriented, safe and efficient circulation system.
 - Policy MOB - 5.1 Coordinate with OCTA as well as the Los Angeles Department of Transportation (LADOT) to customize and implement region-wide transportation technology strategies to ensure an integrated and interoperable regional system.

- **Goal MOB – 6** Coordinate and cooperate with neighboring jurisdictions, the County and the region to reduce traffic and parking congestion and other traffic impacts

- Policy MOB - 6.5 Work with neighboring jurisdictions to link up bicycle facilities and recreational trails to expand their regional reach and benefits to the larger community

Conservation Element

- **Goal CON – 3:** Improve air quality by reducing the amount of vehicular emissions in Placentia
 - Policy CON - 3.6 Encourage non-motorized transportation through the provision and expansion of bicycle and pedestrian pathways

Open Space & Recreation Element

- **Goal OS & R – 1:** Provide recreation/park facilities and programs for all those who live and work in Placentia.
 - Policy OS & R - 1.11 As development occurs, consider bikeways as one means for implementing the goals of Complete Streets [pursuant to the Bike Plan].
- **Goal OS & R – 3:** Preserve open space resources to maintain the high quality of life in Placentia
 - Policy OS & R - 3.7 Conserve Placentia’s flood control facilities as appropriate to protect the public health, safety, and welfare and create recreational opportunities such as bike trails where feasible
 - Action 3.7-1: Connect our street bikeway system into the flood control channel bikeway plan

Health, Wellness, and Environmental Justice

- **Goal HW/EJ – 7:** Ensure that parks, trails, open spaces, and community facilities that support active, healthy recreation and activities are distributed throughout Placentia and are available to residents of disadvantaged communities.
 - Policy HW/EJ - 7.2 Seek opportunities to convert public easements, such as utility corridors and parkway vistas, into parks and trails. Continue to work with the school district to create joint-use facilities

Historic District

The Historic Old Town Placentia District (OT District)⁶ is located on the southwestern portion of the city, the opposite side of the city in relation to the project site. While the City is also focused on transportation efforts within the OT District (that provides connectivity to the project site), per the planned Placentia Metrolink Station, the project site is not within the OT District or other historic districts (see Figure 1.6-2, *Historic Districts*, at the end of this section).

⁶ City of Placentia. 2017. Old Town Placentia Revitalization Plan. Available at: <https://www.placentia.org/726/Old-Town-Revitalization-Plan>

Specific Plans

There are 10 specific plans identified in the Land Use Element of the City’s General Plan, which are scattered throughout the City.⁷ The project site is not located within any of the specific plan areas. There are no specific plan requirements applicable to the proposed project.

1.7 ZONING

The zoning designations along the length of the proposed project site are Single-Family Residential (R-1), High-Density Multi-Family (R-3), Industrial (M, PMD), and Commercial-Manufacturing (C-M) parcels (Table 1.7-1, *Summary of Existing Land Use and Zoning Designations*; see Figure 1.7-1, *Zoning Designations*, at the end of this section). The project site is located within City boundaries, and the proposed project would not require any changes to the City’s zoning designations.

**TABLE 1.7-1
SUMMARY OF EXISTING LAND USE AND ZONING DESIGNATIONS**

Location	General Plan Lands Use	Zoning	Existing Use
Project Site	Low Density Residential	Single-Family Residential District (R-1)	Paved and vacant
	High Density Residential	High-Density Multi-Family (R-3)	
	Industrial	Manufacturing (M) Planned Manufacturing (PMD)	
	Commercial-Manufacturing	Commercial-Manufacturing (C-M)	

Source: City of Placentia General Plan Adopted October 1, 2019. City of Placentia General Plan Update. Available at: <https://www.placentia.org/166/General-Plan-Update>

1.8 BACKGROUND AND EXISTING CONDITIONS

1.8.1 Background

The project site is located within the community of Atwood in the City, which is located in the heart of North Orange County. With a diverse population of 52,755 as of 2018,⁸ the City has several incredible amenities such as a historic downtown and expansive trail network. With the completion of the City's new Metrolink station in the nearby downtown area, expanding the City's trail network would help increase the number of users who can bike/walk to public transportation. In addition, the City has an agreement with the District to use District maintenance access roads on District property that adjoin and would connect to future installed City sidewalks, to provide pedestrian access to and from recreational and transit amenities within the City.

Healthy communities depend on social determinants for greater health and well-being of a community such as improved physical activity and access to safe, open spaces and recreational facilities among others. A healthy community, as noted in the City’s General Plan, provides for healthier living; superior air quality; a safe and effective transportation system with diverse travel options; and opportunities for recreation and physical activity such parks, trails, and open spaces

⁷ City of Placentia. October 2019. City of Placentia General Plan Update: Land Use Element. <https://www.placentia.org/166/General-Plan-Update>

⁸ Southern California Association of Governments (SCAG). May 2019. SCAG: Local Profile of the City of Placentia. https://scag.ca.gov/sites/main/files/file-attachments/placentia_localprofile.pdf?1606012689

as well as extensive walking and cycling routes.⁹ Healthy communities also include provisions and connectivity to residents inclusive of disadvantaged communities. The City is committed to the prosperity and viability of its communities; maintaining and improving the quality of life for all community members has long been an important goal of Placentia. One disadvantaged community is the community of Atwood that would benefit from focused attention on health and wellness for a healthy community.¹⁰

1.8.2 Existing Conditions

Site visits were conducted on January 13, 2022, and January 20-26, 2022, to characterize existing conditions at the project site, including overall photographs of the project site from publicly accessible locations taken on March 13, 2022 (see Figure 1.8-1, *Site Photographs Map and Site Photographs*, at the end of this section).

The proposed project site is a gravel paved, vacant access road that is maintained by the District. The site is located in close proximity to existing bikeways (Class I, Class II, and Class III),^{11,12} a BNSF railroad, and recreational facilities. The BNSF railroad is the dividing site element between the length of the proposed trail and the OTBD trail extension. The proposed project site is surrounded by a transit network that includes roadways, bikeways, public transit, and railways (both commuter and freight lines). In addition, the City includes plans for pedestrian facilities for providing connectivity and enhancing a walkability network citywide for access opportunities to recreation facilities, schools, public transit, neighborhoods, and commerce.

Roadways

The Master Plan of Arterial Highways (MPAH) of the City's General Plan (part of the Mobility Element) identifies smart streets, principal arterials, major arterials, primary arterials, secondary arterials, divided collectors, collectors, and local streets. The proposed project site is surrounded by a network of the MPAH's identified roadways, which include a major arterial roadway (Orangethorpe Avenue), a primary arterial roadway (Lakeview Avenue), two secondary arterials roadways (Richfield Road and Miraloma Avenue), and one collector roadway (South Van Buren Street).¹³ Orangethorpe Avenue is also identified in the Mobility Element of the City's General Plan as a truck route.

Bikeway Network

Bikeways provide access to schools, parks, and other open space areas within the community. In addition, bikeways also provide access to public transit and destination locations city-wide and county-wide. The proposed project is part of the City's current Bikeway Network and contributor to the Orange County Bikeway Plan (OC Bikeway). The City's Bikeway Network consists of Class I,

⁹ City of Placentia. October 2019. City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update>

¹⁰ City of Placentia. October 2019. City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update>

¹¹ City of Placentia. October 2019. City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update>

¹² Orange County. 2012. County of Orange: General Plan. <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/codes-and-regulations/general-plan>

¹³ City of Placentia. October 2019. City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update>

Class II, Class III, and Class IV bikeways. As part of the citywide connectivity, the City also has a master planned bikeway linking public transit to a Transit Oriented Development (TOD) called the Go Placentia Loop on the southern west end of the City.

The City currently has over 13.2 miles of existing bikeways as part of the Bikeway Network, including 1 mile of Class I bike paths, 8 miles of Class II bike lanes, and 4 miles of Class III bike routes.¹⁴ Additionally, the City has approximately 18 miles of planned bikeways consisting of 4 miles of Class I, 11.4 of Class II, and 2.6 miles of Class III bikeways. While identified by the City, there are currently no existing or proposed Class IV bikeways, but potential locations for implementation of this class are being considered.¹⁵

Class I – Bike Paths

Class I bikeways are paved off roadways bike paths with no allowance of motorized vehicular traffic and include at-grade or grade-separated road crossings. These paths are typically along uninterrupted corridors such as rivers, creeks, flood control channels, and railroad rights-of-way. Bike paths that are adjacent to channels, waterways, and railroad rights-of-way are intended as a shared facility for recreational purposes not just for bicycling but also for walking, running/jogging, and equestrian use. There is an existing Class I bicycle loop that surrounds the lake at the Tri-City Park located within the northern portion of the city but is maintained and operated by the Orange County Park System (OCPS).

Class II – Bike Lanes

Class II bikeways are bicycle facilities or bike lanes located to the right of vehicular lanes that are signed and striped along a roadway. Bicycle facilities or bike lanes typically occur on collector and arterial roadways providing connectivity by way of the street network. While not as attractive to users as the Class I bike paths due to the road-sharing aspect, bike lanes are more feasible to install and have increased accessibility and connectivity options as they can be implemented on varying types of streets. The nearest Class II bike lane is along Lakeview Avenue and accessible on the east end of the project site.

Class III – Bike Routes

Class III bikeways are bike routes located on roads that include signage and are shared with vehicular traffic. Class III bike routes are intended to provide a continuum to the bikeway network. Class III bike routes are defined as having no designated road markings along the route for bicyclists as they are shared with motor vehicles on the roadways. In addition to the Class I, there is also an existing Class III bicycle loop surrounding the lake at the Tri-City Park as part of the OCPS.

Class IV – Separated Bike Routes

Class IV bikeways are bike routes or on-street facilities for cyclists that includes a physical roadway separation from traffic lanes. The road separated bike routes can be configured as a one-way facility/bike route, a facility/bike route on both sides of the roadway, or two facilities/bike routes on one side of the roadway. The roadway separator can be made up of a variety of materials such as

¹⁴ City of Placentia. October 2019. City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update>

¹⁵ City of Placentia. October 2019. City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update>

concrete curbs, landscaping, parking lanes, bollards, or other vertical elements. Class IV bike routes vary from the Class I and Class II bikeways as they are nonshared and are physically separated from traffic. There are no Class IV within the City boundary.

Go Placentia Loop

The Go Placentia Loop (GP Loop) is a master planned bikeway network linking the planned Placentia Metrolink Station with the TOD, the OT District, and other nearby destinations such as the California State University, Fullerton campus. The GP Loop is intended to provide on-street facilities to pedestrians and cyclists as part of a larger planned multimodal effort that would encompass various nonmotorized paths, bike lanes, and routes. The GP Loop would also accommodate motorists for access to the planned Placentia Metrolink Station. Essentially, the GP Loop would provide connectivity to the overall Orange County Loop.

Orange County Loop

The Orange County Loop (OC Loop) is a 66-mile seamless trail of connections and opportunity for people to bike, walk, and connect to some of California's most scenic beaches and inland destinations. Approximately 88 percent of the OC Loop has been constructed on existing off-street trails along the San Gabriel River, Coyote Creek, Santa Ana River, and the Coastal/Beach Trail.¹⁶ The OC Loop is a multiagency effort to close the connectivity gap that has helped connect to approximately 200 parks, 180 schools, and 17 cities across Orange County. The OC Loop can be accessed by the proposed project via the Santa Ana River segment and the El Cajon Trail segment to the south and east, respectively.

Pedestrian Network

The City is incorporating Complete Streets (Assembly Bill 1358/Senate Bill 1000) requirements by planning for an interconnected multimodal transportation network that meets the needs of motorists, bicyclists, and pedestrians including children, persons with disabilities, and seniors. The goal of Complete Streets is to enhance pedestrian facilities with improvements to sidewalks, curb ramps, signage, lighting, Americans with Disabilities (ADA) tactile pads, and streetscape amenities. Through Complete Streets facilities, the City is encouraging pedestrian connectivity and enhancements through various improvements that allow for all modes of travel such as walking, bicycling, and transit for reaching key destinations in a safe and direct manner within a community or region.

Public Transportation System

There is a public transit bus service within the vicinity of the proposed project site that is operated by the OCTA and services the community of Atwood. There are two routes (bus lines 30 and 38) and eight bus stops within the project's vicinity.¹⁷ Bus line 30 runs eastbound and westbound along Orangethorpe Avenue with bus stops at the intersections of Jefferson Street, S. Van Buren Street, and Richfield Road. Bus line 38 runs eastbound and westbound along La Palma Avenue (in the neighboring City of Anaheim) at the intersections of S. Van Buren Street, Richfield Road, Fee Ana

¹⁶ Orange County Transportation Authority. N.d. OC Loop. <https://octa.net/Bike/The-OC-Loop/> (accessed May 6, 2022).

¹⁷ Orange County Transit Authority. N.d. System Map. Available at: <https://octa.net/Bus/Routes-and-Schedules/System-Map/> (accessed March 23, 2022).

Street, and Lakeview Avenue.^{18, 19} The OCTA buses are bike friendly and equipped with bike racks that can carry up to three bikes at a time “on the front of every bus.”²⁰ For safety transport, a bike racks can accommodate bicycles based on the OCTA specifications:

- Wheel Size: 20 to 29 inches in diameter
- Wheelbase: 48 inches maximum axle to axle
- Tire Width: No more than 2.5 inches maximum
- Bike weight: No more than 55 pounds per bike rack position

As a contributor to the OC bikeway network, the proposed project is intended to connect the communities to public transit and destinations at the City- and county-wide level. There are continuous bus stops along the Orangethorpe Avenue and La Palma Avenue corridors accessible from the project site that would provide the linkage to various destinations and other transit options City- and county-wide.

Railways

A railway intersects the proposed project site on the western end where the 1.0-mile proposed project trail segment would end and the 0.1-mile OTBD trail extension and bridge considerations would begin (see Figure 1.6-1). The companies utilizing the railways include Metrolink commuter rail trains and the BNSF. Metrolink, operated by Southern California Regional Rail Authority, is a joint powers authority that purchased BNSF and Southern Pacific railway tracks in 1992.²¹ The railway tracks that intersect the project site are owned and operated by Metrolink and connect at the northern end to another set of tracks that are owned and managed by BNSF but are also used by Metrolink for traversing county lines. The City has no authority or jurisdiction over the railways or its property.²² Jurisdiction is solely under the Federal Railroad Administration in coordination and assistance from the California Public Utilities Commission for monitoring emissions in relation to air quality.

Metrolink Commuter Train

Metrolink is a transportation rail system that is ranked as the third largest commuter rail in the United States and consists of seven commuter lines traversing six counties and 62 stations with plans for expansion.²³ The Metrolink line running on the intersecting tracts within the project site is the Inland Empire-Orange County Line (IE-OCL) that runs between San Bernardino and Oceanside, with the nearest station being the Anaheim Canyon Station.²⁴ The 91/Perris Valley Line (91/PVL) that runs

¹⁸ City of Placentia. N.d. City of Placentia: Interactive Transportation GIS Maps. Available at: <https://data-placentia.opendata.arcgis.com/search?tags=transportation> (accessed March 23, 2022).

¹⁹ City of Anaheim. N.d. City of Anaheim: Open Data Interactive Transportation Maps. Available at: <https://data-anaheim.opendata.arcgis.com/search?tags=transportation> (accessed March 23, 2022).

²⁰ Orange County Transit Authority. N.d. Using a Bike Rack: Travel Farther, Bring Your Bike! <https://octa.net/Bus/How-to-Ride/Riding-Tips/Bike-Rack/> (accessed March 23, 2022).

²¹ Metrolink. N.d. Metrolink: History. Available at: <https://metrolinktrains.com/about/agency/history-of-metrolink/#1993-2004> (accessed May 11, 2022).

²² City of Placentia. N.d. Railway Concerns & Violations. Available at: <https://www.placentia.org/856/Railway-Concerns-Train-Horn-Violations> (accessed April 6, 2022).

²³ Metrolink. January 2021. Metrolink Strategic Business Plan. <https://metrolinktrains.com/about/agency/strategic-business-plan/>

²⁴ City of Anaheim. N.d. City of Anaheim: Open Data Interactive Transportation Maps. <https://data-anaheim.opendata.arcgis.com/search?tags=transportation> (accessed March 23, 2022).

between Perris and Los Angeles Union Station shares the track with the BNSF, which runs along Orangethorpe. The Metrolink Strategic Business Plan identifies improvements to the existing Anaheim Canyon Station (IE-OCL); a future Metrolink station in Placentia (Placentia Station – on the 91/PVL) that has been listed as a 2023–2025 funded and committed project; and improvements to the Olive Sub Signals at Atwood where the old Olive District (now Metrolink's Olive Sub) to Orange and ultimately San Diego diverges from the main tracks to Los Angeles.^{25, 26}

BNSF

BNSF has served for over 170 years as a freight line service. Its route within the project's vicinity along Orangethorpe Avenue is shared with Metrolink (91/PVL).

Quiet Zone

The OCTA, in coordination with various cities within Orange County, developed a Quiet Zone, the first and still one of only a few nationwide.²⁷ The OCTA Quiet Zone went into operation in 2007 and is an approximately 0.5-mile-long section of rail line that encompasses public highway-rail grade crossings working to silence train whistles (train horns that are not routinely sounded). Routine sounding can be silenced at specific highway-rail grade crossings after a safety system or procedure is determined by the Federal Railroad Administration to be an effective substitute for the horn. Train horns are sounded in advance of an at-grade crossing to warn drivers and pedestrians approaching the crossing. A train horn may not be sounded for several reasons, when there are crossing warning devices that are malfunctioning or are out-of-service due to maintenance; construction is occurring near the tracks; manual warnings are exhibited for safety reasons, train clearances of the tracks; passenger trains during arrivals or departures at stations for safety reasons; or as a safety precaution for preventing imminent injury, property damage, or death.²⁸ The Quiet Zone does not limit the occurrences of horns or bells ringing at crossings but prohibits the using of horns or bells within the zone as a safety measure.

Recreational Facilities

PDLN is the only recreational facility in the vicinity of the Atwood community within the project site. It is located at 1701 Atwood Avenue and is accessible to the community from S. Van Buren Street via Atwood Avenue or Oak Street by way of walking, biking, or by vehicle or along Richfield Road by way of walking or biking. The park is also accessible from Vincent Avenue at Maria Avenue via a bridge crossing over the Atwood Channel by way of walking or biking. The Park is approximately 3.6 acres (157,505 square feet).²⁹ The park has various amenities such as restrooms, playground with a sand play area, picnic tables, barbeque, fitness equipment, handball court, baseball and basketball courts, a community center, and parking. The community center, within PDLN, is the

²⁵ Metrolink. January 2021. Metrolink Strategic Business Plan. <https://metrolinktrains.com/about/agency/strategic-business-plan/>

²⁶ Trainsorders.com. N.d. Western Railroad Discussion by Evan Werkema. <https://www.trainorders.com/discussion/read.php?1,5082556> (accessed March 23, 2022).

²⁷ OCTA. N.d. Quiet Zones. <https://octa.net/projects-and-programs/all-projects/rail-projects/railroad-crossing-enhancements/quiet-zones/> (accessed March 24, 2022).

²⁸ City of Placentia. N.d. Quiet Zone Update. <https://www.placentia.org/191/Quiet-Zone-Update> (accessed March 24, 2022).

²⁹ City of Placentia. N.d. City of Placentia: Interactive Parks GIS Maps. <https://data-placentia.opendata.arcgis.com/datasets/placentia::city-parks/explore?location=33.866905%2C-117.828046%2C17.48> (accessed March 24, 2022).

Gomez Community Center (GCC) and a LOT318 homework club site that services disadvantaged communities. The GCC offers free recreational youth activities that are funded by the City as part of the Positive Activities and Recreation for Kids program (P.A.R.K.) for the disadvantaged community of Atwood, providing arts and crafts, excursions, games, homework assistance, special events, and sports.³⁰ The PDLN would be located directly adjacent to the proposed project site along the southern side. While PDLN and the GCC would be directly accessible from the proposed project, other accessible recreation facilities from the trail would include Placentia Champions Sports Complex, which would be accessible along Jefferson Street to the north via Orangethorpe Avenue as well as Riverdale Park and Peralta Canyon Park accessible from Lakeview Avenue to the south, both of which are in the City of Anaheim. Placentia Champions Sports Complex is 0.9-mile away from the project site; and the Anaheim recreation facilities, Riverdale Park and Peralta Canyon Park, are 1.3 miles away and 2.0 miles away from the project site, respectively.

Orange County Flood Control District Facilities

The District maintains 380 miles of concrete, rock-lined, and earthen flood control facilities.³¹ The proposed project area is operated and maintained by the District. The District's Operations and Maintenance Division (OMD) provides services related to streams and riverbank erosion management and maintenance that include channels, confined spaces, dams and basins, pump stations, storm drains, and vegetation and pest control but only the channels, storm drains, and vegetation and pest control are in relation to the proposed project site:

- **Channels:** The Atwood Channel is located adjacent to and runs parallel with the project site. Channels are designated to handle water flow from storm drains and other runoff while directing the water to the bay or ocean. Regular inspections and cleanings are conducted as needed by OMD. The Division maintains but also relies on public input for maintaining channels free of blockage or debris for minimizing flooding issues and improving water quality.
- **Storm Drains:** The Atwood Channel is adjacent to and runs parallel with the project site that includes storm drains. Storm drains consist of levees, canals, and pump stations where pump station operators are responsible for operations and maintenance of seven pump stations, three ultraviolet/filtration systems, and four urban runoff diversions containing 46 pumps throughout the OC watershed area. Operations and maintenance of storm drains includes all pumping equipment and associated machinery.
- **Vegetation and Pest Control:** The Atwood Channel contains a few areas alongside the project site where vegetation occurs within concrete lined and soft bottom areas of the channel where Best Management Practices (BMP) would apply. The management, reduction, and control of vegetation growth is addressed using a Pest Management Program and BMPs. Regarding vegetation control, as deemed, is accomplished by hand crews, heavy equipment, pesticide applications, or a combination of available resources.

The OMD conducts regular maintenance and inspections of channels, confined spaces, dams and basins, pump stations, storm drains, and vegetation and pest control. The OMD also encourages

³⁰ City of Placentia. N.d. Youth P.A.R.K.'s Programs. <https://www.placentia.org/160/Youth-PARK-Programs> (accessed July 8, 2022).

³¹ County of Orange Public Works. N.d. OC Operations & Maintenance: Flood Control. <https://ocom.ocpublicworks.com/service-areas/oc-operations-maintenance/flood-control> (accessed April 1, 2022).

the public to notifying the division of any channel or ditch debris blockages to prevent flooding and help improve water quality.

The proposed project would be constructed and maintained by the City of Placentia per the Agreement No. MA-080-18010066 dated September 26, 2017, between the Orange County Flood Control District and the City of Placentia.

The City's focus is management, safety, and security as it relates to operations and maintenance (O&M) considerations of the proposed project. The O&M would include items such as, but not limited to, maintaining the corridor free of debris and other obstacles; permitting sweeping equipment to access sidewalks and separated bikeways; recommendations for trails to be swept systematically according to the existing street maintenance hierarchy, or twice a month to once every two months, with extra sweeping during the fall season; and recommendation for immediate removal of dangerous objects and broken glass occurring outside of the regularly scheduled maintenance. A compiled list of O&M tasks is depicted in Table 1.8.2-1, *Summary of Operation Tasks*, and Table 1.8.2-2, *Summary of Maintenance Tasks*.

**TABLE 1.8.2-1
SUMMARY OF OPERATION TASKS**

Operations Task	Skill/ Expertise	Suggested Frequency
Management/ Coordination/ Communication*	Public Works	Daily
Public Safety	Local Law Enforcement	Daily
Emergency Response	Police Department and Public Works	As Needed
Note: * The public should be encouraged to report maintenance concerns through City-specific applications, or a phone hotline.		

**TABLE 1.8.2-2
SUMMARY OF MAINTENANCE TASKS**

Maintenance Task	Type	Suggested Frequency
Landscape irrigation	Routine	Weekly
Pavement sweeping*	Routine	Twice per Month
Wayfinding sign inspection	Inspection	Monthly; After Rain Events
Basic site furnishings repair/ replacement	Routine	As Needed
Safety lighting repair	Routine	As Needed
Sign repair/replacement	Routine	1-3 Years
Pavement markings repair/replacement	Routine	1-3 Years
Pavement surfacing	Remedial	10-15 Years
Plant trimming/vegetation management	Remedial	Bi-annual
Art maintenance*	Routine	Yearly
Note: * May require special equipment.		

1.9 STATEMENT OF OBJECTIVES

The proposed project is part of a coordinated effort with Orange County, OCTA, and neighboring cities to provide a diversified transportation network. The coordinated agreements include shared goals and objectives for creating connectivity countywide.

Goals

The proposed project has five goals:

1. Close gaps in Placentia's active transportation network.
2. Provide greater connectivity to the neighborhoods that straddle the Atwood community within Placentia (including the Placentia Veteran's Village and Atwood Communities).
3. Incentivize new active transportation users.
4. Promote public health and a walkable community.
5. Provide pedestrian access to and from recreational and transit amenities to the disadvantaged communities within the City.
6. Provide new safe and off-street recreational trail opportunities

Objectives

The City has identified seven objectives of the proposed project:

1. Create a trail alignment that provide connectivity opportunities.
2. Provide safe and continuous trails that avoid vehicular and locomotive crossings.
3. Provide opportunities for access points that connect the trail to neighborhoods, parks, schools, and transit.
4. Provide a dedicated Class I trail that connects to the existing Class II/III bike lanes along Jefferson Street, Richfield Road, and Lakeview Avenue north of Orangethorpe Avenue
5. Provide a dedicated Class I trail that connects to a proposed Class II trail along Richfield Road south of Orangethorpe Avenue.
6. Provide full ADA accessibility, landscaping enhancements, and amenities along the trail.
7. Develop strategies for implementation.
8. Connect the existing Tracks at Brea Trail and the OC Loop from arterial streets.

Benefits to the City based on the City's goals and policies include the following:

- Providing City- and county-wide bikeway connectivity for healthy living (Class I – bike trails, Class II – bike lanes, and Class III – bike routes)
- Local and regional linkage to public transit such as rail lines, buses, and other trails for exploring Orange County
- Accessibility to recreational and institutional facilities such as parks and schools (walking or biking) citywide and regionally
- Providing facilities that promote physical activity, biking, and walking to help reduce health risk
- Inclusion of bikeways to combat climate change through a multimodal transportation approach
- Improvement of bikeway connectivity while closing gaps in existing bikeway network

- Accessibility of key destinations
- Providing safe connection and crossings
- Elevating Placentia’s mission to healthy communities

1.10 PROJECT DESCRIPTION

The proposed project would be an approximately 20-foot-wide trail and would occur alongside the Atwood Channel ROW. The trail would include a paved multiuse path; midblock crossings with ADA accessibility including modified sidewalks and curb ramps; access gates; a trailhead at PDLN; new street signs; path striping and wayfinding signage; and landscaping along selected shoulders or BMPs adjacent to the path. Mid-block crossing options are identified and would be included at the mentioned bisected streets or intersections (S. Van Buren St, Richfield Rd, Fee Ana St, and Lakeview Loop) for providing residents with connection to residential areas and parks. Existing trail slope/grades would be maintained where possible.

The proposed project would include the construction of a 1.0-mile-long segment multiuse trail stretching from the BNSF/Metrolink rail line tracks to Lakeview Avenue to expand the City’s bikeway network and enhance pedestrian and biking connectivity. A 0.1-mile-long segment from Jefferson Street to the BNSF/Metrolink railroad tracks that includes a trail extension and a bridge over the BNSF/railroad tracks is under consideration as OTBD by the City and Caltrans. The trail extension, inclusive of the bridge over the BNSF/Metrolink railroad tracks, is OTBD and will be identified as the trail extension (OTBD) or third segment for simplification. The trail extension (OTBD) is mentioned for reference, context, and the purpose of potential future bikeway connectivity and not a part of the project’s limit of work. The multipurpose trail identifies a two-part proposed trail segment as well as a third segment under consideration for future trail connectivity reference (see Figure 1.10-1, *Proposed Project*, at the end of this section):

1. Proposed Main Trail
2. Proposed Class II Bike Facility (Bike Lane)
3. Trail Extension (OTBD)

The proposed project would incentivize new active transportation users and promote public healthy by providing residents with a dedicated Class I trail that includes full ADA accessibility, landscaping enhancements, and access to amenities including three trail crossings at the intersections of S. Van Buren Street, Richfield Road, and Fee Ana Street. Furthermore, the proposed project would provide opportunities for local access points along the alignment to the Placentia Heights Development³² (also known as the Hudson Townhomes)³³ on the western end at S. Van Buren Street and the Placentia Veterans Village³⁴ on the eastern end at Lakeview Loop and Veterans Way. The proposed trail would alternate between north and south sides along the Atwood Channel within the District maintenance easement. This would allow for maximizing trail accessibility and connectivity opportunities.

³² City of Placentia. October 28, 2021. City Administrator’s Weekly Briefing. <https://www.placentia.org/Archive.aspx?ADID=4590>

³³ City of Placentia. N.d. Hudson Townhomes. <https://placentia.org/964/Hudson-Townhomes> (accessed March 31, 2022).

³⁴ City of Placentia. N.d. Placentia Veterans Village. <https://placentia.org/724/Placentia-Veterans-Village> (accessed April 25, 2022).

Proposed Main Trail

The main trail would be approximately 0.9-mile-long and extend from the BNSF/Metrolink railroad tracks on the west end, approximately 600 feet from Jefferson Street, to Lakeview Loop on the east end. The proposed project site is surrounded by a network of roadways as identified in the MPAH of the City's General Plan including Orangethorpe Avenue, Lakeview Avenue, Jefferson Street, Richfield Road, Miraloma Avenue, and S. Van Buren Street.³⁵ The main trail would be bisected by three of these roadways: from west to east, S. Van Buren Street, Richfield Road, and Lakeview Loop (see Figure 1.10-1; Figure 1.10-2, *Proposed Multipurpose Trail Improvement Plans*, at the end of this section). The main trail would also be bisected by Fee Ana Street, a minor roadway. The bisections of the roadways would create four street-to-street sections:

1. BNSF railroad tracks to S. Van Buren Street
2. S. Van Buren Street to Richfield Road
3. Richfield Rd. to Fee Ana Street
4. Fee Ana Street to Lakeview Loop

Proposed Class II Bike Lane

The Class II bike facility or bike lane would be an approximate 0.1-mile-long segment that connects from the main trail at Lakeview Loop and continues in a southerly fashion, then curving easterly towards Lakeview Avenue to connect to an existing Class II bike lane.

OTBD

Two options are under consideration by the City: (1) the inclusion of fencing along the edge of the channel and (2) the trail extension (OTBD). The trail extension (OTBD) would link the proposed main trail to the proposed trail extension to safely connect it all the way to Jefferson Street and the existing trail system. The options under consideration, fencing and trail extension (OTBD), are not a part of this project's limit of work.

The trail extension (OTBD) would be approximately 0.1 mile in length between the west end of the proposed main trail (at the BNSF railroad tracks) to Jefferson Street. It is intended to connect the main trail to Jefferson Street as well as the City's bikeway network. For future bikeway connectivity, the bisection on Jefferson Street per the MPAH would only occur by the trail extension (OTBD) which is not a part of this project's limit of work.

Countywide Transportation Network

As part of the OCTA funding and in collaboration with OCTA and other Orange County cities, the development of the proposed project scope focused on the identification and prioritization of a regional bikeway for serving commuters and recreational cyclists alike. The goal of the regional bikeways network is expanding travel choices, improving safety, providing connectivity, and supporting the viability of bicycle transportation throughout the County while remaining consistent with OCTA and the various city transportation and mobility plans. Of the 10 regional bikeway corridors identified in the OCTA Commuter Bikeway Strategic Plan subarea, the proposed project

³⁵ City of Placentia. October 2019. City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update>

has the potential to connect to the Brea Mall CSUF – Santa Ana River Trail Corridor.³⁶ This corridor is accessible west of the project site, by way of Orangethorpe Avenue to the north or Miraloma Avenue to the south. Other nearby corridor connection options to the west and south include the Orangethorpe Corridor and the Santa Ana River to Coyote Creek Corridor. Bus route 30 runs along the Orangethorpe Corridor, furthering the connection opportunities.

City Bikeways

The proposed project would advance the City’s trail network and enhance pedestrian and bikeway connectivity and opportunities. It would be located near existing bikeways to the north, east, west, and south of the project site. The proposed project would provide an opportunity to connect to these nearby bikeways:^{37,38,39}

1. Existing Class III bike route along Jefferson Street from Alta Vista to Orangethorpe Avenue
Existing Class III bike route along N. Van Buren Street from Alta Vista Street to Orangethorpe Avenue
2. Existing Class II bike route on Richfield Rd from Mariposa Avenue to Orangethorpe Avenue
3. Proposed Class II bike route on Richfield Rd. from Orangethorpe Ave to Miraloma Avenue
4. Proposed Class II bike lane along Orangethorpe Ave from S. Rose Drive to Lakeview Avenue (the eastern edge of the City) and connecting to the Orange County bikeway system
5. A City of Anaheim existing bikeway Class II bicycle lane on Lakeview Avenue traversing the full eastern edge of the City

1.11 CONSTRUCTION ACTIVITIES

The environmental analysis for the proposed project is based on a potential reasonable worst-case impact scenario for construction activities, including site preparation, grading, paving, and delivery and hauling of construction materials and equipment. Construction activities associated with the proposed project would entail the construction of a multipurpose trail along the existing Atwood Channel ROW extending from the BNSF/Metrolink railway to Lakeview Avenue, including midblock crossings at S. Van Buren Street, Richfield Road, Fee Ana Street and a road connection or Class II bike facility along Lakeview Loop to the existing trail system on Lakeview Avenue.

Demolition

Demolition activities would include the removal of the existing gravel along the maintenance road and base material for the proposed width of the trail. Additional clearing and grubbing would be required for existing vegetation along the existing property fence lines for new landscape areas where applicable.

³⁶ Orange County Transportation Authority. February 2012. Fourth District Bikeway Strategy. <https://octa.net/pdf/4thDistrictBikewaysReport.pdf>

³⁷ Orange County. 2012. County of Orange: General Plan. <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/codes-and-regulations/general-plan>

³⁸ Orange County Transportation Authority. N.d. OCTA: OC Loop. <https://octa.net/Bike/The-OC-Loop/> (accessed March 11, 2022).

³⁹ City of Anaheim. N.d. Bicycle Master Plan Bike Anaheim: Interactive Map. <https://anaheim.net/3398/Bicycle-Master-Plan> (accessed March 15, 2022).

Construction

Construction activities associated with the proposed project, as currently conceived, would entail excavation of material sources, clearing and grubbing, grading, placement of aggregate base and asphalt concrete, revegetation, installation of signs, and installation of lighting and other safety related features necessary to meet current ADA requirements, plus City and County design practice. Anticipated depth for the trail is 12 inches and anticipated depth range for post and fencing may be 30 to 36 inches, pending fence height and required structural depths. Permanent fencing is a feature still under consideration by the City and Caltrans and not a part of the project's limit of work. Temporary fencing would be erected to limit construction impacts to sensitive resources.

Construction activities for the proposed project would include a paved multiuse path composed of Asphalt Concrete (AC) paving and decomposed granite (D.G.) shoulders; midblock crossings including Portland Cement Concrete (PCC) sidewalks and modified curb ramps plus inclusion of crosswalk striping; access gates; a trailhead at PDLN; new street signs; path striping and wayfinding signage; and landscaping along selected shoulders or BMPs adjacent to the path. Drainage would be maintained where possible and away from the channel (*Attachment A, Hydrology Report*). The option to include a trail fence along the edge of the channel and trail extension (OTBD) are still under consideration and are not included as part of the project's limit of work or construction activities. Temporary fencing would be built and installed to limit construction impacts to sensitive receptors and restrict access to the construction site. Temporary fencing installation and clearances would comply with the District's requirements. Permanent fencing may potentially occur in areas where the trail is pinched or narrowed to meander around obstructions along the edge of the channel but will be determined by the City and Caltrans.

Existing utilities within the project area would not be removed or relocated. Consideration of the existing utilities were reviewed and coordinated during the design development process. Utilities within the proposed project site would remain in place and be protected during construction of the proposed project.

Construction Schedule and Phases

Construction of the proposed project is expected to commence in 2025 and would occur for approximately 8 months. Coordination with the District would be required to determine the seasons when construction can occur adjacent to the channel. Each of the five project sections would entail three construction activities: site preparation, grading, and paving (Table 1.11-1, *Construction Schedule and Phases*).

**TABLE 1.11-1
CONSTRUCTION SCHEDULE AND PHASES**

Phases	Project Segment	Construction Activity	Anticipated Construction Period	Total Stage Duration
Section 1: BNSF railroad to S. Van Buren Street	Segment 1 (Main Trail)	Site Preparation: Preparation of the site would include clearing and grubbing for existing vegetation along the property fence lines for new landscape areas.	August–November 2025	3 months
Section 2: S. Van Buren Street to Richfield Road		Grading: Completion of grading activities would occur for all phases which would include the removal of the existing gravel along the maintenance road and base material for the proposed width of the path. The Contract would be required to minimize disturbance to the channel and provide a Best Management Plan to prevent sediment from entering into natural state water. Paving: The proposed project would include a paved path with landscape shoulders or BMPs adjacent to the path.	November 2025–March 2026	4 months
Section 3: Richfield Road to Fee Ana Street				
Section 4: Fee Ana Street to Lakeview Loop				
Section 5: Lakeview Loop to Lakeview Avenue	Segment 2 (Class II Bike Facility)	Striping & Signage	March–April 2026	1 month
Optional To Be Determined: Jefferson St to BNSF	Segment 3 (Optional Trail Extension and Bridge)	Optional: Site preparation, grading, and construction of bridge/grade separation over the BNSF railroad tracks for connecting the Main Trail to the Trail Extension The bridge/grade separation would include, but not limited to: <ul style="list-style-type: none"> • Concrete structure elevated above the BNSF/Metrolink railroad tracks • Pile and Bent supports under the concrete structure • Striping and signage 	N/A	N/A
Total			August 2025–April 2026	8 months

Construction Equipment

Project construction would require varying levels of personnel and equipment at the proposed project site during different phases of construction. Construction equipment would include trail dozers, skid steers, narrow track loaders, rollers, and vibrating plate compactors. Specialized narrow-width equipment is anticipated to be used in areas where the priority is to minimize the width of the construction impact. Hand excavation would be required in limited areas where the trail narrows and/or where the trail may cross within the dripline of oak trees. The construction equipment type used to develop the impact analysis on the proposed project are listed with approximate quantities for the proposed project's limit of work from the BNSF/Metrolink rail line to Lakeview Avenue (Table 1.11-2, *Anticipated Construction Equipment*). It does not include construction equipment for the trail extension (OTBD), which is not part of the project's limit of work.

**TABLE 1.11-2
ANTICIPATED CONSTRUCTION EQUIPMENT**

Approximate Quantities	Type of Equipment/Vehicle	Approximate Duration of On-Site Construction Activity (days)
1	Skid Steer Loaders	120
1	Cement and Mortar Mixers	180
1	Rubber Tired Dozers	240
1	Plate Compactors	240
1	Pavers	240
1	Paving Equipment	240
1	Rollers	240
1	Rubber Tired Dozers	240
1	Tractors/Loaders/Backhoe	240
	Motorized Hand Augers	240
	Power Drills and Saws	240
	Flatbed trucks (up to 26 feet)	120

Staging Areas

The proposed project would also include one to two construction staging areas, to be reviewed and confirmed by the City, for maintaining equipment and storing materials during the construction phase. The staging areas would be temporary. These staging areas would be located within the 1.64-acre area shown in Figure 1.10-1 south of the proposed trail. The potential staging areas under consideration that are being evaluated in this initial study would include the empty lots between the Atwood Channel Easement and Vincente Avenue and between S. Van Buren Street and Benjamin Avenue. The staging areas would be fenced off from the public (see Figure 1.10-1).

Best Management Practices

Site preparation and construction of the proposed project would be carried out in a manner consistent with the City building code (adopted from the 2019 State Building Code).⁴⁰ Daily construction activities would be consistent with City of Placentia Municipal Code Sections 23.76.050 and 23.76.060 noise regulations, which states that construction equipment is permitted to operate

⁴⁰ City of Placentia. N.d. Placentia Municipal Code: 20.50.030 Adoption of California Existing Building Code. Available at: <https://qcode.us/codes/placentia/> (accessed May 12, 2022).

between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, between 9:00 a.m. to 6:00 p.m. on Saturdays, and is prohibited on Sundays or holidays. Noise levels exceeding 70 dBA (A-weighted decibels) for low-density, single-family residences, 70 dBA for multi-family residences, and 75 dBA for office buildings, business, commercial and professional land uses are prohibited by the City Noise Control Ordinance, Chapter 9 - Noise Element of the City General Plan.

The contractor shall conduct construction activities in such a manner that the maximum noise levels at the affected project site would not exceed established noise levels. The construction contractor would be required to incorporate BMPs consistent with the guidelines provided in the *California Stormwater Best Management Practice Handbooks: Construction*, for elimination of non-stormwater discharge from the project site; retaining eroded sediments and other pollutants on the site; retaining stockpiles of earth and other construction related materials on site; proper storage of fuels, oils, solvents, and other toxic materials to prevent spills from being washed into the drainage system; retaining concrete wastes on-site until they can be disposed as solid waste; proper covered storage of trash and construction related solid wastes to prevent contamination of rainwater and dispersal by wind; stabilization of roadways to inhibit sediments from being deposited into the public way; and stabilization of any slopes with disturbed soils or denuded of vegetation to inhibit erosion by wind and water. Should the construction period continue into the rainy season, supplemental erosion measures would need to be implemented.

Wherever possible, grading activities would be undertaken outside the normal rainy season (i.e., October 15 to April 15 for most of Southern California), thus minimizing the potential for increased surface runoff and the associated potential for soil erosion. A recommended construction period would begin in late April or early May and completed in late January, assuming the majority of the construction would be completed within this recommended 9-month period. BMPs would be required to control surface runoff and soil erosion for construction taking place during rainy periods. BMPs for erosion control would be implemented during construction and improvements in accordance with the stormwater pollution prevention plan (SWPPP) that would be required by the California State Water Resources Control Board through the Construction General Permit during the construction phase as the project site is over 1 acre in size (see Section 1.13, *Discretionary Approvals*).

The contractor shall comply with South Coast Air Quality Management District (AQMD) emissions and air quality regulations including Rule 403 requirements regarding fugitive dust control. Construction equipment shall be turned off when not in use. The construction contractor shall ensure that all construction and grading equipment is properly maintained. All vehicles and compressors shall utilize exhaust mufflers and engine enclosure covers (as designed by the manufacturer) at all times.

The contractor would be required to remove all solid waste generated during construction, including diversion of at least 25 percent of their waste stream from landfills, in accordance with Assembly Bill 939. The contractor would also be required to recycle or reuse 50 percent by weight of all construction and demolition debris removed from the project site and submit a recycling and reuse plan and annual reporting to demonstrate compliance with the plan.

Construction and Traffic Management Plan

Minor traffic control would be required at intersection crossing, including but not limited to, lane and shoulder closers for varied durations. Worksite traffic control would occur at the intersection of the Atwood Channel and the following streets: Van Buren Street, Richfield Road, Fee Ana Street, Lakeview Loop, Lakeview Avenue; and at the following street intersections adjacent to the Proposed

Project: Van Buren Street and Vincente Avenue, Richfield Road and Nancita Street, Nancita Street and Fee Ana Street, and Lakeview Loop and Lakeview Avenue (from Lakeview Loop at the Atwood Channel to Lakeview Avenue). The majority of the construction would occur along the channel; therefore, no detours or parking displacement would be anticipated during construction. The proposed project is anticipated to result in minimal impacts to the existing circulation around the channel and above the intersection and would likely cause minimal delays through the active construction zone when adjacent to public streets.

Pedestrian access within public ROW would be maintained during construction of the proposed project along Van Buren Street, Richfield Road, Fee Ana Street, Lakeview Loop, and the pedestrian bridge at PDLN. Staging and traffic control specifications would be detailed and presented as part of the final delivery plans, specifications, and estimate following the Environmental Documentation Phase to be applied during construction phases. Temporary fencing may be implemented along the trail to restrict access to the construction site and prevent potential runoff and noise impacts during construction around existing obstructions. The Orange County Flood Control District would implement a two feet horizontal clearance from any obstructions.

Construction access to the proposed project site would occur at existing maintenance road entrances along the Channel through Jefferson Street, Van Buren Street, the pedestrian bridge at PDLN, Richfield Road, Fee Ana Street, and Lakeview Loop.

1.12 OPERATIONS AND MAINTENANCE

Operation and maintenance activities would include irrigation to maintain the small new planting areas along the trail. The use of chemical herbicides would be limited to chemicals that are not banned by the County. Trails operation and maintenance activities would be conducted by the Tri-City Park Authority, which was founded as a joint venture by three cities: Brea, Fullerton, and Placentia. The Tri-City Park Authority has the responsibility for acquisition, development including master planning future development, and administering day-to-day maintenance and operations. Chapter 22.54 of the City of Placentia Municipal Code includes the requirements for park and recreation dedication and fees. Per the Agreement No. MA-080-18010066 between the Orange County Flood Control District and the City of Placentia dated September 26, 2017, the proposed project would be constructed and maintained by the City of Placentia. See Tables 1.8.2-1 and 1.8.2-2 for summaries of the O&M tasks related to the proposed project.

1.13 RELATED PROJECTS

In accordance with Section 15130 of the CEQA Guidelines, the cumulative impacts that could occur from the proposed project are analyzed as part of this Initial Study through analysis of related projects in Section 2.21, *Mandatory Findings of Significance*. Cumulative impacts (e.g., two or more individual effects that, when considered together, compound or increase the environmental impact(s) of a proposed project) can result from individually minor but collectively significant impacts taking place over a period of time.

The area surrounding the project study area was examined to determine whether there are currently any projects in progress or proposed for the future that could potentially benefit the project or add to the impacts of the proposed project, creating cumulative significant impacts (evaluated in Section 2.20, *Mandatory Findings of Significance*). It was determined that there are four related projects that could affect the cumulative impacts analysis for the proposed project. These projects are anticipated to be implemented by December 2022 (Table 1.13-1, *List of Related Projects*).

**TABLE 1.13-1
LIST OF RELATED PROJECTS¹**

Label	Project Name	Location	Recreational Facility?	Description
A	Placentia Heights Development (Hudson Townhomes; Latitude Residential Project) ^{1,5}	445 S. Van Buren Street, Placentia, CA 97870 (0.3 mile from project site, near the project site at the north side of the Atwood Channel)	No; Area is gated and does not include public facilities	Approved (April 20, 2021) – Development of 139 three-story townhome units on an approximately 5.57-acre site. Zoning of parcel to change from Manufacturing (M(O)) to High-Density Residential (R-3). Remedial site grading underway.
B	Metrolink Placentia and Parking Structure ²	Melrose Avenue and Crowther Avenue near the Orange Freeway (SR-57) (2.4 miles west of the project site)	No; public transportation project	Approved (2016) – Funding approved by OCTA Board of Directors (June 27, 2016); OCTA & City coordinate/review construction bids (12/2016); Final Station & Structure Design Review & Plan Check (Jan-Oct 2017); Construction of underground utilities to completion (Jan-Nov 2020). Pending (TBD): 3 rd railroad tracks and signal, OCTA project bidding and award process, project groundbreaking, project completion
C	Anaheim Canyon Station Project ³	1039 N. Pacific Center Dr, Anaheim, CA 92806 (1.0 mile southwest of project site)	No; public transportation project	Approved (January 26, 2016) – Part of OC Go; Expand and improve the Anaheim Canyon Metrolink Station; Construction of a second main track, a new station platform, and extend the existing platform to improve reliability for passengers overall and accommodate current & future growth. Under Construction and anticipate Completion (2023) ⁴
D	Roadway Rehabilitation Project within Atwood neighborhood	Various Streets but most direct access to project site: ⁶ <ul style="list-style-type: none"> • Orangethorpe Ave • Lakeview Ave • N. Van Buren St • Richfield Rd • Vincent Ave • Nancita St • Fee Ana St • Miraloma Ave 	No	Design: July 2021 – May 2022 Construction: August 2022 – December 2022 (In-Progress). Funding includes Measure M2, U, and SB1/Gas Tax and pavement network improvements are managed under the City's Pavement Management Program (PMP). Residential Streets in Atwood neighborhood that include street repair, damaged sidewalk panels, curb, and gutter; projected 1,350,00 square feet of improvements based on the City's pavement condition index (level of streets condition based on the Pavement Management Program Report) ^{7,8}

**TABLE 1.13-1
LIST OF RELATED PROJECTS¹**

Label	Project Name	Location	Recreational Facility?	Description
Source:				
¹ City of Placentia. January 18, 2022. Pending Development List. https://www.placentia.org/DocumentCenter/View/9467/Pending-Development-Projects-1-18-2022?bidId=				
City of Placentia. October 28, 2021. City Administrator’s Weekly Briefing. https://www.placentia.org/Archive.aspx?ADID=4590				
City of Placentia. N.d. Hudson Townhomes. https://placentia.org/964/Hudson-Townhomes (accessed March 31, 2022).				
² City of Placentia. N.d. Metrolink Station and Parking Structure: Placentia Metrolink Station and Parking Structure. Available at: https://placentia.org/705/Metrolink-Station-and-Parking-Structure (accessed March 24, 2022).				
Metrolink. N.d. Placentia Metrolink Station and Parking Structure. Available at: https://www.octa.net/Projects-and-Programs/All-Projects/Rail-Projects/Placentia-Metrolink-Station-and-Parking-Structure/ (accessed March 24, 2022).				
³ Orange County Transportation Authority. N.d. Anaheim Canyon Station. https://www.octa.net/Projects-and-Programs/All-Projects/Rail-Projects/Anaheim-Canyon-Station-Project/?frm=13789 (accessed April 24, 2022).				
⁴ Orange County Transportation Authority. N.d. On the Move - OCTA’s Transportation Blog: Work Begins on \$30 Million Anaheim Canyon Metrolink Improvements. https://blog.octa.net/posts/work-begins-on-30-million-anaheim-canyon-metrolink-improvements/ (accessed May 12, 2022).				
⁵ California CEQA Net. N.d. Latitude Residential Project. Available at: https://ceqanet.opr.ca.gov/Project/2020080269 (accessed May 12, 2022).				
⁶ City of Placentia. May 23, 2022. Final Report Updated Citywide Pavement Management Plan OC Go 2022-2029. https://www.placentia.org/DocumentCenter/View/9757/2022-Placentia-PMP-Report-Final?bidId=				
⁷ City of Placentia. N.d. Public Works Department: CIP Project & Information. https://www.placentia.org/19/Public-Works (accessed July 13, 2022).				
⁸ City of Placentia. N.d. Measure U: Improvement Projects. https://www.placentia.org/794/Measure-U (accessed July 13, 2022).				

