July 2023 | Initial Study Mitigated Negative Declaration

PATRICK HENRY ELEMENTARY SCHOOL RECONSTRUCTION PROJECT

Anaheim Elementary School District

Prepared for:

Anaheim Elementary School District
Contact: Alexander Kang, Facilities Planning & Construction Coordinator
1001 S East Street
Anaheim, California 92805
714.517.7500

Prepared by:

PlaceWorks
Contact: Jorge Estrada, Senior Associate
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

PLACEWORKS

MITIGATED NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code (PRC) Sections 2100 et seq.) and the State CEQA Guidelines (California Code of Regulations (CCR) Sections 15000 et seq.), the Anaheim Elementary School District has completed this Mitigated Negative Declaration (MND) for the project described below based on the assessment presented in the attached Initial Study.

LEAD AGENCY: Anaheim Elementary School District (District)

PROJECT TITLE: Patrick Henry Elementary School Reconstruction Project

PROJECT LOCATION: The project site includes the entirety of the existing Patrick Henry Elementary School campus at 1123 W. Romneya Drive in the City of Anaheim, Orange County (Project Site). The Project Site is comprised of four legal parcels, including Assessor's Parcel Numbers (APN) 073-446-17, 073-443-11, 073-444-11, and 073-445-11.

EXISTING CONDITIONS: The Project Site is currently developed with the Patrick Henry Elementary School, which serves students from preschool, transitional kindergarten, kindergarten, and grades 1st through 6th. The existing elementary school campus comprises approximately 7.3 acres, and consists of 34 total classrooms, which include one preschool class, one transitional kindergarten class, four kindergarten classes, 10 classes for grades 1 through 3, 11 classes for grades 4 through 6; as well as a library, multi-purpose room, administrative/faculty offices and spaces, a computer lab, before and after school classrooms, occupational and physical therapy classrooms, and support/storage spaces. Additionally, the Project Site consists of outdoor hardcourt and grass playfields, and a surface parking lot with approximately 80 parking spaces. Access to the Project Site is provided from Romneya Drive, including a pick-up/drop-off area located along the southern edge of the Project Site boundary, directly east of the existing parking lot.

PROJECT DESCRIPTION: As part of the District's Long Range Facility Master Plan Update, the District has identified long-range goals for several schools including Patrick Henry Elementary School, creating a road map for school facility improvements to move toward a common, coordinated vision. Pursuant and in response to the Long-Range Facility Master Plan, the proposed project involves reconstruction of the existing Patrick Henry Elementary School campus, which includes among many other site improvements, the addition of on campus parking spaces and an expand drop-off loop to reduce congestion and improve safety on- and offsite.

The proposed project involves the complete demolition and reconstruction of the existing elementary school, which would include the demolition of approximately 50,335 square feet of existing building space (includes permanent and portable buildings) and construction of approximately 119,139 square feet of building space. The additional building space is needed to support the District's educational specifications for modern elementary school education, and not to support an increase in student population. Per the District's long-range plan for the elementary school, the student capacity for the school would not change and remain at 850.

Project construction would occur in a single phase and would start in June 2024 and be completed by December 2025. Construction activities would include minor vegetation removal, building demolition, asphalt demolition and excavation, site preparation and rough grading, utility trenching, fine grading, building construction, architectural coating, asphalt paving, finishing, and landscaping.

DOCUMENT AVAILABILITY: The MND and supporting Initial Study for the proposed project are available for public review at the following locations:

- Anaheim Elementary School District, 1001 S East Street, Anaheim, CA 92805
- Online at: https://anaheimelementary.org/facilities/public-notices/

SUMMARY OF IMPACTS: The attached Initial Study was prepared to identify the potential effects on the environment from development and operation of the proposed project and to evaluate the significance of those effects. Based on the environmental analysis, the proposed project would have no impacts or less-than-significant impacts related to the following environmental issues:

- Aesthetics
- Agriculture & Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology & Soils
- Greenhouse Gas Emissions
- Hydrology & Water Quality
- Land Use & Planning
- Mineral Resources
- Population & Housing
- Public Services
- Recreation
- Transportation
- Utilities & Service Systems
- Wildfire

The environmental assessment presented in the Initial Study identifies potentially significant environmental impacts related to air quality, hazards and hazardous materials, noise, and tribal cultural resources. However, compliance with the mitigation measures identified in the Initial Study would reduce potentially significant impacts related to these environmental issues to less than significant levels.

Findings. It is hereby determined that, based on the information contained in the attached Initial Study, the proposed project would not have a significant adverse effect on the environment. Mitigation measures necessary to avoid the potentially significant effects on the environment are included in the attached Initial Study, which is hereby incorporated and fully made part of this MND. The District has hereby agreed to implement each of the identified mitigation measures, which will be adopted as part of the Mitigation Monitoring and Reporting Program.

Table of Contents

Table of Contents

APPENDICES

Table of Contents

List of Figures

List of Tables

Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

Abbreviations and Acronyms

CO	carbon monoxide
CO_2e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L_{dn}	day-night noise level
L_{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M_W	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model

Abbreviations and Acronyms

tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

Abbreviations and Acronyms

This page intentionally left blank.

1. Introduction

1.1 OVERVIEW

The Anaheim Elementary School District (AESD or District) intends to redevelop the Patrick Henry Elementary School, which would include the complete demolition and reconstruction of the existing school buildings and reorganization of the campus (Proposed Project). The Proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with the Proposed Project.

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by CEQA and the State CEQA Guidelines. CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts). AESD is the lead agency for the Proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the Proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies…" In this case, AESD has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the Proposed Project would result in environmental impacts. An Initial Study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.

1.3 ENVIRONMENTAL PROCESS

A "project" means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

1. An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.

2. An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

3. An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (California Code of Regulations [CCR] § 15378[a])

The proposed discretionary actions by AESD constitute a "project" because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All "projects" in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

1.3.1 Initial Study

The purpose of the Initial Study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist in the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the findings in an MND or ND; 6) eliminate unnecessary EIRs; and 7) determine if the project is covered under a previously prepared EIR. When an Initial Study identifies the potential for immitigable significant environmental impacts, the lead agency must prepare an EIR; however, if all impacts are found to be less than significant or can be mitigated to less than significant, the lead agency can prepare an ND, or MND that incorporates mitigation measures into the project.

1.3.2 Mitigated Negative Declaration

In its preparation of this Initial Study, the District determined that the Initial Study would support the adoption of an MND. A MND is a written statement by the lead agency that briefly describes the reasons why a project that is not exempt from the requirements of CEQA will not have a significant effect on the environment and, therefore, does not require preparation of an EIR (CEQA Guidelines Section 15371).

The MND includes information necessary for agencies to meet statutory responsibilities related to the Proposed Project. State and local agencies will use the MND when considering any permit or other approvals necessary to implement the project. A list of the environmental topics that have been identified for study in the MND is provided in the Initial Study Checklist (Chapter 4).

One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the District. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings.

1.4 IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts.

- A finding of **no impact** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered **less than significant** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered **less than significant with mitigation incorporated** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- **Mitigation Measures.** If, after incorporation and implementation of federal, state, and local regulations, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, state, and local laws and regulations. Mitigation under CEQA Guidelines Section 15370 includes:
    - Avoiding the impact altogether by not taking a certain action or parts of an action.
    - Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
    - Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
    - Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
    - Compensating for the impact by replacing or providing substitute resources or environments.

An impact is considered **potentially significant** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.5 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this Initial Study are that the Proposed Project would have no significant impacts. This report includes the following sections:

- **Chapter 1, Introduction** identifies the purpose and scope of the MND and supporting Initial Study and the terminology used.
- **Chapter 2, Environmental Setting** describes the existing conditions, surrounding land uses, general plan designations, and existing zoning at the project site and surrounding area.
- **Chapter 3, Project Description** identifies the location, provides the background, and describes the scope of the proposed project in detail.

1. Introduction

- **Chapter 4, Environmental Checklist and Analysis** presents the Environmental Checklist, an analysis of environmental impacts, and the impact significance finding for each resource topic.
- **Chapter 5, List of Preparers** identifies the individuals who prepared the MND and supporting Initial Study and technical studies and their areas of technical specialty.
- **Appendices** have data supporting the analysis in this Initial Study.
  - Appendix A - Air Quality and Greenhouse Gas Emissions Background and Modeling Data
  - Appendix B - Geotechnical Engineering Investigation Report
  - Appendix C – Phase I Environmental Site Assessment
  - Appendix D - Noise and Vibration Background and Modeling Data

2. Environmental Setting

2.1 PROJECT LOCATION

The project site includes the entirety of the existing Patrick Henry Elementary School campus at 1123 W. Romneya Drive in the City of Anaheim, Orange County, California (Project Site). The Project Site is comprised of four legal parcels, including Assessor's Parcel Numbers (APN) 073-446-17, 073-443-11, 073-444-11, and 073-445-11. Local access to the Project Site is provided by Romneya Drive to the south, Condor Street to north, Lombard Drive approximately 100 feet west, and Robin Street approximately 350 east (see Figure 1, *Local Vicinity*, and Figure 2, *Aerial Photograph*). Regional access to the Project Site is provided by State Route 91 (SR-91 or Riverside Freeway), approximately 0.20 mile to the north; Interstate 5 (I-5), approximately 1.6 miles to the west; and State Route 57 (SR-57), approximately 3.2 miles to the east (Figure 3, *Regional Location*).

2.2 EXISTING CONDITIONS

The Project Site is currently developed with the Patrick Henry Elementary School, which serves students from preschool, transitional kindergarten, kindergarten, and grades 1st through 6th. Per the District's long-range plan for the elementary school, the school's student enrollment capacity is 850. As shown in Table 1, during the 2021-2022 and 2022-2023 school years, the elementary school had a student population of approximately 436 and 461 students, respectively, which is well under the school's enrollment capacity of 850.

Table 1 Patrick Henry Elementary School Student Population

School Year Enrollment	Grade Pre K	Grade TK	Grade K	Grade 1	Grade 2	Grade 3	Grade 4	Grade 5	Grade 6	Total
2021-2022	—	—	66	55	61	55	67	69	63	436
2022-2023	31	23	39	60	54	59	54	72	69	461

Source: CDE 2022 and AESD 2023.

The existing elementary school campus comprises approximately 7.3 acres, and consists of 34 total classrooms, which include one preschool class, one transitional kindergarten class, four kindergarten classes, 10 classes for grades 1 through 3, 11 classes for grades 4 through 6; as well as a library, multi-purpose room, administrative/faculty offices and spaces, a computer lab, before and after school classrooms, occupational and physical therapy classrooms, and support/storage spaces. Additionally, the Project Site consists of outdoor hardcourt and grass playfields, and a surface parking lot with approximately 80 parking spaces. Access to the Project Site is provided from Romneya Drive, including a pick-up/drop-off area located along the southern edge of the Project Site boundary, directly east of the existing parking lot.

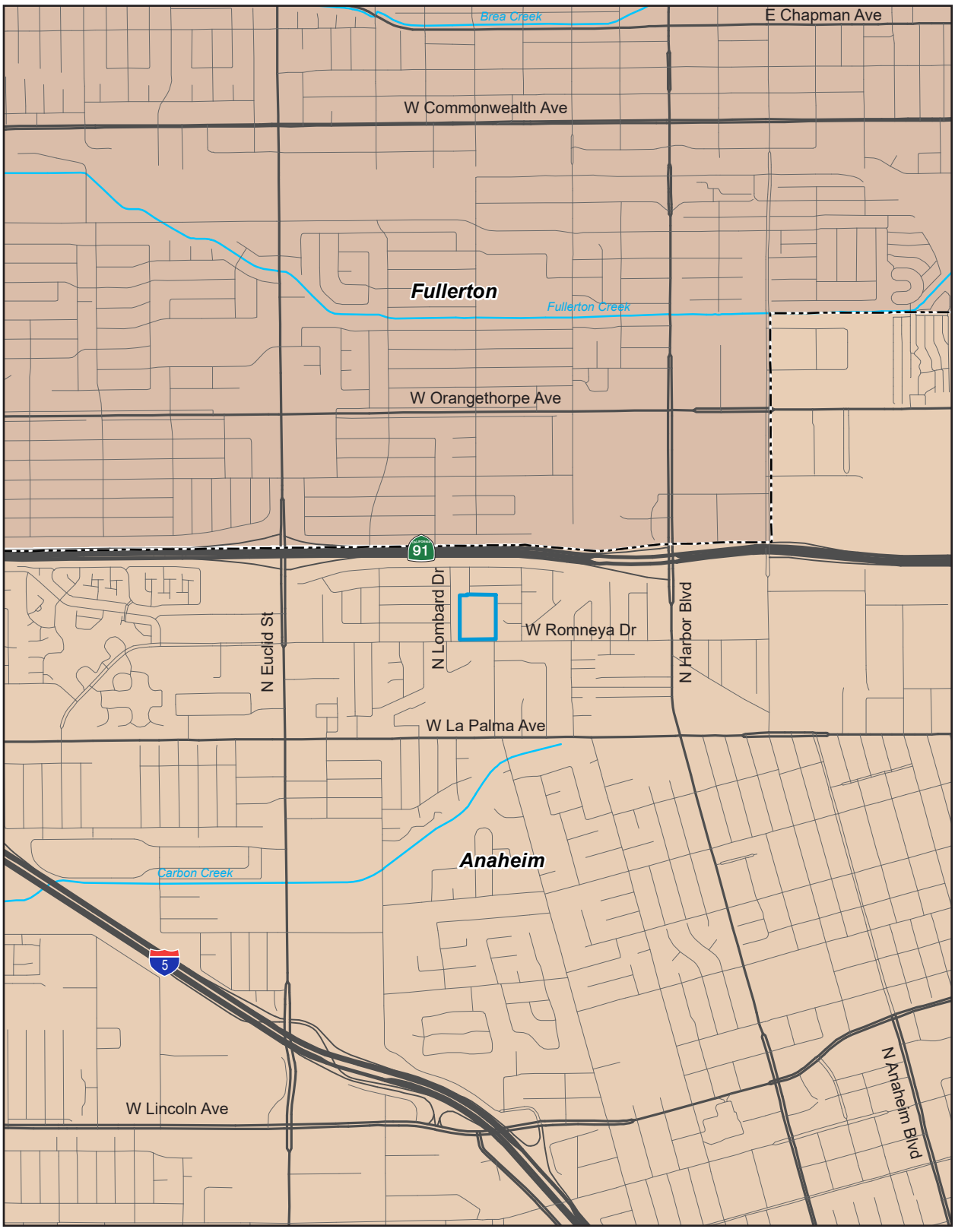
2.2.1 Surrounding Land Use

The Project Site is surrounded by residential properties on all four sides. The residential properties west of the Project Site have a land use designation of low density residential and are zoned RS-2 Single-Family Residential (7,200 square foot minimum lot size); the properties north of the Project Site have a land use designation of low density residential and are zoned RM-3 Multiple-Family Residential (Up to 18 units per acre); and the properties to the east and south of the Project Site have a land use designation of medium density residential and are zoned RM-4 Multiple-Family Residential (Up to 36 units/acre).

2.2.2 General Plan and Existing Zoning

The City of Anaheim General Plan land use designation for the Project Site is Schools, which is considered a Public/Quasi-Public land use. The Schools designation identifies existing public and larger, established private schools, including elementary, junior and high schools. In addition, the Project Site is zoned Transition (T), which is intended to provide for a zone to include land that is used for agricultural uses, in a transitory or interim use, restricted to limited uses because of special conditions, or not zoned to one of the zoning districts in this title for whatever reason, including recent annexation (see Figures 4a, *Land Use Designations*, and 4b, *Zoning Designations*).

Figure 1 - Local Vicinity Map



Source: Generated using ArcMap, 2022.

2. Environmental Setting

This page intentionally left blank.

Figure 2 - Aerial Photograph

School Boundary

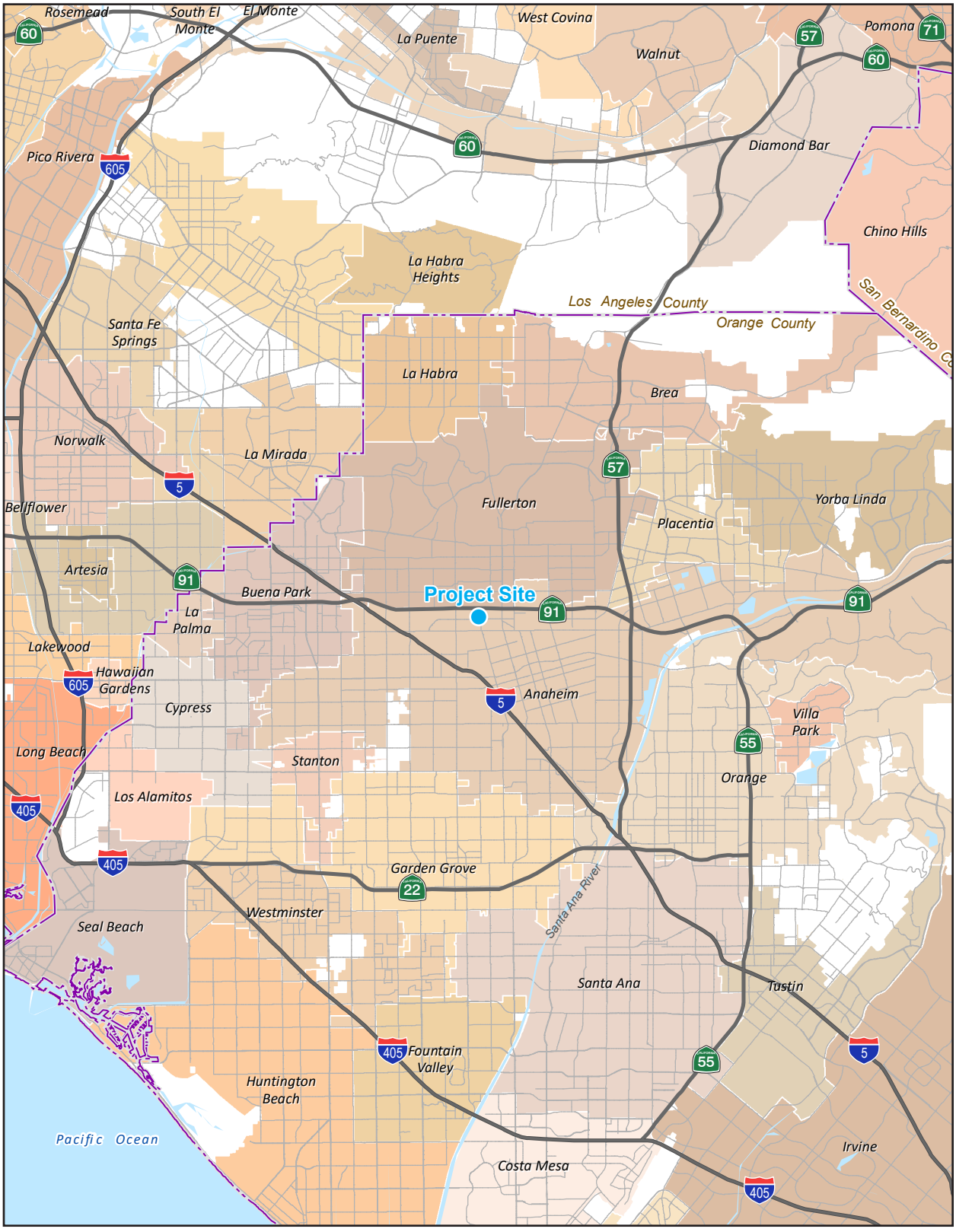
0 155
Scale (Feet)

Source: Nearmap, Inc., 2022.

2. Environmental Setting

This page intentionally left blank.

Figure 3 - Regional Location Map



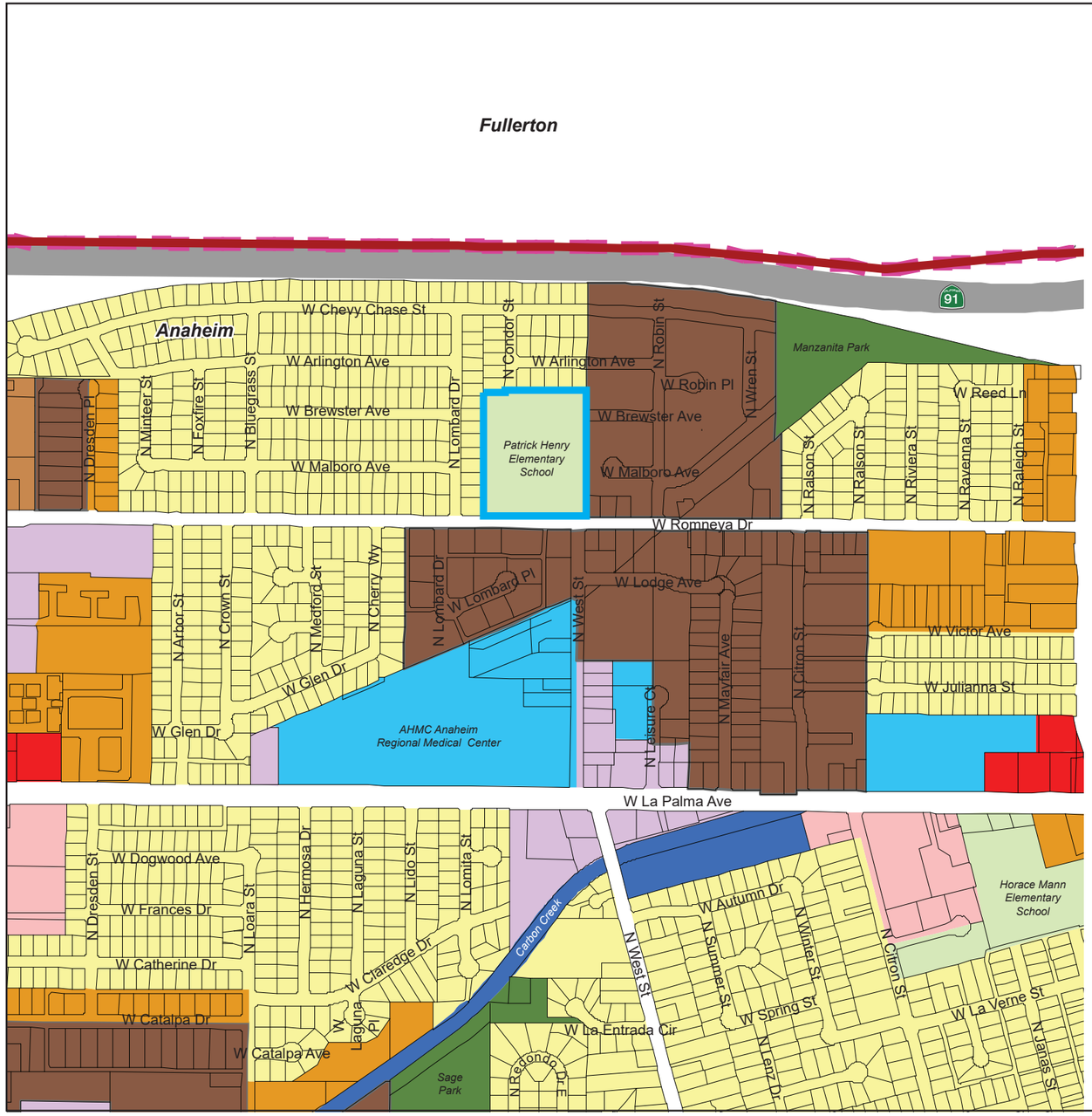
Note: Unincorporated county areas are shown in white.
Source: Generated using ArcMap, 2022.