1.14 REQUIRED APPROVALS

- **City of Placentia:** Plan check review and approval; grading permit and inspections.
- **Orange County Flood Control District:** Review and approval of road/flood control improvement plans and specifications; issuance of an encroachment permit with the District’s Permit and Plan Review Section for any proposed facilities within the County’s right-of-way; improvement to be according to the County Standard Plans.
- **California Department of Fish and Wildlife (CDFW):** Issuance of permits under Section 1600 of the Fish and Game Code related to lake or streambed alterations, as applicable.
- **California State Transportation Agency (Caltrans):** The project is not within Caltrans jurisdiction. No Caltrans encroachment or other permits are required. As the administering agency for funding through the CMAQ Program, the project requires the design and environmental certification of Caltrans to the satisfaction of the Caltrans Local Assistance process and Caltrans environmental procedure.
- **California State Water Resources Control Board (SWRCB):** Construction General Permit for a construction project on 1+ acre (requires the development of a Stormwater Pollution Prevention Plan [SWPPP])

- **Regional Water Quality Control Board (RWQCB):** Since it is anticipated that the project would avoid Waters of the State, waste discharge requirements related to fill activities would not be required. However, the project proponent is still responsible for complying with other applicable permits. This determination may be subject to change.
- **U.S. Army Corps of Engineers (USACE):** Since it is not anticipated that the project would result in discharge of fill below the plane of the Ordinary High Water Mark (OHWM) of the Atwood Channel, a Department of the Army Permit would not be required.
- **Utilities:** Review and approval of projects within utility corridor, under license agreement with Placentia (including clearance review for proposed grading activities)

Additional Reviews/Approvals that would be required for the “Optional To Be Determined” trail extension and bridge over the BNSF rail line:

- **Metrolink:** Review and approval of bridge structure and crossing alignment.
- **BNSF Rail:** Cursory review and approval of bridge structure and crossing alignment.
- **Orange County Transportation Authority:** Review and approval of bridge structure and crossing alignment.
- **California Public Utilities Commission:** Cursory review and approval of bridge structure and crossing alignment.

SECTION 2.0
ENVIRONMENTAL CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

Signature

Date

Printed Name

Title

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. AGRICULTURE AND FORESTRY RESOURCES.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Timberland Production (as defined by Government Code section 51104(g))?				
d) Result in the loss of forest land or conversion of forest land to non-forest uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the proposed project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. GEOLOGY AND SOILS -- Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. GREENHOUSE GAS EMISSIONS -- Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use, plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
excessive noise for people residing or working in the project area?				
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. LAND USE AND PLANNING -- Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

12. MINERAL RESOURCES. Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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13. NOISE -- Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed project expose people residing or working in the proposed project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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14. POPULATION AND HOUSING. Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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15. PUBLIC SERVICES --

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

16. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

17. TRANSPORTATION -- Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

19. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION 3.0

ENVIRONMENTAL ANALYSIS

The environmental analysis provided in this section describes the information that was considered in evaluating the questions in Section 2.0, *Environmental Checklist*.

3.1 AESTHETICS

This analysis is undertaken to determine if the Atwood Multipurpose Trail Project (proposed project) may have a significant impact to aesthetics that would require the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State of California California Environmental Quality Act Guidelines (State CEQA Guidelines).¹ This analysis of aesthetics effects has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia in their capacity as a Lead Agency pursuant to CEQA to support their decision making in relation to the proposed project. Aesthetics and scenic resources play an important role in physically defining densely urbanized cities and communities while providing environmental and public benefits to the residents. The proposed project could affect aesthetics if construction or operations degrade the scenic value, character, or quality of scenic resources. Aesthetics at the proposed project site were evaluated with regard to the Caltrans Scenic Highway System designations;² the Land Use Element and Circulation Element of the City of Placentia General Plan;³ the Resources Element and Scenic Highway Plan Map of the Orange County General Plan;⁴ the Land Use Element, Circulation Element, and Community Design Element of the City of Anaheim General Plan;⁵ site reconnaissance; and a review of conceptual elevations and site plans. The potential for impacts to aesthetics was analyzed by reviewing the conceptual design and geospatial analysis comparing the existing conditions to post-project conditions.

In addition to the CEQA analysis undertaken in this Initial Study, the California Department of Transportation (Caltrans) is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to the National Environmental Policy Act (NEPA). The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans Preliminary Environmental Study (PES) and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Glare: Perceived glare is the unwanted and potentially objectionable sensation as observed by a person looking directly into the light source (e.g., the sun, the sun's reflection, automobile headlights, or other light fixtures). Reflective surfaces on existing buildings, car windshields, etc., can expose people and property to varying levels of glare. Glare may come directly from a light source or be reflected. There are four types of glare: distracting glare, discomforting glare, disabling glare, and blinding glare. This results in some of the light being reflected off the surface, or internally reflecting within a spectacle lens.

Scenic Vista: A scenic vista is a view of natural environmental, historic, and/or architectural features possessing visual and aesthetic qualities of value to the community. The term "vista" generally implies an expansive view, usually from an elevated point or open area.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² California Department of Transportation. N.d. California Scenic Highways. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> (accessed August 15, 2022).

³ Placentia. 2019. General Plan Update. <https://www.placentia.org/166/General-Plan-Update> (accessed September 6, 2022).

⁴ Orange County. 2012. Orange County General Plan. <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/codes-and-regulations/general-plan>

⁵ City of Anaheim. 2021. General Plan. <https://www.anaheim.net/712/General-Plan> (accessed August 16, 2022).

State-Designated Scenic Highways: It is the State's responsibility for the protection and enhancement of California's natural scenic beauty that identifies those portions of the State highway system that, together with adjacent scenic corridors, require special conservation treatment. Scenic corridors consist of land that is visible from, adjacent to, and outside the highway right-of-way, and is comprised primarily of scenic and natural features. Topography, vegetation, viewing distance, and/or jurisdictional lines that determine the corridor boundaries.⁶

Visual Character: Visual character in the CEQA context is an impartial description of the defining physical features, landscape patterns, and distinctive physical qualities within a landscape. Visual character is informed by the composition of land, vegetation, water, and structure and their relationship (or dominance) to one another, and by prominent elements of form, line, color, and texture that combine to define the composition of views. Visual character-defining resources and features within a landscape may derive from notable landforms, vegetation, land uses, building design and façade treatments, transportation facilities, overhead utility structures and lighting, historic structures or districts, or panoramic open space. A change in visual character can be evaluated when it is compared with the viewer response to that change. Changes in visual character can be identified by how visually compatible a proposed project would be with the existing condition by using visual character attributes as an indicator.

Visual Quality: The vividness, intactness, and unity present in a project area. Public attitudes validate the assessed level of quality and predict how changes to the project area can affect these attitudes. This process helps identify specific methods for addressing each visual impact that may occur as a result of the project. Caltrans has established three (3) criteria for evaluating visual quality in Visual Impact Assessments (VIAs):

1. **Vividness** is the extent to which the landscape is memorable and is associated with distinctive, contrasting, and diverse visual elements.
2. **Intactness** is the integrity of visual features in the landscape and the extent to which the existing landscape is free from non-typical visual intrusions.
3. **Unity** is the extent to which all visual elements combine to form a coherent, harmonious visual pattern.

Impact Analysis

The State CEQA Guidelines recommend the consideration of four questions when addressing the potential for significant impacts to aesthetics. Except as provided in Public Resources Code Section 21099, would the proposed project have any of the following effects:

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

The proposed project would result in no impacts in relation to scenic vistas. A significant impact would occur if the proposed project would adversely affect State or City-designated scenic vistas from a physical change in the environment blocking views or resulting in visual blight that degrades a designated scenic vista in the project area. The project site is located on relatively flat terrain in the City of Placentia, approximately 0.7 mile north of the Santa Ana River. The project site is located approximately 3.6 miles south of the base of Chino Hills, approximately 1.6 miles northwest

⁶ California Department of Transportation. N.d. California State Scenic Highways: Scenic Highways Program History. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> (accessed August 15, 2022).

of the base of the Anaheim Hills, and northwest of the Santa Ana Mountains beyond the Anaheim Hills. There are no City-designated scenic vistas or Caltrans-designated vista points along designated scenic highways within the vicinity of the project site.

City Scenic Vistas

The City does not identify scenic vistas or visual resources within its General Plan.⁷ The proposed project, which is a trail project on a relatively flat site in an urbanized location between existing residential and commercial/manufacturing/industrial development, would therefore not adversely affect views from publicly accessible locations in the vicinity of the project area.

Caltrans Vista Points

None of the Caltrans-designated vista points along State scenic highway routes are located in Orange County.^{8,9} The proposed project site is located at a lower elevation and on the opposite side of hills and mountains from the nine nearest vista points located in Los Angeles County (approximately 49.3 miles north), San Bernardino County (approximately 41.3 miles northeast), and Riverside County (approximately 60.1 miles east). Therefore, the proposed project would have no effect on these vistas due to distance and intervening topography.

Therefore, there would be no impacts to aesthetics related to scenic vistas. No further analysis is warranted.

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

The proposed project would result in no impacts in relation to scenic resources within a state scenic highway. This analysis considers designated and proposed state scenic highways and other viewscape corridors identified in City and County General Plans. The project site is located approximately 0.9 mile northwest of the nearest Officially Designated State scenic highway, the 4.2-mile segment of State Route (SR) 91 from SR 55 east to Santa Ana Canyon near Yorba Regional Park.¹⁰ The project site is located approximately 3.1 miles west of the nearest Eligible State scenic highway, the segment of SR 91 that extends from the eastern end of the Officially Designated portion east to the SR 91/Interstate Route (I) 15 interchange in Corona (see Figure 3.1-1, *Scenic Highways and Viewscape Corridors near Project Site*; Table 3.1-1, *State Scenic Highways near Project Site*, at the end of this section). The project site is a paved access road on relatively flat terrain that contains no trees, rock outcroppings, or historic buildings. Additionally, the proposed project would not be visible from the nearest officially designated and eligible scenic highway routes

⁷ City of Placentia. 2019. The City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update>

⁸ California Department of Transportation. 2016. Vista Point Planning and Design. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-k-vista-points> (accessed September 7, 2022).

⁹ Southern California Association of Governments. 2020. Program Environmental Impact Report (PEIR) (SCH#2019011061) for Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Section 3.1, Aesthetics. https://scag.ca.gov/sites/main/files/file-attachments/dpeir_connectsocial_3_1_aesthetics.pdf?1606003413 (accessed September 7, 2022).

¹⁰ Caltrans. N.d. California State Scenic Highway Map. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca> (accessed August 15, 2022).

due to existing visual barriers including intervening development, ornamental trees, topographic conditions, and sound walls.

**TABLE 3.1-1
STATE SCENIC HIGHWAYS NEAR PROJECT SITE**

State Route	Status	Location	Proximity to Project Site
91	Officially Designated	4.2-mile segment from SR 55 east in Anaheim to Santa Ana Canyon near Yorba Regional Park	0.9 mile southeast
91	Eligible	From the eastern end of the Officially Designated portion in Anaheim east to SR 91/I-15 15 interchange in Corona	3.1 miles east
57	Eligible	From SR 57/SR 90 interchange in Brea north to SR 57/SR 60 interchange in Diamond Bar	4.0 miles northwest
142	Eligible	SR 142 (Carbon Canyon Road), from the Orange County/San Bernardino County line northeast to Peyton Drive in Chino	5.9 miles northeast
71	Eligible	From the SR 91/SR 71 interchange in Riverside County north to the San Bernardino/Riverside County line near Abacherli Canyon (on the opposite side of Santa Ana Mountains)	10.0 miles east
1	Eligible	SR 1 (Pacific Coast Highway) from the SR 1/Hathaway Ave/N. Lakewood Blvd/E. Los Coyotes Diagonal/E. Atherton St Traffic Circle in Long Beach southeast to the SR 1/I-5 interchange near Capistrano Beach	16.8 miles southwest

Although there are no designated scenic routes identified in the Circulation Element of the City of Placentia General Plan, the nearby City of Anaheim and Orange County have scenic route designations. The Circulation Element of the City of Anaheim General Plan defines Weir Canyon Road between SR 91 and Oak Canyon Drive (4.3 miles east) and portions of Santa Ana Canyon Road between N. Lakeview Avenue and Imperial Highway (1.1 mile south-southeast) and between Roosevelt Road and N. Riverview Drive (4.2 miles east-southeast) as Scenic Expressways, defined as divided roadways that have restricted access, serve intercity traffic, and provide scenic vistas (per Figure C-1 in the Circulation Element of the City of Anaheim General Plan).¹¹ However, Anaheim’s Scenic Corridor Overlay Zone for Santa Ana Canyon Road extends only to the southern edge of the Santa Clara River, approximately 0.7 mile south of the project site (per Figure C-2 in the Circulation Element of the City of Anaheim General Plan). Orange County has designated “Viewscape Corridors” in the Orange County Scenic Highway Plan of the Orange County General Plan.

Orange County Viewscape Corridors

There are three County identified “Viewscape Corridors” per the Orange County Scenic Highway Plan of the Orange County General Plan located within 5 miles of the project site:¹²

1. **Riverside Freeway (SR 91)** in Anaheim, California, located approximately 1 mile south of the project site starting at the intersection of SR 55 and traversing eastbound to the county boundary. The proposed project would not be visible from this route and would not adversely affect the resources that resulted in the viewscape corridor designation.

¹¹ City of Anaheim. 2021. General Plan. <https://www.anaheim.net/712/General-Plan> (accessed August 16, 2022).

¹² Orange County. 2012. Orange County General Plan. Available at: <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/codes-and-regulations/general-plan>

- **Western Portion:** From approximately 1.0 mile southeast of the project site to approximately 1.6 miles south of the project site, the segment of SR 91 is bordered by sound walls along the northern edge of the freeway, as well as single-family residences and existing trees in the foreground near the sound walls and landscaped slopes at interchanges, that obstruct views to the north of the freeway (Figure 3.1-1). The Chino Hills and Puente Hills located approximately 6 miles north of SR 91 are visible above this freeway sound wall.
 - **Eastern Portion:** From approximately 1.0 mile southeast of the project site east to the Orange County/San Bernardino County line, there is no sound wall obstructing views to the north of SR 91. However, for this portion of the route, the Santa Ana River is featured prominently in the foreground, and intervening industrial and residential development and ornamental trees between the Santa Ana River and the project site blocks potential views of the project site within the relatively flat terrain of central Anaheim, western Yorba Linda, and Placentia.
2. **Carbon Canyon Road (SR 142)** in Brea, California, located approximately 3.7 miles north of the project site starting from Valencia Avenue (near Carbon Canyon Regional Park) and traversing eastbound to SR 71. The southern side of this portion of SR 142 contains dense tree vegetation and topographic features in the foreground as the route ascends into the Chino Hills that focuses views roughly east-west to the corridor itself and precludes vistas beyond a half-mile of the road. Due to this vegetation and intervening topography, the project site is not visible from this route. The proposed project would not be visible from this route and would not adversely affect the resources that resulted in the viewscape corridor designation.
 3. **Weir Canyon Road** between SR 91/Santa Ana Canyon Road and Jamboree Road, approximately 4.3 miles east of the project site. This portion of Weir Canyon Road is densely lined with street trees and sloped edges as it follows a sloped topography from a higher southern elevation at Weir Canyon Peak to a lower northern elevation near the Santa Ana River. The northwestern-southeastern oriented corridor does not provide views of the project site. At the southern end of the designated route, Weir Canyon Peak (5.6 miles southeast of the project site), at an elevation of approximately 1,434 feet above mean sea level, provides a vista point for trail users.¹³ Due to distance and intervening topography (the Weir Canyon Peak vista is oriented towards the north and south because the roadway and trail are located to the northeast and approximately 20 to 25 feet below the ridgeline elevation. The proposed project would not be visible from this route and would not adversely affect the resources that resulted in the viewscape corridor designation.

As the project site is not visible from these three Viewscape Corridors due to intervening topography, vegetation, development, and distance, the proposed trail project with its location on a relatively flat site would not be visible and would therefore have no effect on County scenic vistas along these Viewscape Corridors.

Officially Designated and Eligible State Scenic Highways

SR 91: The western portion of the officially designated SR 91 route between SR 55 (approximately 1.5 miles southwest of the project site) and approximately 1.0 mile southeast of the project site is bordered by sound walls along the northern edge of the freeway, as well as single-family residences and existing trees in the foreground near the sound walls and landscaped slopes at interchanges,

¹³ Peakery. N.d. Weir Canyon Peak. <https://peakery.com/weir-canyon-peak-california/> (accessed September 7, 2022).

that obstruct views to the north of the freeway (see Figure 3.1-1). Farther east, to the end of the officially designated portion of SR 91 and the eligible SR 91 route at the I-15 interchange, the Santa Ana River is featured prominently in the foreground, and intervening industrial and residential development and ornamental trees between the Santa Ana River and the project site blocks potential views of the project site within the relatively flat terrain of central Anaheim, western Yorba Linda, and Placentia.

SR 57: At the southern end of the eligible portion of SR 57, this route runs below SR 90 at the SR 57/SR 90 interchange; the project site is not visible from this portion of the route due to distance and intervening topography. Farther north, the project site is not visible due to distance and intervening industrial development and ornamental trees along the route. Within 5 miles of the project site, there are two sections of sound walls along the western edge of the freeway route (see Figure 3.1-1). Approximately one-quarter mile north of the SR 57/SR 90 interchange, an approximately 0.3-mile sound wall borders the western edge of the freeway, further obstructing potential views of the project site approximately 4.2 miles southeast of the project site. Where a sound wall along SR 57 does not directly obstruct views to the southeast facing the project site, the project site is still not visible from SR 57 due to the presence of development and ornamental trees in the foreground.

SR 142: The project site is not visible from the eligible portion of SR 142 because as the route ascends into the Chino Hills views are focused to the corridor itself and precludes visibility beyond a half-mile of the road. Due to this vegetation and intervening topography, the project site is not visible from this route.

SR 71: The project site is not visible from the eligible portion of SR 71 due to distance and intervening topography, as the project site is located on the opposite side of the Chino Hills.

SR 1: The project site is not visible from the eligible portion of SR 1 due to distance (over 15 miles) and intervening development.

Therefore, the proposed project would result in no impacts to aesthetics related to substantial damage to scenic resources within a state scenic highway. No further analysis is warranted.

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

The proposed project would result in no impacts in relation to degradation of the existing visual character or quality of public views of the site and its surroundings. A significant impact would occur if the proposed project would damage the visual character or quality of public views or the surrounding area affecting visibility from designated scenic vistas or resulting in visual blight. Placentia is located on gently sloping land in the vicinity of rolling hillsides with distant steep mountain slopes. The project site is an existing fenced paved access road along a flood control channel within a relatively flat portion of the City. The project site is located in an urbanized area within the City of Placentia on property under the jurisdiction of the Orange County Flood Control District (for a County floodway) and Caltrans (for Federal-aid Congestion Mitigation Air Quality [CMAQ] Program funding). Based on site visits conducted in January 2022 to characterize existing conditions, the existing visual character in the project area was observed to be a mix of industrial/manufacturing, residential, and flood control infrastructure, separated from the Atwood Channel flood control easement by chain-link fences and other barriers (see Figure 1.8-1, *Site*

Photographs Map and Site Photographs). Parque de Los Niños (Los Niños Park) is located immediately to the north of the project site at the southwestern corner of Richfield Road and E. Orangethorpe Avenue (see Figure 1.4-3, *Parcel Map*). Approximately 0.1 mile west of Richfield Road, at the northern end of Maria Avenue (north of Vincente Avenue), a pedestrian bridge provides an existing connection across Atwood Channel to Oak Street and Parque de Los Niños (see Photos 17–19 in Figure 1.8-1). Approximately 0.1 mile east of Richfield Road, Fee Ana Street provides an existing roadway connection across Atwood Channel as well. Four north-south streets intersect the project site (Jefferson, S. Van Buren, Richfield, and Lakeview).

City of Placentia

The Land Use Element, Mobility Element, Open Space & Recreation Element, and Health, Wellness, and Environmental Justice Element of the City of Placentia General Plan;¹⁴ and the Placentia Municipal Code, including Title 23 Zoning;¹⁵ were reviewed to determine the compatibility of the proposed project with applicable zoning and other regulations. The City Municipal Code, including the Zoning Code, allows for trail development in conjunction with all of the land use designations in the project area. As stated in Section 1, *Project Description*, the City's General Plan land use designations for the 2-acre project site and its immediate vicinity are Density Residential, High Density Residential, Industrial, Commercial-Manufacturing, Parks, and Railroad (see Figure 1.6-1, *General Plan Land Use Designations*, and Table 1.6-1, *Summary of Existing Land Use Designations*). Although a portion of the project site is used as pedestrian path between a parkette and Parque de los Niños (park use), and another portion of the project site is traversed by a railroad, the proposed project would not change these existing designated land uses. The proposed project would be consistent with the City's regulations governing scenic quality because it would not develop natural environment or mountainous areas of the City or adversely affect parks that are associated with scenic value, it would retain all existing street trees, it would provide designated open space in residential zones, consistent with the Open Space Element of the City General Plan.

Caltrans Visual Impact Assessment

The project requires the design and environmental certification be completed to the satisfaction of Caltrans based on the Caltrans Local Assistance process and Caltrans environmental procedure. The project is being evaluated by Caltrans for its eligibility for a Categorical Exclusion in accordance with NEPA, under 23 CFR 771 activity (c)(3). The Caltrans *Questionnaire to Determine Visual Impact Assessment (VIA) Level* was completed on May 16, 2022, resulting in a project score of 9, indicating that no noticeable visual changes to the environment are proposed and no further analysis is required (Appendix A, *Visual Impact Assessment Questionnaire*).¹⁶

Therefore, the proposed project would result in no impacts to aesthetics related to degradation of the existing visual character of the site and its surroundings. No further analysis is warranted.

¹⁴ City of Placentia. 2019. General Plan Update. <https://www.placentia.org/166/General-Plan-Update> (accessed September 6, 2022).

¹⁵ City of Placentia. N.d. Placentia, California Municipal Code. Title 23 Zoning. https://library.qcode.us/lib/placentia_ca/pub/municipal_code/item/title_23 (accessed September 1, 2022).

¹⁶ California Department of Transportation. N.d. Questionnaire to Determine Visual Impact Assessment (VIA) Level. Available at: <https://dot.ca.gov/programs/design/lap-visual-impact-assessment/lap-via-questionnaire> (accessed May 16, 2022).

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

The proposed project would result in less than significant impacts in relation to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the project area. In general, Orange County has high levels of nighttime light, with two darker areas in the mountains northwest of Laguna Beach and Cleveland National Forest.¹⁷ The project site is located approximately 8.4 miles west of Cleveland National Forest, in an urbanized setting with streetlights at each roadway intersection with Atwood Channel. There are no existing lights for nighttime lighting within the nonintersection portions of the project site. Existing sources of daytime glare in the project area include the reflective surfaces of motor vehicles on the roadways, windows on buildings such as multi-family residential development to the north of the project site, and water in Atwood Channel (see Figure 1.8-1). The proposed project would result in a temporary new source of nighttime lighting during construction activities before sunrise or after sunset. As stated in Section 1.11, *Construction Scenario*, construction would be conducted between the hours of 7:00 a.m. and 7:00 p.m. between the months of August 2023 and April 2024. Although these hours would be during daylight in the summer, they would extend into nighttime work efforts in the fall-spring, requiring use of temporary nighttime lighting. The operation stage would be similar to the existing condition, as the proposed trail would have a similar level of reflective surface to the existing paved road, access road vehicles would continue to maintain the flood control channel, and there would be no new lighting installed along the trail. Therefore, the proposed project would result in less than significant impacts to aesthetics related to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the proposed project area. No further analysis is warranted.

¹⁷ Southern California Association of Governments. 2020. Program Environmental Impact Report (PEIR) (SCH#2019011061) for Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Section 3.1, Aesthetics. https://scag.ca.gov/sites/main/files/file-attachments/dpeir_connectsocial_3_1_aesthetics.pdf?1606003413 (accessed September 7, 2022).

3.2 AGRICULTURE AND FORESTRY RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to agriculture and forestry resources, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis will be used by the City of Placentia as an informational document, to support their decision-making role as the Lead Agency under CEQA for the proposed project, and to provide the public an opportunity to comment on the characterization of the baseline conditions and the potential for impacts. Agriculture and forestry resources at the proposed project site were evaluated with regard to the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP),² the Land Use Element of the City General Plan,³ the City Zoning Map,⁴ the Williamson Act Status Report,⁵ Public Resource Codes 12220 and 4526,^{6,7} and Government Code 51104.⁸ The analysis used maps, data, and other information from these sources to assess the potential for the project to result in conversion of such resources.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Farmland: State CEQA Statutes ([§21060.1(a)], Public Resources Code §§21000-21177) define agricultural land to mean “prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture (USDA) land inventory and monitoring criteria, as modified for California,” and is herein collectively referred to as “Farmland.”

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. N.d. California Important Farmland Finder: “California Important Farmland: Most Recent: Orange, 2018.” <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed September 7, 2022).

³ City of Placentia. 2019. City of Placentia General Plan, Land Use Element: “Proposed General Plan Land Use Map.” <https://www.placentia.org/DocumentCenter/View/8431/2-Land-Use-Updated-3?bidId=>

⁴ City of Placentia. 2018. Zoning Map. <https://data-placentia.opendata.arcgis.com/> (accessed September 7, 2022).

⁵ California Department of Conservation. 2022. The Williamson Act Status Report 2020-21. https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx (accessed September 7, 2022).

⁶ California Public Resources Code, Division 10.5, California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1. General provisions [12200-12231], Article 3. Definitions § 12220 (g). <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

⁷ California Public Resources Code, Division 4, Forests, Forestry and Range and Forage Lands [4001-4958], Chapter 8. Z'berg-Nejedly Forest Practice Act of 1973 [4511-4630.2], Article 2, Definitions [4521-4529.5], § 4526. <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

⁸ California Government Code, Title 5, Local Agencies [50001-57550], Chapter 6.7, Timberland [51100-51155], Article 1, General Provisions [51100-51104], § 51104 (g). <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

Forest Land: Defined in Public Resources Code §12220(g) as land that can support 10 percent native tree cover of any species including hardwoods, under natural conditions, and that allows for management of one of more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.⁹

Timberland: Defined in Public Resources Code §4526 as land other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products.¹⁰

Timberland Production Zone (TPZ): Defined in Government Code §51104(g) as an area which has been zoned pursuant to §51112 or §51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses.¹¹

Impact Analysis

The State CEQA Guidelines recommend the consideration of five questions when addressing the potential for significant impacts to agriculture resources.

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

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

The proposed project would result in no impacts in relation to the conversion of Farmland. The project site is a paved flood control access road with no existing agricultural uses. The land use designations surrounding the proposed project site and in its immediate vicinity are Low Density Residential, High Density Residential, Industrial, Commercial-Manufacturing, Parks, and

⁹ California Public Resources Code, Division 10.5, California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1, General provisions [12200-12231], Article 3, Definitions § 12220 (g). <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

¹⁰ California Public Resources Code, Division 4, Forests, Forestry and Range and Forage Lands [4001-4958], Chapter 8, Z'berg-Nejedly Forest Practice Act of 1973 [4511-4630.2], Article 2, Definitions [4521-4529.5], § 4526. <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

¹¹ California Government Code, Title 5, Local Agencies [50001-57550], Chapter 6.7, Timberland [51100-51155], Article 1, General Provisions [51100-51104], § 51104 (g). <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

Railroad (please see Figure 1.6-1, *General Plan Land Use Designations*).¹² The most recent California Department of Conservation FMMP mapping of Orange County for Farmland was reviewed for the proposed project site, and it is designated as Urban and Built-Up Land.¹³ The nearest mapped Farmland is Unique Farmland located approximately 0.8 mile northeast of the proposed project site near Yorba Linda Lakebed Park. Based on the review of the land use designations and applicable Farmland map for the proposed project site, there is no Farmland located in or immediately adjacent to the proposed project site. Therefore, there would be no impacts to agricultural resources related to the conversion of Farmland. No further analysis is warranted.

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

The proposed project would result in no impacts in relation to a conflict with existing zoning for agricultural use or a Williamson Act contract. The zoning designations along the length of the proposed project site are Single-Family Residential (R-1-O), High-Density Multi-Family (R-3), Industrial (M-O, M-PMD), and Commercial-Manufacturing (C-M) parcels (please see Figure 1.7-1, *Zoning Designations*).¹⁴ Per the 2020-21 Williamson Act Status Report, which serves as the most recent status report for the California Department of Conservation, Orange County did not report any agricultural or open space lands with Williamson Act contracts in effect in 2020 or 2021.¹⁵ Based on the review of the City's zoning map and the status of Williamson Act contracts, there would be no impacts to agricultural resources related to a conflict with existing zoning for agricultural use or a Williamson Act contract. No further analysis is warranted.

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

The proposed project would result in no impacts in relation to a conflict with existing zoning for forest land, timberland, or a TPZ. The zoning designations along the length of the proposed project site are Single-Family Residential, High-Density Multi-Family, Industrial, and Commercial-Manufacturing parcels (see Figure 1.7-1).¹⁶ The proposed project site is owned and operated by the Orange County Flood Control District for maintenance of the Atwood Channel; it is not available for any commercial forestry, logging, or timber operations. The proposed project site does not meet the definition of forest land, timberland, or a TPZ.^{17,18,19} Therefore, there

¹² City of Placentia. 2019. City of Placentia General Plan, Land Use Element: "Proposed General Plan Land Use Map." <https://www.placentia.org/DocumentCenter/View/8431/2-Land-Use-Updated-3?bidId=>

¹³ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. N.d. California Important Farmland Finder: "California Important Farmland: Most Recent: Orange, 2018." <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed September 7, 2022)

¹⁴ City of Placentia. 2018. Zoning Map. <https://data-placentia.opendata.arcgis.com/> (accessed September 7, 2022).

¹⁵ California Department of Conservation. 2022. The Williamson Act Status Report 2020-21. https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx (accessed September 7, 2022)

¹⁶ City of Placentia. 2018. Zoning Map. <https://data-placentia.opendata.arcgis.com/> (accessed September 7, 2022).

¹⁷ California Public Resources Code, Division 10.5, California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1, General provisions [12200-12231], Article 3, Definitions § 12220 (g). <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

would be no impacts to forestry resources related to a conflict with existing zoning for forest land, timberland, or a TPZ. No further analysis is warranted.

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

The proposed project would result in no impacts in relation to the loss or conversion of forest land to non-forest use. The zoning designations along the length of the proposed project site are Single-Family Residential, High-Density Multi-Family, Industrial, and Commercial-Manufacturing parcels (see Figure 1.7-1).²⁰ There is no forest land at the proposed project site, as it is an existing flood control access road located in an urbanized area and is surrounded by residential and industrial land uses. The proposed project site is owned and operated by the Orange County Flood Control District for maintenance of the Atwood Channel; it is not available for any commercial forestry, logging, or timber operations. Therefore, there would be no impacts to forestry resources related to the loss or conversion of forest land to non-forest use. No further analysis is warranted.

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

The proposed project would result in no impacts in relation to changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use. Based on site visits and the FMMP, there is no Farmland or forest land at the proposed project site.²¹ As such, the proposed project would not directly convert Farmland or forest land to non-agricultural or non-forest use. Additionally, the proposed project would not involve other changes that would indirectly convert Farmland or forest land, as it would not enhance the suitability of any designated Farmland or forest land for development outside of the proposed project site. Therefore, there would be no impacts related to changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use. No further analysis is warranted.

¹⁸ California Public Resources Code, Division 4, Forests, Forestry and Range and Forage Lands [4001-4958], Chapter 8, Z'berg-Nejedly Forest Practice Act of 1973 [4511-4630.2], Article 2, Definitions [4521-4529.5], § 4526. <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

¹⁹ California Government Code, Title 5, Local Agencies [50001-57550], Chapter 6.7, Timberland [51100-51155], Article 1, General Provisions [51100-51104], § 51104 (g). <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).

²⁰ City of Placentia. 2018. Zoning Map. <https://data-placentia.opendata.arcgis.com/> (accessed September 7, 2022).

²¹ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. N.d. California Important Farmland Finder: "California Important Farmland: Most Recent: Orange, 2018." <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed September 7, 2022)

3.3 AIR QUALITY

This analysis is undertaken to determine if the proposed project may have a significant impact to air quality, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of air quality effects has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia, in their capacity as a Lead Agency pursuant to CEQA, to support their decision making in relation to the proposed project. Air quality at the proposed project site was evaluated with consideration of the City General Plan,² the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), and the Clean Air Act (CAA).³

Data on existing air quality in the South Coast Air Basin (SCAB), in which the proposed project site is located, is monitored by a network of air monitoring stations operated by the California Environmental Protection Agency (CalEPA), Air Resources Board (CARB), and South Coast Air Quality Management District (SCAQMD). The technical analysis for this section of the Initial Study was undertaken by Yorke Engineering, LLC and incorporates all phases of the project, including planning, construction, and maintenance. The analysis of construction impacts was based on a construction scenario, including information about phasing, equipment used during each phase, haul trucks, vendor trucks, worker vehicles, and site plans for the construction of an approximately 1.0-mile-long trail (see Section 1.10, *Proposed Project*, and Section 1.11, *Construction Activities*). The technical study was conducted using California Emissions Estimator Model (CalEEMod) air quality modeling (Appendix B, *Air Quality and GHG Technical Study*). Air quality impacts were evaluated by examining the on-site generation of pollutants and their resulting downwind concentrations.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Carbon Monoxide (CO): CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Lead: Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. 2019. City of Placentia General Plan. <https://www.placentia.org/613/General-Plan-Documents>

³ U.S. Environmental Protection Agency. 2005. Federal Clean Air Act, Title, I Air Pollution Prevention and Control. <http://www.epa.gov/oar/caa/contents.html>.

Nitrogen Dioxide (NO₂): NO₂ is a reddish-brown, reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO). The principal form of NO₂ produced by combustion is NO, but NO reacts quickly to form NO₂, creating the mixture of NO and NO₂ referred to as nitrogen oxides (NO_x). Major sources of NO_x include power plants, large industrial facilities, and motor vehicles. Emissions of NO_x can potentially irritate the nose and throat and may increase susceptibility to respiratory infections, especially in people with asthma. According to the CARB, NO₂ is an oxidizing gas capable of damaging cells lining the respiratory tract. Exposure to NO₂ along with other traffic-related pollutants, is associated with respiratory symptoms, episodes of respiratory illness and impaired lung functioning. Studies in animals have reported biochemical, structural, and cellular changes in the lung when exposed to NO₂ above the level of the current state air quality standard. Clinical studies of human subjects suggest that NO₂ exposure to levels near the current standard may worsen the effect of allergens in allergic asthmatics, especially in children.

Ozone: Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds and NO_x under favorable meteorological conditions such as high temperature and stagnation episodes. An elevated level of ozone irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

Particulate Matter (PM₁₀ and PM_{2.5}): The human body naturally prevents the entry of larger particles into the body. However, small particles including fugitive dust, with an aerodynamic diameter equal to or less than 10 microns (PM₁₀) and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns (PM_{2.5}), can enter the body and are trapped in the nose, throat, and upper respiratory tract. These small particulates could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM₁₀ and PM_{2.5}. Lung impairment can persist for 2 to 3 weeks after exposure to high levels of particulate matter. Some types of particulates could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Sulfur Dioxide (SO₂): Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. Sulfur dioxide potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Volatile Organic Compounds (VOCs): These are compounds comprised primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons, as are architectural coatings. Emissions of VOCs themselves are not "criteria" pollutants; however, they contribute to formation of ozone and are regulated as ozone precursor emissions.

Impact Analysis

The State CEQA Guidelines recommend the consideration of four questions when addressing the potential for significant impacts to air quality. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

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

The proposed project would have a less than significant impact on the applicable Air Quality Attainment Plan, the Final 2016 SCAQMD Air Quality Management Plan (AQMP).⁴ The City is located within the SCAB. Air emissions in the SCAB are regulated by the SCAQMD. The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the SCAB is in non-attainment. Strategies to achieve these emissions reductions are developed in the AQMP, prepared by SCAQMD for the region. The AQMP is based on Southern California Association of Governments (SCAG) population projections as well as land use designations and population projections included in City General Plans for those communities located within the Basin. Population growth is typically associated with the construction of residential units or large employment centers. A project would be inconsistent with the AQMP if it results in population and/or employment growth that exceeds growth estimates for the area. The proposed project would not result in population growth and would not cause an increase in currently established population projections beyond those established by SCAG and the City of Placentia General Plan.⁵

SCAQMD Air Quality Management Plan

The potential for air quality impacts occurring during the construction and operation of the proposed project was evaluated using the CEQA Guidelines and the quantitative thresholds of significance established by the SCAQMD (Table 3.3-1, *SCAQMD Air Quality Significance Thresholds*). The SCAQMD's jurisdictional reach includes the City of Placentia, which is the location of the proposed project site. Designations for attainment are determined from the ambient air quality. The construction, operation, and maintenance of the proposed project would not cause a violation of the SCAQMD AQMP because it would not impede the ability of the basin to achieve the NAAQS attainment deadlines for those pollutants not in attainment. Designations for attainment are determined from the ambient air quality.

⁴ South Coast Air Quality Management District. March 2017. Final 2016 Air Quality Management Plan. www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15

⁵ City of Placentia. 2019. General Plan. Resource Management Element. <https://www.placentia.org/613/General-Plan-Documents>

**TABLE 3.3-1
SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS**

Maximum Daily Thresholds		
Pollutant	Construction	Operation
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and noncarcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO ₂ eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants ^a		
NO ₂	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
1-hour average	0.18 ppm (state)	
Annual arithmetic mean	0.03 ppm (state) and 0.0534 ppm (federal)	
PM ₁₀	10.4 µg/m ³ (construction) ^b & 2.5 µg/m ³ (operation)	
24-hour average	1.0 µg/m ³	
Annual average		
PM _{2.5}	10.4 µg/m ³ (construction) ^b & 2.5 µg/m ³ (operation)	
24-hour average		
SO ₂	0.25 ppm (state) & 0.075 ppm (federal – 99th percentile)	
1-hour average	0.04 ppm (state)	
24-hour average		
Sulfate 24-hour average	25 µg/m ³ (state)	
CO	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
1-hour average	20 ppm (state) and 35 ppm (federal)	
8-hour average	9.0 ppm (state/federal)	
Lead	1.5 µg/m ³ (state)	
30-day average	0.15 µg/m ³ (federal)	
Rolling 3-month average		
<p>Note: lbs/day = pounds per day; ppm = parts per million; µg/m³ = micrograms per cubic meter; MT/year CO₂eq = metric tons per year of CO₂ equivalents; NO_x = nitrogen oxide; VOC = volatile organic compounds; PM₁₀ = particulate matter 10 microns or less in diameter (coarse PM); PM_{2.5} = particulate matter 2.5 microns or less in diameter (fine PM); SO_x = sulfates; CO = carbon monoxide; TACs = toxic air contaminants; GHG = greenhouse gases; NO₂ = nitrogen dioxide; SO₂ = sulfur dioxide.</p> <p>^a Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.</p> <p>^b Ambient air quality threshold based on SCAQMD Rule 403.</p> <p>Source: South Coast Air Quality Management District. April 1993. CEQA Air Quality Handbook.</p>		

There are four primary components of the Air Toxic Control strategy in the SCAQMD AQMP:

- Continue efforts to reduce diesel particulate matter
- Control VOC emissions that are most reactive in ozone and/or PM_{2.5} formation
- Mobile source control strategies that are designed to reduce NO_x, ROG_s, and PM emissions in order to meet the State Implementation Plan (SIP) commitments in the 2016 AQMP, while also producing co-benefits for a variety of toxic air contaminants (TACs)
- Stationary source control strategies that are implemented by the SCAQMD in order to primarily reduce TACs that can create localized impacts to nearby communities.⁶

The proposed project would not conflict with efforts to control VOC emissions that are most reactive in ozone and/or PM_{2.5} formation and stationary source control strategies. While diesel particulate matter is expected to be generated from the proposed project's construction equipment, the contractor shall comply with SCAQMD emissions and air quality regulations including Rule 403 requirements regarding fugitive dust control.

The proposed project would be consistent with the AQMP's goals to invest in strategies that improve air quality by supporting transportation control measures to reduce vehicle miles traveled (VMT). During operations, the proposed project would reduce VMT through an expansion of recreational and non-motorized transit opportunities connecting the project area to various parts of the city and surrounding region. The proposed project is not expected to conflict with the major air toxic control strategies articulated in the SCAQMD AQMP and would not result in a long-term increase in criteria pollutant emissions to achieve attainment deadlines that are not in attainment.

City of Placentia General Plan

The proposed project's objectives are aligned with the City General Plan since they would reduce air pollution through proper land use and transportation planning and improve air quality by reducing vehicular emissions in Placentia. The proposed project would encourage both non-motorized transportation through the provision and expansion of bicycle and pedestrian pathways and create alternate modes of travel to work and school. The proposed project site is located within City boundaries and would not require any change to the General Plan land use designations and would not conflict with the City of Placentia's General Plan.

Therefore, the proposed project would result in less than significant impacts to air quality related to consistency with the applicable air quality plan. No further analysis is warranted.

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

The proposed project would result in less than significant impacts to air quality in relation to criteria pollutants. The CARB-maintained air monitoring stations measure SCAB air pollutant levels. The nearest monitoring station to the project site is the Anaheim Near-Road Monitoring Station, located at 812 West Vermont Street, Anaheim, California 92802, which is approximately 7.3 miles southwest. The Anaheim Loara School Monitoring Station located approximately 9.4 miles southwest of the proposed project site at 1630 Pampas Lane, Anaheim, California, 92802,

⁶ South Coast Air Quality Management District. March 2017. Final 2016 Air Quality Management Plan. <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>

provided PM_{2.5}, PM₁₀, and ozone data. The analysis for this evaluation was based on the three most recent years of available data from these locations for ozone, PM_{2.5}, PM₁₀, and NO₂ (Table 3.3-2, *Summary of Ambient Air Quality at Anaheim Near-Road and Anaheim Loara School Monitoring Stations*).

**TABLE 3.3-2
SUMMARY OF AMBIENT AIR QUALITY AT ANAHEIM NEAR-ROAD AND ANAHEIM LOARA SCHOOL MONITORING STATIONS**

Pollutant	Year		
	2021	2020	2019
Ozone			
Maximum 1-hr concentration (ppm)	0.089	0.142	0.096
Days exceeding CAAQS (0.09 ppm)	0	6	1
Days exceeding NAAQS (no standard)	0	2	0
State Maximum 8-hour concentration (ppm)	0.068	0.098	0.082
National Maximum 8-hour concentration (ppm)	0.068	0.097	0.082
Days exceeding CAAQS (0.070 ppm)	0	16	1
Days exceeding NAAQS (0.070 ppm)	0	15	1
PM_{2.5}			
National maximum 24-hour concentration (µg/m ³)	54.4	60.2	36.1
State maximum 24-hour concentration (µg/m ³)	54.4	64.8	37.1
Measured days exceeding NAAQS (35 µg/m ³)	10	12	4
AAM (µg/m ³)	11.5	12.2	9.3
Does measured AAM exceed NAAQS (15 µg/m ³)?	No	No	No
Does measured AAM exceed CAAQS (12 µg/m ³)?	No	Yes	No
PM₁₀			
National maximum 24-hour concentration (µg/m ³)	63.6	74.8	127.6
State maximum 24-hour concentration (µg/m ³)	63.6	74.5	127.1
Measured days exceeding NAAQS (150 µg/m ³)	0	0	0
Measured days exceeding CAAQS (50 µg/m ³)	1	5	4
AAM (µg/m ³)	23.4	30.8	24.6
Does measured AAM exceed NAAQS (no standard)?	*	*	*
Does measured AAM exceed CAAQS (20 µg/m ³)?	Yes	Yes	Yes
NO₂			
National maximum 1-hour concentration (ppb)	72.3	69.9	59.4
State maximum 1-hour concentration (ppb)	72	69	59
Days exceeding NAAQS (0.100 ppm)	0	0	0
Days exceeding CAAQS (0.18 ppm)	0	0	0
State AAM (ppb)	19	18	19
Does measured AAM exceed NAAQS (0.053 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
CO (not measured at Anaheim monitoring station)			
SO ₂ (not measured at Anaheim monitoring station)			
HS (not measured at Anaheim monitoring station)			
Note: ppm = parts per million by volume; µg/m ³ = micrograms per cubic meter; AAM = annual average; CO = carbon monoxide; SO ₂ = sulfur dioxide; HS = hydrogen sulfide; CAAQS = California Ambient Air Quality Standards; NAAQS = the National Ambient Air Quality Standards; ppb = parts per billion by volume; * Denotes insufficient data.			
Source: California Air Resources Board. N.d. Top 4 Summary: Select Pollutant, Years, & Area. http://www.arb.ca.gov/adam/topfour/topfour1.php (accessed August 30, 2022).			

Construction and operational emissions were quantified using CalEEMod.2020.4.0 (Appendix B). CalEEMod is a statewide land use emissions computer model that calculates both construction and operation emissions from land use projects such as the proposed project. The construction scenario includes the construction duration of 180 days for the approximately 2.8-acre project site. The model estimates both mitigated and unmitigated emissions the proposed project would generate.

Construction Emissions

The construction phase of the proposed project is expected to result in less than significant impacts to air quality regarding a cumulatively considerable net increase of any criteria pollutant during construction (see Table 3.3-3, *Overall Estimated Maximum Daily Construction Emissions [Mitigated]*; and Table 3.3-4, *Overall Estimated Maximum Daily Construction Emissions [Unmitigated]*).

**TABLE 3.3-3
OVERALL ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS (MITIGATED)**

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
Overall maximum daily emissions	1.2	12.4	12.3	0.02	1.9	3.1
Maximum estimated daily emissions for construction	1.2	12.4	12.3	0.02	1.9	3.1
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	No	No	No	No	No	No
Note: ROG = reactive organic gases; NO _x = oxides of nitrogen, CO = carbon monoxide, SO _x = oxides of sulfur; PM _{2.5} = fine particulate matter; PM ₁₀ = coarse particulate matter; SCAQMD = South Coast Air Quality Management District. Source: SCAQMD 2019, Appendix B.						

**TABLE 3.3-4
OVERALL ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS (UNMITIGATED)**

Construction Phase	Construction Emissions (Pounds/Day)					
	ROGs	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
Overall maximum daily emissions	1.2	12.4	12.3	0.02	3.9	6.8
Maximum estimated daily emissions for construction	1.2	12.4	12.3	0.02	3.9	6.8
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	No	No	No	No	No	No
Note: ROG = reactive organic gases; NO _x = oxides of nitrogen, CO = carbon monoxide, SO _x = oxides of sulfur; PM _{2.5} = fine particulate matter; PM ₁₀ = coarse particulate matter; SCAQMD = South Coast Air Quality Management District. Source: SCAQMD 2019, Appendix B.						

Compared to the NAAQS, the Orange County portion of the SCAB is a nonattainment area for 1-hour ozone, 8-hour ozone, and PM_{2.5} for near-source monitors.⁷ Compared to the CAAQS, the County portion of the SCAB is a nonattainment area for 1-hour ozone, 8-hour ozone, PM_{2.5}, and PM₁₀.⁸ The proposed project would generate these pollutants during construction. The results of

⁷ U.S. Environmental Protection Agency. 2022. U.S. EPA Green Book. Non-attainment Areas for Criteria Pollutants. <http://www.epa.gov/green-book>

⁸ California Air Resources Board. 2020. Area Designations Maps / State Ambient Air Quality Standards. <http://www.arb.ca.gov/degis/adm/adm.htm>

the model show that the construction impacts are under the state thresholds and impacts would not contribute substantially to existing or projected air violations (see Table 3.3-3 and 3.3-4). While unmitigated emissions are under SCAQMD thresholds, they would result in a minor addition of short-term construction emissions. In comparison, mitigated activities, including dust suppression, would result in a reduction of PM_{2.5} and PM₁₀ construction impacts. Construction activities would be short term and persist for an anticipated duration of 180 days and would not result in substantial, long-term impacts.

Short-term cumulative impacts related to air quality could occur if the proposed project's construction activities and nearby construction activities were to occur simultaneously. Relative to local impacts, cumulative construction particulate matter (i.e., fugitive dust) impacts are considered when projects are located within a few hundred yards of each other. Four related projects are located within a 3-mile radius of the proposed project site: Placentia Heights Development, Metrolink Placentia and Parking Structure, Anaheim Canyon Station, and Roadway Rehabilitation within the Atwood neighborhood. These projects are expected to be completed before the proposed project's construction is anticipated to start in August 2023. The proposed project would, therefore, not contribute to cumulative air quality impacts in conjunction with any local construction activities.

Operation Emissions

The operational phase of the proposed project is expected to result in less than significant impacts to air quality regarding a cumulatively considerable net increase of any criteria pollutant during operations. Table 3.3-5, *Overall Estimated Maximum Daily Operations Emissions [Mitigated]*; and Table 3.3-6, *Overall Estimated Maximum Daily Operations Emissions [Unmitigated]*, include the quantified results.

**TABLE 3.3-5
OVERALL ESTIMATED MAXIMUM DAILY OPERATIONS EMISSIONS (MITIGATED)**

Category	Operations Emissions (Pounds/Day)					
	ROGs	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
Area	0.05	0	0.01	0	0	0
Energy	0	0	0	0	0	0
Mobile	0	0	0	0	0	0
Total	0.05	0	0.01	0	0	0
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	No	No	No	No	No	No
Note: ROG = reactive organic gases; NO _x = oxides of nitrogen, CO = carbon monoxide, SO _x = oxides of sulfur; PM _{2.5} = fine particulate matter; PM ₁₀ = coarse particulate matter; SCAQMD = South Coast Air Quality Management District. Source: Appendix B.						

**TABLE 3.3-6
OVERALL ESTIMATED MAXIMUM DAILY OPERATIONS EMISSIONS (UNMITIGATED)**

Category	Operations Emissions (Pounds/Day)					
	ROGs	NO _x	CO	SO _x	PM _{2.5}	PM ₁₀
Area	0.05	0	0.01	0	0	0
Energy	0	0	0	0	0	0
Mobile	0	0	0	0	0	0
Total	0.05	0	0.01	0	0	0
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	No	No	No	No	No	No
Note: ROG = reactive organic gases; NO _x = oxides of nitrogen, CO = carbon monoxide, SO _x = oxides of sulfur; PM _{2.5} = fine particulate matter; PM ₁₀ = coarse particulate matter; SCAQMD = South Coast Air Quality Management District. Source: Appendix B.						

The results show that the operational impacts would be under the state thresholds and would not contribute substantially to existing or projected air violations (see Tables 3.3-5 and 3.3-6). Long-term operation-related air emissions in the project study area are likely to result from vehicles traveling to and from the proposed project area. Compared to the NAAQS, the Orange County portion of the SCAB is a nonattainment area for 1-hour ozone, 8-hour ozone, and PM_{2.5} for near source monitors.⁹ Compared to the CAAQS, the Orange County portion of the SCAB is a nonattainment area for 1-hour ozone, 8-hour ozone, PM_{2.5}, and PM₁₀.¹⁰

Therefore, the proposed project would result in less than significant air quality impacts related to criteria pollutants. No further analysis is warranted.

(c) Expose sensitive receptors to substantial pollutant concentrations?

The proposed project would result in less than significant impacts to air quality in relation to exposure of sensitive receptors to substantial pollutant concentrations. Sensitive receptors are defined as locations with human populations, including children, the elderly, and people with illnesses or others who are more susceptible to the effects of air pollutants relative to the general population.¹¹ Land uses classified as sensitive receptors by the SCAQMD in the CARB's Air Quality Handbook include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.¹² Sensitive receptors include single-family residences that border the proposed project site to the north and south between South Van Buren Street and Richfield Road; mobile homes and trailer parks between Jefferson Street and the border of Lakeview Avenue; and medium and high-density multi-family residences to the north. The nearest sensitive receptor is a single-family residential parcel (APN 346-182-17) approximately 40 feet north of the proposed multipurpose trail alignment (Figure 3.3-1, *Sensitive Receptors*). Sensitive receptors within a quarter mile of the

⁹ U.S. Environmental Protection Agency. 2022. U.S. EPA Green Book. Non-attainment Areas for Criteria Pollutants. <http://www.epa.gov/green-book>

¹⁰ California Air Resources Board. 2015. Area Designations Maps / State Ambient Air Quality Standards. <http://www.arb.ca.gov/desig/adm/adm.htm>

¹¹ City of Placentia. 2019. City of Placentia General Plan. <https://www.placentia.org/613/General-Plan-Documents>

¹² California Air Resources Board. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. <http://www.arb.ca.gov/ch/handbook.pdf>

proposed project site include 518 single and 53 multi-family residences, seven mobile homes and trailer parks, and one park: Parque de Los Niños.

Localized Significance Threshold Analysis

The construction of the proposed project would not result in substantial pollutant concentrations during construction (see Table 3.3-4). The SCAQMD’s Localized Significance Threshold (LST) methodology was used to analyze the neighborhood scale impacts of NO_x, CO, PM₁₀, and PM_{2.5} on nearby receptors associated with project specific emissions using 2-acre screening lookup tables. For determining localized air quality impacts from small projects in a defined geographic source receptor area (SRA), the LST methodology provides mass emission rate lookup tables for 1-acre, 2-acre, and 5-acre parcels by the SRA. The proposed project site is 2.8 acres in SRA Zone 16 – North Orange County. The average distance of the nearest receptors is approximately 70 meters (230 feet) away from the site. The evaluation was performed using the second closest distance within SCAQMD LST tables of 50 meters for construction.

Pollutant concentrations disperse with increasing distance from the construction area. On-site construction emissions would meet the LST passing criteria at the nearest receptors (50 meters average distance; see Table 3.3-7, *Construction Emissions Localized Significance Threshold Evaluation*). These emissions would also be below the level of significance and would decrease rapidly with distance from the proposed project. Due to the short-term nature of project construction, sensitive receptors would not be expected to be adversely affected by construction.

**TABLE 3.3-7
CONSTRUCTION EMISSIONS LOCALIZED SIGNIFICANCE THRESHOLD EVALUATION**

Category	Construction Emissions (Pounds/Day)			
	NO _x	CO	PM _{2.5}	PM ₁₀
Construction emissions	12.4	12.3	1.89	3.11
Total	12.4	12.3	1.89	3.11
SCAQMD daily significance construction threshold (pounds/day)	143	1,010	6	17
Significant?	No	No	No	No
Note: ROG = reactive organic gases; NO _x = oxides of nitrogen, CO = carbon monoxide, SO _x = oxides of sulfur; PM _{2.5} = fine particulate matter; PM ₁₀ = coarse particulate matter; SCAQMD = South Coast Air Quality Management District. Source: SCAQMD 2019, Appendix B.				

During operations and maintenance of the proposed project, activities would include irrigation to maintain planting areas along the designed trail and the limited use of chemical herbicides that are not banned by Orange County. The emissions from operation of the proposed project would not result in substantial pollutant concentrations since area, mobile, and energy sources would be well below the SCAQMD significance thresholds (see Tables 3.3-5 and 3.3-6). Therefore, the proposed project would not be expected to result in significant impacts to air quality related to exposure of sensitive receptors. No further analysis is warranted.

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

The proposed project would not be expected to result in impacts to air quality in relation to other emissions (such as those leading to odors) adversely affecting a substantial number of people.

According to CARB's Air Quality Handbook,¹³ land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.

The proposed project does not include land uses typically associated with the generation of nuisance odors. Operations and maintenance of the trail would not introduce new emissions such as those leading to odors.

As specified in the construction scenario included in the project description (see Section 1.11, *Construction Activities*), construction equipment would be turned off when not in use. On-road and off-road construction equipment would be required to comply with CARB tier standards for NO_x, CO, PM, and non-methane hydrocarbons (NMHC) emissions. The construction contractor would be required to ensure that all construction and grading equipment is properly maintained. All vehicles and compressors would utilize exhaust mufflers and engine enclosure covers at all times. Trash and construction-related solid wastes would be properly covered in storage to prevent contamination of rainwater and dispersal by wind.

Therefore, the proposed project would result in no impacts regarding other emissions (such as those leading to odors) adversely affecting a substantial number of people.

¹³ California Air Resources Board. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. <http://www.arb.ca.gov/ch/handbook.pdf>

3.4 BIOLOGICAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact on biological resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of biological resources has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia, in their capacity as a Lead Agency pursuant to CEQA, to support their decision making in relation to the proposed project. Biological resources at the proposed project site were evaluated with regard to Sections 401 and 404 of the Clean Water Act, the Porter-Cologne Act, and the Migratory Bird Treaty Act in consultation with resource agency personnel from the U.S. Army Corps of Engineers (USACE) and the Santa Ana Regional Water Quality Control Board (RWQCB); the City of Placentia Municipal Code;² and a query of the California Natural Diversity Database (CNDDDB)³ for the USGS 7.5-minute series Orange topographic quadrangle where the project is located and the eight surrounding USGS 7.5-minute series topographic quadrangles, including La Habra, Yorba Linda, Prado Dam, Anaheim, Black Star Canyon, Newport Beach, Tustin, Lake Forest/El Toro. In addition, directed surveys in the form of a habitat assessment were undertaken in January 2022 during the project planning phase. A Natural Environmental Study (Minimal Impacts) was prepared for the project (see Appendix C, *Atwood Multipurpose Trail Natural Environmental Study [Minimal Impacts]*). The potential for impacts to biological resources has been evaluated using GIS to quantify any change in habitat that would result from the proposed project.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Federally Designated Sensitive Species: Species that are not listed by the federal government as endangered, threatened, or candidate species but are categorized by the federal government as a federal species of concern. Federal species of concern is a term-of-art that describes a taxon (organism or group of organisms) whose conservation status may be of concern to the United States Fish and Wildlife Services (USFWS) but does not have official status.

Federally Listed Species: Species provided with special legal protection under the federal Endangered Species Act (ESA). A federally listed endangered species is a species that is in danger of extinction throughout all or a significant portion of its range. A federally threatened species is one likely to become endangered in the absence of special protection or management efforts provided by the listing. A candidate species is one that is proposed by the federal government for listing as endangered or threatened.

Federal Wetlands: Defined by the USACE and the U.S. Environmental Protection Agency (EPA) as follows: "Those areas that are inundated or saturated by surface or ground water at a frequency

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. N.d. Municipal Code. https://library.qcode.us/lib/placentia_ca/pub/municipal_code (accessed August 30, 2022).

³ California Department of Fish and Game. 2002. Rarefind 2: A Database Application for the Use of the California Department of Fish and Game Natural Diversity Data Base.

and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.”⁴

Habitat Conservation Plans (HCPs): Required by the USFWS as part of an application for an “incidental take” permit for species listed pursuant to the federal ESA. HCPs describe the anticipated effects of the proposed taking, how the impacts will be minimized and mitigated, and how the HCP is to be funded.

Locally Important Species: Species that are not monitored by the resource agencies but monitored by private organizations or local municipal governments. For the purposes of this initial study, locally important species include those plant species recognized by the California Native Plant Society (CNPS), a private organization dedicated to the conservation of native plants, as well as those recognized by the Audubon Society.

Natural Community Conservation Plan (NCCP): Defined by the California Department of Fish and Wildlife (CDFW) as a plan for the conservation of natural communities that identifies and provides for the regional or areawide protection and perpetuation of plants, animals, and their habitats.

Nursery Site: Considered habitat in which native wildlife may establish nests, maternity roosts, dens, or otherwise engage in breeding and/or the rearing of offspring.

Sensitive Plant Community: A native plant community listed on CDFW Natural Communities List as being rare within California or threatened by human actions.

Special Status Species: Species that have been afforded special recognition by federal, state, and/or local resource agencies or jurisdictions, or recognized resource conservation organizations. Special status wildlife species include those that are federally or state-listed as endangered, threatened, or candidate species pursuant to the federal ESA, the California ESA, or other regulations enforced by a federal or state agency; or those species considered by the scientific community to be rare. For this purposes of this analysis, special status species include listed, sensitive, and locally important species.

Species of Special Concern: Species, subspecies, or distinct population of an animal (bird, mammal, fish, reptile, and amphibian) native to California that currently satisfies one or more of the following criteria: (a) is extirpated from the state or, in the case of birds, in its primary seasonal or breeding role; (b) is listed as federally-, but not state-, threatened or endangered; (c) meets the state definition of threatened or endangered but has not formally been listed; (d) is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for state threatened or endangered status; (e) has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for state threatened or endangered status.

State-Designated Sensitive Species: Species that are not listed by the state government as endangered, threatened, or candidate species but are categorized by the state as a species of special concern or fully protected species. A California species of special concern is defined by the CDFW as being a wildlife species that has declining population levels, a limited range, and/or continuing threats that have made it vulnerable to extinction.

⁴ U.S. Army Corps of Engineers. 1987. Corps of Engineers Wetland Delineation Manual.

State-Listed Species: Species provided special legal protection under the California ESA. A state-listed endangered species is a species that is in danger of extinction throughout all or a significant portion of its range. A state-listed threatened species is one likely to become endangered in the absence of special protection or management efforts provided by the listing. A candidate species is one that is proposed by the federal or state government for listing as endangered or threatened.

State Wetlands/Streams: Defined by the California Fish and Game Code. A *stream* is defined as a body of water that flows at least periodically, or intermittently, through a bed or channel having banks and supporting fish or other aquatic life. *Wetlands* are defined as areas having riparian vegetation, without regard to wetland vegetation, soils, or hydrology.

Waters of the State (WSC). WSC are generally the same as Waters of the United States, but also include isolated vernal pools, isolated wetlands, or other aquatic habitats not normally subject to federal regulation under Section 404 of the Clean Water Act. The Porter Cologne Act defines WSC as “surface water or ground water, including saline waters, within the boundaries of the state.

Waters of the United States: Surface waters such as navigable waters and their tributaries, all interstate waters and their tributaries, natural lakes, all wetlands adjacent to other waters, and all impoundments of these waters. On April 21, 2014, the EPA proposed to refine the definition of waters of the United States to include all tributaries of traditional navigable waters, interstate waters, territorial seas, and impoundments of such tributaries; wetlands adjacent to the foregoing; and waters other than wetlands that are adjacent to other jurisdictional waters.

Impact Analysis

The State CEQA Guidelines recommend the consideration of the following six questions when addressing the potential for significant impacts to biological resources. Would the project:

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

The proposed project would result in no impacts to biological resources in relation to species listed as rare, threatened, or endangered, or identified as candidate, sensitive, or special status pursuant to the federal and state Endangered Species Acts, or species identified as locally important.

Listed Species

The proposed project would result in no impacts to biological resources in relation to species listed as rare, threatened, or endangered pursuant to the Federal and State ESAs. On January 20, 2022, Sapphos Environmental, Inc. biologists conducted a habitat assessment survey of the biological study area (BSA) to determine the presence of suitable habitat for, or the potential presence of, special status species in support of a Natural Environmental Study (Minimal Impacts; see Figure 3, *Biological Study Area and Project Impact Area*, in Appendix C). The approximately 74.44-acre BSA encompasses all potential areas and features expected to be temporarily or permanently impacted by the project plus a 250-foot buffer. Any wetland indicators identified

within the BSA including vegetation, soil, and/or hydrology were noted during the assessment. The proposed project consists of a trail that would be a paved pathway constructed over the existing Atwood Channel gravel maintenance road. The Atwood Channel is an engineered, trapezoidal channel with both earthen and concrete walls with minimal vegetation. At the time of the habitat assessment, the channel was mostly dry with sporadic instances of standing or lightly flowing water. The area immediately surrounding the channel within the BSA is highly developed and is mostly characterized by residential buildings, industrial facilities, and a small public park.

Prior to conducting the survey, a desktop review, including a records search within a 5-mile radius of the project, was completed to determine the potential presence of state and federally listed species of special concern within the BSA. Species lists were obtained from the CNDDDB, CNPS Rare Plant Inventory, and the USFWS Information for Planning and Consultation (IPAC).

The query of the CNDDDB and USFWS identified 27 species in at least one of the nine USGS 7.5-minute quadrangles that contain or surround the project site. Of the federally listed species and state-listed species listed as rare, threatened, or endangered pursuant to the federal and state ESAs that were identified as having the potential to occur in the region of East Orange County, none were determined to have the potential to occur within the project site (see Appendix C).

Of the species identified by the query, one plant, one bird, and one fish species occurred within a 5-mile radius of the project site: federally and state endangered Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*), federally threatened coastal California gnatcatcher (*Poliophtila californica californica*), and federally threatened Santa Ana sucker (*Catostomus santaanae*), respectively. As a result of the habitat assessment, the species were determined to be absent from the project site due to a lack suitable habitat (Appendix C).

Therefore, there would be no impacts to biological resources related to species listed as rare, threatened, or endangered pursuant to the federal and state ESAs. No further analysis is warranted.

Sensitive Species

The proposed project would result in no impacts to biological resources in relation to sensitive species recognized by the USFWS as federal species of concern (federally designated sensitive species) or by the CDFW as California special concern species (state-designated sensitive species).

Of the sensitive species that were identified as having potential to occur in the region of East Orange County, none were determined to have the potential to occur within the project site. A query of the CNDDDB included two sensitive plants and four reptiles within a 5-mile radius of the project site: intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*), many-stemmed dudleya (*Dudleya multicaulis*), southern California legless lizard (*Anniella stebbinsi*), orange-throated whiptail (*Aspidoscelis hyperythra*), western pond turtle (*Emys marmorata*), and coast horned lizard (*Phrynosoma blainvillii*). As a result of the habitat assessment, the species were determined to be absent from the project site due to either a lack suitable habitat and/or a high level of human disturbance (Appendix C).

Therefore, there would be no expected impacts to biological resources related to sensitive species recognized by the USFWS as federal species of concern or by the CDFW as California special concern species. No further analysis is warranted.

Locally Important Species

The proposed project would result in no impacts to biological resources in relation to locally important species afforded protection pursuant to the Placentia, California Municipal Code⁵ as there are no species designated as locally important. Therefore, there would be no impacts to biological resources related to locally important species afforded protection pursuant to the Municipal Code. No further analysis is warranted.

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

The proposed project would result in no impacts to biological resources in relation to riparian habitat or other sensitive natural communities.

Two habitats are identified within the approximately 74.44-acre BSA: developed/landscaped and riverine/constructed channel. Upland portions of the BSA, which make up the developed/landscaped portion, are composed entirely of developed/paved and disturbed or landscaped areas, including residential, commercial, and manufacturing districts, as well as a small public park. Vegetation within these areas is limited to landscaping plants, overlapping residential plants, or roadside grasses and weeds. Trees that occur outside of the project impact area, but throughout the BSA, include avocado (*Persea americana*), Brazilian peppertree (*Schinus terebinthifolia*), eucalyptus (*Eucalyptus* sp.), giant sequoia (*Sequoiadendron giganteum*), Canary Island pine (*Pinus canariensis*), Mexican fan palm (*Washingtonia robusta*), and orange (*Citrus* sp.) (Appendix C).

The riverine/constructed canal portion of the BSA includes the Atwood Channel, which is an engineered channel providing low-quality habitat suitable for ruderal species. The portion of the channel within the BSA was mostly concrete lined, interspersed with concrete box culverts under streets, and a section where the channel walls were highly eroded where riprap or concrete does not occur. At the time of the habitat assessment, this section was found to support sparse vegetation including jimson weed (*Datura stramonium*) and invasive Russian thistle (*Salsola tragus*). Additionally, lightly flowing water existed on the eastern portion of the channel within the BSA, and a section west of it had pooled water with shallow drift deposits supporting cattail (*Typha* spp.).

Eleven California Sensitive Natural Communities were identified by the CNDDDB to occur in at least one of the nine USGS 7.5-minute quadrangles that contain or surround the BSA (Table 3.4-1, *CNDDDB Search Results for California Sensitive Natural Communities*). None of these 11 habitats were found to be within or closely associated with the BSA as a result of the habitat assessment.

⁵ City of Placentia. N.d. Municipal Code. https://library.qcode.us/lib/placentia_ca/pub/municipal_code (accessed August 30, 2022).

**TABLE 3.4-1
CNDDB SEARCH RESULTS FOR CALIFORNIA SENSITIVE NATURAL COMMUNITIES**

Sensitive Natural Community Type	Conservation Status Rank (S-rank)*
California Walnut Woodland	S2.1
Riversidian Alluvial Fan Sage Scrub	S1.1
Southern Coast Live Oak Riparian Forest	S4
Southern Coastal Salt Marsh	S2.1
Southern Cottonwood Willow Riparian Forest	S3.2
Southern Dune Scrub	S1.1
Southern Foredunes	S2.1
Southern Interior Cypress Forest	S2.1
Southern Riparian Scrub	S3.2
Southern Sycamore Alder Riparian Woodland	S4
Southern Willow Scrub	S2.1
Note: CRPR Rank 1 = Plants rare, threatened, or endangered in California and elsewhere CRPR Rank 2 = Plants rare, threatened, or endangered in California but more common elsewhere CRPR Rank 3 = Plants about which information is needed-a review list CRPR Rank 4 = Plants of limited distribution-a watch list .1 = seriously endangered in California .2 = fairly endangered in California .3 = not very endangered in California	

Project activities would not impact the channel as the proposed trail would be constructed along/next to the Atwood Channel and no vegetation removal is proposed along or within the channel. Therefore, there would be no impacts to biological resources related to riparian habitat or other sensitive natural communities, and no further analysis is warranted.

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

The proposed project would result in less than significant impacts to biological resources in relation to federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.

The Atwood Channel is considered a WSC. The Atwood Channel is an engineered channel concrete- or earthen-lined channel maintained by Orange County Public Works for flood control purposes, which flows through residential, commercial, and manufacturing areas of the cities of Placentia and Anaheim. Approximately 40 feet wide from bank to bank, the portion of the channel adjacent to the trail makes up an area of about 4.85 acres. The channel is diverted under streets via concrete culverts, eventually flowing outside of the project site and into the Santa Ana River via Anaheim Lake and the excavated Carbon Canyon Diversion Channel. Downstream, the mouth of the Santa Ana River enters a small tidal lagoon between Huntington Beach and Newport Beach and flows into the Pacific Ocean. The portion of the channel within the project site was mostly concrete lined, interspersed with concrete box culverts under streets, and a section where the channel walls are highly eroded in areas lacking riprap or concrete. At the time of the habitat assessment, this section was found to support sparse vegetation including jimson weed, and invasive Russian thistle. Additionally, lightly flowing water existed on the eastern portion of the

channel within the BSA, and a section west of it had pooled water with shallow drift deposits supporting cattail plants.

Coordination with the Orange and Riverside Counties Division of the USACE confirmed that the project would not require a Section 404 permit as the proposed project would not result in discharge of fill below the plane of the Ordinary High-Water Mark (OHWM) of the Atwood Channel. As a result of consultation with the Santa Ana RWQCB, it was determined that a Section 401 permit would not be required as the proposed project would not impact the channel due to the proposed trail being constructed along/next to the Atwood Channel. However, it is anticipated that a permit under the Waste Discharge Requirements Program may be required as proximity of project activities to the channel increases the likelihood of indirect impacts in the form of falling debris from clearing and grubbing or grading activities, for example (Appendix C).

Therefore, the proposed project would result in less than significant impacts to biological resources related to federally protected wetlands as defined by Section 404 of the Clean Water Act, and no further analysis is warranted.

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

The proposed project would result in less than significant impacts to biological resources related to interfering substantially with the movement of native resident or migratory fish or wildlife species, interfering substantially with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites.

Wildlife Movement/Corridors:

There is limited potential for habitat connectivity in the project site and general vicinity due to the high level of urban development. The Atwood Channel, an engineered, concrete- or earthen-lined channel flows between residential, commercial, and manufacturing areas of the Cities of Placentia and Anaheim. No contiguous natural habitat was identified during the habitat assessment through which wildlife would be expected to move. There is low potential for movement of terrestrial wildlife species through the channel as it is entirely fenced and steep walled, with little to no vegetative cover. Additionally, the CNDDDB BIOS Habitat Connectivity Viewer gives the area in which the project site resides a Connectivity Rating of 1, classifying the area as having limited terrestrial connectivity opportunity.⁶ There is also low potential for movement of native resident or migratory fish as the Atwood Channel is only intermittently flooded and highly disturbed in nature, providing no suitable habitat for fish species to occur. Therefore, the proposed project would result in less than significant impacts related to movement of any migratory fish or wildlife species or with an established wildlife corridor.

Nursery Sites:

Implementation of the proposed project would not be anticipated to impede the use of native wildlife nursery sites. As a result of field investigations, no wildlife nursery or breeding sites were identified within the project site (Appendix C). As stated in Section 1.11, *Construction Scenario*,

⁶ California Department of Fish and Wildlife. N.d. BIOS. <https://apps.wildlife.ca.gov/bios/?bookmark=648> (accessed August 30, 2022).

construction activities are anticipated to commence in August 2023 and end in April 2024, which falls within a portion of the nesting bird season (February 1–September 15).

The project's potential impacts are entirely within the confines of a developed area consisting of a fenced gravel path. The Atwood Channel, an engineered, concrete- or earthen-lined channel, flows between residential, commercial, and manufacturing areas of the Cities of Placentia and Anaheim. Based on visual observations made during the habitat assessment, there was sparse vegetation that could serve as suitable habitat for migratory birds. No tree trunks exist within the BSA; however, the portion of the proposed trail that falls between South Van Buren Street and the BNSF Rail Alignment and between Vicente Avenue and Oak Street, the drip lines of several trees go over the fences of residential properties and into the BSA. Although few, these drip lines may provide suitable nesting habitat for migratory birds, but the projects potential impacts will not affect any trees. No active or inactive nests were observed during the time of the habitat assessment.

The area within the Atwood Channel itself provides marginally suitable habitat for some waterfowl. The portion of the channel within the BSA was mostly concrete-lined, interspersed with concrete box culverts under streets, and a section where the channel walls were highly eroded where riprap or concrete do not occur. At the time of the habitat assessment, this section was found to support sparse vegetation including jimson weed (*Datura stramonium*) and invasive Russian thistle. Additionally, lightly flowing water existed on the eastern portion of the channel within the BSA, and a section west of it had pooled water with shallow drift deposits supporting cattails (*Typha* spp.).

Temporary impacts resulting from noise and vibration related to the operation of construction equipment have the potential to occur, but the immediate surroundings of the construction area are entirely developed and disturbed by human activity, and these impacts are expected to be minimal.

Therefore, the proposed project would result in less than significant impacts to biological resources related to interfering substantially with the movement of native resident or migratory fish or wildlife species, interfering substantially with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites, and no further analysis is warranted.

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

The proposed project would result in no impacts to biological resources in relation to conflicts with any local policies or ordinances protecting biological resources. The City of Placentia adopted the Urban Forest Protection Ordinance on July 2, 2020, via Ordinance No. O-2020-04, regulating the planting, removal, and maintenance of City trees.⁷ Under this ordinance, the removal of any City requires City review and approval. There are no City trees within the vicinity of the BSA, and the proposed project does not propose removal of any trees. Therefore, there would be no impacts to biological resources related to conflicts with any local policies or ordinances protecting biological resources, and no further analysis is warranted.

⁷ Placentia Rich Heritage Bright Future. 2022. Urban Forest Management Program. <https://www.placentia.org/857/Urban-Forest-Management-Program>.

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

The proposed project would result in no impacts to biological resources in relation to conflicts with the provisions of any adopted HCP or NCCP. Implementation of the proposed project would not conflict with the provisions of any adopted HCP or NCCP. No natural communities afforded protection under Sections 2800–2835 of the Natural Community Conservation Planning Act were found to occur within or adjacent to the project site. The proposed project BSA is not located within an HCP area. Therefore, there would be no impacts to biological resources related to conflicts with the provisions of any adopted HCP or NCCP, and no further analysis is warranted.

3.5 CULTURAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to cultural resources, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines. This analysis of cultural resources has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia, in their capacity as a Lead Agency pursuant to CEQA, to support their decision making in relation to the proposed project. Section 15064.5 of the State CEQA Guidelines states that if a project results in physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical or archaeological resource would be materially impaired, resulting in a substantial adverse change, then the project would have an adverse effect on the environment. In addition, the project could have a significant effect if human remains were disturbed. Cultural resources at the proposed project site were evaluated with regard to a query of the South Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC) for the USGS 7.5-minute series topographic map for the Orange quadrangle. Methods for this evaluation included the identification of existing resources and evaluation of potential adverse effects are based on information gathered from published and unpublished literature, SCCIC records search results, and a review of current and historic maps and aerial photographs. This analysis draws from the Historic Property Survey Report (HPSR) prepared for the project (Appendix D, *Historic Property Survey Report*). An intensive pedestrian survey of the project study area was performed in January 2022 by Sapphos Environmental, Inc. Archaeologist Daniel Woodward, who meets the Secretary of Interior Standards Professional Qualifications in the fields of history, historic archaeology, and prehistoric archaeology, to characterize the existing conditions relative to cultural resources and identify visible resources. Historic topographic maps and previous cultural resource reports and published literature were referenced and examined to establish a baseline condition of the project study area.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Archaeological Site: Defined by the National Register of Historic Places (NRHP) as the place or places where the remnants of a past culture survive in a physical context that allows for the interpretation of these remains. Archaeological remains usually take the form of artifacts (e.g., fragments of tools, vestiges of utilitarian, or non-utilitarian objects), features (e.g., remnants of walls, cooking hearths, or midden deposits), and ecological evidence (e.g., pollen remaining from plants that were in the area when the activities occurred). The Office of Historic Preservation (OHP) defines an archaeological “site” as consisting of three or more related resources discovered in one locality. In the event of archaeological discovery, the resources are collected, documented, and curated at an educational institution, such as a school or a museum. These can include prehistoric (pre-European contact), historic (post-contact), or combination thereof.

Historical Resource: Defined by CEQA as any object, building, structure, site (including archaeological sites), area, place, record, or manuscript that is listed in, or is eligible for listing in, the California Register of Historical Resources (CRHR); officially designated or recognized as historically significant by a local government pursuant to a local initiative or resolution; or identified as significant in a historic resource survey conducted in accordance with the requirements of the CRHR statute (Public Resources Code §Section 5024.1(g)). Properties listed in, or determined eligible for listing in, the NRHP are automatically listed in the CRHR and are therefore historical resources under CEQA.

Historic Property: Defined by Section 106 of the National Historic Preservation Act (NHPA) as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an “Indian” (Native American) tribe or Native Hawaiian organization and that meet the National Register criteria.

Prehistoric Period: The era prior to AD 1769. The later part of the prehistoric period (post–AD 1542) is also characterized as the protohistoric period in some areas, which marks a transitional period during which native populations began to be influenced by European presence resulting in gradual changes to their lifeways.

Secretary of the Interior’ Standards and Guidelines: The Standards are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Guidelines offer general design and technical recommendations to assist in applying the Standards to a specific property. Together, they provide a framework and guidance for decision making about work or changes to a historic property. The Standards and Guidelines can be applied to historic properties of all types, materials, construction, sizes, and use. They include both the exterior and the interior and extend to a property’s landscape features, site, environment, as well as related new construction. Federal agencies use the Standards and Guidelines in carrying out their historic preservation responsibilities. State and local officials use them in reviewing both Federal and nonfederal rehabilitation proposals. Historic district and planning commissions across the country use the Standards and Guidelines to guide their design review processes. The Standards offer four distinct approaches to the treatment of historic properties—preservation, rehabilitation, restoration, and reconstruction with Guidelines for each. The Standards for the Treatment of Historic Properties are regulatory for all grant-in-aid projects assisted through the national Historic Preservation Fund. The Standards for Rehabilitation, codified in 36 CFR 67, are regulatory for the review of rehabilitation work in the Historic Preservation Tax Incentives program. The Guidelines are advisory, not regulatory.

Unique Archaeological Resource: Pursuant to Public Resources Code §21083.2, a unique archaeological resource includes artifacts or sites that meet any one or all of the following criteria:

- It has made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
- It is associated with the lives of persons important to California’s past;
- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; and/or

- It has yielded, or may be likely to yield, information important to the prehistory or history of California.

Impact Analysis

The State CEQA Guidelines recommend the consideration of three questions when addressing the potential for significant impacts to cultural resources. Would the project:

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

The proposed project would result in no impacts to cultural resources related to a substantial adverse change in the significance of a historical resource. A California Historical Resource Information System (CHRIS) records search, Native American coordination, and a pedestrian survey of the project study area were completed for this project. Cultural resource record searches for the proposed project were conducted by staff at the SCCIC, California State University, Fullerton, on March 9, 2022. The results of the record search indicated that 14 cultural resources studies have been conducted within a 0.25-mile search radius of the project site (see Appendix D). Of these cultural resource studies, five previous studies occurred within the project site, and nine studies are exclusively within the 0.25-mile buffer. No cultural resources have been previously recorded within a 0.25-mile buffer and the project study area.

Existing development within the project study area is a combination of single-family residential, commercial buildings, and the Parque De Los Niños. Single-family residences within the project study area were constructed between 1922 and 2011. The majority of the residences were developed after World War II, between 1950 and 2011. Due to the sporadic residential development within the project study area, the residential buildings do not represent a cohesive development pattern within any period of significance in the City. Additionally, the residences are all substantially altered and are not excellent examples of any architectural style. A review of the California Office of Historic Preservation's Built Environment Resource Directory (BERD) did not identify any properties within the project study area that had been previously surveyed. No pertinent information was found to suggest that the commercial businesses located with the project study area remain associated with significant commercial development in the City. The adjacent park, Parque De Los Niños, received little attention in local and regional newspaper articles beyond mention of a mural that was painted in the late 1970s.

The Atwood Flood Control Channel within the project study area required evaluation for historical significance. The channel is south of Orangethorpe Avenue in the City. The section of the channel within the project study area is between Lakeview Avenue and Jefferson Street. The Atwood Flood Control Channel was evaluated based on the date of construction (1963) as it is over 50 years old. There was no mention of the channel in historic narratives and newspaper articles. The construction of the channel was not associated with the development of Atwood and was constructed a few years prior to the community of Atwood being annexed by the City of Placentia. The Atwood Flood Control Channel does not meet the criteria to be considered a historical resource because it is not associated with a significant event or person, is not the work of a master, and is a common concrete-lined flood control channel.

Therefore, there would be no impacts to cultural resources related to a substantial adverse change in the significance of a historical resource, and no further analysis is warranted.

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

The proposed project would result in no impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource. The records search conducted at the SCCIC did not indicate the presence of previously recorded cultural resources within the project study area. The review of the historic maps and aerials did indicate previous development or historic period activities that took place within the project study area (see Appendix D). An archaeological field survey of the project study area did not identify any archaeological resources within the project study area. A Sacred Lands Files (SLF) record search request and consultation list request were submitted to the NAHC on February 24, 2022. The NAHC responded on March 24, 2022, indicating that the quadrangle in which the project study area is located is positive for sacred land. In addition, a list of tribal entities was provided who may also have knowledge of cultural resources in the project area.

The following two Native American groups were contacted and sent letters via U.S. Postal Service for Section 106 consultation based on the list provided by the NAHC on March 24, 2022:

- Pala Band of Mission Indians
- Soboba Band of Luiseno Indians

No comments were received from these tribal entities.

An intensive pedestrian survey using no greater than 15-foot transects was conducted on January 20, 2022, by Mr. Woodward throughout the project study area to identify any potential surface archaeological resources or other cultural resources. Additional attention was paid to areas of the project study area where there was exposed ground (i.e., no groundcover or hardscaping). Most (greater than 75 percent) of the project study area is hardscaped or landscaped. The project study area primarily consists of a previously disturbed dirt path (access road) directly adjacent to the flood control channel. The path was created by the construction of the flood control channel in 1963. No archaeological resources were identified as a result of the background research and survey.

Therefore, there would be no impacts to cultural resources related to a substantial adverse change in the significance of an archaeological resource, and no further analysis is warranted.

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

The proposed project would result in no impacts to cultural resources related to disturbance of human remains, including those interred outside of dedicated cemeteries. The project study area is comprised of an access road for Atwood Channel and roadway crossings adjacent to existing residential, industrial, and commercial manufacturing uses. There are no existing cemeteries on or adjacent to the project study area. Based upon a review of historic aerial photographs and topographic maps, human remains are not known to be located within the project study area (see Appendix D). Therefore, the proposed project is not expected to disturb any human remains, including those interred outside of dedicated cemeteries.

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within 24

hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Therefore, the proposed project would result in no impacts in relation to disturbance of any human remains, including those interred outside of formal cemeteries, and no further analysis is warranted.

3.6 ENERGY

This analysis is undertaken to determine if the proposed project may have a significant impact to energy, requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ Energy resources at the proposed project site were evaluated with regard to the California Green Building Standards Code (CALGreen), the California Energy Commission (CEC) Guidebook for the Renewables Portfolio Standard Eligibility,² the Southern California Association of Governments' (SCAG) Regional Transportation Plan (RTP) / Sustainability Communities Strategy (SCS) (Connect SoCal),³ and the City of Placentia General Plan, Resource Management Element and Sustainability Element.^{4,5}

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Impact Analysis

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to energy:

Would the project:

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

The proposed project would result in no impacts to energy in relation to wasteful, inefficient, or unnecessary consumption of energy resources. The proposed project would help achieve energy reduction goals by improving connectivity of the surrounding residential neighborhoods to the City's parks, schools, and neighborhoods. The proposed project would also encourage pedestrian, bicycle, and public transportation in the area.

Construction

Construction of the proposed project would require the use of energy, including electricity and carbon-based fuels, for construction equipment for the 8-month anticipated construction period. Electrical power in the City of Placentia is supplied by Southern California Edison (SCE) through 28 circuits. Southern California Gas (SoCalGas) provides natural gas services to the City. Electric power would be required for lighting and electrically powered hand tools as necessary. The

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² California Energy Commission. 2020. Renewables Portfolio Standards. <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>

³ Southern California Association of Governments. September 2020. Final Connect SoCal. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

⁴ City of Placentia. 2019. City of Placentia General Plan. Chapter 6. Resource Management. <https://www.placentia.org/613/General-Plan-Documents>

⁵ City of Placentia. 2019. City of Placentia General Plan. Chapter 5. Sustainability. <https://www.placentia.org/613/General-Plan-Documents>

majority of energy used for project construction would consist of petroleum-based fuels such as gasoline and diesel for on-road vehicles and off-road construction equipment. Construction workers would travel to and from the project site throughout the duration of construction. Heavy-duty construction equipment of various types would be used for construction activities and would rely on diesel fuel. The amount of electricity used for construction would be minimal and of limited duration. The use of construction equipment is necessary to complete the required improvements and would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. Natural gas is not anticipated to be required for the construction of the proposed project. Petroleum-based fuels would be used during the entirety of construction of the proposed project. Diesel or gasoline consumed by construction equipment would be the primary energy resource expended. There would also be vehicle miles traveled (VMT) associated with the transportation of construction materials and construction worker commutes, which would result in petroleum consumption. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.

Operations and Maintenance

Operation and maintenance activities would include irrigation to maintain the landscaping areas along the trail. During operation, the proposed project would result in a reduction of energy usage through an expanded connectivity of recreational and nonmotorized transit opportunities connecting the project area to various parts of the City. Heavy equipment including excavators, graders, and haul trucks would not be used during operational and maintenance activities.

Therefore, the proposed project would result in no impacts to energy in relation to wasteful, inefficient, or unnecessary consumption of energy resources. No further analysis is warranted.

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

The proposed project would not conflict with any adopted state or local plans related to use of renewable energy or energy efficiency, with adopted state and local plans. The relevant plans include the State Renewable Portfolio Standards (RPS); SCAG SCS/RTP Goals and Policies for Energy Efficiency; and the City of Placentia General Plan Resource Management Element and Sustainability Element.

State Renewables Energy Portfolio Standards

The RPS is a regulatory mandate to increase production of energy from renewable sources such as wind, solar, biomass and other alternatives to fossil and nuclear electric generation. It is also known as a renewable electricity standard. The California state legislature passed Senate Bill (SB) 350 in fall 2015, which requires all utilities in the state to source half of their electricity sales from clean, renewable sources such as wind, solar, geothermal, and biopower, by 2030.⁶ SB 350 sets ambitious annual targets for energy efficiency and renewable electricity aimed at reducing greenhouse gas (GHG) emissions. SB 350 directs the CEC to establish annual targets that will achieve a statewide cumulative doubling of energy efficiency savings and demand reductions in electricity and natural gas final end uses by January 1, 2030. This mandate is one of the primary measures to help the state achieve its long-term climate goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.

⁶ California Energy Commission. 2020. Renewables Portfolio Standards. <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>

SCAG SCS Goals and Policies for Energy Efficiency

Key SCAG SCS policies include striving for sustainability, protecting and preserving existing transportation infrastructure, increasing capacity through improved systems management, providing transportation choices, and promoting economic growth, environmental protection, and public health. SCAG's RCP⁷ includes the following energy goals: supplying the energy needs in a way that reduces the negative environmental impacts, social inequities, and economic hardship on future generations, and develops infrastructure and social capital to adapt to a future energy economy with a constrained supply.

City of Placentia General Plan

The City of Placentia's General Plan Resource Management Element includes the following relevant goals:

Goal RM-5.1: Reduce emissions through reduced energy consumption.

Policy RM-5.1 Promote energy conservation in all sectors of the City including residential, commercial, and residential.

Policy RM-5.2 Promote local recycling of wastes and the use of recycled materials.

Goal S-5: Placemaking design principles are emphasized and incorporated throughout the City.

Policy S-5.1 Identify locations for major streetscape improvements such as landscaped medians, enhanced crosswalks, street trees, directional signage, benches, and public art.

Policy S-5.3 Incorporate principles of the Land Use Element to develop community focal points by allowing greater densities and a mix of uses at key locations.

Policy S-5.4 New development should balance all modes of transportation, including cars, bicycles, pedestrians, transit, and people with disabilities.

Goal S-6: Community members are provided the support and services necessary to meet their basic needs and options for healthy lifestyle choices.

Policy S-6.1 Encourage mobility options to ensure that as individuals age they can access basic services and remain independent.

Policy S-6.2 Create environments that promote physical wellness, provides a full range of social interaction and easy access to healthcare.

Goal S-9: Higher-density, compact, residential development and mixed-uses will be located near the Metrolink station to create an integrated transit-oriented development (see Land Use and Mobility Elements).

Policy S-9.1 Include a mix of uses that will support transit use throughout the day and meet identified needs of transit riders and the immediate area.

⁷ Southern California Association of Governments 2020. Regional Comprehensive Plan.
<http://scag.ca.gov/NewsAndMedia/Pages/RegionalComprehensivePlan.aspx>

- Policy S-9.2** Provide pedestrian oriented development and create a sense of place around the Metrolink station that is compatible with the nature, scale and aesthetics of the surrounding community.
- Policy S-9.4** Provide pedestrian amenities such as lighting, landscaping, and benches and other related street furniture within the area to encourage pedestrian activity and improve safety.

The California state legislature enacted Administration Bill (AB) 939, the Integrated Waste Management Act, which is codified in the Public Resources Code to manage source reduction, recycling and composting and environmentally safe transformation and land disposal. The Integrated Waste Management Plan (IWMP) requires each city or county to develop Source Reduction and Recycling Elements (SRREs). The SRRE includes the following components: waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste, and household hazardous waste. Waste Diversion Mandates require each city or county plan to include implementation of a schedule to divert 25 percent of solid waste from landfills by 1995 and 50 percent by 2000. The City prepared and adopted an SRRE and several programs to implement the SRRE, achieving a 56 percent solid waste diversion rate for 2000.

The City has also established several programs encouraging recycling: Residential Curbside Recycling Program, Multi-Family, Commercial and Industrial Recycling, Green Waste Program, Bulky Item Pick Up, Yearly Recycling Calendar, Recycle Placentia Teen Team, Used Oil Recycling Program, Household Hazardous Waste Collection, and Best Management Practices for Construction Activities. The City promotes energy efficiency through these recycling programs and sends waste collected to a Materials Recovery Facility (MRF) where waste is sorted to remove recyclable materials. Solid waste collection services for the City are contracted to Taormina Industries.

Construction

Construction of the proposed project would require petroleum fuels used for on- and off-site construction equipment and construction worker trips. Construction of the proposed project would require the temporary and minimal use of energy, including electricity and carbon-based fuels, for construction equipment. Because the construction activities would be temporary, there would be no long-term energy impacts associated with the construction of the proposed project. As stated in Section 1, *Project Description*, concrete wastes would be retained on-site until they can be disposed as solid waste and storage of trash and construction related solid wastes would be properly covered in compliance with the *California Stormwater Best Management Practice Handbook: Construction*.⁸

None of the project activities would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, there would be no impact. No mitigation or further analysis is warranted.

Operations and Maintenance

The proposed project would reduce the long-term consumptive use by encouraging and diversifying non-motorized and sustainable transit modes. The provision of the proposed trail

⁸ California Stormwater Quality Association. 1993. California Storm Water Best Management Practice Handbooks: Construction.

would enhance the existing vacant area to incorporate principles of the Land Use Element, by developing community focal points and balancing the existing modes of transportations. The proposed project would encourage the use of local public transit and other mobility options by providing safe access for non-motorized and sustainable transit modes. Therefore, the proposed project would be consistent with the recommendations and goals of the RPS, SCAG, and the City to encourage energy efficiency and reduce energy consumption. The proposed project would not involve the construction of any habitable or other structures that would involve consumptive use of energy during operation.

Therefore, the proposed project would result in no impacts in relation to conflicting with or obstructing a state or local plan for renewable energy or energy efficiency during construction or operations. No further analysis is warranted.

3.7 GEOLOGY AND SOILS

This analysis is undertaken to determine if the proposed project may have a significant impact to geology and soils, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines.¹ Geology and soils at the proposed project site were evaluated with regard to the City of Placentia General Plan 2019 Safety Element;² the U.S. Geological Survey (USGS) 7.5-minute series Orange topographic quadrangle;³ Seismic Hazard Zone Report for the 7.5-minute Orange topographic quadrangle;⁴ the U.S. Department of Agriculture Natural Resources Conservation Service Soil Survey Division, Online Web Soil Survey;⁵ Alquist-Priolo Earthquake Fault Zoning (APEFZ) Maps;⁶ and California Division of Mines and Geology (CDMG) Special Publication 42, “A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California.”⁷

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. October 2019. City of Placentia General Plan: Chapter 7: Safety Element. Exhibit 7-1: Regional Faults; Exhibit 7-2: Potential Liquefaction and Landslide Hazard Areas. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed February 17, 2023)

³ U.S. Geological Survey. N.d. Current and Historical Topo Maps of the U.S. <https://viewer.nationalmap.gov/basic/?basemap=b1&category=histopo,ustopo&title=Map%20View> (accessed February 15, 2023).

⁴ California Department of Conservation. 1998. Seismic Hazard Zone Report for the Orange 7.5-minute Quadrangle, Orange County, California. https://filerequest.conservacion.ca.gov/?q=SHZR_011_Orange.pdf

⁵ U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Survey Division. N.d. Online Web Soil Survey. <http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/> (accessed February 17, 2023).

⁶ California Geological Survey. 2014. Earthquake Fault Zones and Seismic Hazard Zones Orange 7.5-minute Quadrangle, Orange County, California, CGS Information Warehouse: Regulatory Maps.

⁷ California Department of Conservation, California Division of Mines and Geology (CDMG). 2018. Special Publication 42. Earthquake Fault Zones: A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California.

Impact Analysis

The State CEQA Guidelines recommend the consideration of seven questions when addressing the potential for significant impact to geology and soils.

Would the project:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The proposed project would result in no impacts in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. The project site is not located on a regional fault, as outlined in the City of Placentia General Plan 2019 Safety Element Regional Fault Map, Exhibit 7.1, Regional Faults.⁸ Additionally, there are no Alquist-Priolo (AP) earthquake faults within the city limits of Placentia (see Appendix E, *Phase I Initial Site Assessment*). Furthermore, this project does not include any new structures. Therefore, no impacts would result from exposing people or structures to potential substantial adverse effects involving rupture of a known earthquake fault. No further analysis is warranted.

ii) Strong seismic ground shaking?

The proposed project would result in less than significant impacts in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. While the proposed project is in a seismically active region, it is not along a fault line. Furthermore, no structures are proposed, and no substantial change in land use changes would be included as part of the proposed project. Although the project site could be subjected to strong ground shaking in the event of a nearby or more distant regional earthquake, this hazard is common in Southern California, and the effects of ground shaking would be less than significant due to the lack of structures proposed. Therefore, impacts from exposing people or structures to potential substantial adverse effects involving strong seismic ground shaking would be less than significant. No further analysis is warranted.

iii) Seismic-related ground failure, including liquefaction?

The proposed project is expected to result in less than significant impacts in relation to exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Liquefaction during a seismic event would result in the loss of structural integrity of the perimeter improvements and the surrounding structures, with damage or collapse of these structures resulting in human lives in the vicinity at risk of bodily injury or death. Although the project site is in an area with risk of liquefaction (see City of Placentia General Plan, Safety Element, Exhibit 7-2, Potential

⁸ City of Placentia. October 2019. City of Placentia General Plan: Chapter 7: Safety Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed February 17, 2023).

Liquefaction And Landslide Hazard Zones),⁹ the proposed project does not include any structures, and therefore seismic-related ground failure does not have the potential to impact structural integrity of the proposed project. The historic high groundwater map published as a part of the California Geographical Survey (CGS) indicates a historic high groundwater level to be approximately 15 to 18 feet below ground surface at the project site (see Appendix F, *Hydrology Study*). Liquefaction typically occurs where ground water levels are 50 feet or less below ground surface. However, the proposed project does not include structures and, therefore, would not expose buildings or structures to seismic-related ground failure, including liquefaction. Therefore, the proposed project would result in less than significant impacts in relation to exposing people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction. No further analysis is warranted.

iv) Landslides?

The proposed project would result in no impacts to geology and soils in relation to exposing people or structures to potential substantial adverse effects involving landslides. The project site is relatively flat and highly urbanized and lacks geologic or topographic features such as hilltops, ridges, and hill slopes. The project site is not located within an earthquake-induced landslide zone area on the CGS-mapped landslide hazards zone.¹⁰ The nearest designated landslide zone is located 3.04 miles to the northwest of the project site.¹¹ Thus, the proposed project is unlikely to be susceptible to landslide. In addition, the proposed project would comply with all applicable City Grading Codes and the requirements to minimize any potential risk related to landslides. Therefore, no impact would occur in relation to exposure of people or structures to potential substantial adverse effects involving landslide. No further analysis is warranted.

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

The proposed project would result in no impacts to geology and soils in relation to substantial soil erosion and loss of topsoil. Factors that contribute to potential soil erosion include climate, physical characteristics of the soils, topography, slope and terrain steepness, and soil disturbance including construction activities that can increase soil erosion potential. The project site is located within relatively flat, highly urbanized areas with an extensive drainage system and impervious surfaces, and thus, the potential for erosion is relatively low. In addition, the project site is not subject to high levels of wind or rain, factors that may result in soil erosion. The proposed project would comply with all applicable City Code and Grading Codes regulating grading, excavations, landfill, and other construction activities that might cause or be impacted by slope or ground instability, erosion, or flooding to minimize any potential risk related to soil erosion or loss of topsoil.

A stormwater pollution prevention plan (SWPPP), as required by the Regional Water Quality Control Board (RWQCB), would be required to include stormwater Best Management Practices (BMPs) (structural and operational measures) and would be prepared for the construction and operation phase. The activities that are anticipated during operations and maintenance of the proposed project would not expose more topsoil than is present in the existing conditions to

⁹ City of Placentia. October 2019. City of Placentia General Plan: Chapter 7: Safety Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed February 17, 2023).

¹⁰ California Geological Survey. 2018. Earthquake Fault Zones and Seismic Hazard Zones Orange 7.5-minute Quadrangle, Orange County California, CGS Information Warehouse: Regulatory Maps.