0 3
Scale (Miles)

2. Environmental Setting

This page intentionally left blank.

Figure 4a - Land Use Designations



School Boundary

City Boundary

RESIDENTIAL

Designation	Description	Density (Dwelling Units per Acre)	Typical Implementation Zone(s)
Low Density	Conventional single-family detached subdivisions. Typical development consists of single-family residences on lots of 5,000 to 10,000 square feet.	0-6.5	RS-1, RS-2, RS-3, RH-3
Low Medium Density	A wide range of residential uses, including detached, small-lot single-family residences, attached single-family residences, patio homes, zero lot line residences, duplexes, townhouses, and mobile home parks.	0-18.0	RS-4, RM-1, RM-2, RM-3
Medium Density	Multiple-family living environment with design amenities, such as private open space or recreation areas, business services, swimming pools, etc. Typical development includes apartment complexes.	0-36.0	RM-3, RM-3.5, RM-4
Corridor Residential	Residential development on minimum one-acre project sites for single-family attached townhouse style housing typically fronting on arterial highways and incorporating a rear access drive or service alley. *This designation is intended to provide for housing opportunities along the City's arterial corridors.*	0-13.0	RM-1

COMMERCIAL

Neighrbood Center	To serve the surrounding residential neighborhood or cluster of surrounding residential neighborhoods. Development should be compatible in scale and design with adjacent residential areas, and should be designed to encourage predestrian usage. *Not intended to encourage strip commercial development or large, regionally-serving, retail uses.*	0.45	C-NC
General Commercial	Accommodates a variety of land uses, including those identified in the Neighborhood Center designation and may, but not necessarily, serve the adjacent neighborhood or surrounding clusters of neighborhoods. In addition to some of the uses described in the commercial center description. Highway-serving uses such as fast food restaurants, auto oriented uses such as fire stores, service stations, auto parts stores, and other stand-alone retial uses are also envisioned.	0.50	C-G

OPEN SPACE AND RECREATION

Parks	Active and passive recreational uses such as parks, trails, athletic fields, interpretive centers and golf courses.	0.10	PR, SP
Water Uses	Water bodies such as the Santa Ana River, lakes, and reservoirs, and other water-related uses such as flood control channels and drainage basins.	0.10	OS, PR, SP

PUBLIC AND QUASI-PUBLIC FACILITIES

Schools	Existing public and larger, established private schools, including elementary, junior and high schools. Future schools may be developed in other land use designations through procedures established in the Zoning Code. Trade schools or other job training facilities may be developed in various non-residential land use areas under the prodecures established in the Zoning Code.	N/A	SP
Institutional	Existing facilities or known planned public and quasi-public uses, including government offices, transporation facilities, public or private colleges and universities, public utilities, hospitals, large assisted living facilities, community cneters, museums and public libraries. To the extent possible, institutional facilities should be clustered in activity centers to support other similar uses and benefit from access to various modes of transportation. Addtional uses, including assembly areas and day care facilities, may be developed in other land use designations under the procedures established in the Zoning Code. The maximum floor area ratio reflects the potential for high-rise offices used by governmental or quasi-public agencies. Additional intensity provisions are addressed in the Zoning Code.	Up to 3.00	SP

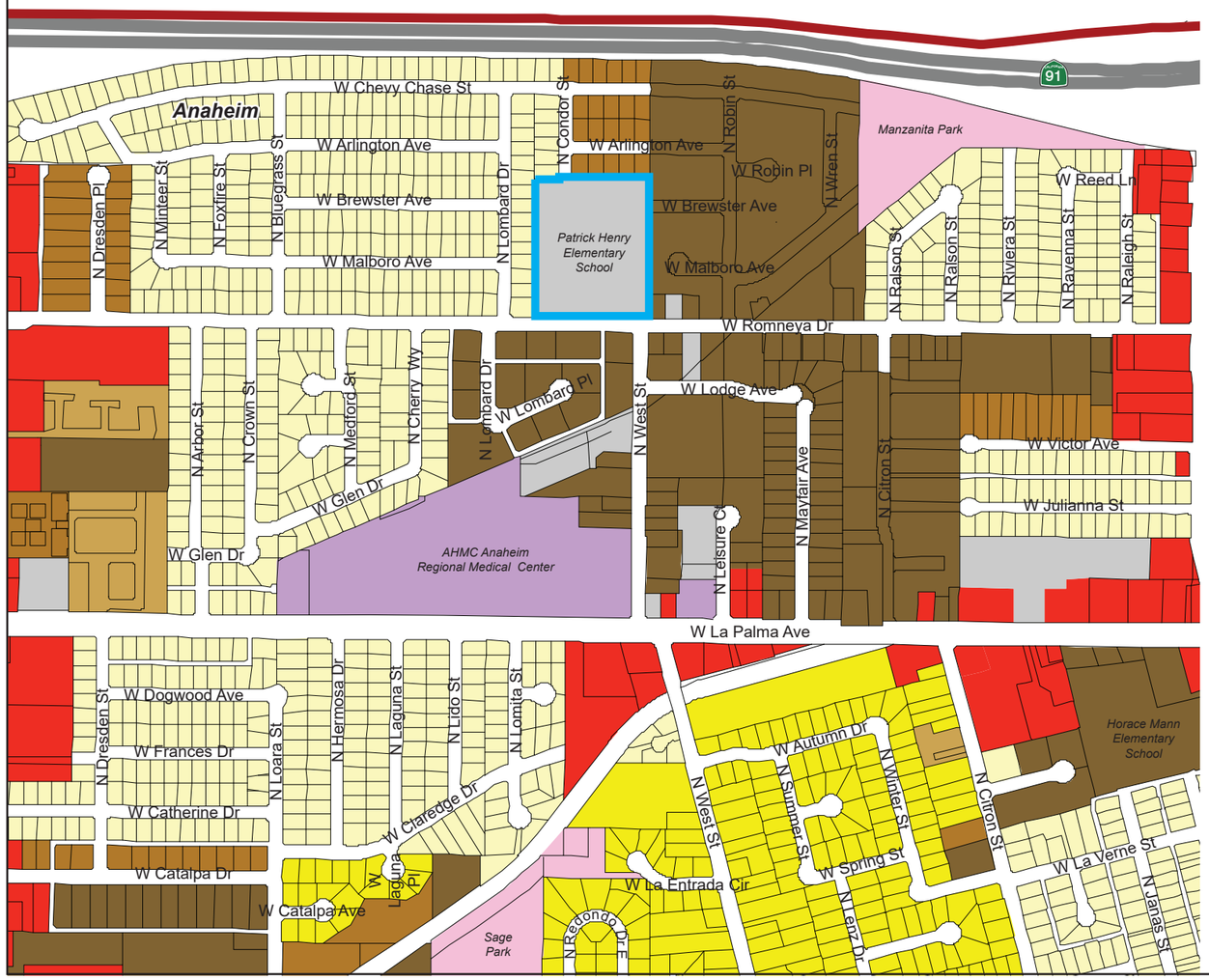
0 620
Scale (Feet)

Source: LPA, 2022.

2. Environmental Setting

This page intentionally left blank.

Figure 4b - Zoning Designations



School Boundary

City Boundary

RESIDENTIAL

Designation	Description
RS-1	Single-Family Residential. The intent of the “RS -1” Zone is to provide an attractive, safe, and healthy environment with single-family dwelling units on a minimum lot size of ten thousand (10,000) square feet. This zone implements the Low Density Residential land use designation in the General Plan.
RS-2	Single-Family Residential. The intent of the “RS-2” Zone is to provide an attractive, safe, and healthy environment with single-family dwelling units on a minimum lot size of seven thousand two hundred (7,200) square feet. This zone implements the Low Density Residential land use designation in the General Plan.
RM-2	Multiple-Family Residential. The intent of the “RM-2” Zone is to provide an attractive, safe, and healthy environment with townhouses and other low-rise multiple-family units with a minimum building site area per dwelling unit of three thousand (3,000) square feet. This zone implements the Low-Medium Density Residential and Low-Medium Hillside Density Residential land use designations in the General Plan.
RM-3	Multiple-Family Residential. The intent of the “RM-3” Zone is to provide an attractive, safe, and healthy environment with multiple-family units with a minimum building site area per dwelling unit of two thousand four hundred (2,400) square feet. This zone implements the Low-Medium Density Residential and Medium Density land use designations in the General Plan. * This parcel is capped at 140 dwelling unit
RM-4	Multiple-Family Residential. The intent of the “RM-4” Zone is to provide an attractive, safe, and healthy environment with multiple-family units with a minimum building site area per dwelling unit of one thousand two hundred (1,200) square feet. This zone implements the Medium Density Residential land use designation in the General Plan.

COMMERCIAL

C-G	General Commercial. The intent of the “C-G” Zone is to allow a variety of land uses, including some identified for the Neighborhood Center Commercial zone described below. Areas designated as “C-G” General Commercial do not necessarily serve the adjacent neighborhood or surrounding clusters of neighborhoods. In addtion to some of the uses described in the commercial centers zones, they typically include high way-serving uses such as fast food restaurants, auto-oriented uses such as tire stores and auto parts stores, and stand-alone retail uses. This zone implements the General Commercial land use designation in the General Plan.
O-L	Low Intensity Office. The intent of the “O-L” Zone is to provide for a variety of low-intensity office uses that are typically three (3) stories or less, including local branches of financial institutions, legal services, insurance services, real estate, consulting services, professional offices, and medical or dental offices and support services. This zone implements the Office-Low land use designation in the General Plan.

PUBLIC AND SPECIAL PURPOSE

T	Transitional. The intent of the “T” Zone is to provide for a zone to include land that is used for agricultural uses, in a transitory or interim use, restricted to limited uses because of special conditions, or not zoned to one of the zoning districts in this title for whatever reason, including recent annexation.
PR	Open Space. The intent of the “OS ” Zone is to protect and preserve open space for the preservation of natural resources, for the conservation and managed production of other resources, for outdoor recreation and education and for public health and safety. This zone is intended to be applied to permanent easements, public and semi public land and agricultural land. This zone implements the Open Space designation in the General Plan.

0 620
Scale (Feet)

Source: LPA, 2022.

2. Environmental Setting

This page intentionally left blank.

3. Project Description

3.1 PROPOSED PROJECT DEVELOPMENT

3.1.1 Proposed Project

As part of AESD's Long Range Facility Master Plan Update, the District has identified long-range goals for several schools including Patrick Henry Elementary School, creating a road map for school facility improvements to move toward a common, coordinated vision. Pursuant and in response to the Long Range Facility Master Plan, the Proposed Project involves reconstruction of the existing Patrick Henry Elementary School campus, which includes among many other site improvements, the addition of on campus parking spaces and an expand drop-off loop to reduce congestion and improve safety on- and offsite (see Figure 5, *Proposed Henry Elementary School Campus*).

The Proposed Project involves the complete demolition and reconstruction of the existing elementary school, which would include the demolition of approximately 50,335 square feet of existing building space (includes permanent and portable buildings) and construction of approximately 119,139 square feet of building space, as shown in Table 2. The additional building space is needed to support the District's educational specifications for modern elementary school education, and not to support an increase in student population. Per the District's long-range plan for the school, the student capacity for the school would not change and remain at 850.

Table 2 Proposed Project Construction

Building	Proposed Facilities	Area (Square Feet)
Building A	Administration Offices, Multipurpose Room, Library, Food Services	37,478
Building B	Classrooms	39,510
Building C	Classrooms	40,105
Free Standing Structure	Covered Outdoor Stage	846
Free Standing Structure	Kindergarten Lunch Shelter	1,200
	Total Building Area	**119,139**

Source: LPA Design Studios 2022

3.1.2 Facilities

The new school campus under the Proposed Project would serve students in grades Preschool (PK) through 6th and would consist of two 2-story buildings, and one 1-story building, which would include classrooms for grade Preschool through 6th (see Figure 6, *Proposed Project Site Plan*).

3. Project Description

Building A

Building A would be designed as a single-story building and located on the southern boundary of the Project Site. Building A would include the school's administration building located on the eastern portion of the building, which would contain a lobby, conference room, parent resource area, a staff work room and lounge, a health room, records and data rooms, administrators' offices, and electrical and custodial rooms. The western portion of Building A would contain a food service area, a flex room, a music room, a library, a multipurpose room and stage area, an innovation lab and resource innovation center, as well as offices, custodial and storage rooms, electrical room, and restrooms. Additionally, the school's single point of entry would be located at the southern portion of the new campus, within Building A (see Figure 7, *Building A Floor Plan*).

Building B

Building B would be designed as a two-story building and located on the western boundary of the Project Site. Building B would countian 1st, 2nd, 5th and 6th grade classrooms, including eight classrooms, two collaborative learning rooms, one learning center, counseling and phycologist rooms, storage and equipment rooms, and restrooms on the first floor. The second floor of Building B would contain nine classrooms, two collaborative learning rooms, a staff work room, storage and custodial rooms, and restrooms. Additionally, Building B would contain three staircases located on the eastern edge of the building, and one elevator located on the southeastern corner of the building (see Figure 8, *Building B Floor Plan*).

Building C

Building C would be designed as a two-story building and located on the eastern boundary of the Project Site. Building C would be countian Preschool, Kindergarten, 3rd, and 4th grade classrooms, including one preschool classroom, on transitional kindergarten classroom, four kindergarten classrooms, two additional classrooms, four staff work rooms, storage and custodial rooms, and restrooms on the first floor. The second floor of Building C would contain nine classrooms, two collaborative learning rooms, a staff work room, storage and custodial rooms, and restrooms. Additionally, Building C would contain three staircases located on the western edge of the building, and one elevator located on the southwestern corner of the building (see Figure 9, *Building C Floor Plan*).

3.1.3 Play Spaces and Landscaping

The Proposed Project includes reconfiguration of the existing quad and playground of the school. The Proposed Project would include new hardcourts on the northwestern portion of the Project Site, and a new grass playfield on the northeastern portion of the Project Site. The kindergarten play area would be located along the eastern boundary of Building C, and would contain swings, a play structure, a grassy mound, and a tricycle rack.

Additionally, the proposed quad area would include a garden, outdoor classrooms areas, small group collaborative spaces, a performance stage with amphitheater seating, a new adventure trail, a grassy mound, play structure with shade canopies, an outdoor innovation space, and an outdoor lunch space/patio (see Figure 10, *Proposed Outdoor Improvements*).

Figure 5 - Proposed Patrick Henry Elementary School Campus

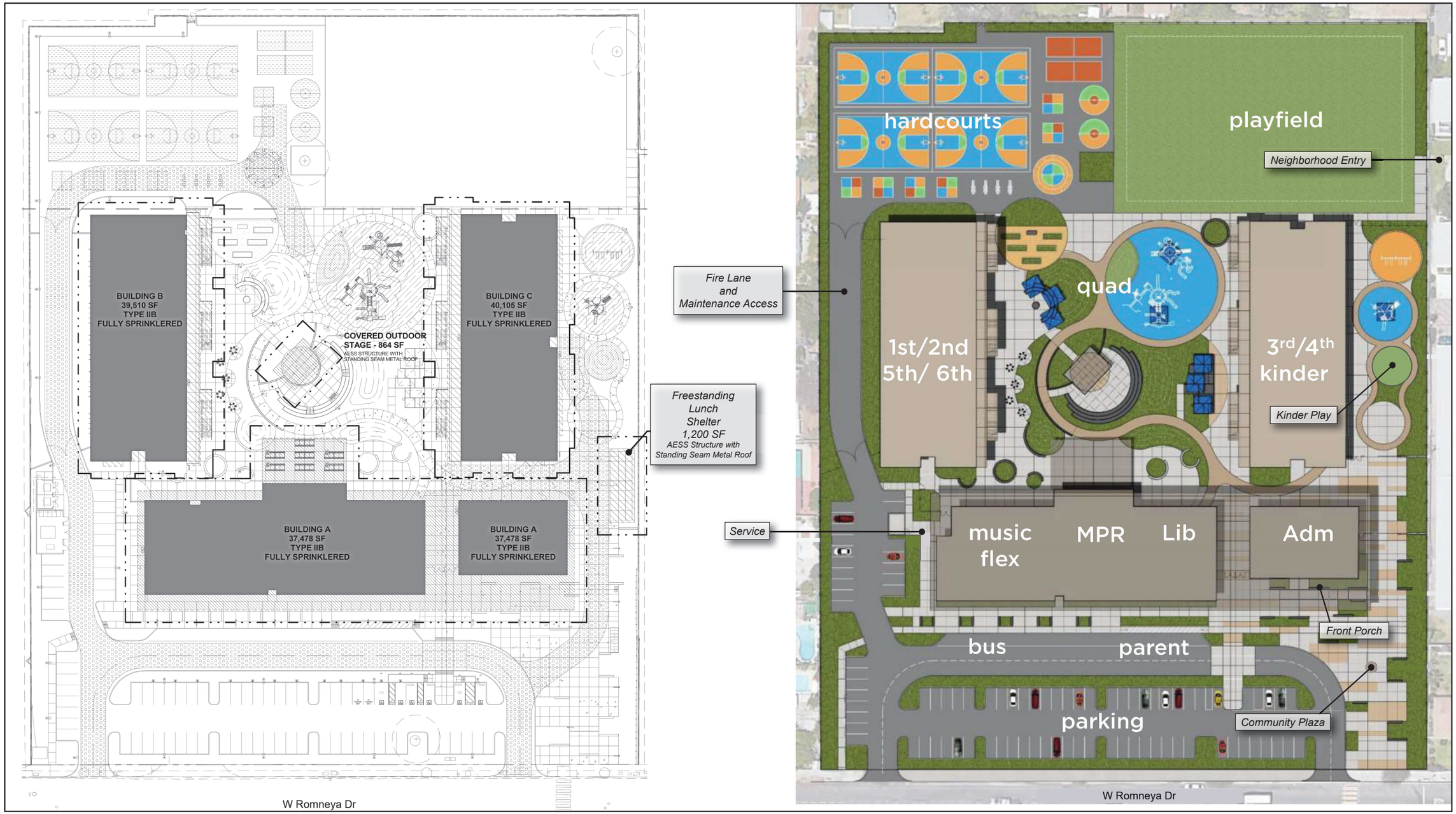
NO SCALE

Source: LPA, 2022.

3. Project Description

This page intentionally left blank.

Figure 6 - Proposed Project Site Plan



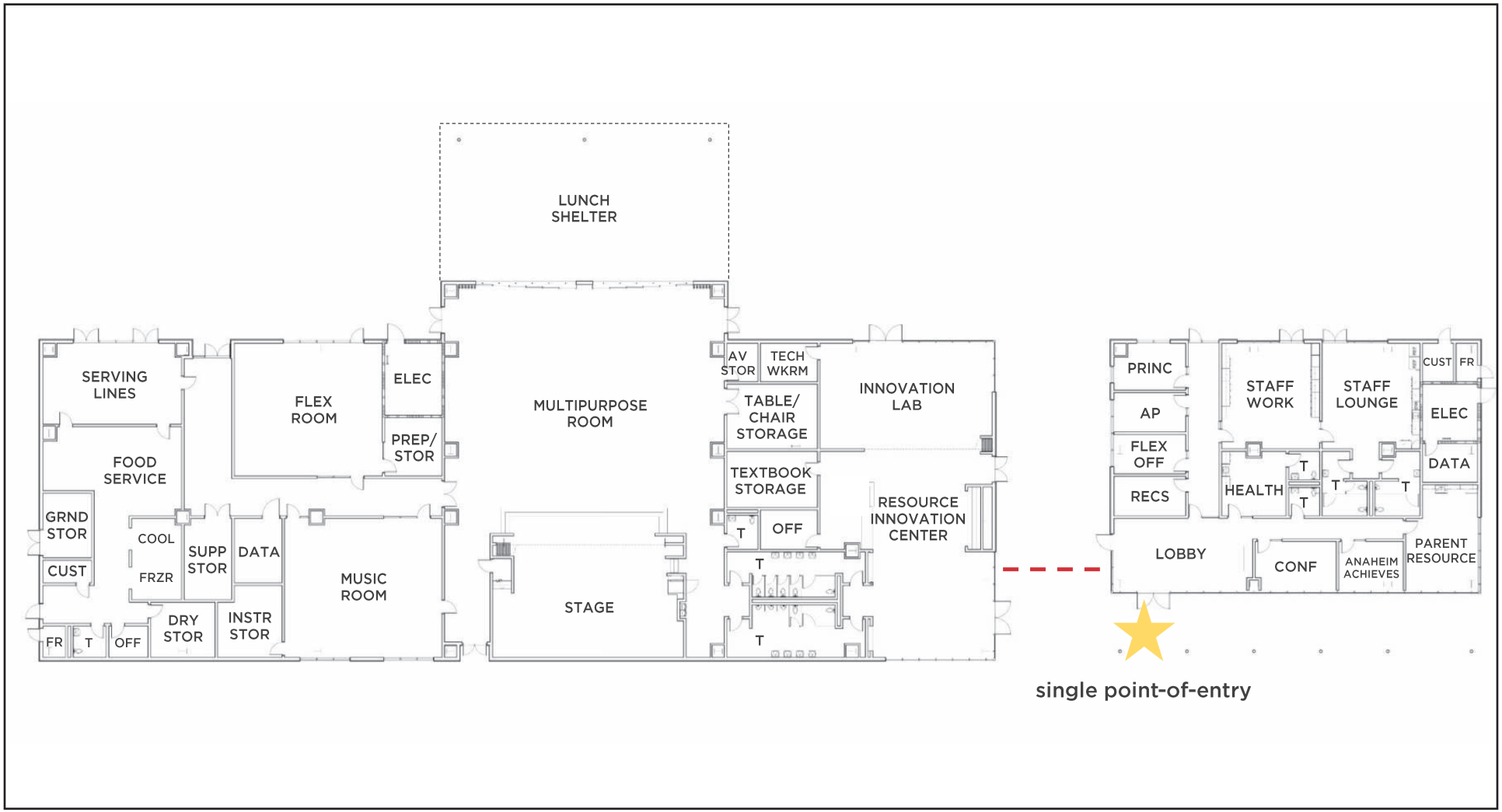
0 80
Scale (Feet)

Source: LPA, 2022.

3. Project Description

This page intentionally left blank.

Figure 7 - Building A Floor Plan



NOT TO SCALE

Source: LPA, 2022.

3. Project Description

This page intentionally left blank.

Figure 8 - Building B Floor Plan

NOT TO SCALE

Source: LPA, 2022.

3. Project Description

This page intentionally left blank.

Figure 9 - Building C Floor Plan

NOT TO SCALE

Source: LPA, 2022.

3. Project Description

This page intentionally left blank.

Figure 10 - Proposed Outdoor Improvements

NO SCALE

Source: LPA, 2022.

3. Project Description

This page intentionally left blank.

Proposed landscaping would be provided throughout school campus, including the eastern and western perimeter of the Project Site, quad area, and proposed parking lots (see Figures 5, *Proposed Patrick Henry Elementary School Campus*, and 6, *Proposed Project Site Plan*).

3.1.4 Access, Circulation, and Parking

3.1.4.1 VEHICULAR ACCESS AND CIRCULATION

As shown in Figure 3, *Aerial Photograph*, vehicular access to the Project Site is currently provided via two driveways that connect to Romneya Drive (which forms the Project Site's southern boundary): a restricted right-in only driveway and a full access driveway (all turning movements permitted). The driveways connect to the existing school's onsite vehicular circulation system and parking areas.

Under the Proposed Project, vehicular access to the Project Site would be provided via two new and improved driveways off Romney Drive. The driveways would connect to the new school's internal vehicular circulation system and parking areas. Parents dropping off students would enter and exit the Project Site from Romneya Drive via the two proposed driveways Unloading and loading of students would be directly from the vehicles passenger side via a dedicated drop off/pick up lane; a passing lane would be provided to the left so that traffic circulation is not obstructed (see Figures 5 and 6). The student drop-off/pick-up area provides approximately 210 linear feet, which would accommodate approximately 10 vehicles. If school busses access the drop-off/pick-up area at the same time as vehicles do, the District would be able to fit two 40-foot long buses and 5 to 6 vehicles.

Additionally, a fire lane and maintenance access would be provided along the western boundary of the Project Site which would allow emergency access from Romneya Drive to the interior portions of the Project Site, including the hardcourts and playfields (see Figures 5 and 6).

3.1.4.2 PEDESTRIAN ACCESS AND CIRCULATION

As shown in Figure 3, *Aerial Photograph*, pedestrian access to the Project Site is currently provided via a public sidewalk along Romneya Drive, which forms the Project Site's southern boundary. Under the Proposed Project, the existing sidewalk would be demolished and replaced with a new public sidewalk. Additionally, a striped crosswalk would be provided on Romneya Drive, near the proposed driveway on the eastern end of the Project Site (see Figures 5 and 6). The new and improved public sidewalk would connect to the internal walkway system of the reconstructed school campus. The walkways would provide a means for school children, staff, personnel, and visitors to conveniently and safely access the Project Site. The main pedestrian entrance to the school campus would be via a covered breezeway that is flanked by the proposed administrative office and library (see Figures 5 and 6).

3.1.4.3 PARKING

The Proposed Project would provide parking spaces for staff in a reconfigured parking lot located on the southern and western edge of the Project Site (see Figures 5, *Proposed Patrick Henry Elementary School Campus*,

and 6, *Proposed Project Site Plan*). The reconfigured parking lot would result in safer student drop-off areas for buses and parents.

Ingress and egress for the parking lot would be from Romneya Drive. The proposed parking lot would encompass approximately 21,558 square feet and would have capacity for 81 total vehicles, including Americans with Disabilities Act (ADA) and Electric Vehicle (EV) parking spaces.

3.2 PROJECT OPERATION

Traditional School. The new school campus would operate on a traditional two-semester academic calendar, with students in session from August through June. School hours would be 8:10 am to 2:45 pm, and some teachers and students may be on campus after school hours to attend various afterschool programs and activities.

School-Related Events. The school would provide after-school and daycare programs for the students, such as special-interest clubs, and extracurricular activities that may end later than 2:45 pm. There may also be occasional nighttime and weekend events during the school year. Some of these events would be campus wide, such as school plays and open houses, and others would be grade specific, such as commencement.

Community Use. In compliance with the Civic Center Act (SB 1404), the campus would be available for community use at selected times when not in use by AESD.

3.3 TEMPORARY SCHOOL HOUSING

During construction of the Proposed Project, students enrolled at that time would be transferred off-campus to the Harbor-Ball campus, which was previously approved for use as interim housing. The Harbor-Ball campus is at 1010 S. Harbor Boulevard in the City of Anaheim, approximately 2.4 miles southeast of the Project Site.

3.4 PROJECT CONSTRUCTION AND PHASING

Project construction would occur in a single phase and would start in June 2024 and be completed by December 2025. The start of classes at the new campus is planned for Fall 2026. Construction activities would include minor vegetation removal, building demolition, asphalt demolition and excavation, site preparation and rough grading, utility trenching, fine grading, building construction, architectural coating, asphalt paving, finishing, and landscaping. Construction staging and equipment storage would all occur on the Project Site.

- **Demolition.** The existing buildings, concrete, asphalt, and landscaped grass areas would be demolished along with the entire campus improvements.
- **Utility Trenching.** Utility trenching would occur in the first three month of construction, and would be excavated, and utility pipes, cables, and storm drainage system would be laid in trenches and connected.
- **Construction.** Building, playground, and parking construction.
- **Architectural Coating.** Painting the new buildings.

- **Asphalt.** Paving within the project site.
- **Finishing and Landscaping.** Finishing and landscaping would be implemented in the final three months of construction.

3.5 AGENCY REVIEWS AND APPROVALS

It is anticipated that the reviewing agencies for the Proposed Project would include, but may not be limited to:

- **City of Anaheim, Public Works Department.** Permit for curb, gutter, and other off-site improvements.
- **City of Anaheim, Fire Department.** Approval of plans for emergency access and emergency evacuation. Division of State Architect's approval of the fire/life safety portion of a project requires local fire authority review of elevator/stair access for emergency rescue and patient transport; access roads, fire lane markings, pavers, and gate entrances; fire hydrant location and distribution; and fire flow (location of post indicator valve, fire department connection, and detector check valve assembly).
- **City of Anaheim, Department of Transportation.** Approval of construction-related haul route.
- **California Department of General Services, Division of State Architect (DSA).** Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- **California Department of Education, School Facilities Planning Division.** Because AESD is requesting new construction funds from the State Allocation Board, the plans must be reviewed and approved by the California Department of Education (Education Code Section 17070.50) before District can submit a funding request.
- **State Water Resources Control Board.** Review of notice of intent to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan.
- **Santa Ana Regional Water Quality Control Board.** Issue National Pollution Discharge Elimination System permit; Clean Water Act Section 401 Water Quality Certification.
- **South Coast Air Quality Management District.** Review and file submittals for Rule 403, Fugitive Dust; Rule 1403, Rule 201, Permit to Construct; Rule 1166; and site monitoring.

3. Project Description

This page intentionally left blank.

4. Environmental Checklist

4.1 PROJECT INFORMATION

1. **Project Title:** Patrick Henry Elementary School Reconstruction Project

2. **Lead Agency Name and Address:**
   Anaheim Elementary School District
   1001 S East Street
   Anaheim, California 92805

3. **Contact Person and Phone Number:**
   Alexander Kang, Facilities Planning & Construction Coordinator
   (714) 517 – 7500

4. **Project Location:** The Project Site includes the entirety of the Patrick Henry Elementary School campus at 1123 W. Romneya Drive in the City of Anaheim, Orange County, California. The Project Site is comprised of four legal parcels, including Assessor's Parcel Numbers (APN) 073-446-17, 073-443-11, 073-444-11, and 073-445-11.

5. **Project Sponsor's Name and Address:**
   Anaheim Elementary School District
   1001 S East Street
   Anaheim, California 92805

6. **General Plan Designation:** School

7. **Zoning:** Transition (T)

8. **Description of Project:** As part of AESD's Long Ranch Facility Master Plan Update, the District has identified long-range goals for several schools including Patrick Henry Elementary school, creating a road map so that school facility improvements can move toward a common, coordinated vision. Pursuant and in response to the Long Range Facility Master Plan, the Proposed Project involves reconstruction of the existing Patrick Henry Elementary School campus, which includes among many other site improvements, the addition of on campus parking spaces and an expand drop-off loop to reduce congestion and improve safety on- and offsite.

   The Proposed Project would involve the demolition of approximately 50,335 square feet of existing building space and construction of about 119,139 square feet of building space. The additional space is needed to support the District's educational specifications for modern elementary school education.

4. Environmental Checklist

9. **Surrounding Land Uses and Setting:** The Project Site is surrounded by residential properties on all four sides. The residential properties west of the Project Site have a land use designation of low density residential and are zoned RS-2 Single-Family Residential (7,200 square foot minimum lot size); the properties north of the Project Site have a land use designation of low density residential and are zoned RM-3 Multiple-Family Residential (Up to 18 units per acre); and the properties to the east and south of the Project Site have a land use designation of medium density residential and are zoned RM-4 Multiple-Family Residential (Up to 36 units/acre).

10. **Other Public Agencies Whose Review and Approval Is Required (e.g., permits, financing approval, or participating agreement):**

- City of Anaheim, Public Works Department.
- City of Anaheim, Fire Department.
- City of Anaheim, Department of Transportation.
- California Department of General Services, Division of State Architect.
- California Department of Education, School Facilities Planning Division.
- State Water Resources Control Board.
- Santa Ana Regional Water Quality Control Board.
- South Coast Air Quality Management District.

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

4.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

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

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

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

☐ 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

07. 17. 2023
Date

4.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) **Earlier Analyses Used.** Identify and state where they are available for review.

   b) I**mpacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

    a) the significance criteria or threshold, if any, used to evaluate each question; and
    b) the mitigation measure identified, if any, to reduce the impact to less than significance.

4. Environmental Checklist

This page intentionally left blank.

5. Environmental Analysis

Section 4.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

5.1 AESTHETICS

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

Discussion

Would the project:

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

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. According to the Anaheim General Plan Green Element, important views and vistas in Anaheim include the Santa Ana Mountains and amenities such as golf courses and the Santa Ana River, which provide visual relief from the built environment and are important visual amenities and landmarks.

The Project Site and surrounding area lack significant topography and are developed with urban land uses. The Project Site is fully developed with an existing elementary school campus, playgrounds, parking, and ancillary educational uses. The Santa Ana River and Santa Ana Mountains are approximately 5 miles and 13 miles east of the Project Site, respectively. The Santa Ana Mountains are not visible from the Project Site and surrounding

area (including public views along Romneya Drive) due to existing intervening development and landscaping that exists in, around and beyond the Project Site. The Santa Ana River is also not visible from the Project Site or its surroundings. Implementation of the Proposed Project would not result in the obstruction or degradation of existing scenic views. Therefore, no impact on scenic vistas would occur and no mitigation measures are necessary.

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

No Impact. The closest designated state scenic highway is State Route 91 (SR-91) from Post Mile (PM) R9.2-R13.4 (officially designated in November 1971), approximately six miles east of the Project Site. The nearest eligible designated state scenic highway is Pacific Coast Highway, approximately 1.4 miles west of the Project Site (Caltrans 2019). Due to distance and intervening land uses, no portion of the Project Site or surrounding area is viewable from either of these scenic highways. Additionally, there are no rock outcroppings or historic buildings onsite—the Project Site is currently developed with the Patrick Henry Elementary School campus. Therefore, the Proposed Project would not damage scenic resources within a state scenic highway. No impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The Project Site is currently developed with an elementary school campus. It is surrounded by adjacent residential uses and qualifies as an "urbanized area." The Proposed Project includes demolition and reconstruction of the entire school campus, which would modernize the school and enhance the visual character of the Project Site and its surroundings. The new buildings would differ in scale, mass, density, and character over buildings that currently exist onsite; however, the Proposed Project would not conflict with the existing zoning or regulations governing scenic quality. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The two major causes of light pollution in the project area include spill light and glare from existing sources of light in and around the Project Site. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface. Existing sources of light on the Project Site include light emanating from building interiors, building and security lights, and parking lot lights. The Project Site is in an urbanized area of the Cit with existing light sources, which include streetlights on Orange Avenue, residential lighting, and vehicle headlights and traffic signals.

No nighttime construction is proposed, and construction activities would be subject to the Anaheim Municipal Code Section 6.70.010, which restricts construction activities to between the hours of 7:00 a.m. and 7:00 p.m.

Therefore, the Proposed Project would not require construction lighting, except for nighttime security and safety lighting.

The Proposed Project would generate lighting from two primary sources: lighting from building interiors that would pass through windows and lighting from exterior sources (e.g., parking area lighting, building illumination, security lighting, and landscape lighting). The proposed lighting is typical of lighting for elementary school campuses throughout the District and the City of Anaheim. The Proposed Project's outdoor parking area lighting would be subject to compliance with the Anaheim Municipal Code Sections 18.42.090.030.0301 and 18.42.090.030.302, which requires a minimum lighting measurement of one foot-candle with a minimum 15:1 uniformity ratio and mandates light to be arranged to reflect the light away from adjoining residential premises and prevents lighting from exceeding 12 feet in height. In addition, the City's Planning and Building Department would review any proposed lighting to ensure conformance with the California Building Code, Title 24 (California Code of Regulations), as well as the California Green Building Standard Code (Part 11 of Title 24, California Code of Regulations), such that only the minimum amount of lighting is used, and no light spillage occurs.

Additionally, the amount and type of lighting that would be generated by the Proposed Project would be similar to that of the elementary school campus that operates on the Project Site. The Proposed Project's sources of lighting would not be new source onsite, although, they would be newer and improved lighting sources over existing conditions. Furthermore, the surrounding area is highly urbanized with multiple sources of illumination from streets lights and residential lighting.

Therefore, impacts would be less than significant and no mitigation measures are necessary.

5.2 AGRICULTURE AND FORESTRY RESOURCES

	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES.	**In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:**				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X

5. Environmental Analysis

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Discussion

Would the project:

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

No Impact. The Proposed Project includes reconstruction of an existing elementary school campus located in an urbanized area of the City of Anaheim. According to the California Department of Conservation's Important Farmland Finder, the Project Site is identified as Urban Built-Up Land, and is not identified as an area of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2022). The Project Site is surrounded by residential uses on all sides and is not adjacent to or within proximity of areas designated as unique farmland, prime farmland, or farmland of statewide importance. Therefore, the Proposed Project would not alter any farmland resources. No impact would occur and no mitigation measures are necessary.

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

No Impact. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. The Project Site is not subject to a Williamson Act contract, and the existing zoning is Transition (T). The Proposed Project would not conflict with agricultural zoning or a Williamson Act contract (DOC 2017). Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The Proposed Project would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined 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 or more forest

resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (PRC section 12220(g)). Timberland is defined as "land….which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (PRC section 4526). The Project Site is not zoned for forest land or timberland use, and there are no timberland-zoned production areas in or surrounding the Project Site. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. See response to Section 3.2.c, above. As substantiated in that section, no impact would occur and no mitigation measures are necessary.

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

No Impact. See responses to Sections 3.2.a, b, and c, above. As substantiated in these sections, no impact would occur and no mitigation measures are necessary.

5.3 AIR QUALITY

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. 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?			x	
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?			x	
c)	Expose sensitive receptors to substantial pollutant concentrations?		x		
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			x	

Discussion

The Air Quality section addresses the impacts of the Proposed Project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the Project Site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate

matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O_3, and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2023).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_x, SO_X, PM_{10}, and $PM_{2.5}$. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations. Would the project:

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

Less Than Significant Impact. The South Coast AQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of General Plans, specific plans, and significant projects.

Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP. The Proposed Project would redevelop the existing Patrick Henry Elementary School campus and would not increase student capacity. Thus, the Proposed Project would not substantially affect housing, employment, or population projections within the region. Due to the nature of the Proposed Project, it would not result in new long-term employment. Construction activities associated with the Proposed Project would result in short-term employment only and would end upon project completion.

Additionally, as demonstrated below in Section 3.3(b), the regional emissions that would be generated by the operational phase of the Proposed Project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the Proposed Project would not affect the regional emissions inventory or conflict with strategies in the AQMP. Impacts would be less than significant and no mitigation measures ae necessary.

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?

Less Than Significant Impact. The following describes project-related impacts from regional short-term construction activities and regional long-term operation of the Proposed Project.

Regional Short-Term Construction Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of volatile organic compounds (VOCs) from paints and asphalt.

Construction activities associated with the redevelopment of the exiting elementary school are anticipated to disturb 7.30 acres on the Project Site. The Proposed Project would involve building and asphalt demolition and debris hauling, site preparation, rough and fine grading, utilities trenching, building construction, paving, architectural coating, and finishing and landscaping. Construction is anticipated to start in June 2024 and finish in December 2025. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1, and are based on the preliminary construction duration and equipment mix provided by the District. Construction emissions modeling are shown in Table 3 and shows maximum daily emissions for VOC, NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, air quality impacts from project-related construction activities would be less than significant and no mitigation measures ae necessary.

Table 3 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2024						
Building and Asphalt Demolition	3	25	23	<1	1	1
Building and Asphalt Demolition and Debris Haul	3	29	24	<1	5	2
Building and Asphalt Demolition Debris Haul	<1	3	2	<1	4	1
Building and Asphalt Demolition Debris Haul and Site Preparation	1	15	12	<1	5	1
Site Preparation	1	12	11	<1	1	1
Rough Grading 2024	2	19	20	<1	4	2
Year 2025						
Rough Grading 2025	2	17	19	<1	4	2
Rough Grading 2025, Utility Trenching, and Building Construction	3	31	39	<1	5	3
Utility Trenching and Building Construction	2	14	20	<1	1	1
Utility Trenching, Building Construction, and Fine Grading	3	31	39	<1	5	3
Building Construction	1	11	16	<1	1	1
Building Construction and Paving	2	19	27	<1	2	1
Building Construction, Paving, and Architectural Coating	53	20	28	<1	2	1
Building Construction, Architectural Coating, and Finishing and Landscaping	53	13	19	<1	1	1
Architectural Coating and Finishing and Landscaping	51	2	3	<1	<1	<1
Finishing and Landscaping	<1	1	1	<1	<1	<1

5. Environmental Analysis

Table 3 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Daily Construction Emissions						
Maximum Daily Emissions	53	31	39	<1	5	3
South Coast AQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1.
Notes: lbs/day = pounds per day
[1] Based on the preliminary information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.
[2] Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

Temporary School Housing

During construction of the Proposed Project, students enrolled at that time would be transferred off-campus to Orange Grove Elementary School, approximately 2.4 miles southeast of the Project Site, via the school's bus system. While there would be an increase in VMT associated with student transport, the increase in VMT would be minimal and would cease upon completion of the Proposed Project. Therefore, impacts from temporary housing of students at the Orange Grove Elementary School during construction of the Proposed Project would be less than significant and no mitigation measures ae necessary.

Long-Term Operation-Related Air Quality Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). Implementation of the Proposed Project would result in the redevelopment of the elementary school campus. However, the Proposed Project would not result in an increase in capacity and would not change attendance boundaries. Because student capacity and staffing would not increase or change after full buildout, the Proposed Project would not result in an increase in emissions from mobile sources, criteria air pollutant emissions from the Proposed Project would be minimal. The Proposed Project would not generate emissions that exceed the South Coast AQMD regional significance thresholds. Projects that do not exceed the South Coast AQMD regional significance thresholds would not result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. In addition, emissions from building energy use would be minimized because the older buildings on the campus, which were constructed prior to modern building energy codes, would be replaced with newer, more energy-efficient buildings that meet the current California Building and Energy Efficiency Standards. Therefore, impacts to the regional air quality associated with operation of the Proposed Project would be less than significant and no mitigation measures ae necessary.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated. The Proposed Project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the Project Site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest offsite sensitive receptors are the single- and multi-family residences along West Arlington Avenue to the north, West Brewster Avenue to the east, West Romneya Drive to the south, and North Lombard Drive to the west of the Project Site.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 4 shows the maximum daily construction emissions (pounds per day) generated during onsite construction activities compared with the South Coast AQMD's screening-level LSTs, for sensitive receptors within 82 feet (25 meters). As shown in the table, the construction of the Proposed Project would not generate construction-related onsite emissions that would exceed the screening-level LSTs, except for PM_{10} for the building and asphalt demolition and debris hauling activity.

Table 4 Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)1			
	NOX	CO	PM102	PM2.52
South Coast AQMD ≤1.00 Acre LST	**103**	**522**	**4.00**	**3.00**
Building and Asphalt Demolition	25	22	1.06	0.98
Building and Asphalt Demolition and Debris Haul	25	22	**4.10**	1.45
Building and Asphalt Demolition Debris Haul	0	0	3.04	0.47
Building Construction	10	13	0.43	0.40
Building Construction, Architectural Coating, and Finishing and Landscaping	12	15	0.49	0.45
Architectural Coating and Finishing and Landscaping	2	2	0.06	0.05
Finishing and Landscaping	1	1	0.03	0.02
Exceeds LST?	No	No	**Yes**	No
South Coast AQMD 1.31-Acre LST	**117**	**597**	**4.62**	**3.31**
Building Construction and Paving	18	23	0.78	0.72
Building Construction, Paving, and Architectural Coating	19	24	0.81	0.75
Exceeds LST?	No	No	No	No

5. Environmental Analysis

Table 4 Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)1			
	NOX	CO	PM102	PM2.52
South Coast AQMD 1.50-Acre LST	**125**	**642**	**5.00**	**3.50**
Building and Asphalt Demolition Debris Haul and Site Preparation	11	10	3.90	0.92
Site Preparation	11	10	0.86	0.45
Exceeds LST?	No	No	No	No
South Coast AQMD 1.81-Acre LST	**139**	**717**	**5.62**	**3.81**
Utility Trenching and Building Construction	13	17	0.52	0.48
Exceeds LST?	No	No	No	No
South Coast AQMD 2.50-Acre LST	**159**	**853**	**6.83**	**4.33**
Rough Grading 2024	18	19	3.60	2.11
Rough Grading 2025	16	18	3.48	2.00
Exceeds LST?	No	No	No	No
South Coast AQMD 4.31-Acre LST	**204**	**1,185**	**9.85**	**5.54**
Rough Grading 2025, Utility Trenching, and Building Construction	29	35	4.00	2.48
Utility Trenching, Building Construction, and Fine Grading	29	35	4.00	2.48
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2008 and 2011.
Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment are included in the analysis. Screening level LSTs are based on an 82 ft receptor in SRA 16.
1 Where specific information for project-related construction activities or processes was not available modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.
2 Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

However, as shown in Table 5, implementation of Mitigation Measures AQ-1 would reduce construction-related emissions to below the PM_{10} LSTs by requiring use of equipment that meets the EPA's Tier 4 (Interim) emissions standards. Thus, with this mitigation measure, project-related construction activities would not have the potential to expose sensitive receptors to substantial pollutant concentrations. Therefore, localized air quality impacts from construction activities would be less than significant with mitigation incorporated.

Table 5 Mitigated Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)1			
	NOX	CO	PM102	PM2.52
South Coast AQMD ≤1.00 Acre LST	**103**	**522**	**4.00**	**3.00**
Building and Asphalt Demolition and Debris Haul	12	18	**3.24**	0.64
Exceeds LST?	No	No	**No**	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment are included in the analysis. Screening level LSTs are based on an 82 ft receptor in SRA 16.

1 Where specific information for project-related construction activities or processes was not available modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.

2 Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, street sweeping with Rule 1186–compliant sweepers, and Mitigation Measure AQ-1, which would require use of demolition equipment that meets the EPA's Tier 4 (Interim) emissions standards.

Mitigation Measures

Construction

AQ-1 The Anaheim Elementary School District shall specify in the construction bid that construction contractor(s) shall, at minimum, use equipment that meets the United States Environmental Protection Agency's (EPA) Tier 4 (Interim) emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier 4 Interim emissions standards for a similarly sized engine, as defined by the California Air Resources Board's regulations. Prior to construction, the construction contractor shall ensure that all plans submitted to the District clearly show the requirement for EPA Tier 4 Interim emissions standards for construction equipment over 50 horsepower for the specific activities stated above. During construction, the construction contractor shall maintain a list of all operating equipment associated with building demolition in use on the site for verification by the District. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.

Construction Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In 2015, the Office of Environmental Health Hazards Assessment (OEHHA) adopted guidance for preparation of health risk assessments, which included the development of a cancer risk factor and non-cancer chronic reference exposure level for DPM over a 30-year time frame (OEHHA 2015). Currently, South Coast AQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The Proposed Project is anticipated to be completed in approximately 18 months, which would limit the exposure to onsite and offsite receptors. Furthermore, construction activities would not generate onsite exhaust emissions that would exceed the screening-level construction LSTs with mitigation (see Mitigation Measure AQ-1). Thus, with mitigation construction emissions would not pose a health risk to onsite and offsite

receptors, and project-related construction health impacts would be less than significant with mitigation incorporated.