¹¹ City of Placentia. October 2019. City of Placentia General Plan: Chapter 7: Safety Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed February 17, 2023).

erosion from wind, water, or human impacts. The proposed project would provide for additional vegetation cover along the trail, providing a potential net positive impact to soil erosion and loss of topsoil. Therefore, no impacts would occur to geology and soils in relation to substantial soil erosion and loss of topsoil. No further analysis is warranted.

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

The proposed project would result in less than significant impacts to geology and soils in relation to location on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The potential for landslides within the project site is minimal due to the area's relatively flat topography and absence of major hills or landforms, and the project is outside a landslide Hazard Zone area on the CGS-mapped landslide hazards zone.¹² Lateral spreading occurs when large blocks of intact soil move downslope in a rapid fluid-like flow movement, primarily as a result of liquefaction. Lateral spreading often occurs along riverbanks and shorelines where loose, saturated sandy soils are commonly encountered, as well as in liquefaction-prone areas. The project site is located within a CGS-mapped liquefaction zone;¹³ however, the Atwood Channel is primarily concrete lined, and the surrounding impermeable surfaces reduce the risk of lateral spreading significantly. Subsidence occurs as a localized mass movement that involves the gradual downward settling of or sinking of the ground surface, resulting from the mineral resources extraction, subsurface oil extraction, natural gas extraction, or ground eater extraction. Collapse is a visible depression of the ground, which is usually caused by the extraction of subsurface liquids or mining of mineral resources. There are currently more than 15 oil and natural gas wells in the vicinity of the project site.¹⁴ Six geotechnical investigations performed on adjacent properties with similar proximity to subsurface oil and natural gas wells were reviewed as part of the Phase I Initial Site Assessment (Appendix E). These sites were determined to be safe for building structures, indicating potential impacts related to soil instability as a result of the nearby oil and gas mining operations are minimal. Additionally, the proposed project does not propose a new mineral resources or oil extraction at the proposed project site; nor would it result in any modifications to the existing extractions in the vicinity of the project site. The proposed project would not include the development of new buildings or structures. Therefore, impacts would be less than significant in relation to location on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. No further analysis is warranted.

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

The proposed project would result in no impacts to geology and soils in relation to location on expansive soil, creating substantial risks to life or property. The proposed project would be

¹² California Geological Survey. 2018. Earthquake Fault Zones and Seismic Hazard Zones Orange 7.5-minute Quadrangle, Orange County, California, CGS Information Warehouse: Regulatory Maps.

¹³ California Geological Survey. 2018. Earthquake Fault Zones and Seismic Hazard Zones Orange 7.5-minute Quadrangle, Orange County, California, CGS Information Warehouse: Regulatory Maps.

¹⁴ City of Placentia. October 2019. City of Placentia General Plan: Chapter 7: Safety Element. Figure 7-3: Well Locations <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed February 17, 2023).

located entirely on Type B soils, with only 10 to 20 percent clay, as outlined in the U.S. Department of Agriculture National Engineering Handbook, Chapter 7, Hydrologic Soil Groups.¹⁵ Furthermore, the proposed project would not include structures. Therefore, there would be no impact in relation to location on expansive soil, creating substantial risks to life or property. No further analysis is warranted.

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

The proposed project would result in no impact to geology and soils in relation to having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed. Therefore, there would be no impact. No further analysis is warranted.

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

The proposed project would result in less than significant impacts to geology and soils in relation to directly or indirectly destroying a unique paleontological resource or site or unique geological feature. Based on review of the CGS Geologic Data Map for the proposed project area,¹⁶ the project is in an area mapped as *QyFsa*, which are young alluvial fan deposits from the late Pleistocene and Holocene (11,700 years ago to the present). Young alluvial fan deposits are composed of unconsolidated to moderately consolidated alluvial fan deposits composed of silt and sand, with slightly to moderately dissected surfaces.¹⁷ These deposits were deposited recently during the Holocene Epoch and have a low paleontological sensitivity. Younger Quaternary alluvial and surficial deposits have a low potential to yield significant paleontological resources.

Additionally, development of the proposed project would involve grading to depths of 12 inches and fence installation at a maximum of 36 inches feet below surface (see Section 1.11, *Construction Activities*). Due to the shallow excavation depth, and low sensitivity of the underlying surficial deposit, the potential to encounter paleontological resources is very low. Thus, potential impacts to unique paleontological resources contained within younger Quaternary alluvial deposits would be less than significant. No further analysis is warranted.

¹⁵ U.S. Department of Agriculture, Natural Resource Conservation Service. 2007. National Engineering Handbook, Chapter 7, Hydrologic Soil Groups. <https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=17757.wba> (accessed February 17, 2023).

¹⁶ Jennings, C.W., C. Gutierrez, W. Bryant, G. Saucedo, and C. Wills. 2010. Geologic Map of California, California Geological Survey, Geologic Data Map GDM-2.2010, 1:750,000. <https://ngmdb.usgs.gov/mapview/?center=-117.835,33.863&zoom=15> (accessed February 21, 2023).

¹⁷ Duke Cultural Resources Management, LLC. 2017. Paleontological Identification and Evaluation Report. Golden Avenue Bridge Replacement and Rehabilitation Project, City of Placentia, Orange County, California. Prepared for California Department of Transportation District 12. <https://www.placentia.org/DocumentCenter/View/6196/Golden-Avenue-Bridge-PIR-PER?bidId> (accessed February 21, 2023).

3.8 GREENHOUSE GAS EMISSIONS

This analysis is undertaken to determine if the proposed project may have a significant impact to air quality, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ The analysis of GHG emissions effects has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia (City), in their capacity as a Lead Agency pursuant to CEQA to support their decision-making in relation to the proposed project. The analysis was undertaken to evaluate the potential impacts the proposed project may have on GHG emissions and identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts if identified. GHG emissions at the proposed project site were evaluated in consideration of the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), the Clean Air Act (CAA), and the 2020 Southern California Association of Governments (SCAG) Regional Transportation Plan / Sustainable Communities Strategy (Connect SoCal 2020).²

The technical analysis for this section of the Initial Study was undertaken by Yorke Engineering, LLC and incorporates all phases of the project, including planning, construction, and maintenance. The analysis of construction impacts was based on a construction scenario, including information about phasing, equipment used during each phase, haul trucks, vendor trucks, worker vehicles, and site plans for the construction of an approximately 1.0-mile-long trail (see Section 1.10, *Proposed Project*, and Section 1.11, *Construction Activities*). A technical study was conducted by Yorke Engineering, LLC using California Emissions Estimator Model (CalEEMod) air quality modeling (Appendix B, *Air Quality and GHG Technical Study*). GHG emission impacts were evaluated by examining the on-site generation of pollutants.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Carbon Dioxide (CO₂): A natural and humanmade GHG that enters the atmosphere through burning fossil fuels, solid waste, trees and other biological materials, and as a result of certain chemical reactions (e.g., cement manufacturing). CO₂ emissions are the most abundant type of GHG emissions contributing to global climate change.³

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² Southern California Association of Governments. September 2020. Final Connect SoCal. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

³ U.S. Environmental Protection Agency. N.d. Overview of U.S. Greenhouse Gas Emissions in 2020. <https://www.epa.gov/ghgemissions/overview-greenhouse-gases> (accessed February 9, 2023).

Methane (CH₄): A GHG that is emitted during the production and transport of coal, natural gas, and oil. These emissions can also result from agricultural practices, land use and by the decay of organic waste in municipal solid waste landfills.⁴

Nitrous Oxide (N₂O): A GHG emitted during agricultural, land use, and industrial activities; combustion of fossil fuels and solid waste; and wastewater treatment.⁵

Carbon Dioxide Equivalent (CO₂e): A measure that converts GHGs to their equivalent CO₂ impacts to determine their individual and total contributions to global warming.⁶ CO₂, CH₄, and N₂O are collectively reported as CO₂e.

Hydrofluorocarbons (HFCs): A group of fluorinated GHGs that are derived from mostly human activities and comprise a very high global warming potential. These GHGs are commonly used for applications such as refrigeration and building insulation.⁷

Perfluorocarbons (PFCs): A group of fluorinated GHGs that are derived from mostly human activities and comprise a very high global warming potential. These GHGs are produced as a byproduct of aluminum production and are applied in semiconductor manufacturing.⁸

Sulfur Hexafluoride (SF₆): A group of fluorinated GHGs that are derived from mostly human activities and comprise a very high global warming potential. These GHGs are used as an insulating gas in electrical transmission equipment.⁹

Impact Analysis

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to greenhouse gas emissions. Would the project:

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

The proposed project is expected to result in less than significant impacts in relation to generating GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The proposed project is located within an urbanized location at the heart of northern Orange County and is near low, medium, and high-density urban development (see Figure 1.7-1, *Zoning Designations*). The proposed project site is vacant, and there are no existing sources of GHG emissions. The proposed project would include a 1.0-mile trail that would provide innovative

⁴ U.S. Environmental Protection Agency. N.d. Overview of U.S. Greenhouse Gas Emissions in 2020. Available at: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases> (accessed February 9, 2023).

⁵ U.S. Environmental Protection Agency. N.d. Overview of U.S. Greenhouse Gas Emissions in 2020. Available at: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases> (accessed February 9, 2023).

⁶ World Bank. N.d. Metadata Glossary. <https://databank.worldbank.org/metadataglossary/world-development-indicators/series/EN.ATM.CO2E.KT> (accessed February 9, 2023).

⁷ U.S. Environmental Protection Agency. N.d. Reducing Hydrofluorocarbon (HFC) Use and Emissions in the Federal Sector through SNAP. <https://www.epa.gov/snap/reducing-hydrofluorocarbon-hfc-use-and-emissions-federal-sector-through-snap> (accessed February 9, 2023).

⁸ U.S. Environmental Protection Agency. N.d. Overview of U.S. Greenhouse Gas Emissions in 2020. Available at: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases> (accessed February 9, 2023).

⁹ U.S. Environmental Protection Agency. N.d. Overview of U.S. Greenhouse Gas Emissions in 2020. Available at: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases> (accessed February 9, 2023).

nonmotorized and sustainable transit modes, connecting the project area to various parts of the city and surrounding region. The proposed project would help achieve GHG reduction goals by improving connectivity to the City’s parks, schools, and neighborhoods while encouraging and diversifying public and active transportation in the area.

Pursuant to Senate Bill 375, the California Air Resources Board (CARB) issued a GHG reduction target of a regional 8 percent per capita for 2020 and 19 percent per capita by 2035. According to Connect SoCal 2020, the six-County SCAG region is on track to meet these goals as it applies to emissions from automobiles and light trucks.¹⁰

Construction Phase

Yorke Engineering, LLC conducted an air quality and GHG emissions technical study and estimated emissions with CalEEMod, Version 2020.4.0 (see Appendix B). The calculated emissions are based on a 180-day construction schedule. Construction emission results are based on the annual emissions output (Table 3.8-1, *Construction GHG Emissions Summary and Significance Evaluation*).

**TABLE 3.8-1
CONSTRUCTION GHG EMISSIONS SUMMARY AND SIGNIFICANCE EVALUATION**

	Construction Emissions (MT/Year)				
	CO ₂	CH ₄	N ₂ O	CO ₂ e	Total
Construction annual emissions	125.87	0.04	0	126.88	126.88
Amortized annual emissions (over 30 years)	4.2	0	0	4.2	4.2
SCAQMD annual significance construction threshold	—	—	—	3,000	—
Significant?	—	—	—	No	—
Note: Comprises construction emissions amortized over 30 years.					
Source: SCAQMD 2019, Appendix B.					

The results demonstrate that CO₂ emissions comprise approximately 99 percent of construction emissions expected from the proposed project. The amortized annual GHG emissions are 4.2 MTCO₂e per year, which are below the SCAQMD threshold of 3,000 MTCO₂e per year. Impacts during construction would be less than significant.

Operation Phase

The proposed project would reduce per capita vehicle miles traveled (VMT) by improving connectivity to public transit and increasing active transportation accessibility and is expected to reduce vehicular use in the area, thereby reducing GHG emissions. There are eight bus stops within the proposed project’s vicinity that are operated by OCTA.¹¹ The nearest Metro Station to the proposed project site is the Anaheim Canyon Station, which is approximately 1.5 miles

¹⁰ Southern California Association of Governments. September 2020. Final Connect SoCal. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

¹¹ Orange County Transit Authority. N.d. System Map. Available at: <https://octa.net/Bus/Routes-and-Schedules/System-Map/> (Accessed August 30, 2022).

southwest.¹² The proposed project site is also located within 1 mile of an HQTAs.¹³

Both construction and operation GHG emissions are well below the suggested GHG reporting thresholds. The proposed project would, therefore, result in less than significant impacts regarding the generation of GHG emissions. No mitigation or further analysis is warranted.

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

The proposed project would result in no impacts to GHG emissions in relation to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The primary applicable plan is Connect SoCal 2020.¹⁴ The CARB has set GHG reduction targets for the SCAG region of reducing per capita GHG emissions 8 percent below 2005 levels by 2020 and 13 percent by 2035.

The proposed project would retain or enhance the achievement of the following goals established in Connect SoCal 2020 (Table 3.8-2, *Connect SoCal 2020 Goals in Relation to the Proposed Project*).¹⁵

**TABLE 3.8-2
CONNECT SOCIAL 2020 GOALS IN RELATION TO THE PROPOSED PROJECT**

Connect SoCal 2020 Goals	Proposed Project
1. Encourage regional economic prosperity and global competitiveness	The proposed project does not introduce any housing or job opportunities. The proposed project would retain the existing opportunities.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods	The proposed project would result in the City's expansion of its recreational amenities; enhance safety; and increase connectivity of the City's parks, schools, and neighborhoods.
3. Enhance the preservation, security, and resilience of the regional transportation system	
4. Increase person and goods movement and travel choices within the transportation system	
5. Reduce greenhouse gas emissions and improve air quality	The proposed project would connect various parts of the city internally and externally to the surrounding region by providing innovative nonmotorized and sustainable transit modes that meet the needs of all users. The proposed project would improve connectivity to encourage the use of public transportation while providing community and recreational opportunities to the disadvantaged communities in the area.
6. Adapt to a changing climate and support an integrated regional development pattern and transportation network	
7. Support healthy and equitable communities	
8. Encourage development of diverse housing types in areas that are supported by multiple transportation options	

¹² City of Anaheim. N.d. City of Anaheim: Open Data Interactive Transportation Maps. <https://data-anaheim.opendata.arcgis.com/search?tags=transportation> (accessed August 30, 2022).

¹³ Southern California Association of Governments. N.d. High Quality Transit Areas (HQTAs) 2045 – SCAG Region. High Quality Transit Areas (HQTAs) 2045 – SCAG Region | High Quality Transit Areas (HQTAs) 2045 – SCAG Region | Southern California Association of Governments (arcgis.com) (accessed August 30, 2022).

¹⁴ Southern California Association of Governments. September 2020. Final Connect SoCal. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

¹⁵ Southern California Association of Governments. September 2020. Final Connect SoCal. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

Connect SoCal 2020 Goals	Proposed Project
9. Leverage new transportation technologies and data-driven solutions that result in more efficient travel	Transit networks would expand as a result of greater interconnectivity to various areas of the City by providing pedestrian and bicyclist access to local public transit. The project site is located within 1 mile of an HQTAs.
10. Promote conservation of natural and agricultural lands and restoration of habitats	The project site is currently paved and vacant. There is no loss of open space that would result from the proposed project. The project would include an open area with urban landscaping.

Among the 10 objectives established by Connect SoCal 2020, the proposed project would be consistent with the goals that focus on supporting healthy and equitable communities within existing urban areas, giving people greater access to recreational resources and sustainable transit opportunities to explore various areas of the City and beyond.

The proposed project would help achieve GHG reduction goals by improving connectivity to the City’s parks, schools, and neighborhoods while encouraging and diversifying public and active transportation in the area. The proposed project site is located within a mile of an HQTAs, served by public transit, and would reduce VMT through encouraging greater public transit opportunities over vehicular use. Therefore, the proposed project is not expected to result in impacts to GHG emissions in relation to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. No mitigation or further analysis is warranted.

3.9 HAZARDS AND HAZARDOUS MATERIALS

This analysis is undertaken to determine if the proposed project may have a significant impact to hazards and hazardous materials, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of hazards and hazardous materials has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City in their capacity as a Lead Agency pursuant to CEQA to support their decision making in relation to the proposed project. Hazards and hazardous materials at the proposed project site were evaluated based on a Phase I Initial Site Assessment (ISA) prepared in support of the project (Appendix E, *Phase I Initial Site Assessment*, review of databases by Environmental Data Resources (EDR included in Appendix E), and the Safety Elements of the County of Orange General Plan² and the City of Placentia General Plan.³

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Impact Analysis

The State CEQA Guidelines recommend the consideration of seven questions when addressing the potential for significant impact to hazards and hazardous materials:

Would the project:

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

The proposed project would result in less than significant impacts to hazards and hazardous materials related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials from the proposed project. The proposed project is not expected to increase the transportation, production, storage, or use of any hazardous materials through its construction activities or ongoing operation and maintenance activities.

Construction

Construction activities associated with the proposed project would entail clearing and grubbing, excavation, grading, placement of aggregate base and asphalt concrete, revegetation, installation of signs and lighting, and other safety related features necessary to meet current Americans with Disabilities Act (ADA) requirements. Normal use of construction-related hazardous materials (concrete wastewater, petroleum products, and adhesives) would occur during construction of the proposed project. These materials would not be likely to present a significant hazard

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² Orange County. 2015. County of Orange General Plan, Chapter IX, Safety Element.

³ City of Placentia. 2019. City of Placentia General Plan, Safety Element.

because of the small quantities created and used. Contractors would follow standard construction industry protocol practices when operating equipment during the proposed project.

Operations and Maintenance

As stated in Section 1.12, *Operations and Maintenance*, maintenance activities would include maintaining the small new planting areas along the trail. The use of chemical herbicides would be limited to chemicals that are not banned by the County, and landscaping teams will abide by standard industry practices for use and application.

Therefore, there would be less than significant impacts to hazards and hazardous materials in relation to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No further analysis is required.

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

The proposed project would have the potential to result in impacts to hazards and hazardous materials related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment. Impacts would be reduced to below the level of significance with the incorporation of mitigation measures.

Construction

Construction of the proposed project has the potential to result in potentially significant impacts due to reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment due to its proximity to active oil and gas wells, pumping facilities, and oil pipelines. The nature of construction activities poses a risk for damage to these facilities, and therefore potential significant impact due to reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment. Construction activities associated with the proposed project entails clearing and grubbing, grading, excavation, placement of aggregate base, asphalt and concrete, revegetation, installation of signs and lighting and other safety related features necessary to meet current ADA requirements. Normal use of construction-related hazardous materials (concrete wastewater, petroleum products, and adhesives) would occur during construction of the proposed project. These materials would not be likely to present a significant hazard because of the small quantities created and used. Contractors should follow standard construction practices when operating during the proposed project.

A Phase I ISA was prepared that summarizes the results of prior investigations and identifies potential hazardous materials present at the proposed project site (Appendix E). There were no prior environmental investigations found for the proposed project site. The proposed project site did not appear in the State of California Regional Water Quality Control Board (Geotracker) or the Department of Toxic Substances Control (EnviroStor) database and identified as a known hazardous waste site. A hazardous sites records search was compiled by EDR for the proposed project site on March 17, 2022 (see Appendix E). The EDR report included a radius map with concentric ellipses indicating the search distances of 0.25, 0.5, and 1 mile from the center of the proposed project site. The EDR Report Radius Map identified industrial and light industrial sites within the vicinity of the project site. Consideration of contamination for properties within a 0.25-

mile radius of the site is required pursuant to CEQA. There are 322 sites listed in the EDR database within 0.25 mile of the proposed project, but none of these were found to pose a hazard or hazardous material concern to the proposed project.

The Phase I ISA also revealed the proposed project site is located within the Richfield oil and gas field. There are numerous oil and gas wells within 0.25 mile of the proposed project site, including pumping facilities. One pumping well (Well #Z25, API #0405906048) is located directly on the proposed trail alignment less than 300 feet east of the South Van Buren Street entrance. There is an additional facility (Well Z22, API 0405906312) located on the proposed staging area for the project. Both are identified on the CalGEM website as active oil and gas wells operated by West Energy Operating, LLC.⁴ The most recent inspection report for the wells does not identify any violations related to poor conditions, spills, improper covering, faulty fencing, or damaged enclosure.⁵ The only current violation is that the signage does not have the correct operator's name. The signage states that well #Z25 is operated by Greka; however, it is now operated by West Energy Operating, LLC.⁶

The presence of the oil and gas facilities within the project site requires that the proposed project implement Mitigation Measures HAZ-1 and HAZ-2, which would ensure that the potential for the proposed project to create a significant hazard to the public or environment due to reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment would be less than significant.

MM-HAZ-1: Construction activities and heavy equipment movement near the oil and gas facilities shall be done with extreme caution not to breach the fenced areas or damage the oil pumping infrastructure. If a spill, release, or threatened release occurs, emergency response actions shall be required in accordance with the California Office of Emergency Services State Warning Center (800.852.7550) and the Orange County Fire Department (911).

MM-HAZ-2: During construction when subsurface digging is scheduled to occur, "DigAlert" (Underground Service Alert of Southern California) shall be notified 48 hours prior to breaking ground (Dial 811).

With implementation of these mitigation measures and when standard construction practices are followed, the proposed project would not be constrained. Therefore, impacts to hazards and hazardous materials in relation to creating a significant hazard to the public or the environment due to reasonably foreseeable upset and accident conditions involving the release of hazardous material into the environment would be reduced to below the level of significance by the incorporation of the specified mitigation measures.

⁴ California Department of Conservation, Geologic Energy Management Division (CalGEM). N.d. Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.82939/33.86648/18> (accessed March 28 and July 13, 2022).

⁵ California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). October 11, 2019. Notice of Violation – Violation I.D. 11183273 through 11183493.

⁶ California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). October 11, 2019. Notice of Violation – Violation I.D. 11183273 through 11183493.

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

The proposed project would have the potential to result in impacts to hazards and hazardous materials with respect to the emission of hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be reduced to below the level of significance with the incorporation of mitigation measures.

Construction

El Camino Real High School, a sensitive receptor, is approximately 0.22 mile from the project site (see Figure 3.3-1, *Sensitive Receptors*). Construction activities associated with the proposed project would entail clearing and grubbing, excavation, grading, placement of aggregate base and asphalt concrete, revegetation, installation of signs and lighting, and other safety related features necessary to meet current ADA requirements. In addition, normal use of construction-related hazardous materials (concrete wastewater, petroleum products, and adhesives) would occur during the proposed project. These materials would not likely present a significant hazard because of the small quantities created and used. Contractors should follow standard construction practices when operating during the proposed project.

The Phase I ISA revealed the proposed project site is located within the Richfield oil and gas field (see Appendix E). There are numerous oil and gas wells within 0.25 mile of the proposed project site, including pumping facilities. One pumping well (Well #Z25, API #0405906048) is located directly on the proposed trail alignment less than 300 feet east of the South Van Buren Street entrance. There is an additional facility (Well Z22, API 0405906312) located on the proposed staging area for the project. Both are identified on the CalGEM website as active oil and gas wells operated by West Energy Operating, LLC.⁷ The most recent inspection report for the wells does not identify any violations related to poor conditions, spills, improper covering, faulty fencing, or damaged enclosure.⁸ The only current violation is that the signage does not have the correct operator's name. The signage states that well #Z25 is operated by Greka; however, it is now operated by West Energy Operating, LLC.⁹

Because of the presence of the oil and gas facilities within the project site, the proposed project would be required to implement Mitigation Measures HAZ-1 and HAZ-2, which would ensure that the potential for the proposed project to create a significant hazard to the public or environment related to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be less than significant. With implementation of these mitigation measures and when standard construction practices are followed, the proposed project would not be constrained.

⁷ California Department of Conservation, Geologic Energy Management Division (CalGEM). N.d. Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.82939/33.86648/18> (accessed March 28 and July 13, 2022).

⁸ California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). October 11, 2019. Notice of Violation – Violation I.D. 11183273 through 11183493.

⁹ California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). October 11, 2019. Notice of Violation – Violation I.D. 11183273 through 11183493.

Operations and Maintenance

There would be no impacts to hazards and hazardous materials related to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school during operations and maintenance of the proposed project. The activities anticipated on the bike trail after completion of construction do not pose a risk for damage or accident to any of the nearby gas and oil facilities.

Therefore, impacts to hazards and hazardous materials in relation to creating a significant hazard to the public or the environment related to emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be reduced below the level of significance by the incorporation of the specified mitigation measures.

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

The proposed project would result in no impacts to hazards and hazardous materials in relation to being located on a site which is included on a list of hazardous materials site. The Phase I ISA did not identify the proposed project site pursuant to the Government Code Section 65962.5 (see Appendix E). In addition, the proposed project site did not appear in the State of California Water Board's Geotracker or DTSC EnviroStor database; nor is it identified as a known hazardous waste site on the EDR database search. Therefore, there would be no impacts related to location on a hazardous materials site. No further analysis is warranted.

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The proposed project would result in no impacts to hazards and hazardous materials in relation to being located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. There are no airports located within 2 miles of the proposed project site. The nearest airport to the project site is Fullerton Municipal Airport, approximately 10 miles west of the proposed project site. Therefore, there would be no impacts in relation to proximity to an airport. No further analysis is warranted.

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

The proposed project would result in no impacts in relation to hazards and hazardous materials in relation to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. The City of Placentia Safety Element of the General Plan⁴ has developed emergency evacuation routes and transportation assembly points (TAP) to facilitate the orderly movement of vehicles through the city and assist members of the community with directions and additional information determined any given incident. The nearest designated city evacuation route is located approximately 0.07 mile north of the proposed project site along Orangethorpe Ave. The nearest TAP is Parque De Los Niños, located adjacent to the proposed project site between N. Van Buren St. and Richfield Rd.

trailheads.¹⁰ The proposed project would not conflict with this TAP because it would not obstruct access to the park during construction or operations; the pedestrian bridge across Atwood Channel would remain open.

Construction

The construction activities within the proposed project limits would be contained within the fenced area adjacent to the Atwood Channel. The proposed staging area for the proposed project is also a fenced area between the Atwood Channel and Vincent Avenue (not an evacuation route) and would not physically impede an existing emergency response plan or pre-designated evacuation plan.

Operations

During operations and maintenance, trail users would be required to yield to emergency response vehicles with sirens when crossing S. Van Buren St. and S. Richfield Rd. Maintenance activities would not require road closures or lane closures for any of the four streets (N. Jefferson St., S. Van Buren St., S. Richfield Rd., or N. Lakeview Ave.) within or adjacent to the project site that intersect with Orangethorpe Ave.

Therefore, the proposed project would result in no impacts in relation to impairing the implementation of or physically interfering with an adopted emergency response plan. No further analysis is warranted.

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

The proposed project would result in no impacts to hazards and hazardous materials in relation to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. The proposed project would not expose people or property to indirect wildfire risks because the project site is not located within a wildland fire risk area. The nearest Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA) is located approximately 2.3 miles to the southeast of the proposed project site, and the nearest VHFHSZ within a State Responsibility Area (SRA) is located approximately 3.0 miles away from the proposed project site (see Section 3.20, *Wildfire*; and Figure 3.9-1, *Fire Hazard Severity Zone*).¹¹ In addition, as the proposed project site is relatively flat and no structures are proposed, people or structures would not be exposed to increased wildland fire risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (see Section 3.10, *Hydrology and Water Quality*). Therefore, there would be no impacts in relation to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. No further analysis is warranted.

¹⁰ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

¹¹ California Department of Forestry and Fire Protection (CAL FIRE), Office of the State Fire Marshall. 2022. Fire Hazard Severity Zones Map. <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/> (accessed February 16, 2023).

3.10 HYDROLOGY AND WATER QUALITY

This analysis is undertaken to determine if the proposed project may have a significant impact to hydrology and water quality, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of effects on hydrology and water quality has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia, in their capacity as a Lead Agency pursuant to CEQA to support their decision making in relation to the proposed project. Hydrology and water quality at the proposed project site were evaluated with regard to the Conservation and Land Use Elements of the City of Placentia General Plan,^{2,3} the City of Placentia Water Quality Management Plans,⁴ and the County of Orange Public Services and Facilities Element and Resources Element of the General Plan,^{5,6} the Santa Ana River Basin Plan for the Santa Ana Regional Water Quality Control Board (RWQCB),⁷ National Flood Insurance Program Flood Insurance Rate Maps for Orange County,⁸ and the U.S. Geological Survey (USGS) 7.5-minute series Orange topographic quadrangle.⁹ The analysis presented in this section is based on the *Hydrology Report for the Atwood Multipurpose Trail Project* (Appendix F).

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies is expected to be prepared for the proposed project.

Working Definitions

Storm Water and Stormwater: In layman’s terms, “stormwater” is defined as an abnormal amount of surface water due to a heavy rain or snowstorm. The term “storm water” is used when employed by the cited source of information. In all other instances, *stormwater* is used, consistent with the provision of Appendix G of the CEQA Guidelines and as defined by the U.S.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. October 2019. City of Placentia General Plan: Chapter 5: Conservation Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed September 6, 2022).

³ City of Placentia. October 2019. City of Placentia General Plan: Chapter 2: Land Use Element. <https://www.placentia.org/DocumentCenter/View/8431/2-Land-Use-Updated-3?bidId=> (accessed September 12, 2022).

⁴ City of Placentia. 2009. Water Quality Management Plans. <https://www.placentia.org/DocumentCenter/View/3157/WQMP-Brochure?bidId=> (accessed September 7, 2022).

⁵ Orange County Department of Regional Planning. August 2015. Orange County General Plan 2035: Chapter 5: Public Services and Facilities Element. <https://ocds.ocpublicworks.com/sites/ocpwoocds/files/import/data/files/59953.pdf> (accessed September 7, 2022).

⁶ Orange County Department of Regional Planning. August 2015. Orange County General Plan 2035: Chapter 6: Resources Element. <https://ocds.ocpublicworks.com/sites/ocpwoocds/files/import/data/files/40235.pdf> (accessed September 12, 2022).

⁷ California Water Boards, Santa Ana R-8. 2019. Santa Ana River Basin Plan. https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (accessed September 12, 2022).

⁸ Federal Emergency Management Agency. N.d. FEMA Flood Map Service Center Search by address. <https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20California#searchresultsanchor> (accessed February 17, 2023).

⁹ U.S. Geographical Survey. N.d. USGS Topography Maps, Orange Quadrangle. <https://ngmdb.usgs.gov/topoview/viewer/#15/33.8685/-117.8382> (accessed February 17, 2023).

Environmental Protection Agency (EPA). Stormwater runoff is generated when precipitation from rain and snowmelt events flows over land or impervious surfaces and does not percolate into the ground. As the runoff flows over the land or impervious surfaces (paved streets, parking lots, and building rooftops), it accumulates debris, chemicals, sediment, or other pollutants that could adversely affect water quality if the runoff is discharged untreated.

Total Maximum Daily Load (TMDL): A TMDL is the calculation of the maximum amount of a pollutant allowed to enter a waterbody so that the waterbody will meet and continue to meet water quality standards for that particular pollutant. A TMDL determines a pollutant reduction target and allocates load reductions necessary to the source(s) of the pollutant.¹⁰

Wastewater: The spent or used water of a community or industry that contains dissolved and suspended matter.¹¹

Water Quality Control Plan (Basin Plan): A regional plan that contains the Region's water quality regulations and programs to implement the regulations. California's Porter-Cologne Water Quality Control Act (Porter-Cologne Act, which became Division 7 of the California Water Code, §13000 et seq.) establishes the responsibilities and authorities of the nine Regional Water Boards and the State Water Board as "the principal State agencies with primary responsibility for the coordination and control of water quality" (§13001). Each Regional Water Board is directed to "formulate and adopt water quality control plans for all areas within the region," including both surface waters and groundwater (§13240). A water quality control plan for the waters of an area is defined as having three components: beneficial uses to be protected, water quality objectives that protect those uses, and a program of implementation needed to achieve the water quality objectives (§13050).

Impact Analysis

The State CEQA Guidelines recommend the consideration of eight questions when addressing the potential for significant impacts to hydrology and water quality.

Would the project:

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

The proposed project would result in less than significant impacts to hydrology and water quality in relation to violating water quality standards, waste discharge requirements, or otherwise substantially degrading surface or ground water quality. The project does not include provisions of any new or expanded restrooms, and therefore there would be no new sources of wastewater. The project currently drains to the Atwood channel, an Orange County Flood Control District (District) channel that is concrete, rock-lined, and earthen along the route of the proposed bike path. The project site is connected to the channel via storm drains and inlets with one main drain entering the channel within the maintenance road area, and a majority of the project draining towards the channel via surface flow (Appendix F, Figure 1-2). The Atwood Channel is part of the

¹⁰ U.S. Environmental Protection Agency. N.d. Impaired Waters and TMDLs. <https://www.epa.gov/tmdl/overview-total-maximum-daily-loads-tmdls> (accessed February 17, 2023).

¹¹ California Association of Sanitation Agencies. N.d. Definition of Terms – S. <http://www.casaweb.org/definition-of-terms/s> (accessed February 17, 2023).

Lower San Gabriel River watershed and ultimately connects to Carbon Canyon Creek,¹² which is not on the 303(d) impaired waterbody list.¹³ The project site vicinity has been assessed using the State Water Resource Control Board California GeoTracker tool to identify clean-up sites within 2,000 feet of the proposed project. The closest open clean-up program site is the Exxon Mobile Atwood Terminal at 1477 Jefferson St. N, approximately 0.16 mile to the west of the westernmost point of the trail. The Hydrology Report determined that sources of contamination near the project footprint were either sufficiently far from the project site or were recently assessed and determined to have no appreciable contamination (Appendix F, Figure 1-7).

Construction

During construction, the project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would outline Best Management Practices (BMPs) to minimize potential for short-term increases in sediment transport caused by construction, including erosion-control requirements; BMPs for storage and housekeeping of construction equipment and supplies with the potential to pollute; and general stormwater management. The current project site is paved, primarily vacant land that is maintained (weed clearance), and includes a gravel paved vacant access road. The proposed project would not be anticipated to utilize significant water for dust control during construction as the project is expected to be completed in under a year and dust control would only be needed on a temporary and intermittent basis. Furthermore, any water onsite during construction, whether stormwater or other sources, would be contained and managed pursuant to the provisions of the SWPPP.

Operations and Maintenance

Ongoing operations and maintenance of the proposed project would include continued regular inspections, cleanings, and maintenance of the Atwood Channel and connecting drainage system for stream and riverbank erosion management and inlet maintenance by the District. All project landscaping would be performed in accordance with industry standards and would not use any pesticides or herbicides that have been banned by the City or Orange County. Irrigation for landscaping would be hauled in and applied directly to the site using a temporary cistern/irrigation system or applied with a pressurized hose/backpack system. Irrigation for the proposed project would be minimal and would not result in significant surface water runoff or require excessive water supplies, as the project would utilize native and drought-tolerant plants. The proposed project would meet all the requirements of the City of Placentia Stormwater Management Plan, the Orange County Municipal Separate Storm Sewer System (MS4) permit,¹⁴ the Yorba Linda Water District Conservation Ordinance, and the City of Placentia General Plan Conservation Element.

The proposed project design would maintain the same level of impermeability as the existing conditions. Proposed BMPs such as landscaping have the potential to improve stormwater

¹² U.S. Environmental Protection Agency. N.d. Waters GeoViewer 2.0. <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=074cfede236341b6a1e03779c2bd0692> (accessed February 17, 2023).

¹³ California Water Boards. N.d. Final California 2012 Integrated Report (303(d) List/305(b) Report), Supporting Information, Regional Board 4 - Los Angeles Region. https://www.waterboards.ca.gov/water_issues/programs/tmdl/2012state_ir_reports/01101.shtml (accessed February 17, 2023).

¹⁴ Santa Ana Regional Water Quality Control Board. July 2006. Order No. R8-2009-0030 NPDES No. CAS618030. https://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2009/09_030_oc_ms4_as_amended_by_10_062.pdf

infiltrating conditions by decreasing runoff volume and runoff speed, providing a net benefit to surface and groundwater quality. The proposed project would maintain a similar level of impermeability from predevelopment conditions to post development conditions, and it is not anticipated that development of the trail would substantially alter or impact the quality, rate, or amount of surface water entering the channel, or the quality of groundwater or being infiltrated at the project site.

Therefore, the proposed project would result in less than significant impacts to hydrology and water quality in relation to violating any water quality standards or waste discharge requirements, or otherwise substantially degrading surface or ground water quality. No further analysis is warranted.

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

The proposed project would result in no impacts to hydrology and water quality in relation to substantially decreasing groundwater supplies or interfering substantially with groundwater recharge. The proposed project would not increase impervious areas from the existing conditions, so infiltration into the groundwater is not expected to decrease. Furthermore, there may be opportunities for increased infiltration via reduced speeds of stormwater runoff as it passes through landscaping along the proposed trail, supporting sustainable groundwater management of the basin. Water use during construction is anticipated to be minimal. Construction is anticipated to be less than one year in duration, and water use for dust control would be limited and temporary. The Hydrology Report (Appendix F) shows that groundwater in this area is already sufficiently high. The most recent assessment by the District, which is responsible for maintaining the quantity and quality of groundwater underlying Placentia, indicates that annual water usage from 2015 to 2020 was the lowest since 1982¹⁵ due to conservation strategies and ordinances imposed by the Yorba Linda Water District Board and the City. The proposed project has incorporated these water conservation strategies in its design by using native and drought-tolerant plants, which would require minimal amounts of water for their long-term operations and maintenance. Therefore, there would be no impact. No further analysis is warranted.

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

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

The proposed project would result in less than significant impacts to hydrology and water quality in relation to alteration of existing drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. During the construction process, slight alterations to flow patterns can occur on the project site. These changes would be targeted and addressed by the project's SWPPP using BMPs to prevent substantial erosion or siltation on- or off-site during construction. Upon project completion and during regular operations and maintenance of the proposed project, the drainage patterns across the site would be anticipated to minimally change from the existing conditions, as outlined in the Hydrology Report (Attachment F, p. 23), and

¹⁵ Municipal Water District of Orange County. April 2022. Monthly Water Usage Data and Water Supply Info. <https://www.mwdoc.com/wp-content/uploads/2021/12/10-REV-Water-Data-Item-for-Apr-2021-AF-mtg-FINAL.pdf> (accessed September 9, 2022).

therefore erosion or siltation would not increase as a result of the proposed project. The potential to alter drainage patterns was also assessed alongside the USGS 7.5-minute series Orange topographic quadrangle for 2022, which confirmed the relatively flat project site and the unchanging topography from existing conditions. Therefore, there would be no impact. No further analysis is warranted.

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

The proposed project would result in no impacts to hydrology and water quality in relation to alteration of existing drainage patterns in a manner that would result in flooding on- site or off-site. During the construction process, slight alterations to flow patterns can occur on the project site, allowing for variations in rate or amount of surface runoff. These changes would be targeted and addressed by the project's SWPPP using BMPs to prevent flooding on- or off-site during construction. Furthermore, due to the project's relatively flat topography, and connection to the larger storm drain and flood control channel, alterations in flow or drainage patterns during construction would be expected to be minimal. Upon project completion and during regular operations and maintenance of the proposed project, the drainage patterns across the site would be anticipated to stay the same as the existing conditions, as outlined in the Hydrology Report (Attachment F, p. 23). The proposed project design would maintain the same level of impermeability as the existing conditions, and therefore a change in the rate and amount of surface runoff is not anticipated. As a result, flooding on site or off site would not be anticipated. A majority of the project site is located within a National Flood Insurance Program (NFIP)–mapped special flood hazard area and includes Zone AE (Regulatory Floodway) along the Atwood Channel and to the southwest, Zone A (special flood hazard zone without base flood elevation) along the channel and to the east,¹⁶ and shaded Zone X (areas between the limits of the 1 percent chance of flood risk [base flood or 100 year] and the 0.2 percent annual change [or 500-year] flood) to the north of Atwood Channel.¹⁷ The southern portion of the project site is designated as Zone X (area with reduced flood risk due to levee, with 1 percent annual flood discharge contained in structure). However, the proposed project would not cause any changes in topography, and the proposed bike path would stay at the same height as the original access road. Therefore, there would be no increased rate of surface runoff, and no increased risk for flooding in surrounding areas as a result of the proposed project. No aspect of operations, maintenance, or daily use of this proposed project would significantly increase surface water present at the project site. Therefore, there would be no impact. No further analysis is warranted.

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

The proposed project would result in no impacts to hydrology and water quality in relation to exceeding the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff. During construction, the quality of stormwater

¹⁶ U.S. Department of Homeland Security, FEMA. Effective December 3, 2009. FEMA Flood Map Service Center: Search by Address. Flood map number 06059C0152. <https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20Placentia%2C%20CA#searchresultsanchor> (accessed September 6, 2022).

¹⁷ U.S. Department of Homeland Security, FEMA. Effective December 3, 2009. FEMA Flood Map Service Center: Search by Address. Flood map number 06059C0152. <https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20Placentia%2C%20CA#searchresultsanchor> (accessed September 6, 2022).

runoff would be maintained pursuant to the project SWPPP. The site-specific SWPPP would identify and mitigate any sources of potential pollution from construction activities. Construction is anticipated to be less than one year, and water use for dust control would be limited and temporary, and therefore would not be anticipated to involve large water quantities. The proposed project would not increase impermeability at the project site and, therefore, would not create or contribute any additional stormwater runoff compared to the existing condition. Irrigation for the proposed project would be minimal and would not result in significant surface water runoff, as the project would utilize native and drought-tolerant plants. Maintenance of the proposed landscaping would not include use of herbicides and pesticides that have been banned by the City or Orange County, and there are not anticipated to be any substantial additional sources of pollutants as a result of the operations, maintenance, and daily activities at the proposed project. Furthermore, the project site is located in an area with significant stormwater drainage infrastructure, specifically the Atwood Channel and its connecting drain inlets (Appendix F, Figure 1-2). The storm drain system in the project vicinity was provided by Orange County Public Works and has been reviewed and documented in the Hydrology Report (Appendix F). The proposed area has adequate capacity for 85th percentile runoff volumes (Appendix F); and because the drainage patterns, flow rates, and runoff amounts would not significantly change from existing conditions, the capacity to handle surface water flows related to this project would be sufficient. Therefore, there would be no impact. No further analysis is warranted.

iv) Impede or redirect flood flows?

The proposed project would result in no impacts to hydrology and water quality in relation to impeding or redirecting flood flows. Construction activities include removal of the existing gravel along the maintenance road, excavation of material sources, clearing and grubbing, grading, placement of aggregate base and asphalt concrete, revegetation, installation of signs, and installation of lighting and other safety related features. At no point during construction would the project site be significantly changed in a way that would impede or redirect flood flows. At completion, the proposed project site and all components of the proposed project would be at the same height and have similar impermeability as the existing condition. Site topography of the proposed project would be minimally changed from the existing conditions. No aspect of operations, maintenance, or daily use of the trail would alter drainage patterns or alter the course of any nearby streams, rivers, or channels. Furthermore, the proposed project site borders the Atwood Channel, and flood flows would continue to be directed into the channel within the proposed trail project. Flood control channels such as Atwood Channel convey 100-year flood protection to reduce the floodplain within Orange County, and are designed to contain stormwater runoff and redirect flood flows. However, as a result of its proximity to the Atwood flood control channel, the project site is located within an NFIP-mapped special flood hazard area and includes Zone AE (Regulatory Floodway) along the Atwood Channel and to the southwest, Zone A (special flood hazard zone without base flood elevation) along the channel and to the east,¹⁸ and shaded Zone X (areas between the limits of the 1 percent chance of flood risk [base flood or 100 year] and the 0.2 percent annual change [or 500-year] flood) to the north of Atwood Channel.¹⁹ The southern portion of the project site is designated as Zone X (area with reduced flood risk due to

¹⁸ U.S. Department of Homeland Security, FEMA. Effective December 3, 2009. FEMA Flood Map Service Center: Search by Address. Flood map number 06059C0152. <https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20Placentia%2C%20CA#searchresultsanchor> (accessed September 6, 2022).

¹⁹ U.S. Department of Homeland Security, FEMA. Effective December 3, 2009. FEMA Flood Map Service Center: Search by Address. Flood map number 06059C0152. <https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20Placentia%2C%20CA#searchresultsanchor> (accessed September 6, 2022).

levee, with 1 percent annual flood discharge contained in structure). Some base flood elevations have been established in areas surrounding this location, as outlined in Appendix A of the Hydrology Report (Appendix F to the Initial Study). This flood hazard designation precedes the proposed project and would not be changed as a result of the proposed project. Therefore, there would be no impact. No further analysis is warranted.

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

The proposed project would result in less than significant impacts to hydrology and water quality in relation to risking release of pollutants due to project inundation in flood hazard, tsunami, seiche zones. The project site is not located in a tsunami risk zone; the nearest tsunami risk zone is located at the mouth of the San Gabriel River roughly 15 miles to the southwest. The project is not located in a seiche zone. The nearest waterbody is the Santa Ana River Lakes, located roughly 1 mile northeast of the proposed project site. The area surrounding the project site is within two special flood hazard zones due to its proximity to the Atwood flood control channel. The project site is located within an NFIP-mapped special flood hazard area and includes Zone AE (Regulatory Floodway) along the Atwood Channel and to the southwest, Zone A (special flood hazard zone without base flood elevation) along the channel and to the east,²⁰ and shaded Zone X (areas between the limits of the 1 percent chance of flood risk [base flood or 100 year] and the 0.2 percent annual change [or 500-year] flood) to the north of Atwood Channel.²¹ The southern portion of the project site is designated as Zone X (area with reduced flood risk due to levee, with 1 percent annual flood discharge contained in structure). These areas are defined by the Federal Emergency Management Agency (FEMA) as having a 1 percent chance of flooding annually.²² As outlined in the Floodplain Risk assessment of the Hydrology Report (Attachment F), areas located within the 100-year special flood hazard area floodplain should avoid raising existing grades; and whenever possible, existing grades should be maintained however small changes may be allowed. The project does not propose raising the existing grade and would maintain the existing grading, topography and overall elevation. During construction, pollutants generated on-site such as concrete, asphalt, and sediment would be managed by the project SWPPP, which would standard housekeeping BMPs for storage, containment, and use of potential construction pollutants. These include scheduling pollutant generating activities when there is the least likely chance of exposure to rain or flooding. The proposed project does not propose changing existing topography or grading; and therefore, risk of flood hazard to the proposed bike path would be maintained at the same level as the pre-project assessment by the NFIP. The operations, maintenance, and daily activities of the proposed project would not be anticipated to introduce any new pollutants. Therefore, the risk of releasing pollutants due to project inundation in the case of flood, tsunami, or seiche zones would be less than significant. No further analysis is warranted.

²⁰ Federal Emergency Management Agency. 2009. FEMA Flood Map Service Center: Search by Address. Flood map number 06059C0152.

<https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20Placentia%2C%20CA#searchresultsanchor> (accessed September 6, 2022).

²¹ Federal Emergency Management Agency. 2009. FEMA Flood Map Service Center: Search by Address. Flood map number 06059C0152.

<https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20Placentia%2C%20CA#searchresultsanchor> (accessed September 6, 2022).

²² Federal Emergency Management Agency. 2020. FEMA Glossary, Flood Zones.

<https://www.fema.gov/glossary/flood-zones#:~:text=SFHA%20are%20defined%20as%20the,flood%20or%20100%2Dyear%20flood>

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

The proposed project would result in no impacts to hydrology and water quality in relation to conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. As the project is more than 1 acre, it would be required to adhere to the Statewide Construction General Permit for Stormwater Discharges from Construction Activities.²³ Operations and maintenance of the proposed project would be consistent with the following water quality control plan or sustainable groundwater management plans: the Conservation Elements of the updated City of Placentia General Plan,^{24,25} the City of Placentia Water Quality Management Plans,²⁶ the County of Orange Public Services and Facilities Element and Resources Element of the General Plan,^{27,28} and the Santa Ana River Basin Plan for the Santa Ana RWQCB. The project design has taken these plans into consideration by considering water use for landscaping elements, planning for adequate stormwater drainage, maintaining pervious surfaces wherever possible, and avoiding introduction of additional sources of pollutants during daily use and operations and maintenance of the bike path. Therefore, there would be no impact. No further analysis is warranted.

²³ U.S. Environmental Protection Agency. February 2022. National Pollutant Discharge Elimination System (NPDES) construction general permit (CGP) for stormwater discharges from construction activities. <https://www.epa.gov/system/files/documents/2022-01/2022-cgp-final-permit.pdf>

²⁴ City of Placentia. October 2019. City of Placentia General Plan: Chapter 5: Conservation Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed September 6, 2022).

²⁵ City of Placentia. October 2019. City of Placentia General Plan: Chapter 2: Land Use Element. <https://www.placentia.org/DocumentCenter/View/8431/2-Land-Use-Updated-3?bidId=> (accessed September 12, 2022).

²⁶ City of Placentia. 2009. Water Quality Management Plans. <https://www.placentia.org/DocumentCenter/View/3157/WQMP-Brochure?bidId=> (accessed September 7, 2022).

²⁷ Orange County Department of Regional Planning. August 2015. Orange County General Plan 2035: Chapter 5: Public Services and Facilities Element. <https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/59953.pdf> (accessed September 7, 2022).

²⁸ Orange County Department of Regional Planning. August 2015. Orange County General Plan 2035: Chapter 6: Resources Element. <https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/40235.pdf> (accessed September 12, 2022).