Operation LSTs

Operation of the Proposed Project would not generate substantial emissions from onsite stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur onsite and would require a permit from South Coast AQMD. The Proposed Project does not fall within these categories of uses. While operation of the new buildings would use standard onsite mechanical equipment such as heating, ventilation, and air conditioning, air pollutant emissions would be nominal. Localized air quality impacts related to operation-related emissions would be less than significant and no mitigation measures ae necessary.

Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). As the Proposed Project would not result in an increase of student capacity, the Proposed Project would not generate additional peak-hour trips. Therefore, implementation of the Proposed Project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the proposed site. Operational impacts would be less than significant and no mitigation measures ae necessary.

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

Less Than Significant Impact. The Proposed Project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors

emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The Proposed Project involves the redevelopment of an elementary school and would not fall within the objectionable odors land uses or generate odors different than what is already generated onsite. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant and no mitigation measures ae necessary.

5.4 BIOLOGICAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
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 U.S. Fish and Wildlife Service?				X
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?				X
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?				X

Discussion

Would the project:

5. Environmental Analysis

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

No Impact. Sensitive biological resources are habitats or species that have been recognized by federal, state, and/or local agencies as endangered, threatened, rare, or in decline throughout all or part of their historical distribution. The Project Site and surrounding area are fully developed, consisting of an existing elementary school and residential uses. Vegetation on the Project Site consists of ornamental trees and plants, and a grass field on the existing playground. The Proposed Project would require the demolition and reconstruction of the entire elementary school campus. No sensitive tree species would be removed. There is no native habitat and no suitable habitat for threatened, endangered, or rare species on or near the site. The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the Project Site is extremely low. Therefore, no impact would occur and no mitigation measures are necessary.

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 U.S. Fish and Wildlife Service?

No Impact. The Project Site is currently developed with an elementary school. The U.S. Fish and Wildlife Service (USFWS) manages the National Wetlands Inventory (NWI), a digital Wetlands Mapper with vetted data to represent current information on wetlands, riparian, and deep-water habitats. There are no riparian habitats that exist on, adjacent to or within proximity of the Project Site (USFWS 2022). Thus, the Proposed Project would not affect any riparian habitats or other sensitive natural communities. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. According to the USFWS's NWI, there are no wetlands near or within the Project Site (USFWS 2022). The Project Site is entirely developed and does not contain any waterways or undeveloped land capable of supporting federally protected wetlands. Therefore, no wetlands would be impacted by the development activities that would occur on-site as a part of the Proposed Project. No impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. Wildlife corridors refer to established migration routes commonly used by resident and migratory species for passage from one geographic location to another. Movement corridors may

provide favorable locations for wildlife to travel between different habitat areas, such as foraging sites, breeding sites, cover areas, and preferred summer and winter range locations. They may also function as dispersal corridors allowing animals to move between various locations within their range.

The Proposed Project would require ground disturbances across the entire Project Site; however, the Project Site is fully developed with an existing elementary school and is not suitable to function as a corridor for migratory wildlife. Also, the Project Site and its surroundings do not represent a wildlife movement corridor or route between open space habitats.

Landscaped trees, shrubs, and structures present within the Project Site may provide nesting habitat for native bird and raptor species protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code sections 3503 et seq. Construction activities would be required to comply with the MBTA. To minimize direct impacts on nesting birds and raptors, nesting bird surveys would be conducted prior to the start of construction activities that may occur during nesting season (February 1 through August 31). A qualified biologist would conduct a nest survey within one week prior to the commencement of construction to ensure that no active nests would be lost. If an active nest is located, then the nest would be flagged and construction within 300 feet (500 feet for raptors) of the nest would be postponed until the biologist has confirmed that the nest is no longer active.

Preconstruction nest surveys and compliance with the MBTA would reduce impacts to migratory wildlife species. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The Proposed Project would comply with the City of Anaheim tree preservation ordinance codified in the Anaheim Municipal Code Section18.18.040, Tree Preservation. No trees in public property, including adjacent sidewalks or street trees, would be removed or damaged as a result of implementation of the Proposed Project. Because the trees that may be potentially removed within the Project Site are not protected by a preservation policy or an ordinance, the impacts of tree removal and/or relocation would not be considered significant. Therefore, the Proposed Project would not conflict with local polices or ordinances protecting biological resources. Impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. The Project Site is in an urbanized and developed area of the City. The Project Site is not within the area of an adopted Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state Habitat Conservation Plan. Therefore, no impact would occur and no mitigation measures are necessary.

5.5 CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

Discussion

Would the project:

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

Less Than Significant Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered "historically significant" if it meets one of the following criteria:

i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

ii) Is associated with the lives of persons important in our past;

iii) 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;

iv) Has yielded, or may be likely to yield, information important in prehistory or history.

Less Than Significant Impact. According to the CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a "substantial adverse change" in the resource's significance. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." Implementation of the Proposed Project would include demolition and construction of the entire existing elementary school. However, the Project Site and existing buildings and structures are not listed on the National Register of Historic Places, as a California Historical Landmark or a California Point of Historical Interest (NPS 2020; OHP 2022). Therefore, impacts to historic resources would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. As shown in Figure 2, *Aerial Photograph*, the Project Site is developed with the Patrick Henry Elementary School and is in a highly urbanized area of the City. The Project Site has already been disturbed due to prior grading and construction activities associated with current use of the site. Given the highly disturbed condition of the Project Site and its surroundings, the potential for the Project to impact an unidentified archeological resource is considered extremely low. However, the Proposed Project would require ground disturbing activities during construction, which may result in the disturbance of unknown subsurface archaeological resources. Excavation to depths greater than current foundations has the potential to encounter unknown archaeological resources. If historical or unique archaeological resources are discovered during construction activities, all work shall stop within a 30-foot radius of the discovery. The District would retain a qualified archaeologist to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program will be prepared and implemented for the remainder of the earthwork activities. With implementation of these requirements, potential impacts to archaeological resources would be reduced to less than significant. No mitigation measures are necessary.

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

Less Than Significant Impact. There are no cemeteries or known human burials on or near the Project Site, which has been previously disturbed during grading and construction of the existing school. Therefore, the likelihood that human remains would be discovered during site clearing and grading activities is considered extremely low.

However, ground disturbance (i.e., grading and excavation) as a result of the Proposed Project could have the potential to result in the discovery or disturbance of previously undiscovered subsurface human remains (. In this unlikely event, the District would be responsible for compliance with Health and Safety Code section 7050.5 and CEQA Guidelines section 15064.5. Health and Safety Code section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Orange County coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted within 24 hours. Subsequently, the NAHC shall identify the most likely descendant. The most likely descendant shall then make recommendations and engage in consultations concerning the treatment of the remains, as provided in Public Resources Code section 5097.98.

Adherence to existing legal requirements associated with human remains would reduce potential impacts associated with the disturbance of human remains. Therefore, impacts would be less than significant and no mitigation measures are necessary.

5. Environmental Analysis

5.6 ENERGY

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

Discussion

Would the project:

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

Less Than Significant Impact. The following discusses the potential energy demands from construction activities associated with the construction and operation of the elementary school.

Short-Term Construction Impacts

Electrical Energy

The majority of construction equipment would be gas- or diesel-powered, and electricity would not be used to power most of the construction equipment. Electricity use during construction would vary during different phases of construction. Later construction phases could result in the use of electricity-powered equipment for interior construction and architectural coatings. It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

Natural Gas Energy

It is not anticipated that construction equipment used for the Proposed Project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage.

Transportation Energy

Transportation energy use during construction of the Proposed Project would come from delivery vehicles, haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of project construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. Furthermore, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the Project Site is centrally located and is served by numerous regional freeway systems (e.g., I-5 and SR-91) that provide the most direct routes from various areas of the region. Electrical energy would be available for use during construction from existing connections, precluding the use of less efficient generators. Thus, energy use during construction of the Proposed Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

Long-Term Impacts During Operation

Operation of the Proposed Project would generate new demand for electricity, natural gas, and transportation energy. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor, outdoor, and perimeter lighting.

Electrical Energy

The proposed net increase in electricity consumption from the Proposed Project compared to existing conditions is shown in Table 6.

Table 6 Net Operation-Related Electricity Consumption

Land Use[1]	Electricity (kWh/year)[1]
Existing Elementary School and Parking Lot	344,594
Proposed Elementary School	745,131
Proposed Parking Lot	18,885
Net Change in Electricity Consumption	419,422

Source: Appendix A.
Notes: kWh = kilowatt-hour
[1] The electricity use per year is based on the elementary school and parking lot electricity use rates as well as the square footage of the existing and proposed school and parking lot area.

Electrical service to the campus would continue to be provided by Anaheim Public Utilities (APU) through connections to existing off-site electrical lines as needed. The Proposed Project would add approximately 69,000 square feet of building area to the campus. As shown in the table, the net new electricity demand from these additional uses from the elementary school would total 419,422 kilowatt-hours per year. While the Proposed Project would generate additional energy demand at the site, it would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements. In addition, the new buildings to be constructed would be more energy efficient than the existing school buildings to be replaced. These features would comply with the goals outlined in Appendix F of the CEQA Guidelines, as the Proposed Project

would promote the use of renewable energy and decrease reliance on fossil fuels to meet the electricity demands of the campus. Because the Proposed Project would comply with these regulations and would provide features to decrease electricity use by the campus, it would not result in wasteful, inefficient, or unnecessary electricity demands. Therefore, operation of the Proposed Project would result in a less than significant impact related to electricity.

Natural Gas Energy

The net new natural gas consumption associated with the Proposed Project is shown in Table 7. As seen in the table, the net new natural gas demand by the new elementary school buildings would total 1,443,501 kilo-British thermal units per year following buildout of the Proposed Project. Development associated with the Proposed Project would be built to meet the Building Energy Efficiency Standards. These measures would comply with the goals outlined in Appendix F of the CEQA Guidelines, as the Proposed Project would decrease reliance on fossil fuels to meet the natural gas demands of the campus. it would not result in wasteful, inefficient, or unnecessary natural gas demands. Therefore, operation of the Proposed Project would result in less than significant impacts with respect to natural gas usage.

Table 7 Net Operation-Related Natural Gas Consumption

Land Use	Natural Gas (kBTU/year)[1]
Proposed Elementary School	2,499,524
Existing Elementary School	1,056,023
Net Change in Natural Gas Consumption	1,443,501

Source: Appendix A.
Notes: kBTU = kilo-British thermal units.
[1] The natural gas use per year is based on the elementary school natural gas use rates as well as the square footage of the existing and proposed school.

Transportation Energy

The Proposed Project would result in the consumption of transportation energy during operation from the use of motor vehicles. The efficiency of the motor vehicles in use (average miles per gallon) is unknown and highly variable. Thus, estimates of transportation energy use are based on the overall vehicle miles traveled (VMT) and related transportation energy use. The Proposed Project-related VMT would primarily come from students and staff. However, because student capacity and staffing would not increase or change after full buildout of the three construction phases, implementation of the Proposed Project would not result in additional trips or an increase in VMT and would not result in additional reliance on fossil fuel consumption. In addition, the Proposed Project would include electric vehicle charging stations, which would contribute to reducing reliance on fossil fuels. Therefore, there would be **no impact** with respect to operation-related fuel usage.

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

No Impact. The state's electricity grid is transitioning to renewable energy under California's RPS Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The RPS goals have been updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 33 percent renewable energy by 2020 (SB X1-2), 44 percent by 2024, 50 percent by 2026, 52 percent by

2027, 60 percent by 2030, 90 percent by 2035, 95 percent by 2040, and 100 percent by 2045. The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as APU, whose compliance with RPS requirements would contribute to the state objective of transitioning to renewable energy. The land uses accommodated by the Proposed Project would not change (school use) and would comply with the current or future iterations of the Building Energy Efficiency Standards and CALGreen. In addition, because the Proposed Project would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements, the new buildings to be constructed would be more energy efficient than the existing school buildings to be replaced. Therefore, implementation of the Proposed Project would not conflict with or obstruct implementation of California's RPS Program and impacts would be less than significant.

5.7 GEOLOGY AND SOILS

The analysis in this section is based partly on the following technical study, which is included as Appendix B to this Initial Study.

- Geotechnical Engineering Investigation Report, Koury Engineering & Testing, Inc., August 22, 2022.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
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?				X
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

5. Environmental Analysis

Discussion

Would the project:

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

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

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. Surface rupture is the most easily avoided seismic hazard. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault zone where the fault breaks along the surface. The main purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent construction of buildings used for human occupancy on the surface of active faults, in order to minimize the hazard of surface rupture of a fault to people and habitable buildings. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the proposed development site is not threatened by surface rupture from future earthquakes.

The Project Site is not within or near an established Alquist-Priolo Earthquake Fault Zone. The nearest mapped active fault—that is, a fault that has ruptured during Holocene time (the last 11,700 years)— is the Whittier Elsinore fault zone, which is approximately 6.6 miles northeast of the Project Site (Appendix B). Due to the distance to the active fault, the potential for surface rupture of a fault onsite is considered negligible. Therefore, project development would not subject people or structures to hazards arising from surface rupture of a known active fault. Impacts would be less than significant and no mitigation measures are necessary.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The most significant geologic hazard to the design life of the Proposed Project is the potential for moderate to strong ground shaking resulting from earthquakes generated on the faults in seismically active southern California. As with other areas in southern California, it is anticipated that the Project Site will likely be subject to strong ground shaking due to earthquakes on nearby faults. As noted above, the Whittier Elsinore fault zone is approximately 6.6 miles northeast of the site. This fault, as well as others in the region, are considered capable of producing strong shaking at the Project Site, thereby exposing people or structures on the site to potential substantial adverse effects, including the risk of loss, injury, or death. The intensity of ground shaking on the Project Site would depend on the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the Project Site.

However, the Project Site is not at a greater risk of seismic activity or impacts than other sites in southern California. Seismic shaking is a risk throughout southern California. Additionally, the state regulates development in California through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The California Building Code (CBC; California Code of Regulations, Title 24, Part 2), adopted by reference in Title 15 (Buildings and Construction), Chapter 15.03 of the Anaheim Municipal Code contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site. Project development would be required to adhere to the provisions of the CBC, which are enforced by the Division of the State Architect during the building plan check and development review process. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking.

Furthermore, incorporation of the recommended design parameters from the geotechnical engineering investigation report prepared for the Proposed Project (Appendix B) would also reduce hazards from strong seismic ground shaking. The Division of the State Architect's would impose the recommended design parameters as a condition of approval, and compliance would be ensured through their building plan check and development review process.

In summary, compliance with the provisions of the CBC and implementation of the recommended design parameters outlined in the geotechnical engineering investigation report would reduce impacts resulting from strong seismic ground shaking. Therefore, impacts would be less than significant and no mitigation measures are necessary.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon that occurs when soil undergoes a transformation from a solid state to a liquified condition. It refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. When subjected to seismic ground shaking, affected soils lose strength during liquefaction and foundation failure can occur.

As stated in the geotechnical engineering investigation report prepared for the Proposed Project (Appendix B), groundwater was not encountered in any of the boring locations onsite, which were conducted to a maximum explored depth of 51.5 feet below existing ground surface. Also, based on a review of a groundwater contour map from the Orange County Water District (2021), groundwater is expected approximately 85 feet below ground surface. Additionally, the California Geological Survey (1998) does not map the Project Site as being within an area of required investigation for liquefaction.

Furthermore, Project Site grading, design, and construction would conform with the recommended design parameters of the geotechnical engineering investigation report prepared for the Proposed Project. The Division of the State Architect would impose the recommended design parameters as a condition of any required planning approval, and compliance would be ensured through their building plan check and development review process.

Therefore, impacts would be less than significant and no mitigation measures are necessary.

iv) Landslides?

No Impact. Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. Based on a review of a topographic map the Project Site is in an area of Anaheim that is characterized by flat topography and urban development (USGS 2015). Also, a review of a regional geologic map of the area does not indicate the presence of known or suspected landslides in the vicinity of the site (Morton 2004). Furthermore, the geotechnical engineering investigation concluded that landsliding is not a potential hazard at the Project Site (Appendix B). Therefore, geologic hazards associated with landslides are not anticipated to occur at the Project Site. No impact would occur and no mitigation measures are necessary.

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

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

Following is a discussion of the potential erosion impacts resulting from the Proposed Project's construction and operational phases.

Construction Phase

Project development would involve site preparation, grading, and construction activities that would disturb soil and leave exposed soil on the ground surface. Common means of soil erosion from construction sites include water, wind, and being tracked offsite by vehicles. These activities could result in soil erosion. Additionally, natural processes, such as wind and rain, could further lead to soil erosion during construction.

However, development on the Project Site is subject to local and state codes and requirements for erosion control and grading during construction. For example, project development is required to comply with standard regulations, including South Coast Air Quality Management District Rules 402 and 403, which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance offsite. For example, as outlined in Table 1 (Best Available Control Measures) of Rule 403, control measures to reduce erosion during grading and construction activities include stabilizing backfilling materials when not actively handling, stabilizing soils during clearing and grubbing activities, and stabilizing soils during and after cut-and-fill activities.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board, effective July 17, 2012, regulates construction activities to minimize water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution

Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in Section 3.10, *Hydrology and Water Quality*. The Proposed Project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP during grading and construction. For example, as outlined in Section 3.10, types of BMPs that are incorporated in SWPPPs and would help minimize impacts from soil erosion include:

- **Erosion controls.** Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats. Amongst other measures

- **Sediment controls.** Filter out soil particles that have been detached and transported in water. Sediment control BMPs include but are not limited to barriers, and cleaning measures such as street sweeping.

- **Tracking controls.** Tracking control BMPs minimize the tracking of soil offsite by vehicles; for instance, stabilizing construction roadways and entrances/exits.

Adherence to the BMPs in the SWPPP and adherence with local and state codes and requirements for erosion control and grading during construction would reduce, prevent, or minimize soil erosion from Proposed Project-related grading and construction activities. Therefore, soil erosion impacts from project-related grading and construction activities would be less than significant and no mitigation measures are necessary.

Operation Phase

The Project Site is relatively flat with gentle slopes (approximately 0.5 percent grade) to the west; the site is currently developed with the Patrick Henry Elementary School campus. Existing elevations across the site vary from approximately 145 feet above mean sea level (msl) along the eastern edge of the Project Site to about 141 feet above msl along the west side (USGS 2015). No major slopes or bluffs are on, adjacent to, or in the vicinity of the Project Site. After project completion, the Project Site would be developed with institutional uses and would not contain bare or exposed soil, similar to existing conditions. The proposed landscaping would be water conserving and have deep root systems that enable soil stabilization and minimize erosion. Upon Proposed Project completion, the potential for soil erosion or the loss of topsoil would be expected to be extremely low.

Additionally, BMPs help minimize sediment pollution of stormwater, and may include underground infiltration chambers; common area landscape management; sweeping of streets; and use of efficient irrigation systems and landscape design, water conservation, and smart controllers. BMPs associated with the Proposed Project are discussed further in Section 3.10, *Hydrology and Water Quality*. Implementation of the BMPs would help ensure that soil erosion would not occur under the Proposed Project's operation phase. BMP implementation would be ensured through the Division of the State Architect's building plan check and development review process.

Therefore, soil erosion impacts from the Proposed Project's operation phase would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Hazards from liquefaction are addressed above in Section 3.7.a.iii, and landslide hazards are addressed above in Section 3.7.a.iv. As concluded in these sections, impacts would be less than significant.

Following is a discussion of the potential impacts resulting from other site geologic and soil conditions of the Project Site.

Lateral Spreading

Lateral spreading is a phenomenon that occurs in association with liquefaction and includes the movement of non-liquefied soil materials. Due to the very low potential for liquefaction on the Project Site, the potential for lateral spreading is considered very low (Appendix B). Therefore, no impact would occur and no mitigation measures are necessary.

Ground Subsidence

The major cause of ground subsidence is the excessive withdrawal of groundwater. The Project Site overlies the Coastal Plain of Orange County Groundwater Basin (Basin). The Basin is a large alluvial groundwater basin with storage in excess of 37 million acre-feet. The basin has a long history of groundwater development for various uses dating back to the late 1800s. As a result, piezometric heads declined basin-wide during the past century. Orange County Water District, the agency responsible for groundwater basin management, has recognized that land subsidence and ground fissuring should be minimized to the extent possible. There is little potential for future widespread permanent, irreversible subsidence given OCWDs statutory commitment to sustainable groundwater management and policy of maintaining groundwater storage levels within a specified operating range. Therefore, project development would not subject people or structures to substantial hazards arising from ground subsidence. Impacts would be less than significant and no mitigation measures are necessary.

Collapsible Soils

Collapsible soils shrink upon being wetted and/or being subject to a load. Soils susceptible to hydro-collapse (or collapsible soils) are predominately sand, silty sand, and sandy silt held in a loose honeycomb structure. This relatively loose honeycomb structure is typically held together by small amounts of clay or calcium carbonate acting as a temporary cementing agent. If the soil remains dry the soil generally maintains its structure, however the addition of water to the soil will greatly weaken the honeycomb structure and the soil subsequently experiences immediate collapses. This collapse can result in rapid soil settlement and potential damage to any improvements which are located within the zone of influence of the collapsible soils. Fine-grained soils such as clays and silty clays are generally not considered susceptible to hydro-collapse.

The geotechnical engineering investigation prepared for the Proposed Project concluded that there is a low to moderate potential for collapsible soils on the Project Site (Appendix B). Project Site grading, design, and

construction would also conform with the design parameters of the geotechnical engineering investigation report. The Division of the State Architect would impose the recommended design parameters as a condition of approval and compliance would be ensured through their building plan check and development review process.

Therefore, impacts would be less than significant and no mitigation measures are necessary.

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?

No Impact. Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. Based on the sandy soils encountered at the Project Site during the geotechnical engineering investigation prepared for the Proposed Project (Appendix B), site soils are anticipated to have a very low expansion potential. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The Proposed Project would include construction of sewer laterals to existing sewers in surrounding roadways. The Proposed Project would not involve the use of septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. Paleontological resources are commonly known as fossils, that is, the recognizable physical remains or evidence of past life forms found on earth in past geological periods — including bones, shells, leaves, tracks, burrows, and impressions.

As shown in Figure 2, *Aerial Photograph*, the Project Site is currently developed with the Patrick Henry Elementary School campus. The Project Site is a disturbed environment and is underlain by Holocene and late Pleistocene sandy young alluvial fan deposits (Morton 2004). Older fan deposits may have the potential to contain significant paleontological resources. However, based on a review of the online catalog of specimens from the University of California, no documented localities of paleontological specimens are located in Anaheim (UCMP 2023). Therefore, the likelihood of paleontological resources on the Project Site is considered to be low.

Furthermore, the geotechnical engineering investigation report prepared for the Proposed Project (Appendix B) revealed that the site soils consist primarily of silty sand, poorly graded sand and sandy silt to the maximum explored depth of approximately 51.5 feet below existing grade. The Proposed Project does not include subterranean structures that would require excavation past this soil layer. Therefore, it is not anticipated that any paleontological resources will be encountered.

Finally, there are no unique geological features onsite or adjacent to or surrounding the Project Site. The Project Site exhibits generally flat topography and is already developed with a school campus.

Therefore, impacts to paleontological resources and unique geology would be less than significant and no mitigation measures are necessary.

5.8 GREENHOUSE GAS EMISSIONS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Discussion

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[1]

Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the project are not applicable and are not included in the analysis.[2] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's Senate Bill 32 (SB 32) inventory and treats this short-lived climate pollutant separately.[3] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

[1] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[2] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018). Because the amount of materials consumed during the operation or construction of the Proposed Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

[3] Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017.).

Would the project:

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

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction and operation-phase GHG emissions are shown in Table 8. Implementation of the Proposed Project would result in the redevelopment of an elementary school on the Project Site. Construction of the Proposed Project would generate GHG emissions. The annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the Proposed Project. During construction of the Proposed Project, students enrolled at that time would be transferred off-campus to Orange Grove Elementary School. There would be a temporary increase in VMT associated with student transport, resulting in an increase in GHG emissions from mobile sources. However, the increase in VMT and GHG emissions would be minimal and would cease upon completion of the Proposed Project.

Table 8 Project-Related Construction GHG Emissions

Source	GHG (MTCO2e/Year)
Year 2024	211
Year 2025	434
Amortized Construction Emissions[1]	22
South Coast AQMD Bright-Line Threshold	3,000 $MTCO_2e$/Yr
Exceeds Bright-Line Threshold?	**No**

Source: CalEEMod, Version 2022.1.
Notes: MTons = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent
[1] Total construction emission are amortized over 30 years per South Coast AQMD methodology.

In addition, because student capacity would not increase after buildout of the Proposed Project, operation of the Proposed Project would not result in an increase in trips, water demand, wastewater generation, or solid waste generation. Furthermore, GHG emissions from building energy use would be minimized because the existing classrooms building, which were constructed prior to modern building energy codes, would be replaced with newer, more energy-efficient buildings that meet the current California Building and Energy Efficiency Standards. Overall, construction and operation of the Proposed Project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year (South Coast AQMD 2010). Therefore, the Proposed Project's cumulative contribution to GHG emissions would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB 2022 Scoping Plan

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include: implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon Fuel Standards (LCFS) to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The Proposed Project would comply with these GHG emissions reduction measures since they are statewide strategies. The Proposed Project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, impacts would be less than significant and no mitigation measures are necessary.

SCAG's Regional Transportation Plan / Sustainable Communities Strategy

SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) in September 2020. Connect SoCal finds that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural

lands and farmlands (SCAG 2020). Connect SoCal's transportation projects help more efficiently distribute population, housing, and employment growth, and forecast development is generally consistent with regional-level general plan data to promote active transportation and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. Nevertheless, the Proposed Project would redevelop and modernize facilities for the existing and future students of Patrick Henry Elementary School within an existing operational school campus. The Proposed Project would not change underlying zoning or uses on the proposed site. The Proposed Project would continue to serve the local student population within the surrounding communities. Since the modernization of the existing school campus would continue to be a local-serving land use, and because the Proposed Project would not result in an increase in student capacity, the Proposed Project would not generate an increase in VMT. Therefore, the Proposed Project would not interfere with SCAG's ability to implement the regional strategies in Connect SoCal. Impacts would be less than significant and no mitigation measures are necessary.

5.9 HAZARDS AND HAZARDOUS MATERIALS

The analysis in this section is based partly on the following technical study, which is included as Appendix C to this Initial Study.

- Phase I Environmental Site Assessment Leighton Consulting, Inc., July 27, 2022.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		X		
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?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
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?				X

5. Environmental Analysis

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Discussion

Would the project:

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

Less Than Significant Impact With Mitigation Incorporated. The term "hazardous material" can be defined in different ways. For purposes of this environmental document, the definition of "hazardous material" is the one outlined in the California Health and Safety Code, Section 25501:

> Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as in the California Health and Safety Code, Section 25117, and in the California Code of Regulations, Title 22, Section 66261.2:

> Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

Exposure of the public or the environment to hazardous materials could occur through but not limited to the following means: improper handling or use of hazardous materials or waste, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; and/or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Following is a discussion of the Proposed Project's potential to create a significant hazard to the public or the environment through the routine use, storage, transport, or disposal of hazardous materials during the operational and construction phases.

Project Operation

The activities of the Proposed Project do not involve the use of unusually large amounts of hazardous materials that could impact surrounding land uses. Project operation would involve the use of small amounts of hazardous materials, such as cleansers, paints, degreasers, adhesive, sealers, fertilizers, and pesticides for cleaning and maintenance purposes. Additionally, institutional facilities are not associated with activities that use, generate, store, or transport large quantities of hazardous materials; such uses generally include manufacturing, industrial, medical (e.g., hospital), and other similar uses.

Additionally, the use, storage, transport, and disposal of hazardous materials would be governed by existing regulations of several agencies, including the US Environmental Protection Agency, US Department of Transportation, California Division of Occupational Safety and Health, and the Hazardous Materials Division of the Anaheim Fire & Rescue. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts.

Furthermore, while highly unlikely due to the proposed use, in the event of a hazardous materials spill of greater amount or toxicity than onsite personnel could safely contain and clean up, assistance would be requested from Anaheim Fire & Rescue at Fire Station 1. As also mandated by the Occupational Safety and Health Administration, all Material Safety Data Sheets for any potentially hazardous project would be provided that inform employees and first responders as to the necessary remediation procedures in the case of accidental release.

Therefore, substantial hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during long-term operation of the Proposed Project would not occur. Impacts would be less than significant and no mitigation measures are necessary.

Project Construction

As shown in Figure 2, Aerial Photograph, the Project Site is an existing elementary school. The Project Site was developed as an elementary school around 1961. The Project Site is bound by Romneya Avenue to the south, and residential land to the north, east and west.

The Phase I Environmental Site Assessment Report prepared for the Proposed Project (Appendix C) involved a search of local, state, and federal databases for known hazardous or contaminated material sites, a site

reconnaissance, a review of historic aerial photographs, and research and interviews with representatives of the public, property ownership, site manager, and regulatory agencies. The purpose of the assessment was to evaluate the likelihood that hazardous materials may be present in soil beneath the Project Site as a result of on- or offsite activities.

The ASTM E 1527-13 Standard defines a Recognized Environmental Concern (REC) in part as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." The Project Site has been an elementary school since at least 1961. Based on the results of the Phase I, one REC was identified for the Project Site. The Project Site was historically used for agricultural purposes from at least 1938 to about 1961. In addition, although not considered a REC, based on the age of the structures on the Project Site, there is a potential for asbestos-containing materials, lead based paint, polychlorinated biphenyls-containing caulk, and lead-containing building materials.

Additionally, the ASTM E 1527-13 Standard defines a Historic Recognized Environmental Concern (HREC) as "a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)." No HRECs were identified for the Project Site.

The ASTM E 1527-13 Standard also requires the identification of controlled RECs (CRECs). The ASTM Standard defines CRECs as "a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)." No CRECs were identified for the Project Site.

Additionally, construction activities would involve use of hazardous materials including cleansers and degreasers; fluids used in routine maintenance and operation of construction equipment, such as oil and lubricants; fertilizers; pesticides; and architectural coatings including paints. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the Project's construction phase.

Furthermore, as with the Proposed Project operation, the use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to federal, state, and local requirements as set forth by the EPA, DTSC, the California Occupational Safety and Health Administration, Caltrans, the Resource Conservation and Recovery Act, and the San Bernardino County Fire Protection District (the Certified Unified Program Agency for San Bernardino County). Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous

materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Based on the preceding, hazards to the public or the environment arising from the routine use of hazardous materials during project construction is considered potentially significant. However, with implementation of Mitigation Measure HAZ-1, impacts would be reduced to a level of less than significant.

Mitigation Measures

HAZ-1 A Phase II Soil Sampling investigation shall be conducted by the Anaheim Elementary School District for the project site following the American Society of Testing and Materials E1903-19 Standard, Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process, and in general conformance with the Department of Toxic Substances Control's Interim Guidance for Sampling Agricultural Properties (Third Revision) and Interim Guidance Evaluation of School Sites With Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides From Termiticides, and Polychlorinated Biphenyls From Electrical Transformers to evaluate if there have been releases at the site from the areas identified as being a potential concern in the Phase I Environmental Site Assessment prepared for the project site and dated July 27, 2022. Through the Phase II Soil Sampling, samples shall be collected in areas of potential concern where soil disturbance activities are planned. Soil samples shall then be analyzed to estimate the potential threat to public health and/or the environment posed by hazardous constituents, if any, at the project site. Soils suspected of contamination shall be tested for potential contamination. If contamination is found to be present per the Department of Toxic Substances Control Screening Levels for residential land use and the Environmental Protections Agency's Regional Screening Levels for residential land use, further testing shall be conducted until all elevated concentrations have been delineated. Contaminated soils encountered shall be transported and disposed of per state regulations to an appropriately permitted landfill.

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

Less Than Significant Impact With Mitigation Incorporated. Following is a discussion of the potential hazards impacts that could arise through the accidental release of hazardous materials from the Proposed Project's construction and operational phases.

Hazardous Materials Associated with Project Construction and Operation

See response to Section 3.9.a, above. As concluded in this section, hazards to the public or the environment arising from the routine use of hazardous materials during Project operation and construction phases would be less than significant with the implementation of Mitigation Measure HAZ-1. Additionally, the Proposed

5. Environmental Analysis

Project consists of the development of a school facility, which would not generate air toxics requiring an SCAQMD permit.

Hazardous Materials Associated with Project Site Conditions

As noted in Section 3.9.a above, one REC was identified for the Project Site. The Project Site was historically used for agricultural purposes from at least 1938 to about 1961. As concluded in this section, impacts would be less than significant with the implementation of Mitigation Measure HAZ-1.

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

No Impact. Based on a review of Google Earth, no school sites other than the Project Site itself were identified within a quarter mile of the Project Site. Additionally, as substantiated in Sections 5.9.a and 5.9.b, above, the Proposed Project does not include elements or aspects that would create or otherwise result in hazardous emissions. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The Environmental Data Resources (EDR) electronic database service was used to complete the environmental records review of the Project Site in the Phase I ESA (Appendix C). As demonstrated through the EDR, the Project Site was only listed once on the Hazardous Waste Tracking System for hazardous waste that was shipped offsite in 1997, likely associated with renovations of the school buildings. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The nearest public-use airport to the Project Site is Fullerton Municipal Airport which is approximately 2.8 miles to the northwest (Airnav 2022). The Airport Environs Land Use Plan for Fullerton Municipal Airport, amended in 2019, sets forth safety zones where land uses are regulated to minimize air crash hazards to people on the ground. The Project Site is outside of such safety zones (OCALUC 2019). Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. Anaheim has a Local Hazard Mitigation Plan (LHMP) and an Emergency Management Program for emergency response within Anaheim. Furthermore, the City of Anaheim has an established Emergency Operation Plan.

The City's Emergency Management Program utilizes the Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS). Both SEMS and NIMS are emergency management systems that provide a consistent template for all levels of government, nongovernmental organizations, and the private sector to work together to prevent, protect against, respond to, recover from, and mitigate the effects of incidents, regardless of their cause, size, location, or complexity.

The City's Fire & Rescue, Police, Public Works, Animal Control, public transit as well as water, power, and communications companies along with other non-government organizations handle smaller incidents that occur on a day-to-day basis. For large incidents, the City's Emergency Operations Center (EOC) coordinate a multi-agency response.

The Project involves the reconstruction of the existing elementary school and would have no impact on emergency response or evacuation plans. During the construction and operation phases, the Project would not interfere with any of the daily operations of the Anaheim Fire & Rescue, Police Department, or EOC which support emergency planning and response efforts in Anaheim. All construction activities would be required to be performed per the City's standards and regulations. The Proposed Project would be required to provide the necessary on- and offsite access and circulation for emergency vehicles and services during the construction and operation phases.

The Proposed Project would also be required to go through DSA's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations in the CBC to ensure that Proposed Project development does not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Based on the preceding, implementation of the Proposed Project (both the construction and operational phases) would not impair implementation of or physically interfere with emergency response or evacuation plans. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. A wildland fire hazard area is typically characterized by areas with limited access, rugged terrain, limited water supply, and combustible vegetation. As shown in Figure 3, Aerial Photograph, the Project Site is in a developed area of Anaheim with surrounding uses consisting of residential development. The Project Site has good access and is served by adequate water infrastructure. Project design would comply with the California Building Code, and the California Fire Code. Additionally, the Project Site is not in or near a Fire Hazard Severity Zone mapped by the California Department of Forestry and Fire Protection (CAL FIRE 2023). Therefore, no impact would occur and no mitigation measures are necessary.

5.10 HYDROLOGY AND WATER QUALITY

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
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:			X	
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
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			X	
iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Discussion

Would the project:

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

Less Than Significant Impact. Urban runoff from storms or nuisance flows (runoff during dry periods) from development projects can carry pollutants to receiving waters. Runoff can contain pollutants such as oil, fertilizers, pesticides, trash, and sediment. This runoff can flow directly into local streams or into storm drains and continue through pipes until it is released untreated into a local waterway and eventually the ocean. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, and plant and animal habitats.

The construction and operational phases of the Proposed Project could have the potential to impact water quality. Construction activities may impact water quality due to sheet erosion of exposed soils. Operational-related activities of the Proposed Project (e.g., runoff from parking areas, solid waste storage areas, and landscaped areas) would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff. The following is a discussion of the potential impacts that the construction and operational phases of the Proposed Project could have on water resources and quality.

Construction Activities

Clearing, grading, excavation, and construction activities associated with the Proposed Project may impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

To minimize these potential impacts, the Proposed Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP; 2022-0057-DWQ). The CGP requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that incorporates Best Management Practices (BMPs) to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The State Water Resource Control Board (SWRCB) mandates that projects that disturb one or more acres of land must obtain coverage under the Statewide CGP. The CGP also requires that prior to the start of construction activities, the project applicant must file Permit Registration Documents (PRDs) with the SWRCB, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to maintain a copy of the SWPPP on-site at all times and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the issuance of a grading permit, the project applicant is required to provide proof of filing of the PRDs with the SWRCB, which include preparation of SWPPP.

The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources. These include, but are not limited to:

- Erosion controls (e.g., earth dikes and swales, mulching, slope drains, compost blankets)
- Sediment controls (e.g., silt fence, sediment trap, sandbag or straw bale barriers)
- Tracking controls (e.g., stabilized construction entrance/exit, tire wash)
- Nonstorm water management (e.g., dewatering practices, vehicle and equipment cleaning)
- Materials and waste management (e.g., material storage, hazardous waste management, soil management)
- Good housekeeping practices

5. Environmental Analysis

Submittal of the PRDs and implementation of the SWPPP and its associated BMPs throughout the construction phase of the Proposed Project will address anticipated and expected pollutants of concern due to construction activities. Therefore, construction phase impacts would be less than significant and no mitigation measures are necessary.

Operational Phase

Once the Proposed Project has been constructed, urban runoff could include a variety of contaminants that could impact water quality. Runoff from buildings and parking lots typically contain oils, grease, fuel, antifreeze, byproducts of combustion (such as lead, cadmium, nickel, and other metals), as well as fertilizers, herbicides, pesticides, and other pollutants. Precipitation at the beginning of the rainy season may result in an initial stormwater runoff (first flush) with high pollutant concentrations.

The Anaheim Elementary School District is not regulated under the County municipal separate storm sewer systems (MS4) permit, and the Phase II Small MS4 permit for K-12 school districts and community colleges has not yet been issued by the SWRCB. In the interim, the Proposed Project is required to comply with the post-construction performance standards under the SWRCB's CGP. The performance standards specify runoff reduction requirements for all sites not covered by Phase I or Phase II MS4 permits to minimize and mitigate stormwater runoff impacts. The following is a discussion of site-design, source-control, and treatment-control BMPs that could be incorporated into the Proposed Project. At this phase of the planning process, detailed design drawings have not yet been developed and the Proposed Project is in the conceptual design phase.

Site Design BMPs

Site design BMPs would be incorporated into the Proposed Project's design to reduce the potential impacts on surface and groundwater quality. These may include, but are not limited to:

- Maximizing pervious areas and minimizing directly connected impervious areas.
- Using on-site ponding areas (i.e., at-grade detention basins).
- Constructing hardscape with permeable materials and implementing hydrologically functional landscape design.
- Incorporating trees, open space, and landscaping to mitigate urban heat island impacts.
- Including mostly native plants and drought-tolerant plants in landscaping plans.
- Using effective irrigation systems to minimize water usage.

Source Control BMPs

Source control BMPs effectively minimize the potential for typical urban pollutants to contact stormwater, thereby limiting water quality impacts downstream. Source control BMPs would be incorporated into the Proposed Project and implemented throughout the operation of the new school campus. These BMPs could include the following:

- Educational materials related to urban runoff provided to all employees, students, and staff.
- Inspection and maintenance of site BMPs—catch basins, grate inlets, etc.
- Providing storm drain stenciling or signage on all storm drain inlets and catch basins.
- Properly designing and inspecting all trash storage areas, loading docks, outdoor storage areas, and outdoor work areas on a regular basis.
- Compliance with the City of Anaheim Municipal Code and Uniform Fire Code.

Treatment Control BMPs

Treatment control BMPs (single or in combination) remove anticipated pollutants of concern from on-site runoff and include measures that treat stormwater runoff through infiltration, evapotranspiration, or harvest and reuse. The proposed preliminary treatment control BMPs are as follows (see Figure 11, *Storm Drain Plan*):

- Roof drains on all three proposed classrooms that convey runoff to the onsite storm drain system.
- Drain inlets in the parking lots and the landscaped areas that convey runoff from those areas into the onsite drain system.
- A system of stormwater infiltration chambers on the northern and southwest end of the Project Site with volumes of 8,600 and 2,700 cubic feet, respectively.
- Two points of connection to the public drain system; one on the southwestern end of the Project Site into a parkway drain in Romneya Drive, and one on the north end of the site into a parkway drain in North Condor Street.

The maintenance requirements, inspection schedule, and staff responsibilities for maintaining the stormwater treatment systems, including treatment control BMPs, would be provided by the District.

Furthermore, as part of the statewide mandate to reduce trash in receiving waters, the Proposed Project would adhere to the requirements of the SWRCB Trash Amendments. The requirements include the installation and maintenance of full-capture trash screening devices at curb inlets, grate inlets, and catch basin inlets. The trash screening devices must be certified by the SWRCB.

With the implementation of the BMP features described above, as well as compliance with state, county, and local regulations and code requirements, the Proposed Project would have a less than significant impact on surface or groundwater quality during the operational phase. No mitigation measures are necessary.

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

Less Than Significant Impact. The Project Site is over the Orange County Groundwater Basin. The City of Anaheim's Public Utilities (APU) Water Services department would provide water to the Project Site. The City's

water supplies are derived from three general water sources: local groundwater, imported water, and recycled water. APU has historically relied on approximately 70 percent groundwater from the Orange County Groundwater Basin and 30 percent imported water purchased from the Metropolitan Water District of Southern California (MWD) to supply its customers (Anaheim 2021). APU estimates that water demands for in its service area for normal years (including recycled water) would increase from approximately 56,912 acre-feet per year (afy) in 2020 to approximately 66,337 afy in 2045. The City forecasts that it will have sufficient water supplies to meet water demands in its service area for normal, single-dry, and multiply dry years (Anaheim 2021). As further substantiated in Section 5.19, Utilities and Service Systems, the Proposed Project would result in an increase of 7,716 gallons per day (gpd), which amounts to less than one percent of the current water demand for APU. Therefore, there would be no significant change in water use and a less than significant impact on groundwater supplies. Additionally, it is unlikely that groundwater would be encountered during construction that would require dewatering, since groundwater was not encountered in borings to the maximum depth explored of 51.5 below ground surface during the geotechnical investigation. Historic groundwater levels, as interpreted from the "Seismic Hazard Zone Report 03, for the Anaheim Quadrangle" indicates that the historic high groundwater may be deeper than 50 feet below ground surface (Koury 2022). Therefore, construction dewatering would not be necessary and would not impact groundwater recharge.

The Project Site is already built out with hardscape and impervious surfaces and the Proposed Project would not substantially increase the amount of impervious surfaces on the Project Site. Therefore, the Proposed Project would not substantially interfere with groundwater supplies or recharge. Impacts to groundwater supplies would be less than significant and no mitigation measures are necessary.

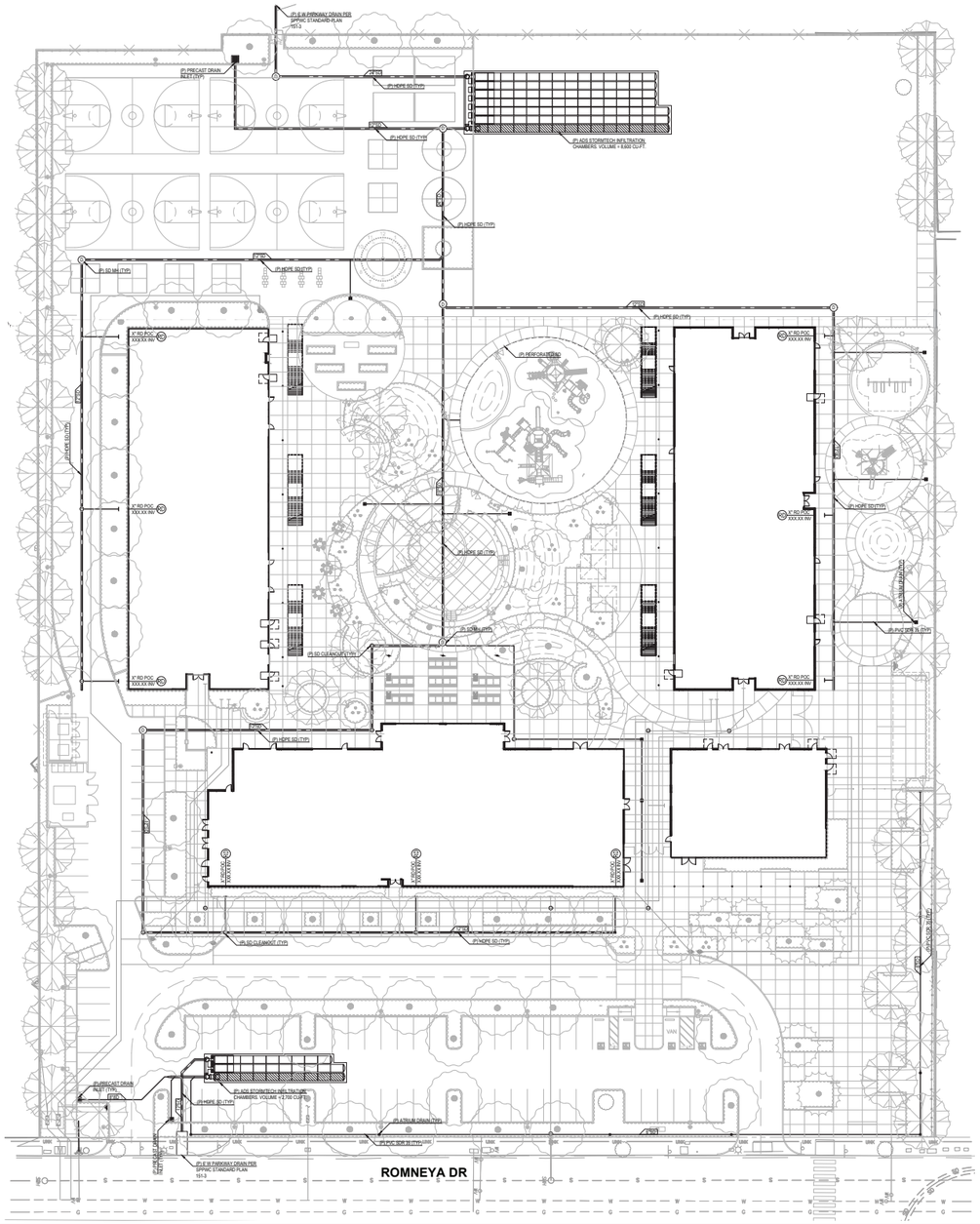
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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

Less Than Significant Impact. Erosion and siltation impacts that could result from alteration of drainage patterns would, for the most part, occur during the Proposed Project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. The Proposed Project would not involve the alteration of any natural drainage channels or any watercourse.