3.11 LAND USE AND PLANNING

This analysis is undertaken to determine if the proposed project may have a significant impact to land use and planning that would require the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of land use and planning effects has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia, in their capacity as a Lead Agency pursuant to CEQA to support their decision making in relation to the proposed project. Land use and planning was evaluated with regard to the Land Use Element, Mobility Element, Open Space & Recreation Element, and Health, Wellness, and Environmental Justice Element of the City of Placentia General Plan;² the Placentia Municipal Code, including Title 23 Zoning;³ the National Flood Insurance Program (NFIP);⁴ and the City Urban Forest Protection Ordinance.⁵ The characterization of baseline conditions of the community and its consistency with the adopted goals and policies was based on the review of the General Plan goals and policies, zoning requirements, and other plans for the project site. The potential for impacts to Land Use and Planning was analyzed by reviewing the project conceptual design and the Hydrology Report prepared for the project (Appendix F). The analysis used site visit observations and geospatial analysis to compare the existing conditions versus the post-project conditions.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

General Plan: The General Plan is a policy-oriented planning document that covers a wide range of land use issues and looks further into the future of an area, setting forth in general terms the context in which site-by-site decisions are made with mapped land use designations. State law also requires that the general plan address a comprehensive list of development issues falling under nine major categories or elements: land use, circulation, housing, conservation, open space, noise, safety, environmental justice, and air quality.⁶ Depending upon the location, a City or County general plan may also be required to address elements such as coastal development and the protection of mineral resources and include relevant topics including recreation, historic preservation, public services, and hazardous waste management. The general plan communicates a jurisdiction's development policies for a planning area.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. 2019. General Plan Update. <https://www.placentia.org/166/General-Plan-Update> (accessed February 22, 2023).

³ City of Placentia. N.d. Placentia, California Municipal Code. Title 23 Zoning. https://library.qcode.us/lib/placentia_ca/pub/municipal_code/item/title_23 (accessed February 22, 2023).

⁴ Federal Emergency Management Agency. N.d. National Flood Insurance Program. <https://www.fema.gov/node/404917> (accessed September 8, 2022).

⁵ City of Placentia. 2020. Urban Forest Protection Ordinance. <https://www.placentia.org/857/Urban-Forest-Management-Program> (accessed February 22, 2023).

⁶ California Office of Planning and Research. N.d. General Plan Guidelines – Chapter 4. Required Elements. https://opr.ca.gov/docs/OPR_C4_final.pdf (accessed February 22, 2023).

Land Use Designation: A land use classification with associated land use or management policies. Land use designations are applied to specific areas through the City land use planning processes and culminate in the adoption of a land use element to the General Plan. Some land use designations have been established through legislation (e.g., National Forest), while other designations such as Planned Manufacturing Districts have been established through policy or planning processes.

Zoning Designation: The regulation of the use of real property by local government, which restricts a particular territory to residential, commercial, industrial, or other uses. A zoning ordinance regulates land use from the viewpoint of the individual project site and is one of the primary measures used to implement the general plan.⁷ The local governing body considers the character of the property as well as its fitness for particular uses. It must enact the regulations in accordance with a well-considered and comprehensive plan intended to avoid arbitrary exercise of government power. A comprehensive plan is a general design to control the use of properties in the entire municipality, or at least in a large portion of it. Individual pieces of property should not be singled out for special treatment. For example, one or two lots may not be placed in a separate zone and subjected to restrictions that do not apply to similar adjoining lands.

Impact Analysis

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to land use and planning.

Would the project:

(a) Physically divide an established community?

The proposed project would result in no impacts in relation to physical division of an established community. As stated in Section 1.4, *Project Location*, the existing condition of the project site consists of a gravel paved, vacant access road located within the established community of Atwood, in the City of Placentia (see Figure 1.4-2, *Local Vicinity Map*). The neighboring cities include Brea to the north, Anaheim to the south, Fullerton to the west, and Yorba Linda to the east. The proposed project area is bound by Orangethorpe Avenue to the north, BNSF/Metrolink railroad tracks to the west, Lakeview Avenue to the east, and Miraloma Avenue to the south. The project would be located adjacent to the southern edge of existing and planned residential uses in the City of Placentia and adjacent to the northern edge of existing industrial and manufacturing land uses concentrated along E. La Palma Avenue in the cities of Placentia and Anaheim (see Figure 1.4-2). The project site is primarily located within the Orange County Flood Control District easement for the concrete-lined and rock/gravel-lined Atwood flood control channel (Atwood Channel). The proposed project would be located within an urbanized portion of the community between Jefferson Street and Lakeview Avenue, adjacent to the Parque de Los Niños (Los Niños Park) and the Veterans Village facility⁸ constructed in 2020 (see Figure 1.4-2 and photos 36–42 in Figure 1.8-1, *Site Photographs Map and Site Photographs*).

⁷ California Office of Planning and Research. N.d. General Plan Guidelines – Chapter 9. Implementation. https://opr.ca.gov/docs/OPR_C9_final.pdf (accessed February 22, 2023).

⁸ City of Placentia. N.d. New Developments: Veterans Village. <https://www.placentia.org/724/Placentia-Veterans-Village> (accessed February 22, 2023).

Existing Community Barriers and Connections

Four north-south streets along the project site (Jefferson, S. Van Buren, Richfield, and Lakeview) provide connections across three existing rail lines (the existing Inland Empire-Orange County Line, Metrolink line, and BNSF railroad) and E. Orangethorpe Avenue, two physical barriers that separate the project area from the majority of residential neighborhoods within Atwood located north of Orangethorpe Avenue:

- (1) Approximately 0.3-mile railroad barrier across E. Orangethorpe Avenue between Jefferson Street and S. Van Buren Street
- (2) Approximately 0.3-mile railroad barrier between S. Van Buren Street and S. Richfield Road
- (3) Approximately 0.4-mile railroad barrier between S. Richfield Road and Lakeview Avenue

Based on site visits conducted in January 2022 to characterize existing conditions, existing land uses in the project area were observed to be a mix of industrial/manufacturing, residential, and flood control infrastructure, separated from the Atwood Channel flood control easement by chain-link fences and other barriers (see Figure 1.8-1). Parque de Los Niños (PDLN) is another existing land use adjacent to the project site, located immediately to the north at the southwestern corner of Richfield Road and E. Orangethorpe Avenue (see Figure 1.4-3). Approximately 0.1 mile west of Richfield Road, at the northern end of Maria Avenue (north of Vincente Avenue), a pedestrian bridge provides a connection across Atwood Channel to Oak Street and PDLN (see photos 17–19 in Figure 1.8-1). Approximately 0.1 mile east of Richfield Road, Fee Ana Street provides an existing roadway connection across Atwood Channel as well.

Atwood Channel is also an existing partial barrier between the existing residential uses south of E. Orangethorpe Avenue, which are concentrated at two locations near the project site (see Figure 1.4-3, *Parcel Map*, Figure 1.6-1, *General Plan Land Use Designations*, and Figure 1.7-1, *Zoning Designations*):

- (1) Single-family residential uses between S. Van Buren Street and S. Richfield Road
 - Atwood Channel provides an approximately 0.17-mile barrier between the existing residential uses from S. Van Buren Street to the pedestrian bridge across the channel to PDLN
 - Atwood Channel provides an approximately 0.12-mile barrier between the existing residential uses from the pedestrian bridge across the channel to PDLN to S. Richfield Road
- (2) Multi-family residential uses between Fee Ana Street and Lakeview Loop
 - Atwood Channel provides an approximately 0.21-mile barrier between the existing residential uses from Fee Ana Street to Lakeview Loop

Construction

Construction of the proposed project would not divide an existing community. Construction activities, including demolition, would be located within the vacant flood control access/maintenance road, which does not currently provide a connection for neighborhoods located north, south, east and west of the project site. Although temporary fencing may be installed along the trail to restrict access to the construction site, construction activities would

not obstruct existing community connections across Atwood Channel. As stated in Section 1.11, *Construction Scenario*, minor traffic control would be required during construction activities at street intersection crossings, including temporary lane and shoulder closures at the intersection of the Atwood Channel and Jefferson Street, Van Buren Street, Richfield Road, Fee Ana Street, Lakeview Loop; and at the following street intersections adjacent to the project site: Van Buren Street/Vincente Avenue, Richfield Road/Nancita Street, Nancita Street/Fee Ana Street, and Lakeview Loop/Lakeview Avenue (from Lakeview Loop at the Atwood Channel to Lakeview Avenue). As the majority of the construction would occur along the channel, no detours are anticipated during construction. The proposed project is anticipated to result in minimal impacts to the existing circulation around the channel and above the intersection and would likely cause minimal delays through the active construction zone when adjacent to public streets. Pedestrian access would be maintained during construction within the public rights-of-way at the streets that intersect with the project site as well as the pedestrian bridge at Maria Avenue.

Operations and Maintenance

The proposed project would result in no impacts in regard to division of a community from operations and maintenance. The proposed project is a trail along Atwood Channel that would not introduce a new barrier to these two residential areas. By providing a multiuse trail that supports walking or biking between N. Jefferson Street and Lakeview Avenue and provides connections to existing bikeways and sidewalks leading 0.7 mile south to the existing Santa Ana River Trail, the proposed project has the potential to increase connectivity within the community of Atwood south of Orangethorpe Avenue (see Section 3.17, *Transportation*). As there are sidewalks along at least one side of the four north-south streets (Jefferson, S. Van Buren, Richfield, and Lakeview) that provide connections across the existing BNSF railroad and Orangethorpe Avenue community barrier, the proposed project would support a more walkable area surrounding the project site. Further, the proposed project would facilitate bicycle connectivity by connecting to the existing Class I Bike Lanes on Lakeview Avenue, mix of Class I and Class III bikeways on Orangethorpe Avenue, and Class III Bike Route on Richfield Road.

The proposed project would advance the City's trail network and enhance pedestrian and bikeway connectivity and opportunities in the community of Atwood. The proposed project site is located in a manner that is compatible with the existing community and would not cause a physical division within the established community of Atwood. Therefore, there would be no impacts to land use and planning resulting in a physical division to the established community. No further analysis is warranted.

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

The proposed project would result in less than significant impacts to land use and planning in relation to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project site is located in the City of Placentia on property under the jurisdiction of Orange County Flood Control District (District; for a County floodway), Caltrans (for Federal-aid Congestion Mitigation Air Quality [CMAQ] Program funding). The project requires the design and environmental certification be completed to the satisfaction of Caltrans based on the Caltrans Local Assistance process and Caltrans environmental procedure. The project is being evaluated by Caltrans for its eligibility for a Categorical Exclusion in accordance with NEPA, under 23 Code of Federal Regulations 771 activity (c)(3). The Land Use Element, Mobility Element, Open Space & Recreation Element,

and Health, Wellness, and Environmental Justice Element of the City of Placentia General Plan;⁹ the Placentia Municipal Code, including Title 23 Zoning;¹⁰ the NFIP;¹¹ the Orange County Flood Control Act;¹² and the City Urban Forest Protection Ordinance¹³ were reviewed to determine the compatibility of the proposed project with adopted land use plans, policies, and regulations. The proposed project is substantially consistent with the goals and policies of the City General Plan, which has established goals, policies, and actions supporting a trail network in the City. The City Municipal Code, including the Zoning Code, does not establish clear land use planning standards or requirements for trails. The proposed project would not conflict with the NFIP or Orange County Flood Control District land use planning, policies, and regulations. As the proposed project would not alter the flood prevention capabilities of Atwood Channel, it would be consistent with the City Water Code. As the proposed project would not require the removal of trees (City, County, or private), it would not conflict with the City Urban Forest Protection Ordinance.

City of Placentia Land Use Planning, Policies, and Regulations

As stated in Section 1, *Project Description*, the City's General Plan land use designations for the 2-acre project site and its immediate vicinity are Density Residential, High Density Residential, Industrial, Commercial-Manufacturing, Parks, and Railroad (see Figure 1.6-1 and Table 1.6-1, *Summary of Existing Land Use Designations*). The project site is not located within a special district. The proposed project would not preclude use of the adjacent land for these designated uses because it would provide a recreational and pedestrian/cyclist transportation use for an existing flood channel maintenance access road that is not currently in use for recreational, industrial, or commercial-manufacturing uses. Although a portion of the project site is used as pedestrian path between a parkette and PDLN (park use), and another portion of the project site is traversed by a railroad, the proposed project would not change these existing designated land uses. The proposed project would be consistent with relevant City land use policies under Goals LU-1, LU-2, and LU-4 of the Land Use Element of the City General Plan intended for the provision of additional open space and recreation uses throughout the city with an emphasis to proximity to residential uses:¹⁴

- **Goal LU-1:** Provide 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-1.5** Where feasible, increase the amount and network of public and private open space and recreational facilities for active or passive recreation as well as for visual relief.

⁹ City of Placentia. 2019. General Plan Update. <https://www.placentia.org/166/General-Plan-Update> (accessed February 22, 2023).

¹⁰ City of Placentia. N.d. Placentia, California Municipal Code. Title 23 Zoning. https://library.qcode.us/lib/placentia_ca/pub/municipal_code/item/title_23 (accessed February 22, 2023).

¹¹ Federal Emergency Management Agency. N.d. National Flood Insurance Program. <https://www.fema.gov/node/404917> (accessed September 8, 2022).

¹² Orange County. 1927. Chapter 36: Orange County Flood Control Act. http://cams.ocgov.com/Web_Publisher_SAM/Agenda12_15_2020_files/images/OCPW20-112%20SUP%20ATTACHMENT%20A_9855677.PDF (accessed February 22, 2023).

¹³ City of Placentia. 2020. Urban Forest Protection Ordinance. <https://www.placentia.org/857/Urban-Forest-Management-Program> (accessed February 22, 2023).

¹⁴ City of Placentia. 2019. General Plan Update. <https://www.placentia.org/166/General-Plan-Update> (accessed February 22, 2023).

- **Project:** Consistent with Policy LU 1.5, the proposed project provides approximately 1.0 mile (5,280 linear feet) of trail accommodating passive recreation use.
- **Goal LU-2:** Ensure that new development is compatible with surrounding land uses, the circulation network, and existing development constraints.
 - **Policy LU-2.12** Establish and maintain recreational open space, areas in proximity to residential areas.
 - **Project:** Consistent with Policy LU 2.12, there are more than 1,000 residential units located within a half mile of the trail, including 50 units at Veterans Village¹⁵ and over 100 other units within a quarter mile of the trail.
- **Goal LU-4:** Improve urban design in Placentia to ensure that development is both architecturally and functionally compatible and to create identifiable neighborhoods, and community areas.
 - **Policy LU-4.4** Develop citywide visual and circulation linkages through strengthened landscaping, pedestrian lighting, and bicycle trails.
 - **Project:** Consistent with Policy LU 4.4, the proposed multi-use trail would include landscaping improvements and provide bicycle access.
 - **Policy LU-4.10** Improve the quality of Placentia's multi-family neighborhoods through a) improved buffers between multi-family residences, and commercial, and business park uses; b) provision of usable private and common open space in multi-family projects; c) increased code enforcement; and d) improved site, building, and landscape design.
 - **Project:** Consistent with Policy 4.10, the proposed project would provide usable open space within walking distance of multi-family residential uses including the Veterans Village project that opened in July 2020.

Further, as stated in Section 1.6, *General Plan Designation*, the proposed project would be consistent with goals and policies in the Mobility Element (Goals MOB-4, MOB-5, and MOB-6), Conservation Element (Goal CON-3), Open Space and Recreation Element (Goals OS&R-1, OS&R-2), and the Health, Wellness and Environmental Justice Element (Goal HW/EJ-7) of the General Plan that promote opportunities for the city to enhance the bikeway network through development of an approximately one-mile multiuse trail that facilitates both bicycle and pedestrian transportation. In particular, the project implements Goal OS&R-3, Action 3.7-1 (connect our street bikeway system into the flood control channel bikeway plan) by providing a multiuse trail along Atwood Channel.

As stated in Section 1.7, *Zoning*, the zoning designations for the project site are Single-Family Residential (R-1), High-Density Multi-Family (R-3), Industrial (M, PMD), and Commercial-Manufacturing (C-M) parcels (see Figure 1.7-1 and Table 1.7-1, *Summary of Existing Land Use and Zoning Designations*). Based on review of the City Zoning Ordinance, trails are not specifically defined as permitted or prohibited uses within these zones (Table 3.11-1, *Recreational Use Allowed within Project Site Zoning Designations*). There are no environmentally based overlay zoning designations in the vicinity of the project site.

¹⁵ City of Placentia. N.d. New Developments: Veterans Village. <https://www.placentia.org/724/Placentia-Veterans-Village> (accessed February 22, 2023).

**TABLE 3.11-1
RECREATIONAL USES ALLOWED WITHIN PROJECT SITE ZONING DESIGNATIONS**

Location within Project Site ¹	General Plan Land Use ²	Zoning Designation	Multiuse Trail Allowed Use? ³
<p>APN 346-162-03 is the proposed optional 0.1-mile trail extension location, along Atwood Channel between N. Jefferson Street and BNSF rail parcel. (To the north of this parcel is an R-3 zoning designation; to the south of this parcel are additional PMD zoned parcels)</p>	<p>Industrial</p>	<p>Planned Manufacturing (PMD)</p>	<p>Recreational uses are not identified within the PMD district. The purpose of the combining PMD is to provide a method by which individual parcels may be developed utilizing a wider variety of building sizes and types than would be possible through the strict application of conventional zoning regulations with the intention that these developments meet the goals of the general plan by providing an alternate method of utilizing industrially zoned land. A trail use needs to avoid conflicting with these uses.</p>
<p>APN 000 is the proposed optional bridge/grade separation over the BNSF railway.</p>	<p>Railroad</p>	<p>n/a</p>	<p>There are no City zoning designations for the BNSF railway parcel or roadways that cross the project site. However, a trail needs to avoid conflicting with the existing railway and roadway uses.</p>
<p>APN 346-164-19 is the proposed main trail location, along Atwood Channel between the BNSF railway and S. Van Buren Street. (To the north is an R-3 zoning designation; to the south are additional M (O) zoned parcels.)</p> <p>APNs 346-015-04 and 346-241-03 are also the proposed main trail location, along Atwood Channel between Richfield Road and Veterans Village. (To the north and south of these parcels is the same M (O) zoning designation.)</p>	<p>Industrial</p>	<p>Manufacturing (M) with Oil Combining District (O)</p>	<p>Recreational uses are not identified within the M district. The purpose of the “M” district is to provide for industrial uses and their related facilities while maintaining an environment free from objectionable noise, odor, dust, or other nuisances. The purpose of the “O” combining district is to provide for the use of land or the surface thereof in connection with the removal of minerals, including, but not limited to, oil, gas and other hydrocarbon substances. A trail use needs to avoid conflicting with these uses.</p>
<p>APNs 346-171-02 and 346-013-16 are the proposed main trail location, along Atwood Channel between S. Van Buren Street and Richfield Road. (To the north and south of these parcels is the same R-1 (O) zoning designation.)</p>	<p>Low Density Residential</p>	<p>Single-Family Residential District (R-1) with Oil Combining District (O)</p>	<p>Public parks are a permitted use; as the purpose of the R-1 district is to stabilize and retain the residential character and integrity of the district, a trail use needs to retain the district’s residential character. The purpose of the “O” combining district is to provide for the use of land or the surface thereof in connection with the removal of minerals, including, but not limited to, oil, gas and other hydrocarbon substances. A trail use needs to avoid conflicting with these uses.</p>

**TABLE 3.11-1
RECREATIONAL USES ALLOWED WITHIN PROJECT SITE ZONING DESIGNATIONS**

Location within Project Site ¹	General Plan Land Use ²	Zoning Designation	Multiuse Trail Allowed Use? ³
APN 346-241-02 is the proposed main trail location, along Atwood Channel immediately south of Veterans Village. (To the north of this parcel is a BNSF railway parcel, and to the south has a M (O) zoning designation.)	High Density Residential	High-Density Multi-Family (R-3)	Public uses, including public parks and playgrounds, are a permitted use; as the purpose of the R-3 district is to stabilize and retain the residential character of the district for medium high density apartment living with substantial space for cooperatively used facilities and open spaces, a trail use needs to retain the district's residential character.
APNs 346-331-09, 000, 346-331-12, and 346-331-13 are the proposed main trail location along Atwood Channel and the proposed 0.15-mile Class II Bike Facility along Lakeview Loop (City zoning maps do not delineate the new Veterans Way and Lakeview Loop roadways.)	Commercial-Manufacturing	Commercial-Manufacturing (C-M)	Recreational uses are not identified within the C-M district. As the purpose of the "C-M" district is to provide a district for uses which combine commercial and industrial characteristics and for certain commercial uses which require large display or storage areas, a trail use needs to avoid conflicting with these uses.
<p>Source: ¹ City of Placentia. N.d. City of Placentia Zoning. https://placentia.maps.arcgis.com/apps/webappviewer/index.html?id=7db81d6cb58d457594207c777c84e046 (accessed September 2, 2022). ² City of Placentia. Produced August 23, 2018. Proposed General Plan Land Use Map. https://data-placentia.opendata.arcgis.com/ (accessed September 2, 2022). ³ City of Placentia. N.d. Placentia, California Municipal Code. Title 23 Zoning. https://library.qcode.us/lib/placentia_ca/pub/municipal_code/item/title_23 (accessed September 1, 2022).</p>			

Orange County Flood Control District Land Use Planning, Policies, and Regulations

The District was established under the Orange County Flood Control Act with a mission to protect Orange County areas from the threat and damage of flooding.¹⁶ Flood control channels such as Atwood Channel convey 100-year flood protection to reduce the floodplain within Orange County, as mapped under the NFIP in Flood Insurance Rate Maps (FIRMs). As stated in Section 3.10, *Hydrology and Water Quality*, the project site is located within a NFIP mapped special flood hazard area. The project site contains Zone AE (Regulatory Floodway) along the Atwood channel and to the South west of the channel, Zone A (special flood hazard zone without base flood elevation) along the channel and to the east, and shaded Zone X (areas between the limits of the 1 percent chance of flood risk [base flood or 100 year flood] and the 0.2 percent annual change [or 500-year] flood) to the north of Atwood Channel.¹⁷ The southern portion of the project site is designated as Zone X (area with reduced flood risk due to levee, with 1% annual flood discharge contained in structure). The Hydrology Report (Appendix F)

¹⁶ Orange County Public Works. N.d. Flood Control Project Process. <https://ocip.ocpublicworks.com/service-areas/oc-infrastructure-programs/flood-control-project-process> (accessed September 6, 2022).

¹⁷ Federal Emergency Management Agency. December 2009. FEMA Flood Map Service Center: Search by Address. Flood map number 06059C0152. <https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20Placentia%2C%20CA#searchresultsanchor> (accessed September 6, 2022).

found that no major hydrological changes would occur as a result of the conversion of a paved access road to a paved trail, which would maintain the overall drainage patterns and existing impervious surface quantities. As the proposed project would be a recreational use on the District's property that does not alter the flood prevention capabilities of Atwood Channel, it would be consistent with Section 2.3 of the City Water Code, which states that, "in addition to its other powers, the board of supervisors shall have the power to permit recreational uses of the flood control district's properties upon a finding by the board of supervisors that said use will not impair or diminish existing or probable future requirements for flood prevention and water conservation."¹⁸

Construction

The construction phase of the project would be minimal and short term, involving site preparation, grading, paving, installation of small new planting areas along the trail, and striping and signage within the project site. Staging areas would be limited to within the empty lots between the Atwood Channel Easement and Vincente Avenue and between S. Van Buren Street and Benjamin Avenue. Minor traffic control would be required during construction at intersection crossing, including, but not limited to, lane and shoulder closers for varied durations (see Section 3.17, *Transportation*). Construction activities are therefore not anticipated to conflict with the neighboring PMD, M(O), R-1, R-3, or C-M zoned uses. The proposed project would not conflict with the Federal or California Endangered Species Act or the Clean Water Act. The project would be required to comply with the Migratory Bird Treaty Act to avoid temporary construction stage effects to existing trees with canopies near or over the project site. No federally listed threatened or endangered species, their critical habitat, or essential fish habitat occur within or adjacent to the proposed construction area, and no wetlands have been observed on the project site (see Section 3.4, *Biological Resources*). As stated in Section 1.11, *Construction Scenario*, Best Management Practices (BMPs) required as part of the Stormwater Pollution Prevention Plan (SWPPP) implementation would be installed to avoid depositing any sediment into the nearby Atwood Channel. No impacts to trees are anticipated to occur.

Operations and Maintenance

Operations activities would involve pedestrian and bicyclist use of the new trail, and maintenance activities would include periodic trail planting care. Maintenance would include irrigation and City-allowed herbicide application to maintain the small new planting areas along the trail. The conversion of the existing flood control access road to a multipurpose trail would not introduce an incompatible land use, as maintenance access for the District would be retained and the proposed project would not restrict the existing residential, commercial, manufacturing, and industrial uses in the vicinity of the existing access road. The proposed project would be generally consistent with District and City planning policies supporting development of trails within flood control properties and near residential uses as long as the flood prevention and adjacent land uses are not adversely affected by the trail use. The proposed project would advance the City's trail network and enhance pedestrian and bikeway connectivity consistent with City planning goals and objectives Atwood. The proposed project is located and designed in a manner that is compatible with the existing floodplain designation as it would not cause a major hydrological change that could impair or diminish existing or probable future requirements for flood prevention and water conservation.

¹⁸ Orange County. 1927. Chapter 36: Orange County Flood Control Act.
http://cams.ocgov.com/Web_Publisher_SAM/Agenda12_15_2020_files/images/OCPW20-112%20SUP%20ATTACHMENT%20A_9855677.PDF (accessed September 6, 2022).

Therefore, the proposed project would result in less than significant impacts to land use and planning related to a conflict with adopted or proposed land use plans, policies, or regulations. No further analysis is warranted.

3.12 MINERAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to mineral resources, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis will be used by the City of Placentia, as an informational document, to support their decision-making role as the Lead Agency under CEQA for the proposed project, and to provide the public an opportunity to comment on the characterization of the baseline conditions and the potential for impacts. Mineral resources at the proposed project site were evaluated with regard to the Conservation Element of the City General Plan² and geospatial data from the California Department of Conservation, including the California Geological Survey,^{3,4} the Geologic Energy Management Division (CalGEM),⁵ and the Division of Mine Reclamation.⁶ The analysis used maps, data, and other information from these sources to assess the potential for the project to result in loss of mineral resources.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Mineral Resource Zone (MRZ): A California Geological Survey designation to indicate the significance of mineral deposits. The MRZ categories follow:

MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.

MRZ-3: Areas containing mineral deposits the significance of which cannot be evaluated from available data.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. 2019. City of Placentia General Plan, Conservation Element. <https://www.placentia.org/166/General-Plan-Update> (accessed September 8, 2022).

³ California Department of Conservation. 1994. Plate 1: Generalized Mineral Land Classification Map of Orange County, CA. In Open File Report 94-15: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part III - Orange County. By R.V. Miller. California Division of Mines and Geology.

⁴ California Department of Conservation. 1983. Plate 4: Santa Ana River and Lower Santiago Creek Resource Areas. In Open File Report 94-15: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part III - Orange County. By R.V. Miller. California Division of Mines and Geology.

⁵ California Department of Conservation, Geologic Energy Management Division (CalGEM). N.d. Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.82999/33.86665/18> (accessed March 28 and September 7, 2022).

⁶ California Department of Conservation, Division of Mine Reclamation. N.d. Mines Online. <https://maps.conservation.ca.gov/mol/index.html> (accessed September 7, 2022).

MRZ-4: Areas where available information is inadequate for assignment to any other MRZ zone.

Impact Analysis

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to mineral resources. Would the project:

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

The proposed project would result in less than significant impacts to mineral resources in relation to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. The California Geological Survey (formerly California Division of Mines and Geology) website provides mineral land classification maps and reports for a given area.⁷ Based on a review of these maps, the proposed project site is situated within an MRZ-2.^{8,9} Designation as an MRZ-2 means that it is an area where geologic data indicate that significant mineral resources are present or likely.

The Conservation Element of the City General Plan states that the only mineral extraction within the City at the present time is petroleum. Oil extraction/pumping operations continue in marketable quantities throughout the City, including at the proposed project site.¹⁰ Based on site visits and review of the CalGEM website, the proposed project area is characterized by several active oil well pumping facilities. These facilities are fenced, and access is restricted. There is one pumping well (Well Z25, API 0405906048) located directly on the proposed trail alignment less than 300 feet east of the South Van Buren Street entrance. The pumping facility is completely fenced and restricted with barbed wire. There is an additional facility (Well Z22, API 0405906312) located on the proposed staging area at South Van Buren Street. Both are identified on the CalGEM website as active oil and gas wells operated by West Energy Operating, LLC.¹¹ All oil well facilities are inaccessible to the public. The proposed trail is designed to avoid the pumping well, and it would remain inaccessible to the public by chain link fence and barbed wire. The oil well operations would not be affected by the proposed project, as neither construction nor operation of the proposed project would interfere with the petroleum extraction.

⁷ California Department of Conservation. N.d. CGS Information Warehouse: Mineral Land Classification/SMARA Maps and Reports. <https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/> (accessed September 7, 2022).

⁸ California Department of Conservation. 1994. Plate 1: Generalized Mineral Land Classification Map of Orange County, CA. In Open File Report 94-15: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part III - Orange County. By R.V. Miller. California Division of Mines and Geology.

⁹ California Department of Conservation. 1983. Plate 4: Santa Ana River and Lower Santiago Creek Resource Areas. In Open File Report 94-15: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part III - Orange County. By R.V. Miller. California Division of Mines and Geology.

¹⁰ City of Placentia. 2019. City of Placentia General Plan, Conservation Element. <https://www.placentia.org/166/General-Plan-Update> (accessed September 8, 2022).

¹¹ California Department of Conservation, Geologic Energy Management Division (CalGEM). N.d. Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.82999/33.86665/18> (accessed September 7, 2022).

The proposed project site consists of the maintenance areas owned and operated by Orange County Flood Control District along the Atwood Channel. The zoning designations along the length of the proposed project site are Single-Family Residential (R-1-O), High-Density Multi-Family (R-3), Industrial (M-O, M-PMD), and Commercial-Manufacturing (C-M) parcels (see Figure 1.7-1, *Zoning Designations*).¹² The purpose of the “O” combining district is to provide for the use of land or the surface thereof in connection with the removal of minerals, including, but not limited to, oil, gas and other hydrocarbon substances.¹³ The remainder of the proposed project site that is not currently used for petroleum extraction is not available for use as a mineral resource and is not planned for use as a mineral resource by the City. Therefore, despite its partial location within an MRZ-2 and the presence of petroleum, the proposed project would result in less than significant impacts related to loss of availability of a known mineral resource, as the Atwood Channel maintenance areas are not intended for additional use as a mineral extraction site. No further analysis is warranted.

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

The proposed project would result in no impacts related to loss of availability of a locally important mineral resource recovery site. Based on review of the California Department of Conservation’s online database of mines, Mines Online, there are no mines at the proposed project site. The nearest mine is a sand and gravel operation approximately 2.6 miles southwest at the Santa Ana River.¹⁴ The Conservation Element of the City General Plan does not list locally important mineral resource recovery sites.¹⁵ The Conservation Element states that the only mineral extraction within the City at the present time is petroleum. Oil extraction/pumping operations continue in marketable quantities throughout the City, as discussed above under question (a). The oil well operations would not be affected by the proposed project, as neither construction nor operation of the proposed project would interfere with the petroleum extraction. Therefore, the proposed project would result in no impacts related to loss of availability of a locally important mineral resource recovery site, as no mineral resource recovery sites would be lost. No further analysis is warranted.

¹² City of Placentia. 2018. Zoning Map. <https://data-placentia.opendata.arcgis.com/> (accessed September 7, 2022).

¹³ City of Placentia. N.d. Placentia, California Municipal Code. Title 23 Zoning. https://library.qcode.us/lib/placentia_ca/pub/municipal_code/item/title_23 (accessed September 1, 2022).

¹⁴ California Department of Conservation, Division of Mine Reclamation. N.d. Mines Online. <https://maps.conservation.ca.gov/mol/index.html> (accessed September 7, 2022).

¹⁵ City of Placentia. 2019. City of Placentia General Plan, Conservation Element. <https://www.placentia.org/166/General-Plan-Update> (accessed September 8, 2022).

3.13 NOISE

This analysis is undertaken to determine if the proposed project may have a significant impact to noise, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines.¹ The noise assessment considers project construction and operation based on the anticipated construction scenario (refer to Section 1.11, *Construction Scenario*). Potential noise impacts were evaluated based on the noise standards in the City of Placentia General Plan, Noise Element, and the City of Placentia Municipal Code.² In relation to the noise criteria, noise measurements were recorded on January 26, 2022, and analyzed for construction and operation of the proposed project (*Appendix G, Noise Measurement Results*).

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

A-weighted Decibel, or dBA: Often used when describing sound level recommendations for healthy listening. While the decibel (dB) scale is based only on sound intensity, the dBA scale is based on intensity and on how the human ear responds. Because of this, dBA provides a better idea of when sound can damage hearing.

Community Noise Equivalent Level (CNEL) is a weighted average of noise level over time.

Decibel: A relative unit of sound measurement corresponding to one-tenth of a bel. It is used to express the ratio of one value of a power or root-power quantity to another, on a logarithmic scale. A logarithmic quantity in decibels is called a level.

Day-Night Average Sound Level (Ldn): The average noise level over a 24-hour period.

Equivalent Continuous Sound Pressure Level (Leq): The constant noise level that would result in the same total sound energy being produced over a given period.

Root Mean Square (RMS): Defined as the process used to determine the average power output (continuous waveform) over a long period of time.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. 2019. City of Placentia General Plan, Noise Element. <https://www.placentia.org/613/General-Plan-Documents>

Impact Analysis

The State CEQA Guidelines recommend the consideration of three questions when addressing the potential for significant impact to noise. Would the project result in:

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

The proposed project would result in potentially significant impacts related to construction noise in relation to exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. After the incorporation of mitigation measures, the proposed project would result in less than significant impacts. Operational noise levels would not be expected to exceed the noise standards established in the local general plan, noise ordinance, or applicable standards of other agencies.

State General Plan Guidelines

The State of California has developed a Land Use Compatibility Matrix for community noise environments that further defines the four categories of acceptance and assigns CNEL values to them (Table 3.13-1, *Community Noise Exposure by Land Use Category*). Pursuant to the State Land Use Compatibility Standards, noise levels of up to 60 dB are acceptable for low density single-family residence, up to 65 dB for multi-family residences, and up to 70 dB for commercial land uses. In addition, the State Building Code (Title 24, California Code of Regulations, Part 2) establishes uniform minimum noise insulation performance standards to protect persons within new hotels, motels, dormitories, long-term care facilities, apartment houses, and residential units other than detached single-family residences from the effects of excessive noise, including, but not limited to, hearing loss or impairment and interference with speech and sleep. Residential structures to be located where the CNEL or Ldn is 60 dBA or greater are required to provide sound insulation to limit the interior CNEL to a maximum of 45 dBA. An acoustic, or noise, analysis report prepared by an experienced acoustic engineer is required for the issuance of a building permit for these structures. Land use changes that result in increased noise levels at residences of 60 dBA or greater must be considered in the evaluation of impacts to ambient noise levels.

**TABLE 3.13-1
COMMUNITY NOISE EXPOSURE BY LAND USE CATEGORY**

Land Use Category	Community Noise Exposure L _{dn} or CNEL, dB						
	Below 55	55-60	60-65	65-70	70-75	75-80	80+
1. Residential – Low Density Single Family, Duplex, Mobile Homes	Normally Acceptable						
	Conditionally Acceptable						
					Normally Unacceptable		
						Clearly Unacceptable	
2. Residential – Multifamily							
3. Transient Lodging – Motels, Hotels							
4. Schools, Libraries, Churches, Hospitals, Nursing Homes							
5. Auditoriums, Concert Halls, Amphitheaters							
6. Sports Arena, Outdoor Spectator Sports							
7. Playgrounds, Neighborhood Parks							
8. Golf Courses, Riding Stables, Water Recreation, Cemeteries							
9. Office Buildings, Business Commercial and Professional							
10. Industrial, Manufacturing, Utilities, Agriculture							

Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: California Governor’s Office of Planning and Research. Updated September 1, 2019. General Plan Guidelines: 2017 Update. Appendix D: Noise Element Guidelines. http://opr.ca.gov/docs/OPR_Appendix_D_final.pdf

The California Governor's Office of Planning and Research's General Plan Guidelines establish corrections for the acceptable community noise levels described above to account for seasons, outdoor residual noise level, previous exposure and community attitudes, and pure tone or impulse. For instance, in a noisy urban residential community (near relatively busy roads or industrial areas), 5 dB should be subtracted from the measured CNEL; in a very noisy urban residential community, 10 dB should be subtracted from the measured CNEL. The guidelines are advisor in nature and local jurisdictions, including the City of Placentia, have the responsibility to set specific noise standards based on local conditions.

City of Placentia General Plan

The Noise Element of the General Plan identifies sources of noise within the City and establishes the policy framework for limiting exposure to objectionable noise. The General Plan includes the following applicable goals and associated policies for addressing noise issues in the community:

Goal N-1: Reduce noise impacts from transportation noise sources.

Policy N-1.3: Reduce transportation noise through proper design and coordination of new or remodeled transportation and circulation facilities.

Policy N-1.8: Require that new equipment purchased by the City of Placentia comply with noise performance standards.

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

Policy N-2.1: Land use planning decisions should be guided by the "normally acceptable" and "conditionally acceptable" community noise exposures, as established by the Office of Planning and Research

Policy N-2.2: Require noise-reduction techniques and mitigation measures in site planning, architectural design, and construction where new projects do not meet the land use compatibility standards

Goal N-5: Develop measures to control non-transportation noise impacts.

Policy N-5.1: Review the City's existing noise ordinance and revise as necessary to better regulate noise-generating uses.

Policy N-5.3: Where possible, resolve existing and potential conflicts between various noise sources and other human activities.

Policy N-5.4: Reduce noise generated by building activities by requiring sound attenuation devices on construction equipment.

The City has adopted noise standards for noise levels to enforce the reduction of objectionable or offensive noises (Table 3.13-2, *Noise and Land Use Compatibility Matrix*). Noise levels are prohibited from exceeding 70 dBA for low-density, single-family residences; 70 dBA for multi-family residences; and 75 dBA for office buildings, business, commercial and professional land uses.

**TABLE 3.13-2
NOISE AND LAND USE COMPATIBILITY MATRIX**

Land Use Category	Community Noise Exposure			
	Ldn or CNEL, dB			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential-Low Density	50–60	60–65	65–75	75–85
Residential-Multiple Family	50–60	60–65	65–75	75–85
Transient Lodging-Motel, Hotels	50–65	65–70	70–80	80–85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50–60	60–65	65–80	80–85
Auditoriums, Concert Halls, Amphitheaters	NA	50–65	NA	65–85
Sports Arenas, Outdoor Spectator Sports	NA	50–70	NA	70–85
Playgrounds, Neighborhood Parks	50–70	NA	70–75	75–85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50–70	NA	70–80	80–85
Office Buildings, Business Commercial and Professional	50–67.5	67.5–75	75–85	NA
Industrial, Manufacturing, Utilities, Agriculture	50–70	70–75	75–85	NA
Note: See Table 3.13-1 for definitions of acceptability. NA = Not Applicable. Source: City of Placentia. 2019. City of Placentia General Plan, Noise Element. https://www.placentia.org/613/General-Plan-Documents .				

The proposed project involves the construction of a 1.0-mile (approximately 20-foot-wide) multiuse trail from BNSF railroad tracks to Lakeview Avenue to expand the bikeway network and enhance pedestrian connectivity. The proposed project would also provide landscaping enhancements, access to three existing trail crossings, and linkage to public transit including rail lines and buses. Construction and operation of the proposed project would be compatible with the Noise Element’s goal, objectives, and policies.

City of Placentia Municipal Code

The Municipal Code exempts construction activities from these requirements if they occur between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between the hours of 9:00 a.m. and 6:00 p.m. on Saturday. Project operations are not exempt. The City’s interior and exterior noise standards for all residential, commercial, and industrial properties are identified are shown in Table 3.13-3, *City of Placentia Noise Ordinance Standards*.

**TABLE 3.13-3
CITY OF PLACENTIA NOISE ORDINANCE STANDARDS**

Noise Zone	Noise Level Limits dBA L _{eq} 1-hour average	Time Period
Exterior Noise Standard		
1	55	7:00 a.m. – 10:00 p.m.
	50	10:00 p.m. – 7:00 a.m.
2	65	Anytime
3	70	Anytime
Interior Noise Standard		
1	55	7:00 a.m. – 10:00 p.m.
	45	10:00 p.m. – 7:00 a.m.
Source: City of Placentia Municipal Code. § 23.76.050 and § 23.76.060. Note: Noise Zone 1: All Residential Property. Noise Zone 2: All Commercial Property. Noise Zone 3: All Industrial Property.		

Noise monitoring was conducted at the project site to characterize ambient noise conditions. Noise monitoring was conducted along the project site at twenty locations for 15-minute intervals and at two locations for a 24-hour interval near the proposed construction staging areas (see Figure 3.13-1, *Noise Measurements for January 26, 2022, Site Visit*, at the end of the section). Ambient noise measurements were recorded with a Larson Davis Spartan 730 Noise Dosimeter (serial number 10381; 10382; 10383; 10385), which meets and exceeds the minimum industry standards performance requirements as defined in the American National Standard Institute (ANSI) S1.4 (Appendix G). The dosimeter was calibrated and the City measuring guidelines were consulted prior to recording measurements. The dosimeter was operated according to the manufacturer's written specifications. The ambient noise conditions range from 53.4 to 73.2 Leq, consistent with the existing land uses (Table 3.13-4, *Ambient Noise Levels*; Appendix G). The peak noise levels during the measurements were due to vehicular use of residents surrounding the project site.

**TABLE 3.13-4
AMBIENT NOISE LEVELS**

Location	Serial #	Date	Start Time	End Time	Leq	Max
1	10382	01/26/22	09:35:36	09:50:36	68.8	84.1
2	10381	01/26/22	09:55:43	10:10:43	58.0	69.7
3	10382	01/26/22	9:58:25	10:13:25	67.5	74.6
4	10383	01/26/22	10:01:44	10:16:44	54.9	73.6
5	10383	01/26/22	10:25:02	10:40:02	55.9	71.3
6	10385	01/26/22	10:29:15	10:44:15	59.0	72.6
7	10383	01/26/22	10:48:13	11:03:13	64.7	77.2
8	10382	01/26/22	10:52:19	11:07:19	70.2	85.0
9	10382	01/26/22	11:13:20	11:28:20	67.4	81.1
10	10383	01/26/22	11:16:26	11:31:25	73.2	88.0
11	10383	01/26/22	11:31:31	11:46:31	65.1	82.8
12	10383	01/26/22	12:07:29	12:22:29	68.8	89.3
13	10382	01/26/22	12:11:20	12:26:20	64.7	76.5
14	10385	01/26/22	12:17:08	12:32:08	63.6	75.0
15	10382	01/26/22	13:05:50	13:20:50	60.0	75.4
16	10381	01/26/22	13:10:11	13:25:11	56.8	72.1
17	10382	01/26/22	13:38:57	13:53:57	62.3	75.8
18	10385	01/26/22	13:41:49	13:56:49	69.2	83.1
19	10382	01/26/22	14:27:17	14:42:17	64.4	84.9
20	10385	01/26/22	14:29:56	14:44:56	55.1	64.8
21	10381	01/26/22	13:31:49	13:31:49	57.6	83.4
22	10383	01/26/22	14:15:10	14:15:10	53.4	75.1

Sensitive Receptors

Land uses considered sensitive by the State of California include schools, playgrounds, athletic facilities, hospitals, assisted living or retirement homes, rehabilitation centers, long-term care, and mental care facilities.³ Sensitive receptors include single-family residences that border the proposed project site to the north and south between South Van Buren Street and Richfield Road; mobile and manufactured home parks between Jefferson Street and the border of Lakeview Avenue; and medium and high-density multi-family residences to the north. The nearest sensitive receptor is a single-family residential parcel (APN 346-182-17), approximately 40 feet north of the proposed project site (see Figure 3.13-1, *Sensitive Receptors*). Sensitive receptors within a quarter mile of the proposed project site include 518 single-family and 53 multi-family residences, seven mobile homes and trailer parks, and one park—Parque de Los Ninos.

Construction

Noise impacts from construction of the proposed project would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise sensitive receptors. Construction activities would generally include site preparation, grading, and paving. Each phase of construction would involve the use of various types of construction equipment and would,

³ City of Placentia. 2019. City of Placentia General Plan, Noise Element. <https://www.placentia.org/613/General-Plan-Documents>

therefore, have its own distinct noise characteristics. The proposed project would require the use of heavy equipment for the site preparation and grading of the project site during the initial phases of the anticipated 8-month construction phase (refer to Section 1.11).

Individual pieces of construction equipment that would be used during construction of the proposed project could potentially generate maximum noise levels ranging from 79 to 85 dBA at the Federal Highway Administration’s reference distance of 50 feet from the noise source (Table 3.13-5, *Noise Levels for Typical Construction Equipment*). These maximum noise levels would occur when equipment is operating under full power conditions (i.e., with the equipment engine at maximum speed). However, equipment on construction sites often operates under less than full power. The ambient noise levels with construction have the potential to exceed the noise level thresholds for the single-family residences that are directly adjacent to the project site.

**TABLE 3.13-5
NOISE LEVELS FOR TYPICAL CONSTRUCTION EQUIPMENT**

Equipment	Estimated Usage Factor* (%)	Typical Noise Level at 50 feet from Source (dBA)
Air Compressors	5	80
Cement and mortar mixer	50	80
Dozer	20	82
Grader	40	85
Roller	20	80
Rubber tired loader	40	79
Tractor / loader / backhoe	40	80

Note: * Usage factor represents the percentage of time the equipment would be operating at full speed.
Source: U.S Environmental Protection Agency. 1974. Background Document for Interstate Motor Carrier Noise Emission Regulations.
 Federal Highway Administration. 2006. FHWA Roadway Construction Noise Model User’s Guide. Prepared by U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center Acoustics Facility.

As indicated in Section 1, *Project Description*, and in compliance with the Municipal Code, construction and maintenance activities would be limited to the hours between 7:00 a.m. to 7:00 p.m. on weekdays, between 9:00 a.m. to 6:00 p.m. on Saturdays, and would prohibit work on federal holidays and Sundays (Municipal Code, Sections 23.76.050 and 23.76.060). The U.S. Environmental Protection Agency (EPA) has established the noise levels for the heavy equipment that will be used during construction to range from 65 to 85 dBA within 50 feet.

Construction noise levels were calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance. Since noise attenuates at a rate of approximately 6.0 dBA per doubling of distance from a point source, the noise impacts on sensitive receptors can be determined by Equation (1) for noise attenuation over distance:

$$(1) \quad L_2 = L_1 - 20 \log_{10} \left(\frac{d_1}{d_2} \right)$$

L_1 = known sound level at d_1

L_2 = desired sound level at d_2

d_1 = distance of known sound level from the noise source

d_2 = distance of the sensitive receptor from the noise source

To characterize construction-phase noise levels more accurately, the average noise level associated with each phase of construction was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction phase. These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

During each phase of construction, there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location of the activity. The EPA has compiled data regarding the noise-generating characteristics of specific types of construction equipment during typical construction phases (Table 3.13-6, *Typical Outdoor Construction Noise Levels*, for a reference distance of 50 feet). Ground-borne noise and other types of construction-related noise impacts would typically occur during the grading construction phase at a level of 89 dBA L_{eq} measured at 50 feet from sensitive receptors. These phases of construction have the potential to create the highest levels of noise generated by construction equipment. For the proposed project, construction equipment listed would be limited to a short duration of use at full power, followed by lower power settings during construction activities.

**TABLE 3.13-6
TYPICAL OUTDOOR CONSTRUCTION NOISE LEVELS**

Construction Phase	Noise Level (dBA L_{eq})	
	50 Feet	50 Feet with Mufflers
Ground clearing	84	82
Excavation, grading	89	86
Structural, paving	85	83
Source: U.S. Environmental Protection Agency. 1971. <i>Noise from Construction Equipment and Operation, Building Equipment and Home Appliances</i> . PB 206717.		

The highest potential noise level during construction with incorporation of equipment mufflers would be 86 dBA (L_1) at 50 feet (d_1) and assuming a construction staging area that is 40 feet (d_2) away from the nearest sensitive receptor located adjacent to the eastern property line, the sound level at the sensitive receptor would be 88 dBA (L_2) from construction. As noise levels during construction have the potential to exceed the significance threshold of 70 dBA for low-density, single-family residences and for multi-family residences, the proposed project would incorporate Mitigation Measure NOISE-1 to reduce construction noise levels to 70 dBA or below at the nearest sensitive receptor located 40 feet from the project boundary. The use of equipment mufflers, noise baffles, and blankets during construction would reduce noise levels by approximately 10 dBA. In addition, the use of temporary sound barriers would reduce sound levels by up to an additional 10 dBA.^{4,5} Further, as discussed in Section 1.11, *Construction Activities (Best Management Practices)*, during construction activities, all vehicles and compressors shall utilize exhaust mufflers and engine enclosure covers at all times and all staging of equipment would be located away from the nearest sensitive receptor to further reduce construction related noise impacts.

⁴ Menge, Christopher W., Christopher J. Rossano, Grant S. Anderson, and Christopher J. Bajdek. 1998. FHWA Traffic Noise Model, © Version 1.0: Technical Manual. Report No. FHWA-PD-96-010 and DOT-VNTSC-FHWA-98-2. John A. Volpe National Transportation Systems Center, Acoustics Facility.

⁵ International Organization for Standardization. 1993. *Acoustics - Attenuation of Sound During Propagation Outdoors - Part 1: Calculation of the Absorption of Sound by the Atmosphere*. International Organization for Standardization, ISO 9613-1:1993.

Operation

Operation and maintenance activities would include irrigation to maintain the landscaping areas along the trail. The proposed project activities would comply with the City's Noise Ordinance. New sources of noise that are attributable to the project would include pedestrians/bicyclists using the trail, and noise from traffic from vehicle trips related to operations and maintenance of the facility. The development of the proposed project would not result in an increase in traffic noise surrounding the project site. The proposed project is not expected to introduce new sources of noise or induce traffic or increase noise levels over existing noise levels on the roadways adjacent to the site; thus, contribute to an audible change of 3 dBA or greater above the existing noise environment.