The Proposed Project's construction includes the removal of existing buildings and hardscape, which would expose loose soil to potential wind and water erosion. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. As previously stated, the Proposed Project would be required to submit PRDs and a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would describe the BMPs to be implemented during the Proposed Project's construction activities, including:

Figure 11 - Storm Drain Plan



STORM DRAIN CONSTRUCTION NOTES

KEY NOTE	DESCRIPTION
RD	ROOF DRAIN POINT OF CONNECTION. SUPPLY AND INSTALL ROOF DRAIN LATERAL STUBBED 5 FT. FROM FACE OF BUILDING S=0.020 MIN. PLUG AND MARK END. COORDINATE EXACT LOCATION WITH PLUMBING PLANS.
20	SUPPLY AND INSTALL 4" RISER WITH NDS 9"X9" LOW PROFILE HOUSING ADAPTER AND A 9"X9" ATRIUM GRATE (BLACK) OR EQUIVALENT. SEE DETAIL __ SHEET ____.
21	SUPPLY AND INSTALL 8" ROUND NDS GRATE PER DETAIL __ SHEET __.
22	SUPPLY AND INSTALL 12"X12" PRECAST CONCRETE DRAIN INLET PER DETAIL __ SHEET ___.
23	SUPPLY AND INSTALL 18"X18" PRECAST CONCRETE DRAIN INLET PER DETAIL __ SHEET ___.
24	SUPPLY AND INSTALL STORM DRAIN CLEAN OUT PER DETAIL __ SHEET ____.
25	SUPPLY AND INSTALL PRECAST CONCRETE STORM DRAIN MANHOLE PER DETAIL __ SHEET ____.
26	SUPPLY AND INSTALL 4" PVC STORM DRAIN AT S=0.010 MIN.
27	SUPPLY AND INSTALL 4" PERFORATED PIPE WITH SOCK PER DETAIL __ SHEET __.
28	SUPPLY AND INSTALL 4" PERFORATED PIPE WRAPPED IN FILTER FABRIC AT FOOTING OF WALL S=0.010 MIN DAYLIGHT OUTLET ON AT TOE OF SLOPE.
29	CONNECT TO PERFORATED PIPE BEHIND RETAINING WALL.
30	CONNECT TO EXISTING STORM DRAIN MANHOLE.
31	SUPPLY AND INSTALL DRYWELL FOR DRINKING FOUNTAIN. SEE DETAIL __ SHEET __. CONNECT TO DRINKING FOUNTAIN WITH 2" SCH 40 DRAIN PIPE, S=0.010 MIN
32	REMOVE EXISTING STORM DRAIN PIPE. PLUG EXISTING STORM DRAIN MAIN.
33	ADJUST EXISTING GRATE INLET TO PROPOSED GRADE.
34	CONNECT TO EXISTING __" STORM DRAIN USING CONCRETE LUG PER _____.
35	CONNECT TO EXISTING STORM DRAIN. CONTRACTOR TO VERIFY ELEVATION OF EXISTING PIPE AND NOTIFY ENGINEER OF ANY DISCREPANCIES PRIOR TO CONSTRUCTION.
36	CONSTRUCT CURB INLET TYPE __ PER ____ WITH STORM DRAIN OUTLET PIPE AS SHOWN. CATCH BASIN LENGTH PER PLAN.
37	CONSTRUCT FRENCH DRAIN PER DETAIL __ SHEET __. INSTALL CLEANOUT AT UP STREAM END PER DETAIL __ SHEET __.
38	SUPPLY AND INSTALL CONTECH STORM FILTER SYSTEM. X' x X' VAULT WITH (X) 18" CARTRIDGES.
39	CONNECT TO EXISTING ROOF DRAIN. CONTRACTOR TO VERIFY DEPTH AND SIZE OF ROOF DRAIN AND NOTIFY ENGINEER OF ANY DISCREPANCIES PRIOR TO CONSTRUCTION.
40	SUPPLY AND INSTALL __" TRENCH DRAIN. POLYDRAIN BY ABT, INC., ___ SERIES WITH PERFORATED HEEL PROOF OR EQUIVALENT (GRATE FINISH _____). EMBED IN CONCRETE PER MANUFACTURE'S RECOMMENDATIONS. CONNECT TO __" STORM DRAIN WITH _" SD AND WYE.
41	SUPPLY AND INSTALL __" TRENCH DRAIN. ACO DRAIN MODEL _____ WITH GRATE _____ PERFORATED HEEL PROOF OR EQUIVALENT (GRATE FINISH _____). EMBED IN CONCRETE PER MANUFACTURE'S RECOMMENDATIONS. CONNECT TO _" STORM DRAIN WITH _" SD AND WYE.

0 80
Scale (Feet)

Source: LPA, 2022.

5. Environmental Analysis

This page intentionally left blank.

- Minimize disturbed areas of the site.
- Preserve existing vegetation to the maximum extent practicable.
- Revegetate exposed areas as quickly as possible.
- Install on-site sediment basins to prevent off-site migration of erodible materials, as needed.
- Install velocity dissipation devices at outlets of sediment basins.
- Implement dust control measures, such as silt fences and regular watering of areas.
- Stabilize construction entrances/exits.
- Install storm drain inlet protection measures.
- Install sediment control measures along the site, such as silt fences or gravel bag barriers.

The Proposed Project's operational phase would contain a number of features to reduce the impact of erosion and siltation including a system of stormwater infiltration chambers as shown in Figure 11. The site design, source control, and treatment control BMPs for the operational phase are described in Section 3.10.a. Implementation of the Proposed Project's construction and operational phase BMPs would therefore ensure that erosion and siltation impacts would be less than significant. No mitigation measures are necessary.

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

Less Than Significant Impact. The Project Site is already built out with hardscape and impervious surfaces associated with the existing Patrick Henry Elementary School, and implementation of the Proposed Project would not substantially increase the amount of impervious surfaces on the Project Site. Furthermore, the Proposed Project would not involve the alteration of any natural drainage or watercourse. With the implementation of site BMPs, including infiltration chambers, roof drains, grates, and drain inlets, the amount of stormwater runoff reaching the City's storm drain system would not exceed existing conditions. Since the site BMPs would be designed to collect and detain peak runoff flows, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding. Therefore, impacts related to stormwater drainage and flooding would be less than significant and no mitigation measures are necessary.

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?

Less Than Significant Impact. As stated in Section 3.10.ii, the Project Site is already built out with hardscape and impervious surfaces associated with the existing Patrick Henry Elementary School, and implementation of the Proposed Project would not substantially increase the amount of impervious surfaces on the Project Site.

The Proposed Project would implement site design, source control, and treatment BMPs per the post-construction requirements of the CGP that would treat stormwater prior to discharge to the City's existing drainage system and potentially reduce peak flows. The onsite storm drainage system discharge excess storm water to the existing City storm drain beneath Romneya Drive (OC Public Works 2023). Therefore,

the amount of stormwater runoff diverted to the City's storm drain system would not exceed the discharge rates under existing conditions and the capacity of the storm drain system would not be exceeded. The Proposed Project would not create substantial additional sources of polluted runoff. During the construction phase, the Proposed Project would be required to prepare a SWPPP that includes erosion controls, thus limiting the discharge of pollutants from the site. During operation, the Proposed Project would implement BMP measures that minimize the amount of stormwater runoff and associated pollutants.

With implementation of these measures, the Proposed Project would not substantially increase the rate or amount of stormwater runoff in a manner that would cause flooding. Therefore, stormwater runoff would not exceed the capacity of existing or planning storm drain facilities. Impacts would be less than significant and no mitigation measures are necessary.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The Project Site is not within a Federal Emergency Management Agency (FEMA) 100-year flood hazard zone (FEMA 2009). According to the City's Local Hazard Mitigation Plan, the Project Site is within the dam inundation zone for Prado Dam (DWR 2023a, Anaheim 2022). Dams in California are monitored and inspected annually by the California Division of Safety of Dams. In addition, dam owners are required to maintain emergency action plans (EAP) that include procedures for damage assessment and emergency warnings. An EAP identifies potential emergency conditions at a dam and specifies preplanned actions to help minimize property damage and loss of life should those conditions occur. EAPs contain procedures and information that instruct dam owners to issue early warning and notification messages to downstream emergency management authorities. Additionally, the State of California Dam Safety Act requires dam owners to submit inundation maps for dams whose total failure would cause loss of life or personal injury. The Proposed Project includes the introduction of relatively small structures to the dam inundation zone that would not impede or redirect flows. Therefore, impacts to flood flows would be less than significant and no mitigation measures are necessary.

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

No Impact. As noted in Section 3.10.c.iv, above, the Project Site is site is not in a 100-year flood zone. Although the Project Site is within a dam inundation zone, the Proposed Project is a school reconstruction development that would not involve the use of heavy pollutants that would impair water quality in the event of inundation.

A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities, because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The Project Site is approximately 1.2 miles from Raymond Retarding Basin and four miles from the Santa Ana River. However, the Project Site is located outside of the 100-year flood zone for both water bodies. Therefore, the Project Site would not be at risk from flooding due to seiches from either Raymond Retarding Basin or the Santa Ana River due to distance from the school site.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The Proposed Project is approximately 12 miles inland from the Pacific Ocean. Therefore, the site is outside the tsunami hazard zone and would not be affected by a tsunami.

Based on the preceding, the Proposed Project would not risk release pollutants as the result of floods, tsunami, or seiche. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The Santa Ana Regional Water Quality Control Board prepares and maintains the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) and designates beneficial uses for surface water bodies and groundwater within the area. The Basin Plan also contains water quality criteria for groundwater. The Proposed Project would not conflict or obstruct the implementation of a water quality control plan or a sustainable groundwater management plan. Project construction would be subject to the Statewide CGP and implementation of BMPs specified in the SWPPP. This would minimize the potential for erosion or siltation impacts to occur that could impact receiving waters. Also, the installation of post-construction BMPs would improve the water quality of stormwater by physical filtration of sediment and solids and/or biological activity to remove pollutants. Therefore, the Proposed Project would comply with the Basin Plan.

Additionally, the Project Site is in the Orange County Groundwater Basin. The groundwater basin is categorized as medium priority by the Department of Water Resources (DWR 2023b). The basin is managed by the Basin 8-1 Alternative, an alternative to a groundwater sustainability plan (GSP). Adopted in 2017, the Basin 8-1 Alternative demonstrates that the groundwater basin has operated within its sustainable yield for more than ten years, establishes objectives and criteria for management that would be addressed in a GSP, and is designed to be functionally equivalent to a GSP (OCWD et al. 2017). The Proposed Project would result in an increase of 7,716 gpd over existing conditions of the Project Site, which amounts to less than one percent of the current water demand for APU. Therefore, the Proposed Project's demand for groundwater would not substantially increase, and the Proposed Project would not interfere with the implementation of the alternative. Additionally, as substantiated in Sections 3.10.a and b, above, the Proposed Project would not violate any water quality standards and would not decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, impacts would be less than significant and no mitigation measures are necessary.

5.11 LAND USE AND PLANNING

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
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?				X

Discussion

Would the project:

a) Physically divide an established community?

No Impact. The Project Site is currently developed with an elementary school campus (see Figure 2, *Aerial Photograph*). The surrounding area is fully developed with urban land uses, including residential land uses. The Proposed Project's construction and operational activities would occur within boundaries of the existing school campus and would not divide an established community.

Additionally, the Proposed Project would not introduce a physical barrier that would separate land uses that are not already separated. Connections between residential uses surrounding the Project Site would remain and not be impeded or impacted in any way. Except for new driveways accessing the southern portion of the Project Site along Romneya Drive, the Proposed Project would not physically change or disrupt the surrounding neighborhood's street patterns or otherwise impede movement through the neighborhoods.

Furthermore, while there is established residential uses surrounding the Project Site, project development would not physically divide these communities in any way because the Proposed Project would be developed within the confines of the Project Site and would not introduce roadways or other infrastructure improvements that would bisect or transect the residential communities. Finally, the Proposed Project would not introduce a new land use that would disrupt existing land use patterns. The Proposed Project would be compatible with the uses surrounding the Project Site.

Therefore, no impact would occur and no mitigation measures are necessary.

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?

No Impact. The Project Site has a General Plan land use designation of Schools, which is considered a Public/Quasi-Public land use. The Schools designation identifies existing public and larger, established private schools, including elementary, junior and high schools. The Project Site is zoned Transition (T). The Prospect Project is consistent with and permitted under the land use and zoning designations of the Project Site and

consists of reconstruction of the existing elementary school campus. The Proposed Project would also be developed within the boundaries of the existing elementary school campus.

Additionally, as shown in Figure 3, *Aerial Photograph*, the Project Site is in an urbanized area of the City and is surrounded by residential uses. The Proposed Project would not represent a change in land use patterns or an inconsistency with adopted land use plans. Furthermore, development of the Proposed Project does not include or require any amendments to the Anaheim General Plan, nor would it require an amendment to the Anaheim Zoning Code or zoning map.

Therefore, development of the proposed project would not conflict with any applicable land use plans, policies or regulations. No impact would occur and no mitigation measures are necessary.

5.12 MINERAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				**X**
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?				**X**

Discussion

Would the project:

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

No Impact. The Project Site is mapped as Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, indicating that it is located in an area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. According to the DOC California Geologic Emergency Management Division (CalGEM), no mineral resource recovery sites are located on or in the immediate vicinity of the Project Site (DOC 2022). The nearest oil and gas well to the Project Site is the Anaheim (ABD) Oil/Gas field located approximately 2.5 miles to the south; and the nearest active well are the Olive and Richfield Oil/Gas fields, which are idle dry wells, located approximately 3.3 miles to the east and 3.5 miles to the northeast, respectively.

Additionally, no mineral resources are identified on or near the Project Site in the Anaheim General Plan Green Element (Anaheim 2004). Furthermore, mining would be incompatible with the surrounding uses and is not a permitted use under the general plan and zoning designations of the Project Site.

Therefore, no impact would occur and not mitigation measures are necessary.

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

No Impact. As discussed in 5.12.a, the Project Site is not mapped in a mineral resource area, a surface mining district, an oil drilling district, or a state-designated oil field. The Project Site has a land use designation of Schools and is currently developed with an operating elementary school campus. As such, it is not currently used for mineral resource extraction, and there are no plans to use the site for mineral resource extraction in the future due to the lack of presence of mineral resources. Therefore, no impact would occur and no mitigation measures are necessary.

5.13 NOISE

Noise Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, both the state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. Additional information on noise and vibration fundamentals and applicable regulations are contained in Appendix D.

Environmental Setting

The Project Site is developed with an existing school (Patrick Henry Elementary) and is in a predominantly residential area with residences adjacent to the west, north and east of the Project Site boundary. Additional residences are south of the Project Site across West Romneya Drive. The nearest major source of transportation noise to the Project Site is State Route 91 (SR-91 or Riverside Freeway), approximately 0.20 miles to the north, and West Romneya Drive. Intermittent noise from nearby residential uses (e.g., property maintenance and parking lot noise) also contribute to the overall noise environment in the project vicinity.

To establish existing noise conditions in the project vicinity, traffic noise contours published in the City of Anaheim's General Plan Future Roadway Noise Contours 2025 map (Figure N-3a) are referenced. According to the Future Roadway Noise Contours map, the Project Site is within the Riverside Freeways' 65 dBA CNEL roadway noise contour.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. The nearest sensitive receptors to the Project Site are the adjacent single-family homes to the west and north, Park Vista Apartment Homes to the east, and the duplex residences to the south across West Romneya Drive. Further receptors include Iglesia Universal approximately 450 feet to the south.

Applicable Standards

California Building Code

The State of California's noise insulation standards for non-residential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA Leq(1hr).

Title 5, Section 14040(q).

Under Title 5, the California Department of Education (CDE) regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

City of Anaheim Municipal Code

Stationary Sources of Noise

Stationary sources of noise are governed under Anaheim Municipal Code, Chapter 6.70, Sound Pressure Levels. Section 6.70.010 states that no person shall, within the City, create any sound, radiated for extended periods from any premises which produces a sound pressure level at any point on the property in excess of 60 dBA. Section 6.70.010 of the municipal code also exempts certain noise sources from the provisions of this code, including traffic sounds, sound created by emergency activities and sound created by governmental units, and noise from temporary construction, repair, or demolition from this chapter's noise standards between the hours of 7:00 AM and 8:00 PM.

Federal Transit Administration

The City of Anaheim does not have a quantified threshold for temporary construction noise and vibration. Therefore, to determine impact significance, the following Federal Transit Administration (FTA) criteria are adopted.

A vibration or construction noise impact would occur if:

- Vibration levels would exceed 0.20 inches/second (in/sec) peak particle velocity (PPV) at the façade of a non-engineered structure (e.g., wood-frame residential) at the nearby sensitive receptors.
- Project construction activities would generate noise levels greater than 80 dBA Leq at the sensitive receptor property line.

5. Environmental Analysis

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?		X		
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?				X

Discussion

Would the project result in:

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

Less Than Significant Impact With Mitigation Incorporated. Following is a discussion of the temporary and permanent noise impacts as a result of the Proposed Project's construction and operational phases.

Construction Noise

Project construction is anticipated to begin in the summer of 2024. Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment.

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA Lmax at 50 feet from the worker and vendor vehicles. However, these occurrences would generally be infrequent and short-lived.

Worker and vendor trips would total a maximum of approximately 92 daily trips and a total of 39 haul trips during overlapping construction activity phases. Site access would be through West Romneya Drive, which currently has an existing average daily traffic (ADT) volume of 8,200. The addition of 131 daily construction trips would result in a temporary noise increase of 0.1 dBA CNEL or less, which would not be substantial nor permanent. Therefore, construction-vehicle noise impacts would be considered less than significant, and no mitigation measures are necessary.

Construction Equipment

Noise generated by onsite construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction stage is determined by combining the Leq contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

On-site Construction Noise

Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Similarly, construction noise from paving activities is modeled from the center of proposed parking and hardcourt areas. Construction equipment for building construction and architectural coating is modeled from the edge of the proposed building to the nearest sensitive receptors. Lastly utility trenching and landscaping finishing typically occurs along the edge of projects, and it is assumed that it could occur within 100 feet of the nearest sensitive receptors.

The Proposed Project's expected construction equipment mix was categorized by construction activity using the FHWA Roadway Construction Noise Model (RCNM). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 9. RCNM modeling input and output worksheets are included in Appendix D.

5. Environmental Analysis

Table 9 Project-Related Construction Noise, dBA Leq

Construction Activity Phase	RCNM Reference Noise Level	Residences to the north	Residences to the east	Residences to the south	Residences to the west
Distance in feet	50	305	250	370	250
Demolition	85	69	71	67	71
Site Preparation	84	68	70	66	70
Rough Grading	85	69	71	67	71
Distance in feet	50	150	65	55	400
Building Construction	82	72	80	81	64
Architectural Coating	74	64	71	73	56
Distance in feet	50	550	250	125	250
Paving	84	63	70	76	70
Distance in feet	50	100	100	100	100
Utility Trenching	85	78	78	78	78
Finish and Landscaping	77	71	71	71	71
Maximum dBA Leq		**79**	**80**	**81**	**79**
Exceed 80 Leq dBA Threshold?		**No**	**No**	**Yes**	**No**

Notes: Calculations performed with the FHWA RCNM software are included in Appendix D.

As shown in Table 9, on-site construction-related noise levels would exceed the 80 dBA Leq threshold at the nearest sensitive receptors during building construction. Therefore, construction-equipment noise impacts would be considered potentially significant. However, with the implementation of Mitigation Measure N-1 noise from construction at the nearby impacted sensitive receptors would be reduced to a less than significant impact.

Implementation of Mitigation Measure N-1 would reduce noise levels by at least 6 dBA with the use of the best available noise control techniques, specifically the use of proper engine mufflers. A study prepared for the US Department of Transportation found that in cases where a particular piece of equipment either does not have or has a very poor muffler, the application of a good muffler will reduce the overall noise by 6 to 12 dBA (Toth 1979). The construction equipment modeled using RCNM is assumed to not have any mufflers or sound attenuating devices installed. Assuming the minimum attenuation of 6 dBA would result in noise levels of 75 dBA Leq or less. Therefore, noise levels would be below the FTA criteria for temporary construction noise of 80 dBA Leq.

Mitigation Measures

N-1 The Anaheim Elementary School District construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. The Construction Noise Control Plan shall include, but not be limited to the following:

- Limit construction to the hours allowed by the City of Anaheim (7:00 AM to 8:00 PM, Monday through Saturday and prohibit construction on Sundays and federal holidays.
- At least 90 days prior to the start of construction activities, all off-site businesses and residents within 300 feet of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the Anaheim Elementary School District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the Anaheim Elementary School District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, they shall investigate, take appropriate corrective action, and report the action to the Anaheim Elementary School District.
- During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds).
- Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary sheds, or insulation barriers or other measures.
- During the entire active construction period, noisy operations shall be combined so that they occur in the same time period as the total noise level produced would not be significantly greater than the level produced if the operations were performed separately (and the noise would be of shorter duration).
- Select haul routes that avoid the greatest amount of sensitive use areas.
- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning

purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

Operational Noise

Mobile Noise

The Proposed Project would not result in an increase in students or staff. Additionally, there are no planned roadway improvements due to the Proposed Project. Therefore, the Proposed Project would not increase roadway traffic volumes over existing conditions Project related traffic noise increases on nearby roadway segments would be less than significant and no mitigation measures are necessary.

Mechanical Equipment Noise

Heating, ventilation, and air conditioning (HVAC) systems are anticipated to be installed on the roofs of the proposed building. The nearest sensitive receptor property line to the new proposed school buildings is approximately 50 feet to the west. Typical HVAC equipment generates noise levels ranging up to 72 dBA at distance of 3 feet. At a distance of 50 feet from the nearest proposed building (Building B), noise levels would attenuate to 48 dBA and would, therefore, not exceed the City of Anaheim's stationary noise standard of 60 dBA. Therefore, impacts would be less than significant impact and no mitigation measures are necessary.

Outdoor Recreational Noise

The Proposed Project includes reconfiguration of the existing quad and playground areas of the existing school. The Proposed Project would include new hardcourts on the northwestern portion of the Project Site, and a new grass playfield on the northeastern portion (see Figures 5, *Proposed Patrick Henry Elementary School Campus*, and 6, *Proposed Project Site Plan*). Additionally, the proposed quad area would include a garden, outdoor classrooms areas, small group collaborative spaces, a performance stage with amphitheater seating, a new adventure trail, a grassy mound, play structure with shade canopies, an outdoor innovation space, and an outdoor lunch space/patio (see Figure 10, Proposed Outdoor Improvements).

Playfields, hardcourts, and playgrounds are existing uses at the Project Site. Reconfiguration of existing outdoor recreational spaces under the Proposed Project would not result a significant noise increase above existing conditions. Additionally, the Proposed Project would not result in a student increase over existing conditions.

Noise levels associated with the lunch shelter area would primarily from students talking among themselves during the lunch period. A typical conversation between two people using a raised voice (to ensure that their peers can be heard over background noise from other students) at a distance of one foot is approximately 76 dBA. The lunch shelter seating area is approximately eight feet from the nearest sensitive receptors property line to the east. At that distance, noise levels would attenuate to 58 dBA which would not exceed the City's exterior daytime noise standard of 60 dBA.

Based on the preceding, noise from outdoor activities would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact With Mitigation Incorporated. Following is a discussion of the Proposed Project's temporary and permanent vibration impacts as a result of the Proposed Project's construction and operational phases.

Operational Vibration

Project operation would not include any substantial long-term vibration sources. Therefore, no significant vibration impact would occur and no mitigation measures are necessary.

Construction Vibration

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

For reference, a vibration level of 0.20 in/sec PPV is used as the limit for non-engineered timber and masonry buildings, which would conservatively apply to the surrounding structures (FTA 2018). To determine potential vibration-induced architectural damage, the distance from the vibration source (construction equipment) to the vibration-sensitive receptors (residences) is measured from the edge of the construction site to the nearest building façade. Vibration-induced architectural damage is assessed in terms of peak velocity (PPV). As shown in Table 2, PPV levels for typical construction equipment would exceed the 0.20 in/sec PPV standard at the nearest vibration sensitive receptors to the north and east of the Project Site as construction equipment during grading activities could be located approximately five feet away from the façade of the residential structures.

As shown in Table 10, vibration from a vibratory roller, large bulldozer, and jackhammer could potentially exceed 0.20 in/sec PPV at 5 feet. Therefore, impacts would be potentially significant. With implementation of Mitigation Measure N-2, however, potential vibration damage impacts would be reduced to a level of less than significant.

5. Environmental Analysis

Table 10 Vibration Damage Levels for Typical Construction Equipment

Equipment	PPV (in/sec)				
	Reference at 25 feet	Residences to the north at 5 feet	Residences to the east at 5 feet	Residences to the south at 60 feet	Residences to the west at 15 feet
Vibratory Roller[1]	0.21	2.348	NA	0.056	0.452
Large Bulldozer[1]	0.089	NA	0.995	0.024	0.191
Jackhammer[1]	0.035	NA[2]	0.391	0.009	0.075
Small Bulldozer[1]	0.003	NA[2]	0.034	0.001	0.006
Static Roller[1]	0.05	0.559	NA	0.013	0.108

Source: FTA 2018.
Notes: NA = Not Applicable
[1] FTA 2018
[2] New Zealand Transport Agency 2012.

Implementation of Mitigation Measure N-2 would reduce project-related construction vibration impacts to the surrounding residential structures to a less than significant level. Specifically, alternative gravel compaction methods and the use of a static roller would reduce vibration levels associated with paving. A static roller is estimated to generate vibration levels of approximately 0.05 in/sec PPV at a distance of 25 feet (New Zealand Transport Agency 2012). Earthwork equipment used for grading shall be limited to equipment with 100 horsepower or less as detailed in Mitigation Measure N-2.

Mitigation Measures

N-2 The Anaheim Elementary School District and its construction contractor shall implement the following measures during all ground-disturbing activities:

- Vibratory compaction that is within 15 to 25 feet of any surrounding residential structure shall be conducted with the use of a static roller in lieu of a vibratory roller. At a distance greater than 25 feet, a vibratory roller would no longer exceed 0.20 inches per second (in/sec) peak particle velocity PPV and would be allowed for use. Therefore, a static roller shall be used within 25 feet where levels would be reduced to 0.20 in/sec PPV or less and mitigate vibration damage.

- Paving activities within 10 feet of a residential structure shall employ self-compacting pea gravel for the base and a concrete finish as to not require vibratory compaction.

- Grading, earthwork, and demolitions activities within 15 feet of adjacent residential structures shall be conducted with off-road equipment that is limited to 100 horsepower or less and the use of small dozer/grader to be used in lieu of a larger dozer/grader.

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

No Impact. The nearest airport to the Project Site is Fullerton Municipal Airport, approximately 2.8 miles northwest (AirNav 2022). The Proposed Project would not expose people residing or working in the project area to excessive aircraft noise levels. Therefore, no impact would occur and no mitigation measures are necessary.

5.14 POPULATION AND HOUSING

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Discussion

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)?

No Impact. The Project Site is in a built-out, urbanized area of the City (see Figure 3, *Aerial Photograph*). The Proposed Project does not include the construction of any new homes or businesses (which result in a direct or indirect growth in population) or changes to the existing land uses onsite. The Proposed Project includes the reconstruction and modernization of the existing elementary school that operates on the Project Site. The proposed reconstruction of improvements to the elementary school campus would accommodate current and future planned student enrollment in accordance with the District's educational objectives.

The Project Site is also provided with adequate road access and utilities, and development of the Proposed Project would not require extension of roadways, utilities, or other infrastructure.

Additionally, institutional uses such as schools are generally developed in response to population growth in an area and do not cause population growth. As with the existing school, the proposed school reconstruction would continue to serve students already living in the area and within the Districts school boundary.

Furthermore, similar to other construction projects in the region, the Proposed Project's construction workers are expected to be drawn from the large, available regional labor force, who would commute to the Project Site during construction of the Proposed Project. As such, the Proposed Project would not induce construction employees to move to the project vicinity.

Based on the preceding, no direct or indirect increases in population growth would result with the Proposed Project's implementation Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. As shown in Figure 3, *Aerial Photograph*, the Project Site is currently developed with an elementary school. The Proposed Project would not involve the removal or relocation of any housing and would therefore not displace any people or necessitate the construction of any replacement housing. No existing residences would be displaced or removed as a result of the Proposed Project. No impact would occur. Therefore, no impact would occur and no mitigation measures are necessary.

5.15 PUBLIC SERVICES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
(i) Fire protection?			X	
(ii) Police protection?			X	
(iii) Schools?				X
(iv) Parks?				X
(v) Other public facilities?				X

Discussion

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

maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

Less Than Significant Impact. Fire protection services are provided to the Project Site by the City of Anaheim Department of Fire & Rescue. The Project Site is served by Fire Station 2 located at 2141 W. Crescent Boulevard, approximately 1.5 mile southwest of the Project Site. The proposed school campus reconstruction efforts would not result in an increase in student enrollment or faculty at the campus. As such, the Proposed Project would not increase demand for fire protection services beyond existing conditions. Furthermore, upgrades to existing buildings and construction of new buildings would be subject to current fire code and Anaheim Fire & Rescue requirements. Compliance with fire code standards would be ensured through the plan check process and would minimize hazards to life and property in the event of a fire. The Proposed Project would be subject to DSA review to ensure that plans, specifications, and construction comply with access, fire, and life safety design standards established by DSA and California's building codes (Title 24 of the California Code of Regulations). DSA would review fire department and emergency access roadways and school drop-off and pickup areas to ensure adequate emergency access is maintained. Fire alarm systems, elevator systems, and building occupancy would also be reviewed for compliance with current safety standards and regulations. Compliance with fire code standards would be ensured through the plan check process and would minimize hazards to life and property in the event of a fire. The Proposed Project would not require the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives such that environmental impacts would result. Therefore, impacts would be less than significant and no mitigation measures are necessary.

ii. Police protection?

Less Than Significant Impact. Police protection services are provided to the Project Site by the Anaheim Police Department. The Anaheim Police Department operates from one station located at 425 S. Harbor Boulevard, approximately 1.7 miles south of the project site. The Proposed Project would not increase student enrollment or staff and would not induce population growth; therefore, the Proposed Project would not increase the need for additional police protection services. Active construction areas would be fenced and would remain secured outside of work hours. Any increase in police demands would be temporary and would not require construction of new or expanded police facilities. Since the Proposed Project would not increase the student population or intensify use of the Project Site, project implementation would not increase the demand for police services or generate a need for additional law enforcement facilities. The Proposed Project would not increase student population or demand and would not result in adverse impacts on existing police service such that environmental impacts would result. Therefore, impacts would be less than significant and no mitigation measures are necessary.

iii. Schools?

Less Than Significant Impact. Typically, the demand for schools is created by new housing development or activities that generate additional population. The Proposed Project does not include the development of new homes, which lead to an increase in student generation and thereby, the need for additional school facilities. The Proposed Project would not induce population growth in the area, either directly or indirectly. The Proposed Project involves reconstruction and modernization of the existing elementary school campus that operates on the Project Site. The Proposed Project would not generate an increase in student enrollment, as the schools current capacity of 750 students would remain unchanged. Further, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, as demonstrated throughout this Initial Study. Therefore, impacts would be less than significant and no mitigation measures are necessary.

iv. Parks?

No Impact. See response to Section 5.16.a, below. As substantiated in this section, no impact would occur and no mitigation measures are necessary.

v. Other public facilities?

No Impact. The need for new or the expansion of existing library services and facilities is tied to population growth. The Proposed Project does not include development of residential or commercial uses and would not contribute to population growth in the City of Anaheim. The Proposed Project involves reconstruction and modernization of the existing elementary school campus that operates on the Project Site. Thus, the Proposed Project would not increase the demand for public facilities, such as library services or other administrative services in the City of Anaheim. Therefore, no impact would occur and no mitigation measures are required.

5.16 RECREATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
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?				X

Discussion

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?

No Impact. Typically, the demand for parks is created by the development of new housing and/or actions that generate additional population. According to the Anaheim General Plan Green Element, there are 63 parks and special use facilities located throughout the City, totaling 689 acres. The closest park to the Project Site is Manzanita Park, located approximately 0.20 miles northeast of the Project Site. The Proposed Project would serve an existing student population and would not increase student enrollment of the elementary school. The Proposed Project would not result in an increase in students or staff at the school and would not increase population in the surrounding community. The Proposed Project involves reconstruction and modernization of the existing elementary school campus with facilities that would accommodate current and planned future student enrollment in accordance with the District's educational objectives. As the proposed facilities and upgrades would be adequate to serve the existing and future student population, increased demand for off-site recreational resources, parks, or other facilities within the City is not anticipated as a result with the Proposed Project's implementation. As such, the Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that the substantial physical deterioration of recreational facilities would occur or be accelerated. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. As shown in Figure 6, *Proposed Project Site Plan*, the proposed school reconstruction would feature a number of onsite amenities that would serve the school's student population, which include playfields, hardcourts, and play structures. The Proposed Project does not involve any construction of recreational facilities beyond what is proposed to serve the school's student population. Additionally, project implementation does not propose or require construction or expansion of existing recreational facilities in Anaheim. Furthermore, construction of the Proposed Project's recreational facilities by themselves are not considered likely to result in a significant construction- or operational-related impact. The physical impacts associated with construction of the Proposed Project's recreational facilities are also analyzed in other topical sections of this Initial Study. Therefore, no impact would occur and no mitigation measures are necessary.

5.17 TRANSPORTATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?			X	

Discussion

Would the project:

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

Less Than Significant Impact. Following is a discussion of the Proposed Project's potential impacts on a program, plan, ordinance, or policy addressing the circulation system. Specifically, the following discussion demonstrates that development of the Proposed Project would not conflict with nor preclude the City from implementing adopted programs, plans, and policies addressing the circulation system, including the Anaheim General Plan.

The Anaheim General Plan Circulation Element details and outlines the City's plans to provide a transportation network system that allows the movement of people, goods, and services easily and safely throughout and beyond Anaheim. The element identifies the broader issues on which the City bases its circulation and transportation policies and outlines the City's goals and implementation policies to provide a safe and efficient transportation system strategy, which includes non-motorized modes of transportation, such as bicycle and equestrian paths and pedestrian ways, as well as bus routes Following is a discussion of how the Proposed Project would be consistent with the applicable components of the Anaheim General Plan Circulation Element.

Vehicular Access and Circulation

As shown in Figure 3, *Aerial Photograph*, vehicular access to the Project Site is currently provided via two driveways that connect to Romneya Drive (which forms the Project Site's southern boundary): a restricted right-in only driveway and a full access driveway (all turning movements permitted). The driveways connect to the existing school's onsite vehicular circulation system and parking areas.

Under the Proposed Project, access to the Project Site would be provided via two new and improved driveways off Romney Drive. The street classification and standards for Romneya Drive were reviewed and compared to existing and future conditions of this roadway as a result of development of the Proposed Project. Per the Anaheim General Plan Circulation Element, Romneya Drive is classified as a Collector Street, which are roadways that distribute residential traffic from its point of origin to higher capacity facilities. They are typically two-lane undivided roadways with a 64-foot right of way width.

Project development would not impact the functionality or use of Romneya Drive as a Collector Street. As shown in Figures 5, *Proposed Patrick Henry Elementary School Campus*, and 6, *Proposed Project Site Plan*, vehicular access to the Project Site would be provided via two driveways on Romneya Drive. Both driveways would be designed and constructed as full access driveways, allowing all vehicular turning movements. The driveways would connect to the internal drive aisle system, which would also serve as the student drop-off/pick-up circulation feature and the fire access lane.

Design and construction of the proposed driveways would be required to adhere to the City of Anaheim Engineering Services established standard plans and details and the standards outlined in the Anaheim Zoning Code, which would be imposed on the Proposed Project during DSA's development review process.

Additionally, the Proposed Project supports and implements the following goals and policies of the Anaheim General Plan Circulation Element:

Goal 2.2: Provide a safe circulation system.

- **Policy 5.** Minimize disruptions to traffic and pedestrian/bicycle flow.
- **Policy 10.** Provide adequate sight distances for safe vehicular movement on roadways, at intersections and at driveways.

Alternative Modes of Transportation

As shown in Figure 3, *Aerial Photograph*, pedestrian access to the Project Site is currently provided via a public sidewalk along Romneya Drive, which forms the Project Site's southern boundary. Under the Proposed Project, the existing sidewalk would be demolished and replaced with a new public sidewalk. Additionally, a striped crosswalk would be provided on Romneya Drive, near the proposed driveway on the eastern end of the Project Site (see Figures 5, *Proposed Patrick Henry Elementary School Campus*, and 6, *Proposed Project Site Plan*). The new and improved public sidewalk would connect to the internal walkway system of the reconstructed school campus. The walkways would provide a means for school children, staff, personnel, and visitors to conveniently and safely access the Project Site.

Additionally, the Proposed Project supports and implements the following goals and policies of the Anaheim General Plan Circulation Element:

Goal 2.2: Provide a safe circulation system.

- **Policy 5.** Minimize disruptions to traffic and pedestrian/bicycle flow.

5. Environmental Analysis

Goal 8.1: Protect and encourage pedestrian travel.

- **Policy 1.** Encourage and improve pedestrian facilities that link development to the circulation network and that serve as a transition between other modes of travel.
- **Policy 2.** Improve pedestrian and bicycle connections from residential neighborhoods to retail activity centers, employment centers, schools, parks, open space areas and community centers.
- **Policy 7.** Ensure that streets and intersections are designed to provide visibility and safety for pedestrians.

Conclusion

As demonstrated above, development of the Proposed Project would not conflict with any components of the Anaheim General Plan Circulation Element, including the goals or policies. Therefore, impacts would be less than significant and no mitigation measures are necessary.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact. Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research to amend the CEQA Guidelines to provide an alternative to level of service for evaluating transportation impacts. SB743 specified that the new criteria should promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. The bill also specified that delay-based level of service could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3, Determining the Significance of Transportation Impacts, was added to the CEQA Guidelines on January 1, 2019. Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT.

Vehicle miles traveled (VMT) is an indicator of the travel levels on the roadway system by motor vehicles. It corresponds to the number of vehicles multiplied by the distance traveled in a given period over a geographical area. In other words, VMT is a function of (1) number of daily trips and (2) the average trip length (VMT = daily trips x average trip length).

The City's Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis provides VMT screening thresholds to identify projects that would be considered to have a less-than significant impact on VMT and therefore could be screened out from further VMT analysis. If a project meets one of the following screening types, then the VMT impact of the project would be considered less-than significant and no further analysis of VMT would be required:

1. The project is located within a Transit Priority Area (TPA).
2. The project is located in a low VMT generating area.
3. Project Type Screening:

- Local-serving K-12 schools
- Pocket, neighborhood and community parks as defined by the General Plan
- Day care centers
- Local-serving retail uses less than 50,000 square feet
- Student housing projects on or adjacent to college campuses
- Community and Religious Assembly Uses
- Public Services
- Local-serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Affordable or supportive housing
- Convalescent & Rest Homes
- Senior housing (as defined by HUD)
- Projects generating less than 110 daily vehicle trips (City of Anaheim 2020).

Screening Type 1 – Transit Priority Area Screening. According to the City's guidelines, projects located in a TPA may be presumed to have a less than significant impact. The Project Site is not in a TPA; therefore, the Proposed Project would not satisfy the requirements of Screening Type 1.

Screening Type 2 – Low VMT Generating Area Screening. The City's guidelines include a screening threshold for projects located in a low VMT generating area. Specifically, residential and office projects located in a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. Other employment-related and mixed-use projects within a low VMT-generating area may also be presumed to have a less than significant impact if the project can reasonably be expected to generate VMT per service population similar to the existing land uses in the low VMT area. The Proposed Project involves reconstruction and modernization of an existing elementary school; therefore, the Proposed Project would not satisfy the requirements of Screening Type 1.

Screening Type 3 – Project Type. According to the City's guidelines, certain project types (as detailed and listed above) are presumed to have a less than significant transportation impact absent substantial. The Proposed Project involves reconstruction and modernization of an existing elementary school, which is project type listed under Screening Type 3. Therefore, the Proposed Project would satisfy the requirements of Screening Type 1. The Proposed Project is considered a locally serving land use and impacts on VMT would be considered less than significant. No mitigation measures are necessary. Additionally, the Proposed Project would not change the land use of the existing school, increase the capacity of the school, or change the attendance boundaries of the school.

Based on the preceding, impacts would be less than significant and no mitigation measures are necessary.

5. Environmental Analysis

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

No Impact. As shown in Figures 5, *Proposed Patrick Henry Elementary School Campus*, and 6, *Proposed Project Site Plan*, vehicular access to the Project Site would be provided via two driveways on Romneya Drive. Both driveways would be designed and constructed as full access driveways, allowing all vehicular turning movements. The driveways would connect to the internal drive aisle system, which would also serve as the student drop-off/pick-up circulation feature and the fire access lane. Emergency vehicle access to the Project Site would be via the western driveway, which connects to the internal loop road. The loop road would serve as a fire access lane and become part of the onsite fire access loop.

The City and Anaheim Department of Fire & Rescue (ADFR) have adopted design standards that preclude the construction of any unsafe roadway, circulation, or access design features. Design and construction of the proposed driveways would be required to adhere to the City of Anaheim Engineering Services established standard plans and details and the standards outlined in the Anaheim Zoning Code, which would be imposed on the Proposed Project during DSA's development review process. For example, at intersections and project driveways and pursuant to the established standard plans, a substantially clear line of sight must be maintained between the driver of a vehicle waiting at the crossroad and the driver of an approaching vehicle. Sight distance is the continuous length of roadway visible to the driver. Based on a review of Google maps, there are no restrictions blocking the view from the proposed locations of the access driveways and east- and westbound traffic on Romneya Drive, and sufficient sight distance would be provided. Compliance with the established standard plans would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, public transit, pedestrians, or bicyclists traveling along Romney Drive.

Furthermore, the Proposed Project would provide a network of low-speed internal drive aisles that would be safe and walkable for pedestrians, while maintaining an efficient circulation system for vehicles. The Proposed Project would also not include incompatible uses such as farm equipment or other unusually slow vehicles that would present a traffic hazard on area roadways.

Therefore, no impact resulting from hazards due to design features or incompatible uses would occur and no mitigation measures are necessary.

d) Result in inadequate emergency access?

Less Than Significant Impact. As outlined above, the Proposed Project would introduce new onsite vehicular access and circulation improvements. To address emergency and fire access needs, the improvements would be required to be designed and constructed in accordance with all applicable City and ADFR design standards for emergency access (e.g., minimum lane width and turning radius). For example, the drive aisles would be designed to meet the minimum width requirements of ADFR to allow the passing of emergency vehicles. Additionally, as shown in Figure 6, *Proposed Project Site Plan,* the internal drive aisles would serve as a fire access road and become part of the onsite fire access loop.

Additionally, the Proposed Project would also be subject to review by DSA who oversees design and construction for K–12 schools. For example, the Proposed Project would be required to comply with all design standards established by DSA including Policy 07-03, "Fire Department and Emergency Access Roadways and School Drop-Off Areas." The purpose of this policy is to establish requirements based on State Fire Marshal Regulations contained in Titles 19 and 24 of the California Code of Regulations, and the California Vehicle Code for fire and emergency access roadways on public school or community college campuses, including fire and emergency access roadways combined with student drop-off and pick-up areas. Also, the Proposed Project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and ADFR. Adherence to these codes and standards is ensured through DSA's development review process; thereby, ensuring the proposed access and circulation improvements meet all applicable regulations and standards.

Based on the preceding, impacts would be less than significant and no mitigation measures are necessary.

5.18 TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 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.		X		

Discussion

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural

landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

No Impact. See response to Section 5.5.a, above. As substantiated in this section, no impact to historical resources would occur and no mitigation measures are necessary. Also, there are no Traditional Cultural Resources listed or eligible for listing in the California Register of Historical Resources as defined in PRC Section 5020.1(k) within the Project Site or within a 0.5-mile radius surrounding the Project Site. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. The intent of the consultations is to provide an opportunity for interested Native American contacts to work together with the lead agency (in this case, the Anaheim Elementary School District) during the project planning process to identify and protect tribal cultural resources.

The provisions of CEQA, PRC Sections 21080.3.1 et seq. (also known as AB 52), require meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources. As defined in PRC Section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe.

As part of the AB 52 process, a Native American tribe must submit a written request to the relevant lead agency if it wishes to be notified of projects that require CEQA public noticing and are within its traditionally and culturally affiliated geographical area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

In accordance with the provisions of AB 52, the City sent letters on February 5, 2022, to the following tribes:

- Campo Band of Diegueno Mission Indians
- Ewiiaapaayp Band of Kumeyaay Indians
- Gabrieleno Band of Mission Indians – Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Tribe
- Juaneno Band of Mission Indians Acjachemen Nation – Belardes
- Juaneno Band of Mission Indians Acjachemen Nation 84A
- La Posta Band of Diegueno Mission Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Diegueno Mission Indians
- Pala Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians

The 30-day noticing requirement under AB 52 ended on May 26, 2023, approximately 30 days from the date the tribes received the notification letter. One tribe responded to the District's AB 52 consultation notification letter: Gabrieleño Band of Mission Indians - Kizh Nation (Kizh Nation). In their response letter, the Kizh Nation stated that they are the direct lineal descendants of the project area and that the project site is within their ancestral tribal territory. Therefore, they requested consultation with the District. Based on the consultation conducted, the Kizh Nation requested mitigation measures to reduce the Project's potential impacts to tribal cultural resources.

Additionally, while unlikely, the presence of subsurface tribal cultural resources on the project site remains possible, and these could be affected by ground-disturbing activities associated with grading and construction at the site. It is possible that subsurface disturbance might occur at levels not previously disturbed or may uncover undiscovered tribal cultural resources at the site. Therefore, impacts to tribal cultural resources are potentially significant.

To enable the Kizh Nation with the ability to protect and preserve their tribal cultural resources and to reduce potential impacts to such resources (if encountered), mitigation is required. With implementation of Mitigation Measures TCR-1 through TCR-3, which are based on input the City received from the Kizh Nation during the consultation efforts, impacts related to tribal cultural resources would be reduced to a level of less than significant.

Mitigation Measures

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

- The Anaheim Elementary School District (District) shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians - Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the project site at all project locations (e.g., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). Ground-disturbing activity shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- A copy of the executed monitoring agreement shall be submitted to the District prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- The monitor shall complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Kizh Nation. Monitor logs shall identify and describe any discovered tribal cultural resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources or TCRs), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the District upon written request to the Kizh Nation.
- On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the District that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the District that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh Nation TCRs.