MM-NOISE-1: Noise levels during construction shall be reduced to below 55 dBA at the nearest sensitive receptor, at approximately 40 feet from the northern edge of the project boundary, abutting the northern and western project boundaries, in compliance with the City of Placentia's conditionally acceptable sound level of 55 dBA for residential land uses. Public Works shall require the use of temporary sound barriers, equipment mufflers, noise baffles, and blankets during construction activities. To reduce noise levels at sensitive receptors during construction activities associated with jack and bore, Public Works shall require the installation of temporary noise walls at the northern boundary of the project site prior to construction activities. Temporary sound barriers would reduce sound levels by up to an additional 10 dBA. Sound walls would be installed along the northern project boundary, which would additionally reduce noise levels by approximately 15 dBA based on placement and structure. The amount of incident sound that a barrier transmits can be described by its sound Transmission Loss (TL) and measurements to determine a barrier's TL shall be made in accordance with American Society for Testing and Materials (ASTM) Recommended Practice E413-87. Public Works and/or Contractor shall perform noise monitoring during construction to verify compliance with the City's noise limits in the event of public complaints, if any, or anticipated noise threshold exceedances.

Construction and operation activities associated with the proposed project would, therefore, result in less than significant impacts with the incorporation of Mitigation Measure NOISE-1, in relation to exposing sensitive receptors to noise levels exceeding the standards established by the Municipal Code. The proposed project would comply with all applicable construction standards and requirements.

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

The proposed project would result in less than significant impacts to noise in relation to generation of excessive ground-borne vibration or ground-borne noise. Ground-borne vibration in the project site is limited to minor traffic-induced vibrations from nearby streets, highways, and freeway vehicular traffic. At the time of the characterization of the baseline conditions in January 2022, there were no construction projects, oil fields, mining operations, blasting, or other activities resulting in ground-borne vibrations within the project site or vicinity. Construction of the proposed project would not require blasting or other activities that would result in excessive ground-borne vibrations. The construction equipment used during construction would not produce substantial vibration impacts.

Typical vibration levels from trucks, which will be used during construction, is 0.076 peak particle velocity (PPV) at 25 feet (inches per second). Vibration levels reduce quickly with distance away

from the source, so vibration would decay below the 0.05 inch per second RMS vertical velocity threshold at the residential housing located immediately adjacent to the project. Equipment such as pile drivers, which produce higher vibration levels, would not be used during the construction.

U.S. Department of Transportation, Federal Transit Administration (FTA) guidelines were utilized in determining vibration impacts. The FTA measures building vibration damage in PPV, which is measured in inches per second (Table 3.13-7, *FTA Construction Vibration Impact Criteria for Building Damage*). The FTA guidelines provide vibration criterion which indicates the significant impact level. While the proposed project does not involve the construction of any buildings, the criterion of 0.2 inch per second for non-engineered timber and masonry buildings will be used for the purpose of this analysis.

**TABLE 3.13-7
FTA CONSTRUCTION VIBRATION IMPACT CRITERIA FOR BUILDING DAMAGE**

Building Category	PPV (inches per second)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: U.S. Department of Transportation, Federal Transit Administration. 2006. Transit Noise and Vibration Impact Assessment.	

Construction

Construction of the proposed project would generate ground-borne vibration during grading and earth-moving activities. The FTA has published standard vibration velocities for various construction equipment operations. The typical vibration levels (in terms of inches per second PPV) at a reference distance of 25 feet, 50 feet, and 100 feet for construction equipment used during construction activities are listed in Table 3.13-8, *Vibration Source Levels for Construction Equipment*.

**TABLE 3.13-8
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT**

Equipment	PPV at 25 feet (in/sec)	PPV at 50 feet (in/sec)	PPV at 100 feet (in/sec)
Vibratory roller	0.210	0.074	0.026
Large bulldozer	0.089	0.031	0.011
Loaded trucks (haul truck)	0.076	0.027	0.010
Small bulldozer	0.003	0.001	0.000
Note: PPV = peak particle velocity; in/sec = inches per second. *Assumed to be comparable to pile driving methods. Source: Federal Transit Administration. 2006. Transit Noise and Vibration Impact Assessment.			

Construction of the proposed project would not include demolition or pile driving methods, and as such, impacts from these activities are not included in this construction vibration analysis. As indicated in Table 3.13-8, vibration velocities from most heavy construction operations that would be used during construction of the proposed project would range from 0.000 to 0.026 inch per

second PPV at a reference distance of 100 feet from the equipment. These levels are well below the potential damage threshold of 0.2 inch per second.

Ground-borne vibration from construction rarely results in a negative response from people who are outdoors. Negative responses are typically associated with the shaking of the building where the person is located. Since construction vibration is transient, the Caltrans guidance manual can be used to categorize the potential human response to construction-induced vibration (Table 3.13-9, *Human Response to Transient Vibration*).⁶

**TABLE 3.13-9
HUMAN RESPONSE TO TRANSIENT VIBRATION**

Average Human Response	PPV (in/sec)
Severe	2.000
Strongly perceptible	0.900
Distinctly perceptible	0.240
Barely perceptible	0.035
Note: PPV = peak particle velocity; in/sec = inches per second.	

The nearest sensitive receptor to the proposed project activities would be a residence located approximately 40 feet north of the proposed project site. Solving for Equation (2) provides a maximum vibration level of 0.04 PPV at the closest sensitive receptor, which is considered barely perceptible according to the Caltrans guidance manual.

$$(2) \quad PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

PPV_{equip} is the peak particle velocity in in/sec of the equipment adjusted for distance

PPV_{ref} is the reference vibration level in in/sec at 25 feet

D is the distance from the equipment to the receiver

Operation

There would be no impacts during operations, as operation of the proposed project would not include the use of any ground-borne vibration producing equipment. Vibration levels from operations and maintenance activities would include minor irrigation efforts to maintain the landscaping areas along the trail. Day-to-day trails operation and maintenance activities would be conducted according to the City of Placentia Municipal Code.

All construction and operation activities would be undertaken in accordance with all federal, state, county, and City building codes. There would, therefore, be less than significant impacts to noise during construction and operations related to generation of excessive ground-borne vibration or ground-borne noise. No further analysis is warranted.

⁶ California Department of Transportation. 2004. Transportation- and Construction-Induced Vibration Guidance Manual.

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

The proposed project would result in less than significant impacts to noise in relation to being located within a private airstrip or airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The John Wayne Airport is located 1.5 miles southwest to the proposed project site. The proposed project would not result in population growth and, therefore, would not result in people residing in the project area and being exposed to excessive noise levels. There would be workers present during construction and maintenance activities, but those activities would be temporary and intermittent in nature. Therefore, impacts would be less than significant, and no further analysis is warranted.

3.14 POPULATION AND HOUSING

This analysis is undertaken to determine if the proposed project may have a significant impact to population and housing, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of population and housing effects has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City in their capacity as a Lead Agency pursuant to CEQA to support their decision-making in relation to the proposed project. This analysis was undertaken to evaluate the potential impacts of the proposed project in regard to population and housing and to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts if identified as a result of the proposed project. The proposed project could affect population and housing if it directly or indirectly induced unplanned population growth, such as through the expansion of utility infrastructure into an area not currently served by utilities, or if it displaced people or houses. Population and housing at the proposed project site were evaluated with regard to state, regional, and local data and forecasts for population and housing, including U.S. Census Bureau and SCAG data,^{2,3,4} State of California Economic Development Department Data,⁵ the City of Placentia General Plan,⁶ and the proximity of the proposed project site to existing and planned utility infrastructure. As the project site is located within the City, the Land Use and Housing Elements of the City of Placentia General Plan^{7,8} and City Zoning Code⁹ were evaluated to fully inform the public related to the potential effects of the project in relation to population and housing. To assess the potential to induce unplanned population growth or to displace a substantial number of existing people or housing, the property and surrounding areas were evaluated based on site reconnaissance conducted in January 2022 and allowable housing and population growth rates in adopted plans.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² U.S. Census Bureau. July 2021. Placentia City, California Population Estimates. <https://www.census.gov/quickfacts/fact/table/placentiacitycalifornia,US/PST045221> (accessed August 31, 2022).

³ Southern California Association of Governments. May 2019. Profile of the City of Los Angeles. <https://www.scag.ca.gov/Documents/LosAngeles.pdf>

⁴ Southern California Association of Governments. September 2020. Demographics and Growth Forecast Technical Report. 3 September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf (accessed August 31, 2022).

⁵ State of California, Employment Development Department. 2019. Labor Market Information for Orange County Profile. <https://www.labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=Orange+County&selectedindex=30&menuChoice=localAreaPro&state=true&geogArea=0604000059&countyName=> (accessed August 31, 2022).

⁶ City of Placentia. 2009. City of Placentia General Plan. <https://www.placentia.org/613/General-Plan-Documents> (accessed August 31, 2022).

⁷ City of Placentia. March 15, 2022. City of Placentia Housing Element 2021-2029. https://www.placentia.org/DocumentCenter/View/9654/Placentia-6th-Housing-Element_2022-03-15_adopted (accessed February 16, 2023).

⁸ City of Placentia. 2019. City of Placentia General Plan. Chapter 2: Land Use Element. <https://www.placentia.org/166/General-Plan-Update> (accessed February 16, 2023).

⁹ City of Placentia. N.d. Placentia Municipal Code, Title 23 Zoning, Chapter 23.84.010 Nonconforming use of land. https://library.qcode.us/lib/placentia_ca/pub/municipal_code/item/title_23-chapter_23_84-23_84_010 (accessed August 31, 2022).

NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Unplanned Population Growth: An increase in the number of people that reside in a country, state, county, or city, beyond that anticipated by adopted planning documents such as the City General Plan.

Displacement of People: Direct displacement of current residents occurs when (1) residents can no longer afford to remain in their homes due to rising housing bills (rents or property taxes); or (2) residents are forced out due to causes such as eminent domain, lease nonrenewals, and evictions to make way for new development or physical conditions that render their homes uninhabitable. While displacement occurs routinely in low-income neighborhoods, when displacement occurs in the context of changes in the physical and social character of the neighborhood, it becomes a characteristic of gentrification.¹⁰

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impacts to population and housing:

Would the project:

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

The proposed project would result in no impacts to population and housing in relation to inducing substantial direct or indirect population growth. The proposed project is a multipurpose trail that would not directly or indirectly induce population growth. No new houses would be built; no new businesses would be introduced; and because the project site is located in an urban context, there is no need to extend infrastructure into any areas not currently served via roads and utilities as a result of the proposed project. The project would not result in a substantial increase in population as a result of the proposed construction activities or operations. The construction and operations employment needs include construction labor for the duration of the project and operation of the new trail. These changes would not increase staff such as to induce substantial unplanned population growth. There are sufficient available labor supplies within 30 miles of the project site to support design, construction, operation, and maintenance of the trail.¹¹ The project area is located in the center of a dense urban area with a high population and readily available workforce, and labor needs would be met through the available labor in Orange County. The labor force as of July 2022 for Orange County is 1,595,100 with an unemployment rate of 2.8 percent.¹² July 2022 construction industry data in the Anaheim-Santa Ana-Irvine

¹⁰ The University of Texas. 2020. Background: Gentrification and Displacement. Retrieved from: <https://sites.utexas.edu/gentrificationproject/gentrification-and-displacement-in-austin/> (accessed September 6, 2022).

¹¹ State of California, Employment Development Department. 2020. Monthly Labor Force Data for Cities and Census Designated Places (CDP). <https://www.labormarketinfo.edd.ca.gov/geography/orange-county.html> (accessed September 7, 2022).

¹² State of California, Employment Development Department. September 1, 2022. Unemployment Rates and Labor Force. Labor Market Information for Anaheim-Santa Ana-Irvine Metropolitan District (Orange County). <https://www.labormarketinfo.edd.ca.gov/geography/orange-county.html> (accessed September 7, 2022).

District starts at 1,595,100 employed, up from 1,573,100 at the beginning of 2022.¹³ Therefore, there is sufficient labor supply within the county to support construction, operation, and maintenance of the multipurpose trail. Local contractors and employees would be available and would not require labor forces to move to or near the project area as a direct result of the proposed project. Therefore, there would be no impacts to population and housing related to inducing substantial direct or indirect population growth, and no further analysis is warranted.

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

The proposed project would result in no impacts to population and housing in relation to the displacement of substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere. The project site is characterized as a flood control access road and small sections of existing streets and an existing railroad. Based on site visits conducted in January 2022 to characterize existing conditions, no people were observed living on the project site, which is separated from the Atwood Channel flood control easement and nearby residential land uses by chain-link fences and other barriers (see Figure 1.8-1, *Site Photographs Map and Site Photographs*). The proposed project is a 1.0-mile trail that is not anticipated to directly or indirectly displace housing in the project area. There is no existing housing, or any proposed housing for construction, within the proposed project site.¹⁴ The proposed project is intended to improve the connectivity of the City's active transportation network and is not anticipated to increase property values such that residents would no longer be able to afford staying in their homes. The proposed project would not require any eminent domain or evictions to make way for new development, and no indirect displacement is anticipated from the project. Therefore, there would be no impacts to population and housing related to the displacement of substantial amounts of existing people or housing, and no further analysis is warranted.

¹³ State of California, Employment Development Department. 2019. Industry Employment Official Monthly Estimates (CES): Los Angeles-Long Beach-Glendale Metropolitan District Construction Industry Number of Employed Data. Labor Market Information Resources and Data. <https://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/areaselection.asp?tablename=ces>

¹⁴ City of Placentia. 2009. City of Placentia General Plan. <https://www.placentia.org/166/General-Plan-Update> (accessed February 16, 2023).

3.15 PUBLIC SERVICES

This analysis is undertaken to determine if the proposed project may have a significant impact to public services, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis will be used by the City of Placentia (City), as an informational document, to support their decision-making role as the Lead Agency under CEQA for the proposed project, and to provide the public an opportunity to comment on the characterization of the baseline conditions and the potential for impacts. This analysis was undertaken to evaluate the potential impacts of the proposed project in regard to public services; and identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts if identified as a result of the proposed project. Public services at the proposed project site were evaluated with regard to the Safety Element of the City General Plan,² the Open Space and Recreation Element of the City General Plan,³ and the Placentia-Yorba Linda Unified School District.⁴ The analysis used maps, data, and other information from these sources to assess the potential for the project to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

State CEQA Guidelines recommend the consideration of the following question when addressing the potential for significant impact to public services:

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

1) Fire protection

The proposed project would result in no impacts in relation to substantial adverse physical impacts associated with new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. October 2019. City of Placentia General Plan. Safety Element. <https://www.placentia.org/DocumentCenter/View/8391/7-Safety?bidId=>

³ City of Placentia. October 2019. City of Placentia General Plan. Open Space and Recreation Element. <https://www.placentia.org/166/General-Plan-Update> (accessed September 9, 2022).

⁴ Placentia-Yorba Linda Unified School District. N.d. Boundary Maps. https://www.pylusd.org/apps/pages/index.jsp?uREC_ID=206487&type=d&pREC_ID=453794 (accessed September 14, 2022).

Based on review of the Safety Element of the City General Plan, fire protection in the City is provided by the Placentia Fire and Life Safety Department (PFLSD).⁵ The PFLSD is comprised of career firefighters and reserve staff to support large-scale incidents, and it has access to a well-developed network of water systems to adequately respond to large-scale fires that may occur within the City. The City has two fire stations: Station 1 and Station 2 (Table 3.15-1, *City Fire Stations*). Station 1 is located approximately 2.1 miles or a 5-minute drive northwest of the proposed project site and would provide fire protection services in case of emergency.

**TABLE 3.15-1
CITY FIRE STATIONS**

Station	Location	Personnel/Equipment	Distance to Site / Drive Time
No. 1	110 South Bradford Avenue, Placentia, CA 92870	Engine 1	2.1 miles / 5 minutes
No. 2	1530 North Valencia Avenue, Placentia, CA 92870	PFLSD Battalion Chief; a Quint / Aerial Apparatus, and a rapid response apparatus	2.3 miles / 6 minutes
Source: City of Placentia. October 1, 2019. City of Placentia General Plan. Safety Element. https://www.placentia.org/DocumentCenter/View/8391/7-Safety?bidId=			

The proposed project includes construction and operation of approximately 1.0 mile of recreational facilities comprised of a multi-use trail along the existing access road for Atwood Channel and existing paved roadways.

Construction of the proposed project would not result in the need for new or physically altered fire protection facilities, as construction activities would occur temporarily over a period of 8 months, during which there would not be an increased need for fire protection services. Construction work would occur within the maintenance areas for Atwood Channel, and staging areas would be situated within disturbed vacant lots. Fire protection access would not be hindered during construction. Operation of the proposed project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure (see Section 3.14, *Population and Housing*). As there would be no net increase in population, there would be no need for additional firefighting personnel or new or expanded fire stations as a result of the proposed project. The proposed project site would continue to be served by PFLSD due to its location in the City.

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

2) Police protection

The proposed project would result in no impacts in relation to substantial adverse physical impacts associated with new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Based on review of the Safety Element of the City General Plan, the City Police Department station is located within

⁵ City of Placentia. October 2019. City of Placentia General Plan. Safety Element.
<https://www.placentia.org/DocumentCenter/View/8391/7-Safety?bidId=>

the City Civic Center at 401 East Chapman Avenue, approximately 1.6 miles or a 4-minute drive west of the proposed project site.⁶

The proposed project includes construction and operation of approximately 1.0 mile of recreational facilities comprised of a multi-use trail along the existing access road for Atwood Channel and existing paved roadways. Construction of the proposed project would not result in the need for new or physically altered police protection facilities, as construction activities would occur temporarily over a period of 8 months, during which there would not be an increased need for police protection services. Operation of the proposed project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no net increase in population, there would be no need for additional police personnel or new or expanded police stations as a result of the proposed project. The proposed project site would continue to be served by the City Police Department due to its location in the City.

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

3) Schools

The proposed project would result in no impacts in relation to substantial adverse physical impacts associated with new or physically altered school facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

The proposed project site is served by the Placentia-Yorba Linda Unified School District.⁷ Within the school district, the nearest elementary school facility is Glenview Elementary School (approximately 0.4 mile northeast), the nearest middle school facility is Valadez Middle School (approximately 2.0 miles southwest), and the nearest high school facility is El Camino Real High School (approximately 0.1 mile northwest).⁸

The proposed project includes construction and operation of approximately 1.0 mile of recreational facilities comprised of a multi-use trail along the existing access road for Atwood Channel and existing paved roadways. The proposed project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no net increase in population, there would be no need for new or expanded school facilities as a result of the proposed project.

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered school facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

⁶ City of Placentia. October 2019. City of Placentia General Plan. Safety Element.
<https://www.placentia.org/DocumentCenter/View/8391/7-Safety?bidId=>

⁷ Placentia-Yorba Linda Unified School District. N.d. Boundary Maps.
https://www.pylusd.org/apps/pages/index.jsp?uREC_ID=206487&type=d&pREC_ID=453794 (accessed September 14, 2022).

⁸ Placentia-Yorba Linda Unified School District. N.d. Boundary Maps.
https://www.pylusd.org/apps/pages/index.jsp?uREC_ID=206487&type=d&pREC_ID=453794 (accessed September 14, 2022).

4) Parks

The proposed project would result in no impacts in relation to substantial adverse physical impacts associated with new or physically altered park facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

The City of Placentia has adopted an Open Space and Recreation Element in its General Plan that establishes park development standards of 4 acres per 1,000 residents, for a total goal of 202 acres.⁹ The City has met and exceeded its goal, with 224.2 acres of existing parks. As stated in Section 1.6, *General Plan Designation*, and Section 1.8.2, *Existing Conditions*, the project site is located immediately south of Parque de Los Niños (PDLN)/Los Niños Park, an approximately 3.7-acre community park managed by the City of Placentia, and an unnamed parkette (see Figure 3.15-1, *City of Placentia Parks and Public School Open Space*, at the end of this section).¹⁰

The proposed project includes construction and operation of approximately 1.0 mile of recreational facilities comprised of a multi-use trail along the existing access road for Atwood Channel and existing paved roadways. The proposed project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no net increase in population, there would be no need for new or expanded park facilities as a result of the proposed project.

Although the proposed project would involve construction of a new recreational resource, the impacts associated with planning, construction, operation, and maintenance of the proposed trail have been fully evaluated in this document, and the determination has been made that the trail would result in no adverse physical effect on the environment.

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered park facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

5) Other public facilities

The proposed project would result in no impacts in relation to substantial adverse physical impacts associated with new or physically altered public facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

The proposed project site is currently used by the Orange County Flood Control District (District) for maintenance of the Atwood Channel, and it is fenced and locked to the public. The proposed project would not require the construction of new maintenance roads for the District as a result of the proposed project, and the proposed project does not involve the construction of public facilities beyond the recreational usage (please see above). The proposed project would not directly or indirectly induce population growth because it does not include the development of new homes, habitable structures, businesses, roads, or infrastructure. As there would be no net increase in population, there would be no need for new or expanded public facilities as a result of the proposed project to serve a new population.

⁹ City of Placentia. October 2019. City of Placentia General Plan. Open Space and Recreation Element. <https://www.placentia.org/166/General-Plan-Update> (accessed September 9, 2022).

¹⁰ Placentia. N.d. Facilities. <https://www.placentia.org/Facilities?clear=True> (accessed August 16, 2022).

Therefore, there would be no impacts in relation to substantial adverse physical impacts associated with new or physically altered public facilities in order to maintain acceptable service ratios, response times, or other performance objectives. No further analysis is warranted.

3.16 RECREATION

This analysis is undertaken to determine if the proposed project may have a significant impact to recreation, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of recreation effects has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia, in their capacity as a Lead Agency pursuant to CEQA and the associated decision-making responsibility in relation to the proposed project. This analysis was undertaken to evaluate the potential impacts of the proposed project in regard to recreation; and identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts to recreation if identified as a result of the proposed project. Existing and proposed parks in the vicinity of the project site, including trails, have been characterized based on a review of the Open Space and Recreation Element of the City General Plan,² the City's Facilities website,^{3,4} and Orange County (OC) Parks' Santa Ana River Regional Trail Map,⁵ and the Rails-to-Trails Conservancy's Santa Ana River Trail Map.⁶ Recreation at the proposed project site was evaluated by reviewing the conceptual design and comparing the existing conditions to proposed post-project conditions.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Bike Trails are identified as a recreational facility opportunity within Placentia's flood control facilities under Placentia General Plan Open Space and Recreation Element Goal 3.7. A bike trail is an unpaved area for bicycles.

Community Park is defined in the Open Space and Recreation Element as a generally 5- to 10-acre park with a service radius of approximately 3 miles.

Multi-Use Trails are identified as a recreational facility opportunity within abandoned road and railroad rights-of-way and similar environmentally impacted or unused linear open space under Placentia General Plan Open Space and Recreation Element Goal 1.8. A multi-use trail is designed to accommodate a variety of user groups on the same trail and is most commonly designated for cyclists, equestrians, and pedestrians.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. October 2019. General Plan Update. Chapter 6: Open Space and Recreation Element. <https://www.placentia.org/DocumentCenter/View/8397/Open-Space-and-Recreation?bidId=> (accessed February 22, 2023).

³ City of Placentia. N.d. Facilities. <https://www.placentia.org/Facilities?clear=True> (accessed February 22, 2023).

⁴ City of Placentia. 2018. Facilities Map. <https://www.placentia.org/DocumentCenter/View/31/Facility-and-Park-locations?bidId=> (accessed February 22, 2023).

⁵ OC Parks. N.d. Santa Ana River Regional Trail. <https://www.ocparks.com/sites/ocparks/files/2021-04/Santa%20Ana%20River%20Trail%20Map.pdf> (accessed February 22, 2023).

⁶ Rails-to-Trails Conservancy. N.d. TrailLink. Santa Ana River Trail Map. <https://www.traillink.com/trail/santa-ana-river-trail/> (accessed February 22, 2023).

Neighborhood Park is defined in the Open Space and Recreation Element as a typically 1- to 5-acre park with a neighborhood service radius of 1/2 half mile (or a 5- to 15-acre park adjacent to a school that generally serves a residential area of 1 square mile, bounded by arterial streets, and is served by an elementary school).

Parkettes are defined in the Open Space and Recreation Element of the Placentia General Plan as 1 acre or smaller passive recreation areas with a quarter-mile service area.⁷

Special Use Facilities are defined in the Open Space and Recreation Element as recreational facilities that provide a specific recreational service, such as golf courses, zoos, and athletic complexes.

Sub-Regional Parks are defined in the Open Space and Recreation Element as generally 25- to 50-acre parks with a service area of 3 miles or greater. Tri-City Park is a 40-acre designated sub-regional park, 13.3 acres of which are credited to Placentia. Nature trails are a typical recreational facility established in the City's Park Development Guidelines for Sub-Regional Parks.

Impact Analysis

The State CEQA Guidelines recommend the consideration of two questions when addressing the potential for significant impact to recreation:

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

The proposed project would result in no impacts to recreation in relation to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration. As stated in Section 1.6, *General Plan Designation*, and Section 1.8.2, *Existing Conditions*, the project site is located immediately south of Parque de Los Niños (PDLN)/Los Niños Park, an approximately 3.7-acre community park managed by the City of Placentia, and an unnamed parkette (see Figure 3.15-1, *City of Placentia Parks and Public School Open Space*, in Section 3.15, *Public Services*).⁸ An existing pedestrian bridge crosses the project site to provide recreation access to PDLN from Vincente Avenue (see Photo 17 in Figure 1.8-1, *Site Photographs*). The pedestrian bridge starts and ends with a concrete path across each side of the channel. On the northern side of Atwood Channel, the concrete path across the existing flood control access road is lined with chainlink fences to the east and west to facilitate Orange County Flood Control District access for maintenance purposes. These chainlink fences would remain closed during construction, with pedestrian access maintained from Vincente Avenue to PDLN.

⁷ City of Placentia. October 2019. General Plan Update. Chapter 6: Open Space and Recreation Element. <https://www.placentia.org/DocumentCenter/View/8397/Open-Space-and-Recreation?bidId=> (accessed February 22, 2023).

⁸ City of Placentia. N.d. Facilities. <https://www.placentia.org/Facilities?clear=True> (accessed February 22, 2023).

The City of Placentia has adopted an Open Space and Recreation Plan in its General Plan that establishes park development standards of 4 acres per 1,000 residents, for a total goal of 202 acres.⁹ The City has met and exceeded its goal, with 227.3 acres of existing parks (Table 3.16-1, *Existing City Parks and Recreation Facilities near Project Site*). Placentia Champions Sports Complex is located approximately 0.5 mile north of the project site, and Parque de los Vaqueros is located approximately 1.2 miles north. The project site is also located approximately 0.5 mile north of bicycle-friendly roads along the northern/western side of the Santa Ana River and approximately 0.7 mile north of the 50.3-mile Santa Ana River Regional Trail, within the nearby City of Anaheim.^{10,11} The proposed project is a 1.0-mile multipurpose trail intended to close gaps in Placentia's active transportation network and provide a greater connectivity and safety to the existing trail network. Although construction of the proposed project would be located immediately adjacent to PDLN, construction activities would not enter the park or obstruct access from the existing pedestrian bridge across Atwood Channel. As stated in Section 3.14, *Population and Housing*, it would not result in an increase, during the construction or operations phases, in the number of people, residents, or visitors, that would avail themselves of existing recreational facilities. Therefore, there would be no impacts to recreation related to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration of existing facilities. No further analysis is warranted.

⁹ City of Placentia. Adopted October 1, 2019. General Plan Update. Chapter 6: Open Space and Recreation Element. <https://www.placentia.org/DocumentCenter/View/8397/Open-Space-and-Recreation?bidId=> (accessed February 22, 2023).

¹⁰ OC Parks. N.d. Santa Ana River Regional Trail. <https://www.ocparks.com/sites/ocparks/files/2021-04/Santa%20Ana%20River%20Trail%20Map.pdf> (accessed February 22, 2023).

¹¹ Rails-to-Trails Conservancy. N.d. TrailLink. Santa Ana River Trail Map. <https://www.traillink.com/trail/santa-ana-river-trail/> (accessed February 22, 2023).

**TABLE 3.16-1
EXISTING CITY PARKS AND RECREATION FACILITIES NEAR PROJECT SITE**

Park Category¹	Park Name	Park Acreage	Distance from Project Site²
Parkette	Jaycee Parkette	0.40	2.4 miles west-southwest
	La Placita Parkette	0.90	2.3 miles southwest
Neighborhood	Goldenrod Park	2.50	1.5 miles northwest
	Koch Park	4.30	2.5 miles northwest
	Wagner Park	1.80	1.9 miles northwest
	Santa Fe Park	1.10	2.3 miles west
	Parque del Arroyo Verde	4.40	1.3 miles northwest
	Parque de Los Vaqueros	5.40	1.2 miles north
	Richard R. Samp Park	3.40	1.2 miles northwest
	Community	Parque de Los Niños	3.70
Kraemer Park		11.00	2.0 miles west
McFadden Park		3.90	2.1 miles southwest
Special Use Facilities	Tuffree Park	3.40	2.9 miles northwest
	Bradford Park/House	1.70	2.1 miles northwest
	Placentia Champions Sports Complex	13.00	0.5 mile north
Institutional Use (Yorba Linda Unified School District [YLUSD] Elementary School Open Space)*	Ruby Drive Elementary School	5.10	2.2 miles northwest
	Morse Elementary School	4.20	1.6 miles northwest
	Sierra Vista Elementary School	5.30	2.9 miles northwest
	Brookhaven Elementary School	5.00	2.3 miles northwest
	Golden Elementary School	4.75	2.5 miles north-northwest
	Wagner Elementary School	6.30	1.8 miles northwest
	Van Buren Elementary School	5.40	1.2 miles north
	Melrose Elementary School	4.70	2.1 miles west-southwest
	Tynes Elementary School	7.50	1.1 miles west-northwest
	George Key School	5.05	2.6 miles northwest
Institutional Use (YLUSD Middle School Open Space)*	Kraemer Middle School	11.35	1.7 miles west-northwest
	Tuffree Middle School	10.10	2.8 miles northwest
	Valadez Middle School	5.60	2.0 miles west-southwest
Institutional Use (YLUSD High School Open Space)*	El Dorado High School	19.55	2.0 miles northwest
	Valencia High School	20.85	1.7 miles west-northwest
	El Camino High School	2.55	0.2 mile north-northwest
Subregional	Tri-City Park	40.00	2.9 miles northwest
Total Park Acreage		224.20	
Source:			
¹ City of Placentia. Adopted October 1, 2019. General Plan Update. Chapter 6: Open Space and Recreation Element. Tables 6-2 and 6-3. https://www.placentia.org/DocumentCenter/View/8397/Open-Space-and-Recreation?bidId= (accessed February 22, 2023).			
² City of Placentia. Spring 2018. Facilities Map. https://www.placentia.org/DocumentCenter/View/31/Facility-and-Park-locations?bidId= (accessed February 22, 2023).			
Note: * One-half of the City's school acreage is credited to the City's open space inventory.			

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

The proposed project would result in less than significant impacts to recreation in relation to adverse physical effects on the environment as a result of existing recreational facilities or proposed construction or expansion of recreational facilities. A trail is considered to be a recreational resource. The project site is an existing fenced paved access road along a flood control channel. The proposed project includes construction and operation of approximately 1.0 mile of recreational facilities comprised of a multi-use trail along the existing access road for Atwood Channel and existing paved roadways. Although the proposed project would involve construction of a new recreational resource, the impacts associated with planning, construction, operation, and maintenance of the proposed trail have been fully evaluated in this document, and the determination has been made that the trail would result in no adverse physical effect on the environment. Construction would be of a short 8-month duration, with construction staging on previously disturbed empty lots. The operation stage for the project would be similar to the existing condition, as the proposed trail would have a paved surface similar to the existing paved road, and access road vehicles would continue to maintain the flood control channel. As stated in Section 3.14, *Population and Housing*, it would not result in a population increase, during the construction or operations phases, in the number of people, residents, or visitors, that would require the expansion of existing recreational facilities. Therefore, the proposed project would result in less than significant impacts to recreation related to adverse physical effects on the environment as a result of existing recreational facilities or proposed construction or expansion of recreational facilities. No further analysis is warranted.

3.17 TRANSPORTATION

This analysis is undertaken to determine if the proposed project may have a significant impact to transportation, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of transportation has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia, in their capacity as a Lead Agency pursuant to CEQA and the related decision-making for the proposed project. Transportation at the proposed project site was evaluated with regard to the Mobility Element and Safety Element of the City of Placentia General Plan;² Assembly Bill (AB) 1358 (the Complete Streets Act);^{3,4} Senate Bill (SB) 743;⁵ the Southern California Association of Governments (SCAG) 2020 Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS);⁶ and the State of California Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA.⁷ The potential for impacts to Transportation was analyzed by reviewing the conceptual design and analysis comparing the existing conditions to post-project conditions. This analysis has been reviewed by a transportation engineer at Alta Planning+Design.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA, in accordance with Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

High Quality Transit Area (HQTAs): An area within one-half mile of an existing or planned well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. HQTAs have been mapped by SCAG based on existing transit stops and corridors as well as transit projects planned for completion by 2045 that are listed in the Connect SoCal Plan.⁸

¹ California Code of Regulations. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² Placentia. 2019. General Plan Update. <https://www.placentia.org/166/General-Plan-Update> (accessed February 22, 2023).

³ Government Code Sections 65040.2 and 65302.

⁴ State of California. September 30, 2008. Assembly Bill No. 1358: Chapter 657. http://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=200720080AB1358

⁵ State of California. September 27, 2013. Senate Bill No. 743: Chapter 386. https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743

⁶ Southern California Association of Governments. September 2020. Adopted Final Connect SoCal. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>

⁷ State of California Governor's Office of Planning and Research. December 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

⁸ Southern California Association of Governments. Updated February 18, 2021. High Quality Transit Areas (HQTAs) 2045 – SCAG Region. <https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1/explore?location=33.861891%2C-117.824645%2C15.00> (accessed February 6, 2023).

Senate Bill (SB) 743: In 2013, Governor Brown signed SB 743, which creates a process to change the way that transportation impacts are analyzed under CEQA.⁹ Specifically, SB 743 required the OPR to amend the CEQA Guidelines to provide an alternative to Level of Service (LOS) for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code [PRC] Section 21099(b)(1)). Measurements of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.” Transportation impacts related to air quality, noise, and safety must still be analyzed under CEQA where appropriate. OPR recommends that a per capita or per employee vehicle miles traveled (VMT) that is 15 percent below that of existing development may be a reasonable threshold. The City updated its transportation analysis guidelines in January 2021 to reflect the OPR’s guidance.¹⁰ The City’s Traffic Impact Analysis (TIA) Guidelines include (1) Transit Priority Area screening, (2) low-VMT area screening, and (3) project type screening to determine whether project-level assessment is required. Identified project types that are assumed to have a less than significant impact absent substantial evidence to the contrary (as their uses are local serving in nature) include local parks and projects generating less than 110 daily trips.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): The RTP is prepared by SCAG every 4 years as mandated by 23 Code of Federal Regulations (CFR) Part 450. The RTP includes a collective vision for the SCAG region and provides a guide for the future development of the regional transportation system. The projects addressed in the RTP become eligible for state and federal funding once the plan is adopted. The RTP’s goals include providing adequate levels of accessibility and mobility for the efficient movement of people, goods, and services within the region. The RTP aims to improve transportation system safety through design, operations and maintenance, system improvements, support facilities, public information, and law enforcement efforts. SB 375 (the Sustainable Communities and Climate Protection Act) requires regional metropolitan planning organizations in California (such as SCAG) to develop SCSs, or long-range plans, that align transportation, housing, and land use decisions toward achieving GHG emissions reduction targets set by the California Air Resources Board (CARB). SCSs help California meet its climate and air quality goals, as well as advance community goals for public health, accessibility, equity, conservation, the economy, and much more. The 2020 RTP/SCS (Connect SoCal Plan) provides a comprehensive set of policies, strategies, and tools to improve mobility and sustainability in the region through 2045.

Vehicle Miles Traveled (VMT): The amount of travel for vehicles in a geographic region over a given period of time. The term *vehicle* refers to on-road passenger vehicles, specifically cars and light trucks.¹¹ Heavy-duty trucks should only be included in a traffic impacts analysis for modeling convenience and ease of calculation (e.g., where models or data provide combine auto and heavy-freight VMT) but should not contribute to a finding of significant traffic impact under any circumstances.

⁹ Governor’s Office of Planning and Research. N.d. Transportation Impacts (SB 743). <https://opr.ca.gov/ceqa/sb-743/> (accessed February 23, 2023).

¹⁰ Fehr & Peers. January 2021. City of Placentia Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment. <https://www.placentia.org/ArchiveCenter/ViewFile/Item/4247> (accessed February 23, 2023).

¹¹ State CEQA Guidelines, Section 15064.3, subdivision (a).

Impact Analysis

The State CEQA Guidelines recommend the consideration of four questions when addressing the potential for significant impact to transportation.

Would the project:

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

The proposed project would result in less than significant impacts to transportation in relation to conflicting with an applicable program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The Mobility Element of the City of Placentia General Plan,¹² which encompasses the requirements outlined in the California Complete Streets Act of 2008 (AB 1358)¹³ by planning for an interconnected multimodal transportation network; and the SCAG 2020 RTP/SCS (Connect SoCal)¹⁴ were considered in the evaluation.

Existing Conditions

Mobility Element: The Mobility Element provides four goals and six policies related to transit, roadway, bicycle, and pedestrian facilities relevant to the proposed project:

- **Goal MOB – 1:** Provide adequate transportation facilities for existing and future inhabitants of the City, maximizing use of existing facilities and enhancing those facilities as growth occurs.
- **Goal MOB – 2:** 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 Placentia.
 - **Policy MOB – 2.2:** Ensure adequate capacity to accommodate the traffic generated by land uses within the City, while balancing the needs of the pedestrian, cyclists and other multi-modal users.
 - **Policy MOB – 2.17:** Continue to assure safety at the railroad/roadway crossing locations.
- **Goal MOB – 3:** Encourage transit and active transportation modes, including public transportation, bicycles, ridesharing, and walking, and other alternative modes of transportation to support land use plans and related transportation needs.
 - **Policy MOB – 3.4:** Implement adequate sidewalks and crosswalks to meet the required uses and needs, which serve to encourage alternative modes of transportation.

¹² City of Placentia. 2019. City of Placentia General Plan Update. <https://www.placentia.org/166/General-Plan-Update> (accessed February 22, 2023).

¹³ State of California. September 30, 2008. Assembly Bill No. 1358: Chapter 657. http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200720080AB1358

¹⁴ Southern California Association of Governments. September 2020. Adopted Final Connect SoCal. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>

- **Goal MOB – 4:** Encourage bicycle travel as a primary mode of transportation.
 - **Policy MOB – 4.10:** Support efforts to maintain, expand and create new connections between the Placentia bikeways, the bikeways in neighboring jurisdictions and regional bikeways.
 - **Policy MOB – 4.15:** Where space and appropriate roadway conditions currently exist, continue to install bike routes.
 - **Policy MOB – 4.16:** Work with the Orange County Flood Control District under the City and District’s cooperative agreement to develop and utilize District facilities within Placentia as off-road recreational bike trails and loop connections or other existing or planned on-street bicycle facilities.

Connect SoCal Plan: The Connect SoCal Plan provides four goals that encourage providing multimodal trails within proximity to residential land uses:¹⁵

- **Goal 2:** Improve mobility, accessibility, reliability, and travel safety for people and goods.
- **Goal 4:** Increase person and goods movement and travel choices within the transportation system.
- **Goal 6:** Support healthy and equitable communities.
- **Goal 9:** Encourage development of diverse housing types in areas that are supported by multiple transportation options.

Additionally, Chapter 3 provides two relevant strategies towards focusing growth near destinations and mobility options and promoting a green region:

- Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.
- Identify ways to improve access to public park space.

Creating “complete streets” and encouraging active transportation with completion of infrastructure projects that can reduce automobile vehicle miles traveled by increasing the number of trips accomplished by walking, bicycling, and the use of micro-mobility devices are a core vision of Connect SoCal.

Multimodal trails are not currently available to connect residential land uses to recreation and commercial land uses in the vicinity of the project site (see Figure 1.4-3, *Parcel Map*).

Existing Transit System: The project site is located approximately 0.3 mile north of the nearest SCAG-mapped HQTA at the intersection of Jefferson Street and Miraloma Avenue. The next closest facility is located at the intersection of E. La Palma Avenue and N. Van Buren Street approximately 0.6 mile south of the project site.¹⁶ The Orange County Transportation Authority (OCTA) Route 30 bus line follows Orangethorpe Avenue east-west to the north of the project site.¹⁷ Approximately 0.3 mile south of the project site, OCTA Route 38 follows La Palma Avenue

¹⁵ Southern California Association of Governments. September 2020. Adopted Final Connect SoCal. <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>

¹⁶ Southern California Association of Governments. February 18, 2021. High Quality Transit Areas (HQTA) 2045 – SCAG Region. <https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1/explore?location=33.861891%2C-117.824645%2C15.00> (accessed February 16, 2023).

¹⁷ City of Placentia. October 2019. General Plan Update: Mobility Element. <https://www.placentia.org/166/General-Plan-Update> (accessed February 16, 2023).

east-west. The Inland Empire-Orange County Line, a heavy rail route, parallels Orangethorpe Avenue to the north of the project site and traverses the project site on the BNSF rail line; the nearest station, Anaheim Canyon, is located 0.9 mile south-southwest of the project site. The Metrolink 91-Perris Valley Line, another heavy rail route, also parallels Orangethorpe Avenue to the north of the project site.

Existing Roadway Circulation System: The project site is located approximately 0.1 mile south of Orangethorpe Avenue, a major arterial roadway and designated truck route that runs east-west, and approximately 0.2 to 0.3 mile north of Miraloma Avenue, a secondary arterial roadway that runs east-west.¹⁸ As stated in Section 1.4, *Project Location*, and Section 1.8.2, *Existing Conditions*, the eastern end of the project site follows Lakeview Loop from its intersection with Lakeview Avenue (a primary arterial roadway that runs north-south), towards the west and north before following the existing Atwood flood control channel towards the west, near Nancita Street (runs east-west), between Oak Street and Vicente Avenue (running east-west), with one proposed BNSF rail crossing, west to Jefferson Street (a secondary arterial roadway that runs north-south). The project site also crosses Fee Ana Street, Richfield Road (a secondary arterial), and S. Van Buren Street (a collector street).

Existing Bicycle Circulation System: The project site is located approximately 0.7 mile north and within biking distance of the existing Santa Ana River Bikeway, an approximately 57.7-mile existing section of a planned 100-mile-long recreational trail along the Santa Ana River extending from the crest of the San Bernardino Mountains through Orange County to the coast of the Pacific Ocean.¹⁹ At the eastern end of the project site, Lakeview Avenue (in the City of Anaheim) and its intersection with Orangethorpe Avenue to the north have dedicated bicycle lanes (Class II). Richfield Road is a designated bike route (Class III), and the portion of E. Orangethorpe Avenue to the north of the project site contains a mix of Class II and Class III bikeways. Approximately 0.2 mile south of the project site at the intersection with Sierra Madre Circle, a Class III bike route starts on S. Van Buren Street and provides a connection to a Class II bicycle lane along Miraloma Avenue that starts at the Van Buren/Miraloma intersection and extends west approximately 2.1 miles. The existing Richfield Road bikeway provides bicycle access south to La Palma Avenue then east to Lakeview Avenue; the existing bikeway along Lakeview Avenue provides a direct connection to the Santa Ana River Bikeway.

Existing Pedestrian Circulation System: The project site is located approximately 0.7 mile north of the 50.3-mile Santa Ana River Regional Trail within the nearby City of Anaheim.^{20,21} From the eastern end of the project site, Lakeview Avenue has existing sidewalks on both sides of the road south to the intersection with La Palma Avenue, approximately 0.1 mile north of the connection to the Santa Ana River Regional Trail. Within the immediate vicinity of the project site, sidewalks are available on both sides of the roadway to support pedestrian use on Jefferson Street south of Atwood Channel (only eastern sidewalk to the north of the channel), Richfield Road, Fee Ana Street south of Atwood Channel (no sidewalk to the north of the channel),

¹⁸ City of Placentia. October 2019. General Plan Update: Mobility Element. <https://www.placentia.org/166/General-Plan-Update> (accessed February 16, 2023).

¹⁹ Santa Ana Watershed Project Authority. N.d. Santa Ana River Trail & Parkway (Crest to Coast Trail). <https://sawpa.org/task-force/santa-ana-river-trail-parkway-crest-to-coast-trail/> (accessed February 6, 2023).

²⁰ OC Parks. N.d. Santa Ana River Regional Trail. <https://www.ocparks.com/sites/ocparks/files/2021-04/Santa%20Ana%20River%20Trail%20Map.pdf> (accessed September 21, 2022).

²¹ Rails-to-Trails Conservancy. N.d. Santa Ana River Trail Map. <https://www.trailink.com/trail/santa-ana-river-trail/> (accessed September 21, 2022).

Lakeview Loop, and Lakeview Avenue. S. Van Buren Street has a consistent sidewalk on the eastern side on both sides of the channel and limited sidewalk on the western side of the roadway:

- North of Atwood Channel, there is no western sidewalk.
- South of Atwood Channel, there is a walking path followed by a sidewalk.

Construction

Construction of the proposed project would result in less than significant impacts in relation to conflicts with goals or policies.

Mobility Element: The goals and policies in the Mobility Element do not specifically address construction of improvements. Construction of the proposed project would use the staging area for off-street parking consistent with the intent of new development policies under GOAL MOB – 2. During the project construction phase, there would be temporary additional trips associated with construction haul trucks, delivery trucks, and workers. However, the additional trips would be temporary and would not result in degradation of existing capacity of the roads surrounding the project site.

Connect SoCal Plan: The goals and strategies in the Connect SoCal Plan do not specifically address construction of improvements. Construction of the proposed project may result in temporary disruption of local traffic.

Transit System: Construction of the proposed project would not impact existing bus or rail operations; construction activities would not obstruct Orangethorpe Avenue or La Palma Avenue.

Roadway System: As stated in Section 1.11, *Construction Activities*, construction of the proposed project is anticipated to require an 8-month duration, including site preparation, grading, paving, and striping and signage. Construction equipment would include trail dozers, skid steers, narrow track loaders, rollers, and vibrating plate compactors. Construction access to the proposed project site would occur at existing maintenance road entrances along the Atwood Channel through Jefferson Street, Van Buren Street, the existing pedestrian bridge across Atwood Channel, Richfield Road, Fee Ana Street, and Lakeview Loop. The construction equipment and vehicles are not anticipated to generate sufficient traffic congestion to adversely affect the LOS at these CMP intersections as the existing roadway grid provides opportunities for dispersed traffic flow, such as potential alternative use of State Route (SR) 91 to the south of the project site, as well as Lakeview Avenue to the east and La Palma Avenue to the south, which would provide more effective vehicular access to the project site if Orangethorpe Avenue to the north is congested during peak hours. Construction of the proposed project is not anticipated to interfere with existing roadway circulation in the vicinity of the project site. The effects from construction would be temporary and contained on-site. Construction activities would not obstruct any roads or lanes, with staging confined to a fenced area between Vincente Avenue and the Atwood Channel.

Bicycle Circulation System: There would be no adverse impact to the city bicycle system as a result of construction or operation of the proposed project. The proposed project is consistent with the City bicycle circulation system and provides 1.0 mile of additional dedicated multiuse trails, accommodating cyclists. Construction activities would not obstruct use of the existing bikeways located within 1 mile of the project site.

Pedestrian Circulation System: The proposed project is consistent with the City Mobility Element in relation to pedestrian circulation and provides an additional 1.0 mile of multimodal trails to accommodate pedestrian movement within the City. Construction of the proposed project is not anticipated to interfere with existing pedestrian facilities in the vicinity of the project site. Construction activities would not obstruct use of the existing sidewalks located within 1.0 mile of the project site.

Operations and Maintenance

There would be no impact during operations and maintenance due to a conflict with goals or policies. The project would result in additional pedestrian and bicycle facilities, consistent with the Mobility Element, without compromising transit or roadway facilities. During operations, the project would result in a benefit to the existing bicycle circulation system as the proposed project would provide approximately 1.0 mile of dedicated trail to safely connect pedestrians and cyclists to nearby OCTA and Metrolink transit stops. During operations, the project would require trail users to cross S. Van Buren St. north of Vincente Ave., Richfield Rd. north of Nancita St., and Fee Ana St. north of Nancita St., three locations that do not have a stop sign or traffic signal. There is a potential for vehicle and trail user conflicts that could affect the existing roadway circulation system during operations at S. Van Buren St. and Richfield Rd. at these locations because these are collector and secondary arterial streets, respectively, that provide a vehicular connection with the Orangethorpe arterial. However, as shown in Figure 1.10-2, *Proposed Multipurpose Trail Improvement Plans*, the proposed project would include striping for new crosswalks where the trail crosses S. Van Buren St., Nancita St., Richfield Rd., and Fee Ana St., which would serve to alert vehicles regarding potential trail users crossing at these locations. Due to the location of the trail crossing at Fee Ana St. near the northern end of the street (with a dead end south of Orangethorpe and the two existing rail lines), potential vehicle and trail user conflicts are anticipated to be less than significant where vehicles are already expected to slow down at the Atwood Channel crossing. During operations, the project would result in a benefit to the existing bicycle circulation system as trail users would be within biking distance of nearby bicycle facilities. During operations, the project would result in a benefit to the existing pedestrian circulation system as the 1.0-mile multiuse trail would provide increased pedestrian access to the nearby Parque de Los Niños (PDLN) and along Atwood Channel.

Mobility Element: The project would be consistent with the Mobility Element of the City General Plan by providing approximately 1.0 mile of multimodal trails that accommodate pedestrians and cyclists near recent residential development, consistent with Goal MOB – 1 and Goal MOB – 2 (Policy MOB – 2.2). The project proposes the conversion of a maintenance road along the Atwood Channel to a multiuse trail. At buildout, the project would not generate vehicle trips except for trail maintenance, so it would not compromise roadway facilities. By providing continental crosswalks for the trail crossings south of the railway/roadway crossings, the proposed project would not conflict with Policy MOB – 2.17. The project would contribute to the multi-modal circulation system by building new bike and pedestrian facilities and would have a beneficial impact on alternative transportation, consistent with Goal MOB – 3 and Policy MOB – 3.4 with crosswalks to encourage alternative modes of transportation. By providing a multiuse trail that supports walking or biking between N. Jefferson Street and Lakeview Avenue and provides connections to existing bikeways and sidewalks leading 0.7 mile south to the existing Santa Ana River Trail, the proposed project has the potential to increase active transportation system connectivity within the community of Atwood south of Orangethorpe Avenue. As there are sidewalks along at least one side of the four north-south streets (Jefferson, S. Van Buren, Richfield, and Lakeview) that provide connections across the existing BNSF railroad and Orangethorpe Avenue community barrier, the proposed project would support a more walkable area surrounding the project site. Further, the proposed

project would facilitate bicycle connectivity consistent with Goal MOB – 4 by connecting to the existing Class I Bike Lanes on Lakeview Avenue, mix of Class I and Class III bikeways on Orangethorpe Avenue, and Class III Bike Route on Richfield Road. The proposed project would advance the City’s trail network and enhance pedestrian and bikeway connectivity and opportunities in the community of Atwood. The proposed project would directly support implementation of Policy MOB - 4.16, as the proposed project would take place within an existing City right-of-way along the Atwood Channel.

Connect SoCal Plan: The project would be consistent with the Connect SoCal Plan, which provides goals that encourage providing multimodal trails within proximity to residential land uses towards supporting healthy communities, supporting diverse housing types with multiple transportation options, increasing connectivity in existing neighborhoods, and encouraging active transportation with completion of infrastructure projects.²² The proposed project, by providing an approximately 1.0-mile multimodal trail that accommodates pedestrians and cyclists in an area with over 1,000 residential units within a half mile walking distance, would be consistent with the intent of state, regional, and local goals addressing transit, bicycle, and pedestrian facilities in accordance with the 2008 requirement established by AB 1358 for “the legislative body of a city or county, upon any substantive revision of the circulation element of the general plan, modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. By requiring new duties of local officials, this bill would impose a state-mandated local program.”²³

Therefore, the proposed project would result in less than significant impacts to transportation during construction and no impacts during operations in relation to conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. No further analysis is warranted.

(b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

The proposed project would result in less than significant impacts to transportation in relation to conflicts or inconsistency with CEQA Guidelines Section 15064.3, subdivision (b). In accordance with SB 743,²⁴ CEQA Guidelines Section 15064.3, subdivision (b) deals with a project’s potential to result in significant impacts with respect to VMT, the number and distance of automobile travel attributable to a project. As stated in Section 15064.3, subdivision (b) and clarified in the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA, VMT refers to the amount and distance of automobile (on-road passenger vehicle) travel attributable to a project and heavy-duty truck VMT.²⁵

²² Southern California Association of Governments. September 2020. Adopted Final Connect SoCal. <https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx>

²³ State of California. September 30, 2008. Assembly Bill No. 1358: Chapter 657. http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200720080AB1358

²⁴ State of California. September 27, 2013. Senate Bill No. 743: Chapter 386. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743

²⁵ State of California Governor’s Office of Planning and Research. December 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Existing Conditions

Existing land uses in the project area are separated from the Atwood Channel flood control easement by chain-link fences and other barriers. PDLN, located immediately to the north of the site at the southwestern corner of Richfield Road and E. Orangethorpe Avenue, is accessible via a pedestrian bridge that crosses the project site and Atwood Channel approximately 0.1 mile west of Richfield Road. The ability of residents and visitors to the City of Placentia to walk or cycle within a quarter mile of the proposed project is interrupted by the Atwood Channel, E. Orangethorpe Avenue, and the three rail lines immediately south of E. Orangethorpe Avenue (see Figure 1.4-3, *Parcel Map*, Figure 1.6-1, *General Plan Land Use Designations*, and Figure 1.7-1, *Zoning Designations*):

- Atwood Channel provides an approximately 0.17-mile barrier between the existing single-family residential uses from S. Van Buren Street to the pedestrian bridge across the channel to PDLN.
- Atwood Channel provides an approximately 0.12-mile barrier between the existing single-family residential uses from the pedestrian bridge across the channel to PDLN to S. Richfield Road.
- Atwood Channel provides an approximately 0.21-mile barrier between the existing multi-family residential uses from Fee Ana Street to Lakeview Loop.

Construction

There would be less than significant impacts to per capita VMT during construction, due to the anticipated 8-month construction period where works and equipment would be deployed to the work area to construct the proposed project. During the project construction phase, there would be temporary additional trips associated with construction haul trucks, delivery trucks, and workers. However, the additional trips would be temporary and would not result in unplanned population growth as a result of the 8-month construction duration due to the location of the project site in the center of a dense urban area with a high population and readily available workforce, and labor needs would be met through the available labor in Orange County (see Section 3.14, *Population and Housing*).

Operations and Maintenance

There would be no adverse impact to VMT as a result of the project. The project is consistent with goals and policies of the Mobility Element of the City General Plan and Connect SoCal related to facilitating alternative modes of travel through the provision of multimodal trails. The purpose of the proposed project is to expand the City's trail network and enhance pedestrian and biking connectivity. During operations, the proposed project would reduce VMT through an expansion of recreational and nonmotorized transit opportunities connecting the project area to various parts of the city and surrounding region. The proposed project would encourage both nonmotorized transportation through the provision and expansion of bicycle and pedestrian pathways and create alternate modes of travel to work and school. As stated in Sections 1.8, *Existing Conditions*, and 1.12, *Operations and Maintenance*, operation and maintenance activities for the proposed project would be conducted by the City of Placentia pursuant to an existing agreement²⁶ with the Orange

²⁶ Orange County Flood Control District and the City of Placentia. September 26, 2017. MA-80-18010066. Bikeways and Trails in the City of Placentia.

County Flood Control District and the City and conducted daily (public safety operations) to once every 10 to 15 years (pavement surfacing). As the 1.0-mile trail would be operated and maintained by existing City departments, the proposed project is not anticipated to result in a substantial population increase to support maintenance activities. As the project is a recreational project that does not include residential development, operations and maintenance activities are not anticipated to increase per capita VMT as a result of employment or population growth associated with the project.

Therefore, there would be less than significant impacts during construction and no impacts during operations to transportation in relation to conflicts with or inconsistency with CEQA Guidelines §15064.3, subdivision (b). No further analysis is warranted.

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

The proposed project would result in no impacts to transportation in relation to substantially increasing hazards due to a design feature or incompatible use.

Existing Conditions

The proposed project would take place within an existing City right-of-way along the Atwood Channel. The project site is primarily situated on existing Public Works maintenance access roads that are currently fenced off to the public within parcels along the Atwood Channel, with the exception of three street crossings (S. Van Buren St., S. Richfield Rd., and Fee Ana St.), one pedestrian bridge to PDLN, and the 0.1-mile location for the proposed Class II bike lane along Lakeview Loop at the eastern end (see Figure 1.4-3). As mentioned in Section 3.9, *Hazards and Hazardous Materials*, the project site is located within the Richfield oil and gas field. Existing land uses within the project site boundaries and immediate vicinity include residential uses, industrial uses, commercial-manufacturing uses, active oil and gas wells, recreational uses (PDLN and pedestrian bridge), street crossings, and the BNSF railroad crossing within the optional to-be-determined trail extension area. The active oil and gas wells in the western portion of the project site are enclosed by chain-link fences (see photos 1–3, 7, and 14 in Figure 1.8-1, *Site Photographs Map and Site Photographs*).

Construction

There would be no impact from construction due to introduction of a design feature or incompatible uses within the vicinity of the project site. Construction activities would be conducted within the project site, including parking within the staging area. As stated in Section 1.11, *Construction Activities*, the proposed project may affect or redirect access to roadways on a temporary basis during the construction period. Minor traffic control would be required at intersection crossing, including, but not limited to, lane and shoulder closers for varied durations. The majority of the construction would occur along the channel. Temporary fencing may be implemented along the trail to restrict access to the construction site and prevent potential runoff and noise impacts during construction around existing obstructions. Construction activities would not introduce a hazard to the pedestrian bridge, which would remain open between two stretches of fenced property along Atwood Channel.

http://cams.ocgov.com/Web_Publisher_Sam/Agenda09_26_2017_files/images/SIGNED%20AGREEMENT%20NO.%20MA-080-18010066_9850625.PDF (accessed February 22, 2023).

Operations and Maintenance

There would be no impacts during operations and maintenance due to introduction of a design feature or incompatible uses within the vicinity of the project site. The trail use would be compatible with the existing maintenance road use for the flood control channel as maintenance vehicle access would not be obstructed. As with the existing condition, the oil and gas wells along Atwood Channel would remain fenced off from public access. There are no trees or other potential visual obstructions proposed within the rights-of-way of the street crossing locations that would pose a hazard by obstructing visibility. As shown in Figure 1.10-2, *Proposed Multipurpose Trail Improvement Plans*, the proposed project includes striping for new continental crosswalks and pedestrian/bike crossing signs where the trail crosses S. Van Buren St., Nancita St., Richfield R., and Fee Ana St. in order to address the potential for vehicle and trail user conflicts that could affect the existing roadway circulation system during operations at S. Van Buren St. and Richfield Rd., because these are collector and secondary arterial streets that provide a vehicular connection with the Orangethorpe arterial. The crosswalks, street restriping, and signage would serve to alert vehicles regarding potential trail users crossing at these locations during operations.

Therefore, the proposed project would result in no impacts to transportation related to substantially increasing hazards due to a design feature. No further analysis is warranted.

(d) Result in inadequate emergency access?

The proposed project would result in no impacts to transportation in relation to resulting in inadequate emergency access. The City has established the Placentia Fire and Life Safety Department (PFLSD) and predesignated evacuation routes and Transportation Assembly Points (TAPs).²⁷ The PFLSD has provides 24-hour emergency response to a wide variety of critical situations including fires, medical emergencies, accidents, and miscellaneous public assistance requests.²⁸ The evacuation routes and TAPs would allow community members to either self-evacuate or shelter at assembly points for those who may not have access to adequate transportation and may require special assistance in case of emergencies.²⁹ The City's nearest evacuation route to the proposed project site is Orangethorpe Ave, located directly north of the project site and approximately 0.07 mile away. The nearest TAP is the PDLN, located adjacent to the proposed project site between N. Van Buren St. and Richfield Rd. trailheads.³⁰ The designated evacuation routes and TAPs would not be adversely affected as a result of the proposed project as the project site and staging area would be fenced off and construction would not obstruct any major roads.

Construction

Construction activities would be contained within the fenced area adjacent to the Atwood Channel and a fenced staging area between the Atwood Channel and Vincent Avenue (not an evacuation route). Construction activities would not require lane closures or obstruct existing roads that

²⁷ City of Placentia. October 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

²⁸ City of Placentia. N.d. Placentia Fire and Life Safety Department. <https://www.placentia.org/24/Fire> (accessed August 29, 2022).

²⁹ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

³⁰ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

provide emergency access. The pedestrian bridge across Atwood Channel to PDLN would remain open during construction.

Operations

During operations and maintenance, trail users would be required to yield to emergency response vehicles with sirens when crossing S. Van Buren St. and S. Richfield Rd. Maintenance activities would not require road closures or lane closures for any of the four streets (N. Jefferson St., S. Van Buren St., S. Richfield Rd., or N. Lakeview Ave.) within or adjacent to the project site that intersect with Orangethorpe Avenue. Therefore, operations and maintenance would have no impact in relation to interfering with or impairing use of the City's roads for emergency access, including access to emergency evacuation routes and TAPs.

Therefore, the proposed project would result in no impacts to transportation related to inadequate emergency access. No further analysis is warranted.

3.18 TRIBAL CULTURAL RESOURCES

This analysis is undertaken to determine if the proposed project may have a significant impact to tribal cultural resources, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis draws from the Historic Property Survey Report, including Archaeological Survey Report, prepared for the project (Appendix D, *Historic Property Survey Report*). Tribal cultural resources at the proposed project site were evaluated with regard to a query of the South Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC) for the USGS 7.5-minute series Orange topographic map. Methods for this study included the identification of existing resources and evaluation of potential adverse effects based on information gathered from published and unpublished literature, a Sacred Lands Files (SFL) record search, and a review of current and historic maps and aerial photographs. An intensive pedestrian survey of the project Area of Potential Effects (APE) was performed to characterize the existing conditions relative to tribal cultural resources and identify visible resources. Historic topographic maps and previous cultural resource reports and published literature were referenced and examined to establish a baseline condition of the project study area. On March 24, 2022, the City of Placentia (City) transmitted notification letters to two tribal contacts on the City's tribal contact list to initiate the Assembly Bill (AB) 52 consultation process. Tribal contacts have 30 days upon receipt to request consultation with the City. No consultation was requested for the project during this period.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

AB 52: An act to amend Section 5097.94 of, and to add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to, the Public Resources Code (PRC), relating to Native Americans. The goal of AB 52 is to promote the involvement of California Native American Tribes in the decision-making process when it comes to identifying and developing mitigation for impacts to resources of importance to their culture. To reach this goal, the bill establishes a formal role for tribes in the CEQA process. CEQA lead agencies are required to consult with tribes about potential tribal cultural resources in the project area, the potential significance of project impacts, the development of project alternatives, and the type of environmental document that should be prepared. AB 52 specifically states that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.

Consultation: The meaningful and timely process of seeking, discussing, and carefully considering the views of others. Meaningful consultation usually consists of face-to-face (or virtual) meetings conducted in such a way that recognizes the cultural values of all parties involved and makes a concerted effort to reach an agreement. Consultation should recognize the tribe's potential need for confidentiality regarding places that hold traditional tribal significance. Consultation with tribes is considered the most effective way for lead agencies to determine if a project could result in significant environmental impacts to tribal cultural resources (PRC § 21080.3.1(a); GC § 65352.4).

¹ California Code of Regulations. Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

Impact Analysis

The State CEQA Guidelines recommend the consideration of the following questions when addressing the potential for significant impact to tribal cultural resources:

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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) **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)?**

The proposed project would have the potential to result in significant impacts to tribal cultural resources in relation to being eligible for listing in the California Register of Historical Resources or in a local register of historical resources if ground-disturbing activities occur in native soils. Impacts would be reduced to below the level of significance with the incorporation of mitigation.

A tribal cultural resource is 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, that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).

A records search of the California Historical Resource Information System (CHRIS) was completed for the proposed project. Cultural resource record searches for the proposed project were conducted by staff at the SCCIC on March 9, 2022. The results of the record search indicated that 14 cultural resources studies have been conducted within a 0.25-mile search radius of the project site (see Appendix D). Of these cultural resource studies, five previous studies occurred within the project site, and nine studies are exclusively within the 0.25-mile buffer. No cultural resources have been previously recorded within a 0.25-mile buffer and the project Area of Potential Effect (APE). There is no indication of the presence of tribal cultural resources within the project footprint. Every effort was made to visually inspect all areas of the project APE that may contain tribal cultural resources.

An SLF search was conducted by the NAHC on February 24, 2022. The NAHC responded on March 24, 2022, indicating that the quadrangle in which the project APE is located is positive for sacred land. In addition, a list of tribal entities was provided who may also have knowledge of cultural resources in the project area (see Appendix D).

The following two Native American groups were contacted and sent letters via U.S. Postal Service for Section 106 Consultation based on the list provided by the NAHC on March 29, 2022:

- Pala Band of Mission Indians (Chasta Gaughen)
- Soboba Band of Luiseno Indians (Joseph Ontiveros)

No comments were received from these tribal entities.

The following 11 Native American Groups were contacted and sent letters via the U.S. Postal service for AB 52 consultation based on a list provided by the NAHC on March 29, 2022:

- Gabrielino band of Mission Indians-Kizh nation (Andrew Salas)
- Gabrielino/Tongva San Gabriel Band of Mission Indians (Anthony Morales)
- Gabrielino Tongva Indians of California Tribal Council (Robert Dorame)
- Gabrielino/Tongva Nation (Sandonne Goad)
- Gabrielino-Tongva Tribe (Charles Alvarez)
- Gabrielino-Tongva Tribe (Christina Conley)
- Juaneno Band of Mission Indians Acjachemen Nation-Belardes (Joyce Perry)
- Juaneno Band of Mission Indians Acjachemen Nation-Belardes (Matias Belardes)
- Pala Band of Mission Indians (Chasta Gaughen)
- Santa Rosa Band of Cahuilla Indians (Lovina Redner)
- Soboba Band of Luiseno Indians (Joseph Ontiveros)

No comments were received from these tribal entities.

An intensive pedestrian survey using no greater than 15-foot transects was conducted on January 20, 2022, by Sapphos Environmental, Inc. throughout the project APE to identify any potential surface archaeological resources or other cultural resources (see Appendix D). Additional attention was paid to areas of the project study area where there was exposed ground (i.e., no groundcover or hardscaping). Most (greater than 75 percent) of the project study area is hardscaped or landscaped. The project study area primarily consists of a previously disturbed dirt path directly adjacent to the flood control channel. The path was created by the construction of the flood control channel in 1963. No tribal cultural resources were identified as a result of the background research and survey.

In addition, the presence of significant buried tribal cultural resources is very low due to the inherent nature and development of the project area. The project area is currently paved over and substantially disturbed. It is unlikely that any archaeological resources would be encountered in the depth below the disturbed pavement layer.

However, the potential to encounter tribal cultural resources exists during ground-disturbing activities in native undisturbed soils. Implementation of Mitigation Measure TRIBAL-1 would be required to reduce potential impacts to below the level of significance.

MM-TRIBAL-1: Tribal Resources – Avoidance. In the event that previously unknown tribal cultural resources are encountered during construction, the resources shall either be left *in situ* and avoided through redesign, or the resources shall be salvaged, recorded, and repositied at a repository consistent with the provisions of a Phase III data recovery program and the provisions of a Cultural Resource Management Plan. The Cultural Resource Management Plan shall include further consultation with Native American Tribes. Data recovery is not required by law or regulation. It is, though, the most commonly agreed-upon measure to mitigate adverse effects to tribal cultural resources eligible or listed under Section 106 Criterion D/CRHR Criterion 4, as it preserves important information that would otherwise be lost.

In addition, in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are encountered during excavation activities, the County Coroner shall be notified within

24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains within 100 feet shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the NAHC in Sacramento within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC shall immediately notify the person(s) it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the City, the disposition of the human remains. The MLD's recommendation shall be followed if feasible and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the City rejects the MLD's recommendations, the agency shall rebury the remains with appropriate dignity on the property within a time frame agreed upon between the City and the MLD's in a location that will not be subject to further subsurface disturbance (14 California Code of Regulations §15064.5(e)).

Implementation of Mitigation Measure TRIBAL-1 and compliance with regulatory requirements relating to the unanticipated discovery of tribal cultural resources would reduce potential impacts to below the level of significance. No further analysis is warranted.

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

The proposed project would result in less than significant impacts after mitigation to tribal cultural resources in relation to criteria set forth in subdivision (c) of PRC Section 5024.1. No listed or eligible resources are located within the APE (see Appendix D). Furthermore, as stated above, the City sent letters to two Native American groups for Section 106 Consultation based on the list provided by the NAHC on March 29, 2022. No comments were received. In addition, as stated above, the City sent letters to 11 Native American Groups for AB 52 consultation based on a list provided by the NAHC on March 29, 2022. No comments were received. Therefore, the proposed project site does not include resources determined to be significant pursuant to the criteria set forth in subdivision (c) of PRC Section 5024.1. However, the potential to encounter previously unidentified resources exists during ground-disturbing activities in native soils. Implementation of mitigation measure TRIBAL-1 would reduce potential impacts to below the level of significance. No further analysis is warranted.

3.19 UTILITIES AND SERVICE SYSTEMS

This analysis is undertaken to determine if the proposed project may have a significant impact to utilities and service systems, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ Utilities and service systems such as potable water, wastewater treatment, stormwater conveyance, electric power, natural gas, and telecommunications facilities are essential for the functioning and life and safety of people living in modern urban, suburban, and rural environments. This analysis of utilities and service systems effects has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia in their capacity as a Lead Agency pursuant to CEQA to support their decision making in relation to the proposed project. Utilities and service systems at the proposed project site were evaluated with regard to the Conservation Element of the City of Placentia General Plan,² the City of Placentia Water Quality Management Plans (WQMP),³ and the County of Orange Public Services and Facilities of the General Plan.⁴ To assess the potential to impact utilities and service systems, the property and surrounding areas were evaluated based on site reconnaissance conducted in January 2022.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Storm Water and Stormwater: In layman's terms, "stormwater" is defined as an abnormal amount of surface water due to a heavy rain or snowstorm. The term "storm water" is used when employed by the cited source of information. In all other instances, *stormwater* is used, consistent with the provision of Appendix G of the CEQA Guidelines and as defined by the U.S. Environmental Protection Agency (EPA). Stormwater runoff is generated when precipitation from rain and snowmelt events flows over land or impervious surfaces and does not percolate into the ground. As the runoff flows over the land or impervious surfaces (paved streets, parking lots, and building rooftops), it accumulates debris, chemicals, sediment, or other pollutants that could adversely affect water quality if the runoff is discharged untreated.

Wastewater: The spent or used water of a community or industry that contains dissolved and suspended matter.⁵

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. October 2019. City of Placentia General Plan: Chapter 5: Conservation Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed February 16, 2023).

³ City of Placentia. 2009. Water Quality Management Plans. <https://www.placentia.org/DocumentCenter/View/3157/WQMP-Brochure?bidId=> (accessed February 16, 2023).

⁴ Orange County Department of Regional Planning. August 2015. Orange County General Plan 2035: Chapter 5: Public Services and Facilities Element. <https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/8639.pdf> (accessed February 16, 2023).

⁵ California Association of Sanitation Agencies. N.d. Definition of Terms – S. <http://www.casaweb.org/definition-of-terms/s> (accessed February 16, 2023).

Impact Analysis

The State CEQA Guidelines recommend the consideration of five questions when addressing the potential for significant impact to utilities and service systems.

Would the project:

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

The proposed project would result in less than significant impacts to utilities regarding the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. As stated in Section 1.8, *Background and Existing Conditions*, the project site is a gravel-paved access road located in an urbanized context near existing bikeways, the Burlington Northern Santa Fe Railway (BNSF)/Metrolink rail line, the Atwood Channel, and Parque De Los Niños (PDLN). The general project area is served by the Yorba Linda Water District (YLWD) and Golden State Water Company. The City of Placentia has a sanitary sewage system and a storm drainage system, served by the Orange County Sanitation District and Orange County Flood Control District (District). The stormwater drainage infrastructure is designed to prevent flooding by carrying excess rainwater away from streets; it is not designed to be a waste disposal system. Many storm drainpipes cross under the roads that intersect with the project site, including S. Van Buren St., Richfield Rd., and Fee Ana St.⁶ Sewer pipes cross under the same roads, as well as N. Lakeview Ave., and directly parallel to Oak St.⁷ Electric power service is provided by Southern California Edison, natural gas service is provided by the Southern California Gas Company (SoCalGas), and telephone and internet services are provided by Spectrum and AT&T.

Construction

Construction activities would use existing utilities that serve the property, and no new utilities would be required to be constructed. The proposed project would entail a trailhead at PDLN, new street signs, and wayfinding signage. No new restrooms are required as the project site is near PDLN, which has many restroom facilities. Construction of the project would not require construction of new or expanded water, wastewater treatment or storm water drainage (beyond the proposed project), electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. A temporary increase in sewage generation due to construction crews is anticipated to be minor. As stated in Section 1.11, *Construction Activities*, the number of personnel will vary depending on the work during the construction phase. With this type of construction work, a crew comprised of 10 to 12 members is anticipated, which is minimal and would not exceed the capacity of the wastewater treatment facilities.

⁶ City of Placentia GIS. June 2018. Storm Drain Pipes. Data provided by Willdan Engineering and G2 Construction. <https://data-placentia.opendata.arcgis.com/search?tags=pubworks> (accessed February 15, 2023).

⁷ City of Placentia GIS. April 2018. Sewer Pipes. <https://data-placentia.opendata.arcgis.com/datasets/placentia::sewer-pipes/explore?location=33.866623%2C-117.826682%2C17.00> (accessed February 15, 2023).

Operations and Maintenance

Maintenance activities for the proposed project would include trail maintenance, riverbank erosion management and maintenance, and vegetation and pest control. As stated in Section 1.12, *Operations and Maintenance*, maintenance activities would include irrigation to maintain the small new planting areas along the trail. The use of chemical herbicides would be limited to chemicals that are not banned by the County. The proposed project area is operated and maintained by the District.⁸ The District's Operations and Maintenance Division (OMD) provides services such as erosion management and maintenance and vegetation and pest control to the Atwood Channel and related storm drains. The increase in potential maintenance activities due to increased trail use is anticipated to be minimal as the trail is only 1.0 mile long. Due to the climate-appropriate landscaping palette, maintenance would not be intensive. With the expanded connectivity between the trails and the recreational facility, and presumed increase in community members using the facility, there may be an increase in sewage generation. As stated in Section 3.14, *Population and Housing*, the proposed project is not anticipated to directly or indirectly induce population growth. Therefore, the increase in sewage generation due to increased trail use is anticipated to be minimal and would not exceed the capacity of the wastewater treatment facilities according to District standards.⁹ The proposed project is a recreational trail that would not require new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or system services.

Therefore, there would be no impacts to utilities and service systems during construction or operations regarding the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. No further analysis is warranted.

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

The proposed project would result in less than significant impacts to utilities and service systems in relation to having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

The Golden State Water Company (GSWC) and YLWD provide water distribution in the City of Placentia. About 75 percent of the City's water comes from the groundwater basin managed by CSWC and YWLD, while the other 25 percent is imported through the Municipal Water District of Orange County (MWDOC). The City works with the GSWC to promote voluntary water conservation strategies, while the YLWD Board had passed a Conservation Ordinance to further these efforts. Through various water conservation measures, Orange County's average annual water usage from 2015 to 2020 was the lowest since 1982.¹⁰ In the 2020 Urban Water

⁸ Orange County Public Works. N.d. OC Operations & Maintenance: Flood Control. <https://ocom.ocpublicworks.com/service-areas/oc-operations-maintenance/flood-control> (accessed September 8, 2022).

⁹ Orange County Sanitation District. N.d. Chapter 1. District Overview and Compliance. <https://www.ocsan.gov/home/showpublisheddocument/10331/635102622226630000> (accessed September 8, 2022).

¹⁰ Municipal Water District of Orange County. April 2022. Monthly Water Usage Data and Water Supply Info. <https://www.mwdoc.com/wp-content/uploads/2021/12/10-REV-Water-Data-Item-for-Apr-2021-AF-mtg-FINAL.pdf> (accessed September 9, 2022).

Management Plan, YLWD projects that it will rise to 19,133 acre-feet (AF) by 2025. The water demand projections incorporate water savings, or “passive savings,” which are the result of implementation of new plumbing codes along with consumer awareness of the need to conserve water.

Construction

As stated in Section 1.11, *Construction Activities*, construction activities would be short in duration (approximately 8 months) and would require minimal water for dust control during the construction phase. According to the Best Management Practices (BMPs), water use for dust control during the construction phase would be limited and temporary and, therefore, is not anticipated to involve large water quantities.

Operations and Maintenance

As stated in Section 1.12, *Operations and Maintenance*, operations and maintenance of the proposed project would require irrigation of trees and landscaping in the long term but would not require large amounts of water. The water for these uses would be hauled into the proposed project site and applied directly to the site using a temporary cistern/irrigation system or applied with a pressurized hose/backpack system. Long-term water demand for plant irrigation would be minimal as the project would utilize native and drought-tolerant plants. As a result, the proposed project would not result in significant increased water supplies.

Therefore, there would be less than significant impacts to utilities and service systems during construction or operations related to having sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. No further analysis is warranted.

(c) Result in a determination by the waste water 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?

The proposed project would result in no impacts to utilities and service systems in relation to resulting 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. As discussed in Section 1, *Project Description*, the proposed project is a recreational trail that would not involve the construction or operation of structures that would require sanitary sewer wastewater treatment. There would be no new restrooms or expanded restroom facilities constructed as part of the project. Therefore, there would be no impacts. No further analysis is warranted.

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

The proposed project would result in less than significant impacts to utilities and service systems in relation to generating 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. The proposed project would not induce substantial population growth directly or indirectly that would result in an increase in solid waste. The Conservation Element of the City of Placentia

General Plan¹¹ includes eight policies related to solid waste management:

- **Policy Con 8.1:** Continue implementing the Source Reduction and Recycling Element as required by State legislation.
- **Policy CON 8.2:** Continue to comply with the requirements mandated by the Integrated Waste Management Act and other related legislation (AB 939, AB 341, AB 1826) in order to reduce the amount of solid waste and organic waste ending up in local landfills.
- **Policy CON 8.3:** Maximize public awareness of all source reduction and recycling programs, including opportunities for communication feedback and educational outreach.
- **Policy CON 8.4:** Maximize integration of all source reduction programs.
- **Policy CON 8.5:** Encourage composting as an alternative to disposal for organic wastes.
- **Policy CON 8.6:** Ensure that new development and reuse projects provide adequate space for recycling and organics collection activities to support state waste reduction goals.
- **Policy CON 8.7:** Continue to provide public information regarding residential collection of household hazardous wastes including paint containers, electronics, household chemicals, motor oils, and pesticides, and promote development of facilities that collect these materials.
- **Policy CON 8.8:** Coordinate with the County and surrounding jurisdictions to dispose of special waste including tires, construction/ demolition debris, medical waste, asbestos, household hazardous waste, and computer technology waste.¹²

Additionally, the City of Placentia has adopted CalRecycle's Source Reduction and Recycling Element (SRRE) in response to Assembly Bill (AB) 939, the California Integrated Waste Management Act, which requires all California cities to divert 25 percent of their waste stream from landfills by 1995 and 50 percent by 2000.¹³

Construction

As discussed in Section 1.11, *Construction Activities*, the contractor would be required to prevent sediment from entering the natural state water. Construction of the proposed project would require the disposal of sediment be removed and disposed of at an approved landfill site. During construction, the contractor would be required to divert 65 percent of their waste stream from landfills per the Orange County Waste and Recycling's Construction and Demolition (C&D) Program. Republic Waste Services provides solid waste collection and recycling services to the City of Placentia, where it is collected and hauled to Republic's material recovery facility (MRF) in the City of Anaheim. Prior to being transported to the landfill, the waste is processed to separate recyclables from the waste stream.

There are three OC Waste and Recycling landfills in Orange County, but the closest to the City is Olinda Alpha Landfill located at 1942 N. Valencia Ave. in Brea, CA. Olinda Alpha Landfill recycles in accordance with Senate Bill (SB) 1383, which seeks to reduce emissions of short-lived climate pollutants (SLCP; e.g., methane, black carbon, tropospheric ozone, hydrofluorocarbons). This

¹¹ City of Placentia. October 2019. City of Placentia General Plan: Chapter 5: Conservation Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed September 6, 2022).

¹² City of Placentia. October 2019. City of Placentia General Plan: Chapter 5: Conservation Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed September 6, 2022).

¹³ City of Placentia. October 2019. City of Placentia General Plan: Chapter 5: Conservation Element. <https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId=> (accessed September 6, 2022).

has resulted in Olinda Alpha Landfills to set the goal of reducing organic waste disposal 75 percent by 2025, and to recover at least 20 percent of currently disposed surplus edible food by 2025.¹⁴ The landfill employs composting, metal recycling, and mattress recycling as part of their efforts to reduce solid waste. For hazardous materials or any other materials that are not accepted at this landfill, there is a referral list provided online. These practices align with the policies outlined above.

Operations and Maintenance

As stated in Section 1.11, *Construction Activities*, under *Best Management Practices*, operations and maintenance of solid waste would comply with AB 939. Therefore, operations and management would have no anticipated increase in solid waste and would not impair the solid waste reduction goals. The C&D program requires that at least 65 percent of all C&D materials removed from a project site be diverted via reuse, recycling, or composting at County-approved facilities or a County Franchised Waste Hauler.¹⁵ Reporting is completed by filling out the application packet from the website and providing disposal receipts and completed tonnage report.

Through the Orange County C&D program, the project would be in compliance with the above policies and other relevant legislation (i.e., SRRE, AB 939, AB 341, and SB 1383) regarding solid waste management. Therefore, there would be less than significant impacts to utilities and service systems related to the wastewater treatment provider which serves or may serve the capacity to serve the project's projected demand in addition to the provider's existing commitments. No further analysis is warranted.

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

The proposed project would result in no impacts to utilities and service systems in relation to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed project would not include the construction of any structures that would generate solid waste that would have the potential to conflict with federal, state, or local solid waste statutes and regulations. The construction and maintenance waste that would be generated by the proposed project would be limited to vegetation debris from site clearing and soil export from excavation and grading. Construction of the proposed project would require the disposal of sediment that would be removed and disposed of at a landfill site with adequate capacity. Disposal of this sediment would comply with all federal, state, and local regulations regarding the disposal of inert sediment.

Federal. The proposed project would not conflict with the Federal Clean Water Act as the project would not discharge or dredge materials into navigable waters or waters of the United States. This project would not conflict with the Safe Drinking Water Act (SWDA) as it would not impact drinking water sources.

State. As stated in Section 1.11, *Construction Activities*, under *Best Management Practices*, the proposed project would remove all solid waste generated during construction, including diversion of at least 25 percent of their waste stream from landfills in accordance with AB 939, the Solid

¹⁴ County of Orange Waste & Recycling. N.d. SB1383. <https://oclandfills.com/sb1383> (accessed February 15, 2023).

¹⁵ County of Orange Waste & Recycling. N.d. Construction & Demolition (C&D) Program. <https://oclandfills.com/CD> (accessed September 9, 2022).

Waste: Diversion Rule (AB 341), and SB 1383. The proposed project would also recycle or reuse 50 percent by weight of all construction and demolition debris removed from the project site and submit a recycling and reuse plan and annual reporting to demonstrate compliance with the plan in accordance with the California Solid Waste Reuse and Recycling Act.

Local. The BMPs of the proposed project would align with the City's SRRE and the Orange County Waste and Recycling's C&D Program, which has a 65 percent diversion requirement. Managed by Orange County Public Works/Planning, the C&D program requires that at least 65 percent of all C&D materials removed from a project site be diverted via reuse, recycling, or composting at County-approved facilities or a County Franchised Waste Hauler.¹⁶

By adhering to the County of Orange C&D Program and the City's SRRE, the proposed project would result in less than significant impacts in regard to complying with federal, state, and local statutes and regulations related to solid waste. No further analysis is warranted.

¹⁶ County of Orange Waste & Recycling. N.d. Construction & Demolition (C&D) Program. <https://oclandfills.com/CD> (accessed September 9, 2022).

3.20 WILDFIRE

This analysis is undertaken to determine if the proposed project may have a significant impact in relation to wildfire, thus requiring the consideration of mitigation measures or alternatives, in accordance with Section 15063 of the State CEQA Guidelines.¹ This analysis of wildfire risk has been prepared as an information disclosure document for the public, stakeholders, and other agencies, and to support the City of Placentia, in their capacity as a Lead Agency pursuant to CEQA, to support their decision making in relation to the proposed project. The scope of the analysis considers potential for the project to adversely affect or impair a state or local adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risk based on slope, winds, or topography; result in a need for infrastructure, whether installation or maintenance, including roads, fuel brakes, emergency water sources, power lines, and utilities that would also exacerbate wildfire risk; or expose people or structures to significant risks as a result of runoff, postfire slope instability, or drainage changes. Wildfire risk at the proposed project site was evaluated to assess impacts from the proposed project with regard to the City of Placentia General Plan Safety Element;² the California Department of Forestry and Fire Protection's (CAL FIRE) Fire and Resource Assessment Program (FRAP) website³ and viewer;⁴ as well as relevant data, maps, and other pertinent information such as landscape architectural drawings for the proposed project. The evaluation of the potential for the proposed project to result in impacts was based on a desktop review of the CAL FIRE's FRAP website, the site's landscape architectural drawings, and geospatial data and maps comparing the existing conditions versus the post-project conditions in relation to wildfire risk.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Working Definitions

Fire Hazard Severity Zone (FHSZ): FHSZs are CAL FIRE mapped zones/areas of significant fire hazards (based on fuels, terrain, weather, and other relevant factors) that have been designated as FHSZs per Government Code §§51175–51189 and are subject to additional development and maintenance standards that influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are classified as Very High, High, and Moderate in State Responsibility Areas (SRAs) and Very High in Local Responsibility Areas (LRAs) and Federal Responsibility Areas (FRAs).

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

² City of Placentia. 2019. City of Placentia General Plan. <https://www.placentia.org/166/General-Plan-Update>

³ California Department of Forestry and Fire Protection. N.d. Fire and Resource Assessment Program (FRAP): Orange County: Very High Fire Hazard Severity Zones (VHFHSZ) Map. https://osfm.fire.ca.gov/media/6739/fhszl_map30.pdf (accessed August 19, 2022).

⁴ California Department of Forestry and Fire Protection. N.d. Fire and Resource Assessment Program (FRAP): Fire Hazard Severity Zones (FHSZ) Viewer. <https://frap.fire.ca.gov/mapping/viewers/> (accessed August 19, 2022).

Responsibility Areas:

Federal Responsibility Area: The 2018–2023 California Master Cooperative Wildland Fire Management and Stafford Act Response Agreement between the U.S. Department of the Interior, U.S. Department of Agriculture, and CAL FIRE states that FRAs are the areas where federal agencies are primarily responsible for wildland fire protection and suppression under various federal laws. Direct Protection Areas (DPAs) are areas where, regardless of jurisdiction, wildland fire protection responsibilities are negotiated created and agreed to by the administrative units of either the federal agencies or the State. The protection responsibility of SRAs and FRAs within DPA boundaries are developed, reviewed, and updated as a part of the annual operating plan, although federal resources are available to assist in wildland fire activities in SRAs and State resources are available to assist in wildland fire activities in the FRAs.⁵

Local Responsibility Area: LRAs are defined in Assembly Bill (AB) 337, which amended Government Code §§51175–51188 to require the CAL FIRE, in cooperation with local fire authorities, to identify and map VHFHSZs within LRAs in California. Twenty-five counties contain VHFHSZs and 33 do not. Once CAL FIRE identifies the VHFHSZs, they are to notify the local authority, who then has the option of adopting the model ordinance developed by the State Fire Marshal, adding to or subtracting areas from the identified zone(s), indicating that they already “meet or exceed” the Bates minimums, or some combination of these. Subsequent amendments such as AB 3819, AB 1216, and Senate Bill (SB) 1369 provide additional regulatory requirements including roof requirements, clearances around structures, and other fire defense improvements in VHFHSZs in LRAs. Where the lands in the State are designated as LRAs, as within cities and other classified unincorporated areas, all fire protection responsibility rests with the established local government entity.⁶

State Responsibility Area: SRAs are areas where CAL FIRE has legal responsibility for wildland fire protection. SRAs are defined in Public Resources Code §§4125–4137 as lands classified by the State Board of Forestry as areas where it is the primary financial responsibility of the State to prevent and suppress fires. Such lands are (1) exclusive of incorporated cities and federal lands regardless of ownership; (2) covered wholly or in part by timber, brush, undergrowth or grass, whether of commercial value or not, which protect the soil from erosion, retard runoff of water, or accelerated percolation; and (3) used principally for range or forage purposes. SRAs do not exceed a housing density of 3 units per acre, contain wildland vegetation as opposed to agriculture or ornamentals, and have watershed value and/or has range/forage value, effectively eliminating most desert lands.⁷

Very High Fire Hazard Severity Zone (VHFHSZ): VHFHSZs are woodland and brush areas with high fire potential.

⁵ U.S. Department of the Interior, U.S. Department of Agriculture, and California Department of Forestry and Fire Protection. 2018-2023. California Master Cooperative Wildland Fire Management and Stafford Act Response Agreement. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5350828.pdf

⁶ California Department of Forestry and Fire Protection. N.d. Fire and Resource Assessment Program (FRAP): Wildfire Hazard Real Estate Disclosure. <https://frap.fire.ca.gov/frap-projects/wildfire-hazard-real-estate-disclosure/> (accessed September 6, 2022).

⁷ California Department of Forestry and Fire Protection. N.d. Fire and Resource Assessment Program (FRAP): Wildfire Hazard Real Estate Disclosure. <https://frap.fire.ca.gov/frap-projects/wildfire-hazard-real-estate-disclosure/> (accessed September 6, 2022).

Wildfire Risk: In the 2018 Consolidated Appropriations Act (House Resolution 1625, Section 210), Congress directed the Forest Service to produce a nationwide map that could inform communities about wildfire risk, help them understand their risk profile, and guide them toward steps to reduce their risk. Wildfire risk is the combination of *hazard* and *vulnerability*. The likelihood (of fire occurring) and intensity (physical condition of topography and vegetation fuel available to burn) equals *hazard* and *vulnerability* is the mix of exposure (location where wildfire can occur) and susceptibility (propensity of a home or community to be damaged if wildfire occurs).⁸

Wildfire Risk = Hazard [*Likelihood + Intensity*] x Vulnerability [*Exposure + Susceptibility*]

Slope Instability / Landslides: The Safety Element of the City General Plan identifies landslides as the result from the downward movement of earth or rock materials that have been influenced by gravity and that occur due to various factors including steep slope conditions, erosion, rainfall, groundwater, nature of the underlying soil or bedrock, previous landslide deposits, and grading impacts.⁹

Impact Analysis

The State CEQA Guidelines recommend the consideration of four questions when addressing the potential for significant impact to wildfires. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

The proposed project would result in no impacts to wildfire in relation to the impairment of adopted emergency response and/or emergency evacuation plans in or near SRAs or lands classified as VHFHSZ. The proposed project site is not located within or near an SRA, LRA, or VHFHSZ (Figure 3.9-1, *Fire Hazard Severity Map*). The proposed project site is located approximately 3 miles away from the nearest SRA VHFHSZ to the north and approximately 2.3 miles away from the nearest LRA VHFHSZ to the southeast. According to CAL FIRE's website and Fire Hazard Severity Zone map, the proposed project site is not located within or near an LRA or SRA.¹⁰ In addition, the Safety Element of the City General Plan states that "the city does not have a significant history of fire – structures or woodland" and "with the city approaching *build-out* [conditions], there are no longer any high-fire danger zones located within the City of Placentia."¹¹ Furthermore, in 2019 the City transitioned to a full-service public safety entity, Placentia Fire and Life Safety Department (PFLSD), who has joint agreements with the surrounding jurisdictions that has increased access to various special operations resources and equipment for enhance the City's capacity for responding to urban and nearby wildland fires.¹² The City has implemented a

⁸ U.S. Forest Service. N.d. Wildfire Risk. <https://wildfirerisk.org/understand-risk/> (accessed September 6, 2022).

⁹ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

¹⁰ California Department of Forestry and Fire Protection, Office of the State Fire Marshall. N.d. Fire Hazard Severity Zones Maps. <https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/> (accessed November 20, 2019).

¹¹ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

¹² City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

fire and life safety department plus evacuation routes and Transportation Assembly Points (TAPs).¹³ The emergency response and/or evacuation plans would not be adversely affected as a result of the proposed project as the project site and staging area would be fenced off and construction would not obstruct any major roads.

The City does not have a significant history of structural or wildland fire and is approaching *build-out* conditions with no high-fire danger zones located within the City.¹⁴ Regardless of the City's fire history, the PFLSD has increased the City's capacity for responding to urban and nearby wildland fires and provides 24-hour emergency response to a wide variety of critical situations including fires, medical emergencies, accidents, and miscellaneous public assistance requests.¹⁵ Furthermore, despite having a low fire risk history, the City has elected to provide pre-designated evacuation routes and TAPs as identified in Exhibit 7-5 (Evacuation Routes) of the Safety Element of the City General Plan. The evacuation routes and TAPs would allow community members to either self-evacuate or shelter at assembly points for those who may not have access to adequate transportation and may require special assistance in case of emergencies.¹⁶ The City's nearest evacuation route to the proposed project site is Orangethorpe Ave, located directly north of the project site and approximately 0.07 mile away. The nearest TAP is the Parque De Los Niños (PDLN), located adjacent to the proposed project site between N. Van Buren St. and Richfield Rd. trailheads.¹⁷ The proposed project would involve improvements to a flood control access road that is maintained by the Orange County Flood Control District along the Atwood Channel right-of-way that entail an asphalt concrete (AC) paving and decomposed granite path, midblock crossings, gate access, and signage. The project site and staging area would be fenced during construction, with permanent fencing and gates once installed. The proposed project is not within or near an SRA and/or VHFHSZ and would not hinder emergency response and emergency evacuation plans. Therefore, there would be no impacts to wildfire related to the impairment of adopted emergency response and emergency evacuation plans in or near SRA or lands classified as VHFHSZ from the proposed project. No further analysis is warranted.

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

The proposed project would result in no impacts to wildfire in relation to exacerbated wildfire risk due to slope, prevailing winds, and other factors and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire in or near SRAs or lands classified as VHFHSZs. The proposed project site is not located within or near an SRA, LRA, or VHFHSZ.¹⁸ In addition, the proposed project site is relatively flat with an approximate

¹³ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

¹⁴ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

¹⁵ City of Placentia. N.d. Placentia Fire and Life Safety Department. <https://www.placentia.org/24/Fire> (accessed August 29, 2022).

¹⁶ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

¹⁷ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

¹⁸ California Department of Forestry and Fire Protection, Office of the State Fire Marshall. N.d. Fire Hazard Severity Zones Maps. <https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/> (accessed November 20, 2019).

16.7-foot elevation difference from east end to west end of the 1.0-mile trail length (Section 1, *Project Description*). The slope, prevailing winds, and other factors would not be adversely affected as a result of the proposed project because the project site is a paved trail that is relatively flat with minor landscaping and minimal construction grading of up to 12 inches.

The Santa Ana Winds pose a significant fire hazard to the city each year, typically from September to December. The combination of dry air, low humidity, and heavy winds contribute to “fire weather.”¹⁹ However, the City does not have a significant history of structural or wildland fire and is approaching *build-out* conditions with no high-fire danger zones located within the City.²⁰ The proposed project with its relatively flat terrain site, location outside an SRA and VHFHSZ, and its contribution to the City’s build-out as articulated in the General Plan, would not exacerbate wildfire risk. Therefore, there would be no impacts to wildfire related to exacerbated wildfire risk due to slope, prevailing winds, and other factors and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire from the proposed project. No further analysis is warranted.

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

The proposed project would result in no impacts to wildfire in relation to the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment in or near SRAs or lands classified as VHFHSZs. The proposed project site is not located within or near an SRA, LRA, or VHFHSZ. The project site is currently an access road within a flood control easement that is not being used by the public. The proposed project involves improvements entailing a cycling and pedestrian path. There would be no required wildfire response or utility infrastructure installation that would adversely exacerbate fire risk or result in impacts to the environment as a result of the proposed project.

The City does not have a significant history of structural or wildland fire and it is approaching *build-out* conditions with no high-fire danger zones located within the City.²¹ The proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate wildfire risk or result in impacts to the environment as the proposed project would include a paved path with minimal planting, marked street crossings, access gates, and signage and would not restrict potential emergency access of the road. In addition, the project site is located in an urbanized setting with existing infrastructure, low wildfire risk, and would not result in population growth (see Section 3.14, *Population and Housing*), and thus installation of new infrastructure would not be required in accordance with fire/life/safety requirements. Furthermore, the proposed project would be a publicly accessible path for cyclists, pedestrians, and maintenance vehicles, and would contribute to the City’s build-out, thus minimizing any potential for fire conditions. Therefore, the proposed project would have no impacts to wildfire and would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency

¹⁹ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

²⁰ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

²¹ City of Placentia. 2019. City of Placentia General Plan, Safety Element. <https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment in or near SRAs or lands classified as VHFHSZs from the proposed project. No further analysis is warranted.

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

The proposed project would result in no impacts to wildfire related to exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes in or near SRAs or lands classified as VHFHSZs. The proposed project site is not located within or near an SRA, LRA, or VHFHSZ. In addition, the proposed project site is relatively flat with an approximate 16.7-foot elevation difference from east end to west end of the 1.0-mile trail length (Section 1, *Project Description*). Furthermore, the majority of the City has not been mapped as being within a zone susceptible to landslides as designated by the State of California Seismic Hazard Zones.²² Based on Exhibit 7-2 (Potential Liquefaction and Landslide Hazard Zones) in the Safety Element of the City General Plan, the nearest slope instability area is in the northwest area of the city, south of Anaheim Union Reservoir in Tri City Park,²³ over 3 miles northwest of the project site. There would be no exposure of people or structures to significant post-fire risk as a result of the proposed project because the project site is within an urban low fire risk area, outside a landslide zone (see Section 3.7, *Geology and Soils*), and on a relatively flat site that is paved and would be maintained as a paved surface. As the project would involve only minor grading and repaving, there would be no major drainage changes (see Section 3.10, *Hydrology and Water Quality*).

While the proposed project site is within a 100-year flood zone as identified in Exhibit 7-6 (FEMA Flood Zones) of the Safety Element under the City's General Plan, there is a 1 percent chance of flooding each year. The "District has implemented measures to reduce the likelihood of flooding at these locations. Drainage through the City is controlled and directed via storm drains and storm drain channels, including ... Atwood Channel."²⁴ The proposed project is on relatively flat terrain, not located within an SRA and VHFHSZ, not within a zone susceptible to landslides or seismic hazards, and its contribution to the City's build-out would not exacerbate wildfire risk. Therefore, the proposed project would result in no impacts to wildfires related to exposure of people or structures to significant risks as a result of runoff, postfire slope instability, or drainage changes in or near state responsibility areas or lands classified as VHFHSZs. No further analysis is warranted.

²² City of Placentia. 2019. City of Placentia General Plan, Safety Element.
<https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

²³ City of Placentia. 2019. City of Placentia General Plan, Safety Element.
<https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

²⁴ City of Placentia. 2019. City of Placentia General Plan, Safety Element.
<https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

This analysis is undertaken to determine if the proposed project may have a significant impact to Mandatory Findings of Significance, thus requiring the consideration of mitigation measures or alternatives in accordance with Section 15063 of the State CEQA Guidelines.¹ Mandatory Findings of Significance at the proposed project site were evaluated with regard to City of Placentia General Plan and in consideration of the analysis conducted in Sections 3.1, *Aesthetics*, through 3.20, *Wildfire*.

In addition to the CEQA analysis undertaken in this Initial Study, Caltrans is the federal Lead Agency (acting on delegated authority from the Federal Highway Administration) pursuant to NEPA. The proposed project is undergoing environmental review pursuant to NEPA to the satisfaction of Caltrans based on the Caltrans Local Assistance Procedures. A Caltrans PES and Categorical Exclusion with technical studies are expected to be prepared for the proposed project.

Impact Analysis

The State CEQA Guidelines recommend the consideration of three questions when addressing the potential for significant impact to Mandatory Findings of Significance:

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

The proposed project would result in less than significant impacts after incorporation of mitigation measures NOISE-1 and TRIBAL-1 in relation to the quality of the environment, substantially reducing the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, substantially reducing the number or restricting the range of a rare or endangered plant or animal or eliminating important examples of the major periods of California history or prehistory. The proposed project would result in no impact to Biological Resources or Cultural Resources in relation to substantially reducing the habitat of a fish or wildlife species, causing a fish or wildlife population to drop below self-sustaining levels, threatening to eliminate a plant or animal community, substantially reducing the number or restricting the range of a rare or endangered plant or animal or eliminating important examples of the major periods of California history or prehistory (please see Sections 3.4, *Biological Resources*, and 3.5, *Cultural Resources*). It is unlikely that any archaeological resources would be encountered in the depth below the disturbed pavement layer. However, construction activities would have a short-term potential effect on the quality of the environment in relation to aesthetics and noise. Construction activities would also have a potential effect on tribal cultural resources.

Aesthetics: Daytime or Nighttime Glare

As stated in Sections 3.1, *Aesthetics*, the proposed project would have the potential to result in less than significant impacts to the quality of the environment in relation to daytime or nighttime glare. The proposed project is located within a highly urbanized setting in the City of Placentia that includes existing streetlights along the surrounding streets. In addition, both the City and Orange

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.

County have high levels of nighttime light. There is no existing lighting within the current gravel access road (nonintersectional) portions of the site. The proposed project would be developed on a vacant gravel access road with a new paved multiuse path, and there would be no new lighting added. As to daytime glare, existing reflective sources such as surfaces, motor vehicles on the roadway, windows on buildings, and water in the Atwood Channel are current examples occurring at the project site. The staging area would be similar to existing conditions, and the proposed project would have similar surfaces as the neighborhood roads. However, during construction (approximately 8-month duration), there would be glare from equipment and materials that would be temporary. Therefore, the proposed project would have the potential to result in less than significant impacts to quality of the environment.

Noise: Construction Activities near Sensitive Receptors

The proposed project would have the potential to result in significant impacts to the quality of the environment. Incorporation of mitigation measures would reduce these impacts to below the level of significance. Thresholds for decibel levels, specifically, A-weighted decibel levels (dBA) for healthy listening as well as noise standards were gathered from the state, City of Placentia, and the Federal Highway Administration. In addition, noise monitoring was conducted to determine ambient noise at the site, with peak noises being attributed to vehicular use from neighborhood roadways. Furthermore, a sensitive receptor (single-family residence) is located 40 feet from the site, and Parque de Los Niños (PDLN) is located within 0.25-mile. The proposed project is not expected to introduce new source of noise, induce traffic, or increase noise levels. However, construction equipment would generate noise levels that would potentially exceed the threshold of 70 dBA. Based on construction equipment, location, timing, duration of activity, and distance to sensitive receptors, the proposed project would be required to implement mitigation measure NOISE-1 as identified in Section 3.13, *Noise*. The mitigation could potentially reduce the noise level by 20 dBA by including equipment mufflers, noise baffles, blankets, and the use of temporary sound barriers. The construction noise would be temporary for a period of approximately 8 months.

Tribal Cultural Resources: Ground-Disturbing Activities in Native Undisturbed Soils

The proposed project would have the potential to result in significant impacts to tribal cultural resources if ground-disturbing activities occur in native soils. Impacts would be reduced to below the level of significance with the incorporation of mitigation. The project's Area of Potential Effect (APE) is located within a 7.5-minute U.S. Geological Survey quadrangle that is positive for sacred land. Although the presence of significant buried tribal cultural resources is very low due to the inherent nature and development of the project area, which is paved over and substantially disturbed, the potential to encounter tribal cultural resources exists during ground-disturbing activities in native undisturbed soils. Implementation of Mitigation Measure TRIBAL-1 would be required to reduce potential impacts to below the level of significance.

Therefore, the proposed project would result in less than significant impacts to quality of the environment with the incorporation of mitigation measures NOISE-1 and TRIBAL-1.

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

The proposed project would result in less than significant impacts with mitigation measures regarding impacts that are individually limited but cumulatively considerable. Aside from the

proposed project, three related private and public projects are proposed or planned in the vicinity of the proposed project (Table 3.21-1, *Timeframe for Related Projects*). Two of the projects (A and C) may have construction overlap with the proposed project. The proposed project would include a paved multiuse path; new midblock crossings; a trailhead at PDLN; new street signs and striping; and wayfinding signage. Only one related project (A) has a direct connection to the proposed project and can be accessed from S. Van Buren Street, whereas the other two related projects (B and C) are located approximately 2.14 miles and 0.89 mile away, respectively, and would require trail or bikeway connectors for accessing them. However, both projects (B and C) are part of the Go Placentia Loop linkage destinations. The proposed project would provide existing residents and new residents from Hudson Homes (A) with a connection to citywide and countywide destinations, including Projects B and C. The proposed project would be completed within approximately 8 months and would have short-term impacts during construction. The proposed project would not contribute to cumulatively considerable impacts in conjunction with the planning efforts within the vicinity of the proposed project. The environmental impacts would be consistent with the countywide trail network. The project is consistent with several elements of the General Plan (Section 1.0, *Project Description*) as well as the countywide and citywide bikeway network, pedestrian network under Complete Streets, the OCTA public transportation and trail network.

**TABLE 3.21-1
TIMEFRAME FOR RELATED PROJECTS**

Label	Project Name	Construction Overlap Time Period
A	Hudson Homes	Approved: April 20, 2021, units are available but currently under construction as of February 2023
B	Metrolink Placentia and Parking Structure	November 2020 – Underground Utilities Completion TBD – Station Construction & Completion as of February 2023 ¹
C	Anaheim Canyon Station Project	2023 – Completion (time of year unknown)
Source: ¹ City of Placentia. N.D. Metrolink Station and Parking Structure. https://placentia.org/705/Metrolink-Station-and-Parking-Structure (accessed February 23, 2023).		

The proposed project would result in no impact, with no contribution to cumulative impacts, regarding six of environmental issue areas: Agriculture/Forestry Resources, Cultural Resources, Energy, Population/Housing, Public Services, and Wildfire. These six issue areas are not considered further.

The proposed project would result in less than significant impacts regarding 11 environmental issue areas: Aesthetics, Air Quality, Biological Resources, Geology and Soils, Greenhouse Gas Emissions, Hydrology/Water Quality, Land Use and Planning, Mineral Resources, Recreation, Transportation, and Utilities/Service Systems. Finally, the proposed project would result in less than significant impacts with incorporation of mitigation to three environmental issue areas: Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources.

Aesthetics: Daytime or Nighttime Glare

The proposed project would not contribute to cumulatively considerable impacts in relation to aesthetics, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). Project C is not a new project and only includes infrastructure upgrades. All three related projects and the proposed project are within urbanized settings with high levels of nighttime light including existing streetlights along the

surrounding streets. However, the related projects would include night lighting, whereas the proposed project would not. The proposed project would be developed on a vacant gravel access road with a new paved multiuse path and no new lighting. As to daytime glare, existing reflective sources such as surfaces, motor vehicles on the roadway, windows on buildings, and water in the Atwood Channel are current examples occurring at the project site with similar conditions. The proposed project would have similar surfaces as the neighborhood roads and the related projects would also have similar surfaces such as roads, vehicles, and windows. The transportation hubs (B and C) already have vehicles nearby with emanating glare. However, during construction (approximately 8-month duration), there would be glare from equipment and materials that would be temporary. Therefore, the related projects would not be expected to emanate glare. As with the proposed project, the related projects would be located within an area already characterized by very high nighttime light levels. Therefore, the proposed project would not result in cumulatively considerable impacts regarding aesthetics.

Air Quality

The proposed project would not contribute to cumulatively considerable impacts in relation to air quality, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). The proposed project, similar to the related projects, would have temporary construction impacts. The proposed project would have an 8-month construction duration, whereas the related projects would entail longer timeframes based on the type and nature of the project. As stated in Section 3.3, *Air Quality*, short-term cumulative impacts related to air quality could occur if the proposed project's construction activities overlapped with nearby construction activities, but the related projects are expected to be completed prior to the start of the proposed project's anticipated construction schedule in August 2023. The proposed project is also expected to result in less than significant impacts related to a cumulatively considerable net increase of criteria pollutant during operations. Both construction and operation activities associated with the proposed project would result in less than significant impacts in relation to exposing sensitive receptors to substantial pollutant concentrations in excess of the standards established by the South Coast Air Quality Management District. Although the related projects could potentially require mitigation based on the proximity of sensitive receptors, the combined effect of the proposed project and related projects is not anticipated to exceed significance thresholds. Therefore, the proposed project would not result in cumulatively considerable impacts regarding air quality.

Biological Resources

The proposed project would not contribute to cumulatively considerable impacts in relation to biological resources, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). Of the two transportation hubs, one (C) would entail infrastructure upgrades, whereas the residential project (A) and the second transportation hub (B) are new developments. Project C is not a new project and only includes infrastructure upgrades. All three related projects and the proposed project are within urbanized settings. As stated in Section 3.4, *Biological Resources*, there is limited potential for habitat connectivity in the general vicinity of the site due to the high level of urban development. Due the urban development and high level of human disturbance, there is a lack of suitable habitat for federal or state sensitive species or species of special concern. The proposed project would result in less than significant impacts to biological resources related to federally or state protected wetlands as it would not impact the Atwood Channel. The nearest related project (A) to the Atwood Channel could potentially require mitigation to reduce potential effects to the channel, which contains Waters of the State (WSC). Due to the activity at Project A and the proposed project, it is

anticipated that a permit under the Waste Discharge Requirements Program may be required as proximity of project activities to the channel increases the likelihood of indirect impacts in the form of falling debris from clearing and grubbing or grading activities. After mitigation has been implemented for Project A, the potential for effects to the Atwood Channel, a WSC, would be less than significant. Therefore, the proposed project would not result in cumulatively considerable impacts regarding biological resources.

Geology and Soils

The proposed project would result in no impacts related to rupture of a known earthquake fault, landslides, substantial erosion or loss of topsoil, expansive soil, or soils incapable of supporting alternative wastewater disposal systems; therefore, it would not contribute to cumulatively considerable impacts in relation to those geologic resources. The proposed project would result in less than significant impacts related to strong seismic ground-shaking, liquefaction, and unstable soils, as these geologic hazards exist but would not be exacerbated by the proposed project. When considered cumulatively with the related projects in the vicinity, the proposed project would not expose substantially more people to these geological hazards than that which already exists in the City of Placentia. The proposed project does not involve any structures; therefore, it would not contribute to a substantial increase in structures that would increase risks related to geologic hazards. Additionally, the proposed project would result in less than significant impacts related to paleontological resources, as the soils have low paleontological sensitivity, and the construction involves shallow excavation depths (12-inch grading and 36-inch fence installation). As the potential to encounter paleontological resources is very low, the proposed project would not contribute to cumulatively considerable regarding geology and soils.

Greenhouse Gas Emissions

The proposed project would not contribute to cumulatively considerable impacts in relation to greenhouse gas emissions, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). Of the two transportation hubs, one (C) would entail infrastructure upgrades, whereas the residential project (A) and the second transportation hub (B) are new developments. Project C is not a new project and only includes infrastructure upgrades. All three related projects and the proposed project are within urbanized settings. As stated in Section 3.8, *Greenhouse Gas Emissions*, the proposed project would reduce per capita vehicle miles traveled (VMT) by improving connectivity to public transit and increasing active transportation accessibility, which is expected to reduce vehicular use in the area. In comparison, Projects B and C have the potential to facilitate greater public transit activity during operations, thereby reducing VMT, although Project A may require mitigation measures to reduce VMT. Together with the related projects, the proposed project would not result in cumulatively considerable impacts regarding greenhouse gas emissions.

Hazards and Hazardous Materials

The proposed project would not contribute to cumulatively considerable impacts in relation to hazards and hazardous materials, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). Of the two transportation hubs, one (C) would entail infrastructure upgrades, whereas the residential project (A) and the second transportation hub (B) are new developments. Due to the presence and proximity of existing oil and gas wells, pumping facilities, and oil pipeline to the project site plus the nature of construction activities within the proposed project (Section 1, *Project Description*), there is a potential risk for damage to these facilities that could cause accidental release of hazardous

materials during the construction phase of the project. Project A is the only related project that is within the proposed project's vicinity, S. Van Buren Street. Project A is within a private property on S. Van Buren Street where oil and gas wells are located outside in nearby properties. The proposed project contains one pumping well directly on the proposed trail alignment less than 300 feet east of the South Van Buren Street entrance. The presence and consideration of the existing oil and gas facilities within the project site especially during construction requires that the proposed project implement mitigation measures HAZ-1 and HAZ-2 as identified in Section 3.9, *Hazards and Hazardous Materials*. The nearest related project (A) would not be expected to damage gas and oil facilities as the project is on private land with wells outside the surrounding area. Therefore, impacts would be less than significant with incorporation of mitigation measures, and the proposed project would not result in cumulatively considerable impacts regarding hazards and hazardous materials.

Hydrology and Water Quality

The proposed project would not contribute to cumulatively considerable impacts in relation to hydrology and water quality, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). Of the two transportation hubs, one (C) would entail infrastructure upgrades, whereas the residential project (A) and the second transportation hub (B) are new developments. Similar to the proposed project, the surrounding projects do not significantly alter the level of impermeability from the existing conditions, creating minimal impacts to groundwater recharge, drainage patterns, erosion and siltation, and flooding. Project B had installation of utilities in 2020 with no known date for the construction of the structure which is still to be determined. Project C, which only entails infrastructure, is scheduled to enter the construction phase in 2023, but no specific date has been provided. The proposed project would not contribute towards cumulative impacts to hydrology and water quality during construction as there may not be any overlap with construction based on the known timelines for the related projects. Additionally, the proposed project would comply with all applicable construction standards and requirements, such as the Stormwater Pollution Prevention Plan that would be required for the project. Finally, the proposed project does not include any structures that can impede or redirect flood flows; nor would it introduce significant new sources of pollution during construction activities, daily use, or operations and maintenance. Therefore, impacts to hydrology and water quality would be less than significant, and the proposed project would not result in cumulatively considerable impacts regarding hydrology and water quality.

Land Use and Planning

The proposed project would not contribute to cumulatively considerable impacts in relation to land use and planning, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). The proposed project would result in no impacts in relation to physical division of an established community and would therefore not contribute to cumulative impacts regarding this topic (see Section 3.11, *Land Use and Planning*). The proposed project would result in less than significant impacts in relation to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect because although the project site is located within a mapped special flood hazard area, it has been designed in a manner that is compatible with the existing floodplain designation, and it would not cause a major hydrological change that could impair or diminish existing or probable future requirements for flood prevention and water conservation (see Appendix F, *Hydrology Report*). As the proposed project would be a recreational use on the District's property that does not alter the flood prevention capabilities of Atwood Channel, it would be consistent with

Section 2.3 of the City Water Code. Related Project (A)² is a high-density residential project that would also be partially located within the existing flood hazard area along Atwood Channel (Zone AE). Related Projects (B) and (C) are transportation hubs located outside of a flood hazard area (Zone X) and are therefore not anticipated to have any effects on flood risk. Similar to the proposed project, the related projects do not significantly alter the level of impermeability from the existing conditions, creating minimal impacts to drainage patterns and flooding. Additionally, the proposed project does not include any structures that can impede or redirect flood flows. Therefore, impacts to land use and planning would be less than significant, and the proposed project would not result in cumulatively considerable impacts regarding land use and planning.

Mineral Resources

The proposed project would result in no impacts related to loss of availability of a locally important mineral resource recovery site; therefore, it would not contribute to cumulatively considerable impacts in relation to a locally important mineral resource recovery site. The proposed project would result in less than significant impacts to mineral resources in relation to the loss of availability of a known mineral resource, as there is one pumping well (Well Z25, API 0405906048) located directly on the proposed trail alignment, and the proposed project site is located within an MRZ-2, or an area where geologic data indicate that significant mineral resources are present or likely. While the proposed project site contains mineral resources, the oil well operations would not be affected by the proposed project, as neither construction nor operation of the proposed project would interfere with the petroleum extraction. The remainder of the proposed project site that is not currently used for petroleum extraction is not available for use as a mineral resource and is not planned for use as a mineral resource by the City. Therefore, despite its partial location within an MRZ-2 and the presence of petroleum, the site is already developed for other purposes and therefore the proposed project would not result in the loss of availability of a mineral resource, and it would not contribute to cumulative impacts when considered with the loss of availability of a mineral resource due to the related projects. Additionally, the development of the proposed trail does not preclude the area from development for the purpose of mineral extraction in the future. Therefore, the proposed project would not result in cumulatively considerable impacts to mineral resources.

Noise

The proposed project would not contribute to cumulatively considerable impacts in relation to noise, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). The proposed project, similar to the related projects, would have temporary noise impacts. The proposed project would have an 8-month construction duration, whereas the related projects would entail longer timeframes based on the type and nature of the project. Project B had installation of utilizes in 2020 with no know date for the construction of the structure, which is still to be determined. Project C, which only entails infrastructure, is scheduled to enter the construction phase in 2023, but no specific date has been provided. The proposed project would not contribute to cumulative impacts as there may not be any overlap with construction based on the known timelines for the related projects. The proposed project would not contribute to cumulative impacts on noise, in conjunction with other planning efforts in the vicinity, as the net effect of the transportation and recreation planning efforts would be to enhance bikeway and trail facilities to accommodate users within a disadvantaged community. However, the proposed project would result in potentially significant impacts to noise and would require the incorporation of mitigation measure NOISE-1 as outlined in Section 3.13, *Noise*.

² City of Placentia. N.d. Hudson Townhomes. <https://placentia.org/964/Hudson-Townhomes> (accessed February 24, 2023).

Construction activities associated with the proposed project would result in less than significant impacts after mitigation in relation to exposing sensitive receptors to noise levels in excess of the standards established by the state, City of Placentia, and the Federal Highway Administration. The proposed project would comply with all applicable construction standards and requirements. In addition, the proposed project is not expected to introduce a new source of noise, induce traffic, or increase noise levels. However, construction equipment would generate noise levels that would potentially exceed the threshold of 70 dBA but would reduce dBA levels by up to 20 dBA through the use of equipment mufflers, noise baffles, blankets, and the use of temporary sound barriers. The construction noise would be temporary for a period of 8 months. Therefore, impacts would be less than significant with incorporation of mitigation measures, and the proposed project would not result in cumulatively considerable impacts regarding noise.

Recreation

The proposed project would not contribute to cumulatively considerable impacts in relation to recreation, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). The proposed project would result in no impacts in relation to increased use of existing neighborhood and regional parks or other recreational facilities that would contribute to their physical deterioration (see Section 3.16, *Recreation*). The proposed project would result in less than significant impacts in relation to adverse physical effects on the environment as a result of existing recreational facilities or proposed construction or expansion of recreational facilities because the proposed project includes the construction of approximately 1.0 mile of recreational facilities, which would have potential temporary effects during construction (see hazards and hazardous materials, noise and tribal cultural resources), but no long-term adverse physical effect on the environment. The operation stage for the project would be similar to the existing condition, as the proposed trail would have a paved surface similar to the existing paved road, and access road vehicles would continue to maintain the flood control channel. Of the related projects, Project A³ is a high-density residential project that includes construction of recreational areas to serve the 139 new residential townhomes. Similar to the proposed project, the site for Project A has been heavily graded and primarily used as a parking lot prior to construction, and the recreational facilities would constitute an improvement to the environment compared to the past use. Projects B and C are transportation hubs that do not include or require the construction of recreational facilities, so they are anticipated to have no impacts to recreation. Therefore, impacts to recreation would be less than significant and the proposed project would not result in cumulatively considerable impacts regarding recreation.

Transportation

The proposed project would not contribute to cumulatively considerable impacts in relation to transportation, in conjunction with other planning efforts within the vicinity as the related projects would involve high density residential and transportation hubs (A, B, and C). As the proposed project would result in no impacts in relation to substantially increasing hazards due to a design feature or incompatible use and inadequate emergency access, it would therefore not contribute to cumulative impacts regarding these topics (see Section 3.17, *Transportation*). The proposed project would result in less than significant impacts during construction in relation to conflicts or inconsistency with CEQA Guidelines §15064.3(b), as well as conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The proposed project, similar to the related projects, would have temporary

³ City of Placentia. N.d. Hudson Townhomes. <https://placentia.org/964/Hudson-Townhomes> (accessed February 24, 2023).

impacts. Construction of the proposed project may result in temporary disruption of local traffic and a temporary increase in per capita vehicle miles traveled (VMT) for construction worker vehicles; however, the additional trips would be temporary and would not result in degradation of existing capacity of the roads surrounding the project site. The proposed project would have an 8-month construction duration, whereas the related projects would entail longer timeframes based on the type and nature of the project. Project B had installation of utilities in 2020 with no known date for the construction of the structure which is still to be determined. Project C, which only entails infrastructure, is scheduled to enter the construction phase in 2023, but no specific date has been provided. The proposed project would not contribute towards cumulative impacts as there may not be any overlap with construction based on the known timelines for the related projects. The proposed project would comply with all applicable construction standards and traffic control requirements described in Section 1.11, *Construction Activities*. Therefore, impacts would be less than significant, and the proposed project would not result in cumulatively considerable impacts regarding transportation.

Tribal Cultural Resources

The proposed project would not contribute to cumulatively considerable impacts in relation to tribal cultural resources, in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). The related projects would require considerable deeper levels of excavation compared to the shallow 12 inches of excavation related to the proposed project. The proposed project revealed that there were no records or presence of previous cultural resources in the area based on the research conducted yet there was positive indication of sacred lands. As such, there is potential to encounter resources in native soils within the project area. The proposed project would require the implementation of mitigation measure TRIBAL-1 to reduce potential impacts to below the level of significance. As there would be no net substantial adverse change in the significance of a tribal cultural resource as a result of the proposed project after implementation of mitigation measures, there would be no cumulative impacts. Therefore, the proposed project would not result in cumulatively considerable impacts regarding tribal cultural resources.

Utilities and Service Systems

The proposed project would not contribute to cumulatively considerable impacts in relation to utilities and service systems in conjunction with other planning efforts within the vicinity as the related projects would involve high-density residential and transportation hubs (A, B, and C). Of the two transportation hubs, Project C would entail infrastructure upgrades, whereas the residential project (A) and the second transportation hub (B) are new developments. While the surrounding projects may have impacts to utilities and service systems based on their project types, these projects have been reviewed under CEQA, are within the City of Placentia General Plan, and would conform with all local, statewide, and federal ordinances and laws regarding utilities and service systems. Project B had installation of utilities in 2020 with no known date for the construction of the structure which is still to be determined. Project C, which only entails infrastructure, is scheduled to enter the construction phase in 2023, but no specific date has been provided. The proposed project would not contribute to cumulative impacts to Utilities and Service Systems during construction as there may not be any overlap with construction based on the known timelines for the related projects. Therefore, impacts to utilities and service systems would be less than significant, and the proposed project would not result in cumulatively considerable impacts regarding utilities and service systems.

The environmental impacts of the related projects would add to the impacts of the proposed project on a cumulative basis. However, the impacts of the proposed project would be limited in scope and intensity due to the nature of the project with a paved multiuse path; new midblock crossings; a trailhead at PDLN; new street signs and striping; and wayfinding signage. Based on a small scale, minimal excavation, short construction timeframe, and types of improvements proposed, the proposed project impacts would be less than significant after mitigation. The impacts associated with the proposed project are not expected to be cumulatively considerable when added to the impacts of related projects in the vicinity.

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

The proposed project would result in less than significant impacts after incorporation of mitigation in relation to having environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. Potential impacts to hazards and hazardous materials and construction noise would be reduced to below the level of significance with the incorporation of mitigation measures HAZ-1, HAZ-2, and NOISE-1.

Hazards and Hazardous Materials

Due to the presence and proximity of existing oil and gas wells, pumping facilities, and oil pipelines to the proposed project site, plus the nature of construction activities associated with the proposed project (Section 1, *Project Description*), there is a potential risk for damage to these facilities that could cause accidental release of hazardous materials during the construction phase of the project. The presence and consideration of the existing oil and gas facilities within the project site especially during construction requires that the proposed project implement mitigation measures HAZ-1 and HAZ-2 as identified in Section 3.9, *Hazards and Hazardous Materials*. Potential environmental impacts for hazards and hazardous materials associated with the proposed project regarding adverse effects on human health and safety, directly or indirectly, during construction would be expected to be reduced to below the level of significance with the incorporation of mitigation measures.

Noise

Construction equipment would generate noise levels that would potentially exceed the threshold of 70 dBA, resulting in potential effects to the nearest sensitive receptors, including a single-family residence located 40 feet from the project site and PDLN located within a quarter mile of the project site. Based on construction equipment, location, timing, duration of activity, and distance to sensitive receptors, the proposed project would be required to implement mitigation measure NOISE-1 as identified in Section 3.13, *Noise*. The mitigation could potentially reduce the noise level by 20 dBA by including equipment mufflers, noise baffles, blankets, and the use of temporary sound barriers. The construction noise would be temporary for a period of approximately 8 months. Potential environmental impacts for noise associated with the proposed project regarding adverse effects on human health and safety, directly or indirectly, during construction would be expected to be reduced to below the level of significance with the incorporation of mitigation measures.

SECTION 4.0 REFERENCES

- California Air Resources Board. 2005. Air Quality and Land Use Handbook: A Community Health Perspective. <http://www.arb.ca.gov/ch/handbook.pdf>
- California Air Resources Board. 2015. Area Designations Maps / State Ambient Air Quality Standards. <http://www.arb.ca.gov/desig/adm/adm.htm>
- California Air Resources Board. 2020. Area Designations Maps / State Ambient Air Quality Standards. <http://www.arb.ca.gov/desig/adm/adm.htm>
- California Association of Sanitation Agencies. N.d. Definition of Terms – S. <http://www.casaweb.org/definition-of-terms/s> (accessed February 17, 2023).
- California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, Appendix G.
- California Department of Conservation, California Division of Mines and Geology (CDMG). 2018. Special Publication 42. Earthquake Fault Zones: A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California.
- California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. N.d. California Important Farmland Finder: “California Important Farmland: Most Recent: Orange, 2018.” <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed September 7, 2022).
- California Department of Conservation, Division of Mine Reclamation. N.d. Mines Online. <https://maps.conservation.ca.gov/mol/index.html> (accessed September 7, 2022).
- California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). October 11, 2019. Notice of Violation – Violation I.D. 11183273 through 11183493.
- California Department of Conservation, Geologic Energy Management Division (CalGEM). N.d. Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.82999/33.86665/18> (accessed September 7, 2022).
- California Department of Conservation. 1983. Plate 4: Santa Ana River and Lower Santiago Creek Resource Areas. In Open File Report 94-15: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part III - Orange County. By R.V. Miller. California Division of Mines and Geology.
- California Department of Conservation. 1994. Plate 1: Generalized Mineral Land Classification Map of Orange County, CA. In Open File Report 94-15: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part III - Orange County. By R.V. Miller. California Division of Mines and Geology.

- California Department of Conservation. 1998. Seismic Hazard Zone Report for the Orange 7.5-minute Quadrangle, Orange County, California.
https://filerequest.conservation.ca.gov/?q=SHZR_011_Orange.pdf
- California Department of Conservation. 2015. Seismic Hazard Zone Report for the Orange 7.5-Minute Quadrangle, Los Angeles, Orange and San Bernardino Counties, California.
- California Department of Conservation. 2022. The Williamson Act Status Report 2020-21.
https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx (accessed September 7, 2022).
- California Department of Conservation. N.d. CGS Information Warehouse: Mineral Land Classification/SMARA Maps and Reports.
<https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/> (accessed September 7, 2022).
- California Department of Fish and Game. 2002. Rarefind 2: A Database Application for the Use of the California Department of Fish and Game Natural Diversity Data Base.
- California Department of Fish and Wildlife. N.d. BIOS.
<https://apps.wildlife.ca.gov/bios/?bookmark=648> (accessed August 30, 2022).
- California Department of Forestry and Fire Protection, Office of the State Fire Marshall. 2022. Fire Hazard Severity Zones Map. <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/> (accessed February 16, 2023).
- California Department of Forestry and Fire Protection, Office of the State Fire Marshall. N.d. Fire Hazard Severity Zones Maps. <https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/> (accessed November 20, 2019).
- California Department of Forestry and Fire Protection. N.d. Fire and Resource Assessment Program (FRAP): Fire Hazard Severity Zones (FHSZ) Viewer.
<https://frap.fire.ca.gov/mapping/viewers/> (accessed August 19, 2022).
- California Department of Forestry and Fire Protection. N.d. Fire and Resource Assessment Program (FRAP): Orange County: Very High Fire Hazard Severity Zones (VHFHSZ) Map. https://osfm.fire.ca.gov/media/6739/fhszl_map30.pdf (accessed August 19, 2022).
- California Department of Forestry and Fire Protection. N.d. Fire and Resource Assessment Program (FRAP): Wildfire Hazard Real Estate Disclosure. <https://frap.fire.ca.gov/frap-projects/wildfire-hazard-real-estate-disclosure/> (accessed September 6, 2022).
- California Department of Transportation. 2016. Vista Point Planning and Design.
<https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-k-vista-points> (accessed September 7, 2022).
- California Department of Transportation. June 2004. Transportation- and Construction-Induced Vibration Guidance Manual.

- California Department of Transportation. N.d. California Scenic Highways. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> (accessed August 15, 2022).
- California Department of Transportation. N.d. California State Scenic Highway Map. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca> (accessed August 15, 2022).
- California Department of Transportation. N.d. California State Scenic Highways: Scenic Highways Program History. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> (accessed August 15, 2022).
- California Department of Transportation. N.d. Questionnaire to Determine Visual Impact Assessment (VIA) Level. Available at: <https://dot.ca.gov/programs/design/lap-visual-impact-assessment/lap-via-questionnaire> (accessed May 16, 2022).
- California Energy Commission. 2020. Renewables Portfolio Standards. <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard>
- California Geological Survey. 2014. Earthquake Fault Zones and Seismic Hazard Zones Orange 7.5-minute Quadrangle, Orange County, California, CGS Information Warehouse: Regulatory Maps.
- California Geological Survey. 2018. Earthquake Fault Zones and Seismic Hazard Zones Orange 7.5-minute Quadrangle, Orange County California, CGS Information Warehouse: Regulatory Maps.
- California Government Code, Title 5, Local Agencies [50001-57550], Chapter 6.7, Timberland [51100-51155], Article 1, General Provisions [51100-51104], § 51104 (g). <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).
- California Office of Planning and Research. N.d. General Plan Guidelines – Chapter 4. Required Elements. https://opr.ca.gov/docs/OPR_C4_final.pdf (accessed February 22, 2023).
- California Office of Planning and Research. N.d. General Plan Guidelines – Chapter 9. Implementation. https://opr.ca.gov/docs/OPR_C9_final.pdf (accessed February 22, 2023).
- California Public Resources Code, Division 10.5, California Forest Legacy Program Act of 2007 [21200-12276], Chapter 1. General provisions [12200-12231], Article 3. Definitions § 12220 (g). <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).
- California Public Resources Code, Division 4, Forests, Forestry and Range and Forage Lands [4001-4958], Chapter 8. Z'berg-Nejedly Forest Practice Act of 1973 [4511-4630.2], Article 2, Definitions [4521-4529.5], § 4526. <https://leginfo.legislature.ca.gov/faces/codes.xhtml> (accessed September 23, 2019).
- California Stormwater Quality Association. 1993. California Storm Water Best Management Practice Handbooks: Construction.

California Water Boards, Santa Ana R-8. 2019. Santa Ana River Basin Plan. https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (accessed September 12, 2022).

California Water Boards. N.d. Final California 2012 Integrated Report (303(d) List/305(b) Report), Supporting Information, Regional Board 4 - Los Angeles Region. https://www.waterboards.ca.gov/water_issues/programs/tmdl/2012state_ir_reports/01101.shtml (accessed February 17, 2023).

City of Anaheim. 2021. General Plan. <https://www.anaheim.net/712/General-Plan> (accessed August 16, 2022).

City of Anaheim. N.d. Bicycle Master Plan Bike Anaheim: Interactive Map. <https://anaheim.net/3398/Bicycle-Master-Plan> (accessed March 15, 2022).

City of Anaheim. N.d. City of Anaheim: Open Data Interactive Transportation Maps. Available at: <https://data-anaheim.opendata.arcgis.com/search?tags=transportation> (accessed March 23, 2022).

City of Placentia. 2009. Water Quality Management Plans. <https://www.placentia.org/DocumentCenter/View/3157/WQMP-Brochure?bidId=> (accessed September 7, 2022).

City of Placentia. 2017. Old Town Placentia Revitalization Plan. Available at: <https://www.placentia.org/726/Old-Town-Revitalization-Plan>

City of Placentia. 2018. Facilities Map. <https://www.placentia.org/DocumentCenter/View/31/Facility-and-Park-locations?bidId=> (accessed February 22, 2023).

City of Placentia. 2018. Zoning Map. <https://data-placentia.opendata.arcgis.com/> (accessed September 7, 2022).

City of Placentia. 2019. City of Placentia General Plan. <https://www.placentia.org/166/General-Plan-Update>

City of Placentia. 2019. City of Placentia General Plan, Conservation Element. <https://www.placentia.org/166/General-Plan-Update> (accessed September 8, 2022).

City of Placentia. 2019. City of Placentia General Plan, Land Use Element: “Proposed General Plan Land Use Map.” <https://www.placentia.org/DocumentCenter/View/8431/2-Land-Use-Updated-3?bidId=>

City of Placentia. 2019. City of Placentia General Plan, Noise Element. <https://www.placentia.org/613/General-Plan-Documents>

City of Placentia. 2019. City of Placentia General Plan, Open Space and Recreation Element. <https://www.placentia.org/DocumentCenter/View/8397/Open-Space-and-Recreation?bidId=> (accessed February 22, 2023).

City of Placentia. 2019. City of Placentia General Plan, Resource Management Element. <https://www.placentia.org/613/General-Plan-Documents>

- City of Placentia. 2019. City of Placentia General Plan, Safety Element.
<https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId=>
- City of Placentia. 2019. City of Placentia General Plan, Sustainability Element.
<https://www.placentia.org/613/General-Plan-Documents>
- City of Placentia. 2020. Urban Forest Protection Ordinance.
<https://www.placentia.org/857/Urban-Forest-Management-Program> (accessed February 22, 2023).
- City of Placentia. October 28, 2021. City Administrator's Weekly Briefing.
<https://www.placentia.org/Archive.aspx?ADID=4590>
- City of Placentia. March 15, 2022. City of Placentia Housing Element 2021-2029.
https://www.placentia.org/DocumentCenter/View/9654/Placentia-6th-Housing-Element_2022-03-15_adopted (accessed February 16, 2023).
- City of Placentia. N.d. City of Placentia: Interactive Parks GIS Maps. <https://data-placentia.opendata.arcgis.com/datasets/placentia::city-parks/explore?location=33.866905%2C-117.828046%2C17.48> (accessed March 24, 2022).
- City of Placentia. N.d. City of Placentia: Interactive Transportation GIS Maps. Available at: <https://data-placentia.opendata.arcgis.com/search?tags=transportation> (accessed March 23, 2022).
- City of Placentia. N.d. Facilities. <https://www.placentia.org/Facilities?clear=True> (accessed February 22, 2023).
- City of Placentia. N.d. Hudson Townhomes. Available at: <https://placentia.org/964/Hudson-Townhomes> (accessed March 31, 2022).
- City of Placentia. N.d. Municipal Code.
https://library.qcode.us/lib/placentia_ca/pub/municipal_code (accessed August 30, 2022).
- City of Placentia. N.d. New Developments: Veterans Village.
<https://www.placentia.org/724/Placentia-Veterans-Village> (accessed February 22, 2023).
- City of Placentia. N.d. Placentia Fire and Life Safety Department.
<https://www.placentia.org/24/Fire> (accessed August 29, 2022).
- City of Placentia. N.d. Placentia Municipal Code. Title 23 Zoning.
https://library.qcode.us/lib/placentia_ca/pub/municipal_code/item/title_23 (accessed September 1, 2022).
- City of Placentia. N.d. Placentia Municipal Code. 20.50.030 Adoption of California Existing Building Code. <https://qcode.us/codes/placentia/> (accessed May 12, 2022).
- City of Placentia. N.d. Placentia Veterans Village. <https://placentia.org/724/Placentia-Veterans-Village> (accessed April 25, 2022).

City of Placentia. N.d. Quiet Zone Update. <https://www.placentia.org/191/Quiet-Zone-Update> (accessed March 24, 2022).

City of Placentia. N.d. Railway Concerns & Violations. Available at: <https://www.placentia.org/856/Railway-Concerns-Train-Horn-Violations> (accessed April 6, 2022).

City of Placentia. N.d. Youth P.A.R.K.'s Programs. <https://www.placentia.org/160/Youth-PARK-Programs> (accessed July 8, 2022).

City of Placentia GIS. April 2018. Sewer Pipes. <https://data-placentia.opendata.arcgis.com/datasets/placentia::sewer-pipes/explore?location=33.866623%2C-117.826682%2C17.00> (accessed February 15, 2023).

City of Placentia GIS. June 2018. Storm Drain Pipes. Data provided by Willdan Engineering and G2 Construction. <https://data-placentia.opendata.arcgis.com/search?tags=pubworks> (accessed February 15, 2023).

County of Orange Waste & Recycling. N.d. Construction & Demolition (C&D) Program. <https://oclandfills.com/CD> (accessed September 9, 2022).

County of Orange Waste & Recycling. N.d. SB1383. <https://oclandfills.com/sb1383> (accessed February 15, 2023).

Duke Cultural Resources Management, LLC. 2017. Paleontological Identification and Evaluation Report. Golden Avenue Bridge Replacement and Rehabilitation Project, City of Placentia, Orange County, California. Prepared for California Department of Transportation District 12. <https://www.placentia.org/DocumentCenter/View/6196/Golden-Avenue-Bridge-PIR-PER?bidId> (accessed February 21, 2023).

Federal Emergency Management Agency. 2009. FEMA Flood Map Service Center: Search by Address. Flood map number 06059C0152. <https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20Placentia%2C%20CA#searchresultsanchor> (accessed September 6, 2022).

Federal Emergency Management Agency. 2020. FEMA Glossary, Flood Zones. <https://www.fema.gov/glossary/flood-zones#:~:text=SFHA%20are%20defined%20as%20the,flood%20or%20100%2Dyear%20flood>

Federal Emergency Management Agency. N.d. FEMA Flood Map Service Center Search by address. <https://msc.fema.gov/portal/search?AddressQuery=Atwood%2C%20California#searchresultsanchor> (accessed February 17, 2023).

Federal Emergency Management Agency. N.d. National Flood Insurance Program. <https://www.fema.gov/node/404917> (accessed September 8, 2022).

Federal Highway Administration. 2006. FHWA Roadway Construction Noise Model User's Guide. Prepared by U.S. Department of Transportation, Research and Innovative

Technology Administration, John A. Volpe National Transportation Systems Center
Acoustics Facility.

International Organization for Standardization. 1993. Acoustics - Attenuation of Sound During Propagation Outdoors - Part 1: Calculation of the Absorption of Sound by the Atmosphere. International Organization for Standardization, ISO 9613-1:1993.

Jennings, C.W., C. Gutierrez, W. Bryant, G. Saucedo, and C. Wills. 2010, Geologic Map of California, California Geological Survey, Geologic Data Map GDM-2.2010, 1:750,000. <https://ngmdb.usgs.gov/mapview/?center=-117.835,33.863&zoom=15> (accessed February 21, 2023).

Menge, Christopher W., Christopher J. Rossano, Grant S. Anderson, and Christopher J. Bajdek. 1998. FHWA Traffic Noise Model,® Version 1.0: Technical Manual. Report No. FHWA-PD-96-010 and DOT-VNTSC-FHWA-98-2. John A. Volpe National Transportation Systems Center, Acoustics Facility.

Metrolink. January 2021. Metrolink Strategic Business Plan. <https://metrolinktrains.com/about/agency/strategic-business-plan/>

Metrolink. N.d. Metrolink: History. Available at: <https://metrolinktrains.com/about/agency/history-of-metrolink/#1993-2004> (accessed May 11, 2022).

Municipal Water District of Orange County. April 2022. Monthly Water Usage Data and Water Supply Info. <https://www.mwdoc.com/wp-content/uploads/2021/12/10-REV-Water-Data-Item-for-Apr-2021-AF-mtg-FINAL.pdf> (accessed September 9, 2022).

Orange County Department of Regional Planning. August 2015. Orange County General Plan 2035: Chapter 5: Public Services and Facilities Element. <https://ocds.ocpublicworks.com/sites/ocpwoocds/files/import/data/files/59953.pdf> (accessed September 7, 2022).

Orange County Department of Regional Planning. August 2015. Orange County General Plan 2035: Chapter 6: Resources Element. <https://ocds.ocpublicworks.com/sites/ocpwoocds/files/import/data/files/40235.pdf> (accessed September 12, 2022).

Orange County Parks. N.d. Santa Ana River Regional Trail. <https://www.ocparks.com/sites/ocparks/files/2021-04/Santa%20Ana%20River%20Trail%20Map.pdf> (accessed February 22, 2023).

Orange County Public Works. N.d. Flood Control Project Process. <https://ocip.ocpublicworks.com/service-areas/oc-infrastructure-programs/flood-control-project-process> (accessed September 6, 2022).

Orange County Public Works. N.d. OC Operations & Maintenance: Flood Control. <https://ocom.ocpublicworks.com/service-areas/oc-operations-maintenance/flood-control> (accessed September 8, 2022).

Orange County Public Works. N.d. OC Operations & Maintenance: Flood Control. <https://ocom.ocpublicworks.com/service-areas/oc-operations-maintenance/flood-control> (accessed April 1, 2022).

- Orange County Sanitation District. N.d. Chapter 1. District Overview and Compliance. <https://www.ocsan.gov/home/showpublisheddocument/10331/635102622226630000> (accessed September 8, 2022).
- Orange County Transportation Authority. February 2012. Fourth District Bikeway Strategy. <https://octa.net/pdf/4thDistrictBikewaysReport.pdf>
- Orange County Transportation Authority. N.d. OC Loop. <https://octa.net/Bike/The-OC-Loop/> (accessed May 6, 2022).
- Orange County Transportation Authority. N.d. Quiet Zones. <https://octa.net/projects-and-programs/all-projects/rail-projects/railroad-crossing-enhancements/quiet-zones/> (accessed March 24, 2022).
- Orange County Transportation Authority. N.d. System Map. Available at: <https://octa.net/Bus/Routes-and-Schedules/System-Map/> (accessed March 23, 2022).
- Orange County Transportation Authority. N.d. Using a Bike Rack: Travel Farther, Bring Your Bike! <https://octa.net/Bus/How-to-Ride/Riding-Tips/Bike-Rack/> (accessed March 23, 2022).
- Orange County. 1927. Chapter 36: Orange County Flood Control Act. http://cams.ocgov.com/Web_Publisher_SAM/Agenda12_15_2020_files/images/OCPW20-112%20SUP%20ATTACHMENT%20A_9855677.PDF (accessed September 6, 2022).
- Orange County. 2012. County of Orange General Plan. <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/codes-and-regulations/general-plan>
- Peakery. N.d. Weir Canyon Peak. <https://peakery.com/weir-canyon-peak-california/> (accessed September 7, 2022).
- Placentia Rich Heritage Bright Future. 2022. Urban Forest Management Program. <https://www.placentia.org/857/Urban-Forest-Management-Program>.
- Placentia-Yorba Linda Unified School District. N.d. Boundary Maps. https://www.pylusd.org/apps/pages/index.jsp?uREC_ID=206487&type=d&pREC_ID=453794 (accessed September 14, 2022).
- Rails-to-Trails Conservancy. N.d. TrailLink. Santa Ana River Trail Map. <https://www.traillink.com/trail/santa-ana-river-trail/> (accessed February 22, 2023).
- Santa Ana Regional Water Quality Control Board. July 2006. Order No. R8-2009-0030 NPDES No. CAS618030. https://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2009/09_030_oc_ms4_as_amended_by_10_062.pdf
- South Coast Air Quality Management District. March 2017. Final 2016 Air Quality Management Plan. <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>
- Southern California Association of Governments 2020. Regional Comprehensive Plan. <http://scag.ca.gov/NewsAndMedia/Pages/RegionalComprehensivePlan.aspx>

Southern California Association of Governments. 2020. Program Environmental Impact Report (PEIR) (SCH#2019011061) for Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Section 3.1, Aesthetics. https://scag.ca.gov/sites/main/files/file-attachments/dpeir_connectsocial_3_1_aesthetics.pdf?1606003413 (accessed September 7, 2022).

Southern California Association of Governments. May 2019. Local Profile of the City of Placentia. https://scag.ca.gov/sites/main/files/file-attachments/placentia_localprofile.pdf?1606012689

Southern California Association of Governments. May 2019. Profile of the City of Los Angeles. <https://www.scag.ca.gov/Documents/LosAngeles.pdf>

Southern California Association of Governments. N.d. High Quality Transit Areas (HQTA) 2045 – SCAG Region. High Quality Transit Areas (HQTA) 2045 – SCAG Region | High Quality Transit Areas (HQTA) 2045 – SCAG Region | Southern California Association of Governments (arcgis.com) (accessed August 30, 2022).

Southern California Association of Governments. September 2020. Demographics and Growth Forecast Technical Report. 3 September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf (accessed August 31, 2022).

Southern California Association of Governments. September 2020. Final Connect SoCal. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176

State of California, Employment Development Department. 2019. Industry Employment Official Monthly Estimates (CES): Los Angeles-Long Beach-Glendale Metropolitan District Construction Industry Number of Employed Data. Labor Market Information Resources and Data. <https://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/areaselection.asp?tablename=ces>

State of California, Employment Development Department. 2019. Labor Market Information for Orange County Profile. <https://www.labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=Orange+County&selectedindex=30&menuChoice=localAreaPro&state=true&geogArea=0604000059&countyName=> (accessed August 31, 2022).

State of California, Employment Development Department. 2020. Monthly Labor Force Data for Cities and Census Designated Places (CDP). <https://www.labormarketinfo.edd.ca.gov/geography/orange-county.html> (accessed September 7, 2022).

State of California, Employment Development Department. September 1, 2022. Unemployment Rates and Labor Force. Labor Market Information for Anaheim-Santa Ana-Irvine Metropolitan District (Orange County). <https://www.labormarketinfo.edd.ca.gov/geography/orange-county.html> (accessed September 7, 2022).

- Trainsorders.com. N.d. Western Railroad Discussion by Evan Werkema.
<https://www.trainorders.com/discussion/read.php?1,5082556> (accessed March 23, 2022).
- U.S. Army Corps of Engineers. 1987. Corps of Engineers Wetland Delineation Manual.
- U.S. Census Bureau. July 2021. Placentia City, California Population Estimates.
<https://www.census.gov/quickfacts/fact/table/placentiacitycalifornia,US/PST045221>
(accessed August 31, 2022).
- U.S. Department of Agriculture, Natural Resource Conservation Service. 2007. National Engineering Handbook, Chapter 7, Hydrologic Soil Groups.
<https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=17757.wba>
(accessed February 17, 2023).
- U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Survey Division. N.d. Online Web Soil Survey.
<http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/survey/> (accessed February 17, 2023).
- U.S. Department of the Interior, U.S. Department of Agriculture, and California Department of Forestry and Fire Protection. 2018-2023. California Master Cooperative Wildland Fire Management and Stafford Act Response Agreement.
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5350828.pdf
- U.S. Department of Transportation, Federal Transit Administration. 2006. Transit Noise and Vibration Impact Assessment.
- U.S. Environmental Protection Agency. 1971. Noise from Construction Equipment and Operation, Building Equipment and Home Appliances. PB 206717.
- U.S. Environmental Protection Agency. 1974. Background Document for Interstate Motor Carrier Noise Emission Regulations.
- U.S. Environmental Protection Agency. 2005. Federal Clean Air Act, Title, I Air Pollution Prevention and Control. <http://www.epa.gov/oar/caa/contents.html>.
- U.S. Environmental Protection Agency. 2022. U.S. EPA Green Book. Non-attainment Areas for Criteria Pollutants. <http://www.epa.gov/green-book>
- U.S. Environmental Protection Agency. February 2022. National Pollutant Discharge Elimination System (NPDES) construction general permit (CGP) for stormwater discharges from construction activities. <https://www.epa.gov/system/files/documents/2022-01/2022-cgp-final-permit.pdf>
- U.S. Environmental Protection Agency. N.d. Impaired Waters and TMDLs.
<https://www.epa.gov/tmdl/overview-total-maximum-daily-loads-tmdls> (accessed February 17, 2023).
- U.S. Environmental Protection Agency. N.d. Overview of U.S. Greenhouse Gas Emissions in 2020. Available at: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>
(accessed February 9, 2023).

- U.S. Environmental Protection Agency. N.d. Reducing Hydrofluorocarbon (HFC) Use and Emissions in the Federal Sector through SNAP. <https://www.epa.gov/snap/reducing-hydrofluorocarbon-hfc-use-and-emissions-federal-sector-through-snap> (accessed February 9, 2023).
- U.S. Environmental Protection Agency. N.d. Waters GeoViewer 2.0. <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=074cfede236341b6a1e03779c2bd0692> (accessed February 17, 2023).
- U.S. Forest Service. N.d. Wildfire Risk. <https://wildfirerisk.org/understand-risk/> (accessed September 6, 2022).
- U.S. Geographical Survey. N.d. USGS Topography Maps, Orange Quadrangle. <https://ngmdb.usgs.gov/topoview/viewer/#15/33.8685/-117.8382> (accessed February 17, 2023).
- U.S. Geological Survey. N.d. Current and Historical Topo Maps of the U.S. <https://viewer.nationalmap.gov/basic/?basemap=b1&category=histopo,ustopo&title=Map%20View> (accessed February 15, 2023).
- University of Texas. 2020. Background: Gentrification and Displacement. Retrieved from: <https://sites.utexas.edu/gentrificationproject/gentrification-and-displacement-in-austin/> (accessed September 6, 2022).
- World Bank. N.d. Metadata Glossary. <https://databank.worldbank.org/metadataglossary/world-development-indicators/series/EN.ATM.CO2E.KT> (accessed February 9, 2023).

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