TCR-2 **Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)**

- Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation shall recover and retain all discovered TCRs in the form and/or manner the Kizh Nation deems appropriate, in the Kizh Nation's sole discretion, and for any purpose the Kizh Nation deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3 **Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects**

- Native American human remains are defined in Public Resources Code (PRC) Section 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC Section 5097.98, are also to be treated according to this statute.
- If Native American human remains and/or grave goods are discovered or recognized on the project site, then PRC Section 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).
- Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

5.19 UTILITIES AND SERVICE SYSTEMS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. 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?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

Discussion

Would the project:

5. Environmental Analysis

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?

Less Than Significant Impact. Following is a discussion of the Proposed Project's potential impacts on water, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications facilities.

Water Supply Facilities

Water to the Project Site is provided by APU, which relies on local groundwater, imported water, and a small portion of recycled water to meet its water needs. APU's service area matches the City of Anaheim's boundaries, with minor exceptions, and covers approximately 49.3 square miles. APU has historically relied on approximately 70 percent groundwater from the Orange County Groundwater Basin and 30 percent imported water purchased from the Metropolitan Water District of Southern California (MWD) to supply its customers (Anaheim 2021).

APU estimates that water demands in its service area for normal years (including recycled water) would increase from approximately 56,912 acre-feet per year (afy) in 2020 to approximately 66,337 afy in 2045. The City forecasts that it will have sufficient water supplies to meet water demands in its service area for normal, single-dry, and multiply dry years (Anaheim 2021).

Water demand estimates for the existing uses onsite and proposed uses under the Proposed Project are included in Table 11. As shown in the table, existing water uses have a total water demand of 7,879 gpd. The Proposed Project would require approximately 14,928 gpd, or 16.7 afy. Therefore, the Proposed Project would result in an increase of 7,049 gpd, which amounts to less than one percent of the current water demand for APU. Therefore, APU would have adequate water supplies to service the Proposed Project.

Table 11 Water Demands, Existing and Proposed

Scenario	Outdoor Irrigated Area (SF)	Outdoor Water Use (gpd)[2]	Building Area (SF)	Indoor Water Use Rate (gpd/SF)[3]	Indoor Water Use (gpd)	Total Water Use (gpd)
Existing Uses						
School Facilities	91,000[1]	3,852	50,335	0.08	4,027	7,879
Proposed Uses						
School Facilities	82,255	5,561[4]	117,093[5]	0.08	9,376	14,928
Net Increase	—	1,709	—	—	5,349	7,049

Source: CAPCOA 2017; CIMIS 2023, DWR 2017.
Notes: SF = square feet; gpd = gallons per day
1 Landscaped square footage estimated from Google Maps and all assumed to be irrigated with an overhead system.
2 DWR's Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes was used to calculate the maximum allowed water allowance (MAWA). An annual precipitation of 8.5 inches per year and a reference evapotranspiration (Eto) of 57.5 inches per year were obtained from CIMIS for the period from January 2022 to December 2022.
3 Indoor water use for "Elementary School" used as indicated in the CalEEMod Default Data Tables.
4 Playfields are considered Special Landscape Areas and the 40,205 SF for the playfields is inputted as such in the DWR worksheet. The MAWA is shown in the table.
5 Includes buildings A, B, and C of 37,478 SF, 39,510 SF, and 40,105 SF. The two free standing structures of 846 SF and 1,200 SF are not included since they do not generate a water demand.

As a part of the Proposed Project, onsite water lines (for potable water, irrigation, and fire suppression purposes) would connect to the existing water line on Romneya Drive. The proposed water system improvements would be designed and constructed in accordance with City requirements and would require City approval.

Additionally, the District would be required to pay a water service connection pursuant to Section 10.16.420 of the Anaheim Municipal Code.

Furthermore, the District would be required to implement the requirements of Sections 10.18 (Water Conservation and Water Shortage Contingency Rules and Regulations), 10.19 (Landscape Water Efficiency), and 18.46 (Landscaping and Screening) of the Anaheim Municipal Code to reduce water consumption impacts and comply with landscaping development and water use standards. Finally, project development would be required to comply with the provisions of the most current CALGreen, which contains requirements for indoor water use reduction and site irrigation conservation. Specifically, project development would be required to adhere to the mandatory nonresidential standards outlined in Division 5.3 (Water Efficiency and Conservation) of CALGreen, including those of Sections 5.303 (Indoor Water Use) and 5.304 (Outdoor Water Use). For example, Section 5.303 outlines the standards for water conserving plumbing fixtures and fittings; Section 5.304 outlines the standards for water efficient landscape.

Based on the preceding, project development would not require the construction of new or expanded water treatment facilities. Impacts would be less than significant and no mitigation measures are necessary.

Wastewater Treatment Facilities

APU's Sewer and Storm Drain Division provides wastewater collection and conveyance service to the Project Site. The Project Site is located in the Central Anaheim Master Plan of Sanitary Sewers (CAMPSS). Wastewater from CAMPSS drains into an Orange County Sanitation District (OCSD) trunk sewer at Euclid Street for further treatment and final discharge (Anaheim 2017). OCSD's Plant No. 1 in Fountain Valley has a capacity of 320 million gpd and Plant No. 2 in Huntington Beach has a capacity of 312 million gpd. In 2020-2021, the average daily flows at Plant No. 1 and No. 2 were 188 million gpd and 64 million gpd respectively (Anaheim 2021).

The net increase in wastewater generation for the Proposed Project is assumed to be 90 percent of the increase in indoor water use (King County 2014). The Proposed Project results in a net increase of indoor water demand of 5,349 gpd. Therefore, the Proposed Project would generate a net increase in wastewater generation of about 4,814 gpd. The amount of wastewater that would be generated is less than one percent of VFWD's wastewater treatment plant's total remaining daily treatment capacity. Therefore, project development would not require the construction of new or expanded wastewater treatment facilities.

Additionally, the District would have to pay a sewer connection fee, sewer impact and improvement fee, and sewer assessment fee pursuant to the Anaheim Municipal Code.

Therefore, the Proposed Project's development would not require the construction of new or expanded wastewater facilities that could cause significant environmental effects. Impacts would be less than significant and no mitigation measures are necessary.

Stormwater Drainage Facilities

Impacts related to storm drainage facilities are addressed in Section 5.10, *Hydrology and Water Quality*, Impact c.iii, above. As discussed in this Section, the Project Site is already built out with hardscape and impervious surfaces associated with the existing Patrick Henry Elementary School, and implementation of the Proposed Project would not substantially increase the amount of impervious surfaces on the new campus. Excess water would be discharged to the existing City storm drains beneath Romneya Drive. With the implementation of BMP features, as outlined in Section 5.10, the amount of stormwater discharged to the City's storm drain system would not exceed than the volume discharged under existing conditions.

Implementation of the BMP features would ensure that a new or expanded storm drain system would not be necessary. Therefore, impacts would be less than significant and no mitigation measures are necessary.

Electricity and Natural Gas Services and Facilities

Electricity would be supplied by APU's Electrical Division, and natural gas would be supplied by the Southern California Gas Company (SoCalGas). All new utility infrastructure would be installed underground or placed in enclosed spaces (e.g., utility closets).

Total electricity consumption in APU's service area was 2,780 GWh in fiscal year 2021 to 2022 (Anaheim 2023). The net increase in electricity consumption for the Proposed Project would be 419,422 kWh/year (see Table 6, *Net Operation-Related Electricity Consumption*), which amounts to less than one percent of APU's total annual consumption. See Section 5.6, *Energy*, for further discussion on electricity. The Proposed Project would be located in an urbanized area and connect to existing electricity infrastructure. Therefore, project development would not require APU to obtain new or expanded electricity supplies.

Additionally, the total gas consumption in the SoCalGas service area was approximately 7,406 million therms in 2019, with slightly decreasing demand projected up to 2030 (CEC 2019). The natural gas consumption rate for the Proposed Project is typical for projects of this size and type and is a modest increase in gas use in the context of SoCalGas' service territory.

Furthermore, the Proposed Project would be required to comply with energy efficiency standards set forth by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. The Proposed Project would also comply with CALGreen requirements related to energy and water conservation. These measures will decrease electricity and gas consumption.

Therefore, the Proposed Project would not result in a substantial increase in natural gas or electrical service demands. APU and SoCalGas would not need to expand their supply or transmission facilities in order to handle the demand generated by the Proposed Project. Impacts would be less than significant and no mitigation measures are necessary.

Telecommunication Facilities

Various private services, including AT&T, Time Warner Communications, and Frontier Communications, provide telecommunication services to Anaheim, including the Project Site. The Proposed Project would include onsite connections to offsite telecommunication services and facilities in the immediate area of the Project Site. Additionally, facilities and infrastructure for the various telecommunication providers are adequate to serve the needs of the Proposed Project. Therefore, project development would not require the construction of new or expanded telecommunication facilities. Impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. As substantiated above in Section 3.19.a, APU has sufficient water supplies to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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?

Less Than Significant Impact. As substantiated above in Section 3.19.a, there is existing wastewater treatment capacity in the region for the estimated Proposed Project wastewater generation. Project development would not require the construction of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The City would provide solid waste collection services to the Project Site. Solid waste generated in the City is delivered to 19 landfills. Of these, Olinda Alpha Sanitary Landfill received 82 percent of the waste generated by the City in 2019, receiving 387,940 tons (CalRecycle 2019a). The landfill is operated by Orange County Waste and Recycling. Capacity and disposal data for the landfill is shown in Table 12. As shown in the table, the landfill has a remaining capacity of 637 tons per day.

Table 12 Landfill Capacity

Landfill Name and Location	Maximum Permitted Throughput, tons per day	Average Disposal, tons per day	Residual Disposal Capacity, tons per day	Remaining Capacity, cubic yards[2]	Estimated Closing Year
Olinda Alpha Sanitary Landfill 1942 North Valencia Avenue Brea, CA 92823	8,000	7,363[1]	637	17,500,000	2036
Total	**23,253**	**16,086**	**7,167**	**222,500,000**	N/A

Source: CalRecycle 2019b; CalRecycle 2019c; CalRecycle 2019d.
[1] Based on six days per week operation (300 days per year).
[2] Remaining capacity as of October 1, 2020.

5. Environmental Analysis

Based on the building square footages, the Proposed Project is estimated to generate a net increase of about 482 pounds of solid waste per day, as shown in Table 13.

Table 13 Net Increase in Solid Waste Generation

Scenario	Square Feet	Solid Waste Generation, pounds per day[1]	
		Per square foot	Total
Existing Conditions			
School Buildings	50,335	0.007	352
Proposed Conditions			
School Buildings	119,139[2]	0.007	834
		Net increase	**482**

Source: CalRecycle 2019d.
[1] CalRecylce rate for "School" used.
[2] Includes buildings A, B, and C of 37,478 SF, 39,510 SF, and 40,105 SF, respectively, and two free standing structures of 846 SF and 1,200 SF.

As demonstrated in Table 12, there is adequate landfill capacity in the region for the Proposed Project's forecasted solid waste disposal, and project development would not require additional landfill capacity at the landfill(s) serving Anaheim. Additionally, the total amount of solid waste expected to be generated under the Proposed Project would be minimal compared to the residual daily disposal capacity of the landfills.

Furthermore, substantial reductions in solid waste from construction materials can be achieved through recycling, reuse, and diversion programs. CALGreen section 5.408 (Construction Waste Reduction, Disposal and Recycling) mandates recycling and/or salvaging for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. The Proposed Project would comply with CALGreen's goal of reusing or recycling the Proposed Project's construction waste.

Based on the preceding, impacts on landfill capacity would be less than significant and no mitigation measures are necessary.

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

No Impact. See response to section 3.19.d, above.

Additionally, the following federal, state, and local laws and regulations govern solid waste disposal, including:

- **USEPA** administers the Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which govern solid waste disposal.
- **Assembly Bill (AB) 341** (Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020, and mandates recycling for commercial and multi-family residential land uses.

- **AB 939** (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) required every California city and county to divert 50 percent of its waste from landfills by the year 2000 by such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled for a 15-year period.

- **AB 1327** (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations govern solid waste disposal. Therefore, no impact would occur and no mitigation measures are necessary.

5.20 WILDFIRE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				**X**
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?				**X**
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?				**X**
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?				**X**

Discussion

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

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

No Impact. According to the Office of the State Fire Marshall, the Project Site is not located in a designated very high fire hazard severity zone (VHFHSZ)(CAL FIRE 2011). The nearest Fire Hazard Severity Zone is approximately seven miles east of the Project Site. The Proposed Project would not impair an adopted emergency evacuation or response plan within such an area. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The Project Site is not located in or near a local responsibility area (LRA) or a state responsibility area (SRA) or lands classified as VHFHSZ. The Project Site is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. The Project Site is developed within an urban and built area of the City (see Figure 3, *Aerial Photograph*). No wildlands exist within the immediate vicinity of the Project Site. Therefore, the Proposed Project would not exacerbate wildfire risks or expose the project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire within such an area. No impact would occur and no mitigation measures are necessary.

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

No Impact. The Proposed Project does not require the installation or maintenance of associated infrastructure, including roads, fuel breaks, emergency water sources, power lines or other utilities. Therefore, the Proposed Project would not exacerbate fire risk or result in temporary or ongoing impacts to environment. No impact would occur and no mitigation measures are necessary.

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

No Impact. The topography of the Project Site is relatively flat, and the soils on the Project Site are not susceptible to landslides. Additionally, implementation of the Proposed Project would not alter the existing drainage patterns or substantially increase the amount of runoff. Therefore, the Proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides. No impact would occur and no mitigation measures are necessary.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

Discussion

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

Less Than Significant Impact. As discussed in Section 5.4, *Biological Resources*, the Proposed Project would neither degrade the quality of the environment nor substantially impact any endangered species of plants or animals. The Proposed Project includes the demolition and reconstruction of an existing elementary school, and other site improvements. Because the Project Site is already developed with an existing elementary school and the surrounding area is highly urbanized, redevelopment of the Project Site would not impact the habitat or population level of a fish, plant, or animal community or the range of a rare or endangered plant or animal. Additionally, as discussed under Section 5.5, *Cultural Resources*, the Proposed Project would not significantly impact historic, archaeological, paleontological resources, and human remains. Because the Project Site is not historic and is already developed and the surrounding area is highly urbanized, redevelopment of the Project Site would not impact examples of California history or prehistory. The Proposed Project does not have the potential to substantially degrade the quality of the environment. Furthermore, impacts to tribal cultural resources were deemed to be less than significant with implementation of Mitigation Measures TCR-1 to TCR-3. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. A cumulative impact could occur if the Proposed Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. As demonstrated in the analysis provided in this Initial Study, any construction or operational-related impacts would either be less than significant or mitigated to a less than significant level and there would be no long-term significant operational impacts. As

such, there is no contribution to cumulative impacts from the Proposed Project. Additionally, based on the relatively small and localized scale of the Proposed Project, and that no other cumulative projects are identified in the area, the Proposed Project would not result in impacts that are individually limited but cumulatively considerable. Furthermore, the issues relevant to development of the Proposed Project are confined to the immediate project site and surrounding area. Therefore, cumulative impacts would be less than significant.

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

Less Than Significant Impact With Mitigation Incorporated. The Proposed Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this Initial Study. As discussed in the respective topical sections of this Initial Study, implementation of the Proposed Project would not result in significant impacts, either directly or indirectly, in the areas of GHG, geology and soils, hazards and hazardous materials, hydrology and water quality, or wildfire, which may cause adverse effects on human beings. Additionally, construction-related air quality impacts were deemed to be less than significant with implementation of Mitigation Measure AQ-1. Furthermore, construction-related noise impacts were deemed to be less than significant with implementation of Mitigation Measures NOI-1 and NOI-2. With implementation of the identified mitigation measures, the Proposed Project is not expected to cause significant adverse impacts to humans.

6. Mitigation Monitoring and Reporting Program

Project-specific mitigation measures have been categorized in matrix format, as shown in Table 14. The matrix identifies the environmental factor, specific mitigation measures, schedule, and responsible monitor. The mitigation matrix serves as the basis for scheduling the implementation of, and compliance with, all mitigation measures and conditions of approval.

6. Mitigation Monitoring and Reporting Program

This page intentionally left blank.

Table 14 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
Air Quality					
AQ-1	The Anaheim Elementary School District shall specify in the construction bid that construction contractor(s) shall, at minimum, use equipment that meets the United States Environmental Protection Agency's (EPA) Tier 4 (Interim) emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier 4 Interim emissions standards for a similarly sized engine, as defined by the California Air Resources Board's regulations. Prior to construction, the construction contractor shall ensure that all plans submitted to the District clearly show the requirement for EPA Tier 4 Interim emissions standards for construction equipment over 50 horsepower for the specific activities stated above. During construction, the construction contractor shall maintain a list of all operating equipment associated with building demolition in use on the site for verification by the District. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.	Anaheim Elementary School District and construction contractor	Prior to and during the construction phase	Anaheim Elementary School District	
Hazards and Hazardous Materials					
HAZ-1	A Phase II Soil Sampling investigation shall be conducted by the Anaheim Elementary School District for the project site following the American Society of Testing and Materials E1903-19 Standard, Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process, and in general conformance with the Department of Toxic Substances Control's Interim Guidance for Sampling Agricultural Properties (Third Revision) and Interim Guidance Evaluation of School Sites With Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine	Anaheim Elementary School District, construction contractor and site assessment specialist	Prior to the commencement of grading activities	Anaheim Elementary School District	

6. Mitigation Monitoring and Reporting Program

Table 14 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
	Pesticides From Termiticides, and Polychlorinated Biphenyls From Electrical Transformers to evaluate if there have been releases at the site from the areas identified as being a potential concern in the Phase I Environmental Site Assessment prepared for the project site and dated July 27, 2022. Through the Phase II Soil Sampling, samples shall be collected in areas of potential concern where soil disturbance activities are planned. Soil samples shall then be analyzed to estimate the potential threat to public health and/or the environment posed by hazardous constituents, if any, at the project site. Soils suspected of contamination shall be tested for potential contamination. If contamination is found to be present per the Department of Toxic Substances Control Screening Levels for residential land use and the Environmental Protections Agency's Regional Screening Levels for residential land use, further testing shall be conducted until all elevated concentrations have been delineated. Contaminated soils encountered shall be transported and disposed of per state regulations to an appropriately permitted landfill.				
Noise					
N-1	The Anaheim Elementary School District construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. The Construction Noise Control Plan shall include, but not be limited to the following: • Limit construction to the hours allowed by the City of Anaheim (7:00 AM to 8:00 PM, Monday through Saturday and prohibit construction on Sundays and federal holidays. • At least 90 days prior to the start of construction activities, all off-site businesses and residents within 300	Anaheim Elementary School District and construction contractor		Anaheim Elementary School District	

Table 14 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
feet of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the Anaheim Elementary School District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. • At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the Anaheim Elementary School District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, they shall investigate, take appropriate corrective action, and report the action to the Anaheim Elementary School District. • During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). • Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.				

6. Mitigation Monitoring and Reporting Program

Table 14 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
• During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary sheds, or insulation barriers or other measures. • During the entire active construction period, noisy operations shall be combined so that they occur in the same time period as the total noise level produced would not be significantly greater than the level produced if the operations were performed separately (and the noise would be of shorter duration). • Select haul routes that avoid the greatest amount of sensitive use areas. • Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes. • During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.				

Table 14 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
N-2	The Anaheim Elementary School District and its construction contractor shall implement the following measures during all ground-disturbing activities: • Vibratory compaction that is within 15 to 25 feet of any surrounding residential structure shall be conducted with the use of a static roller in lieu of a vibratory roller. At a distance greater than 25 feet, a vibratory roller would no longer exceed 0.20 inches per second (in/sec) peak particle velocity PPV and would be allowed for use. Therefore, a static roller shall be used within 25 feet where levels would be reduced to 0.20 in/sec PPV or less and mitigate vibration damage. • Paving activities within 10 feet of a residential structure shall employ self-compacting pea gravel for the base and a concrete finish as to not require vibratory compaction. • Grading, earthwork, and demolitions activities within 15 feet of adjacent residential structures shall be conducted with off-road equipment that is limited to 100 horsepower or less and the use of small dozer/grader to be used in lieu of a larger dozer/grader.	Anaheim Elementary School District and construction contractor		Anaheim Elementary School District	
Tribal Cultural Resources					
TCR-1	TCR-1 **Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities** • The Anaheim Elementary School District (District) shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians - Kizh Nation (Kizh Nation). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the project site at all project locations (e.g., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). Ground-	Anaheim Elementary School District, Native American monitor, and construction contractor	Prior to the commencement of any ground-disturbing activities	Anaheim Elementary School District	

6. Mitigation Monitoring and Reporting Program

Table 14 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
disturbing activity shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. • A copy of the executed monitoring agreement shall be submitted to the District prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. • The monitor shall complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Kizh Nation. Monitor logs shall identify and describe any discovered tribal cultural resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources or TCRs), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the District upon written request to the Kizh Nation. • On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the District that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh Nation to the District that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh Nation TCRs.				

Table 14 Mitigation Monitoring Requirements

	Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
TCR-2	**Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)** • Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Nation monitor and/or Kizh Nation archaeologist. The Kizh Nation shall recover and retain all discovered TCRs in the form and/or manner the Kizh Nation deems appropriate, in the Kizh Nation's sole discretion, and for any purpose the Kizh Nation deems appropriate, including for educational, cultural and/or historic purposes.	Anaheim Elementary School District, Native American monitor, and construction contractor	During ground-disturbing activities	Anaheim Elementary School District	
TCR-3	**Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects** • Native American human remains are defined in Public Resources Code (PRC) Section 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC Section 5097.98, are also to be treated according to this statute. • If Native American human remains and/or grave goods are discovered or recognized on the project site, then PRC Section 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. • Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2). • Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. • Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	Anaheim Elementary School District, Native American monitor, and construction contractor	During ground-disturbing activities	Anaheim Elementary School District	

6. Mitigation Monitoring and Reporting Program

This page intentionally left blank.

7. References

AirNav.com. 2022. Airports. https://www.airnav.com/airports/.

Anaheim, City of. 2008. City of Anaheim Average Daily Traffic Volume Map. https://anaheim.net/DocumentCenter/View/367/Average-Daily-Traffic-Volume-Map-PDF?bidId=.

———. 2017, December. Central Anaheim Master Plan of Sanitary Sewers. https://www.anaheim.net/DocumentCenter/View/20610/CAMPSS_12182017_FINAL-revised.

———. 2020, June. City of Anaheim Traffic Impact Analysis Guidelines for California Environmental Quality Act Analysis. https://www.anaheim.net/DocumentCenter/View/32774/City-of-Anaheim-TIA-Guidelines-for-CEQA-Analysis-62020.

———. 2021, June. 2020 Urban Water Management Plan. https://www.anaheim.net/DocumentCenter/View/37199/Anaheim-2020-UWMP?bidId=.

———. 2022, April 1. Local Hazard Mitigation Plan. https://www.anaheim.net/DocumentCenter/View/43389/Draft-hazard-mitigation-plan-03312022?bidId=.

———. 2023. Anaheim Public Utilities: About Electric Services. https://www.anaheim.net/2104/About-Electric-Services.

Bay Area Air Quality Management District (BAAQMD). 2017, May. California Environmental Quality Act Air Quality Guidelines.

California Air Pollution Control Officers Association (CAPCOA). 2022. California Emissions Estimator Model (CalEEMod). Version 2022.1.0. Prepared by: ICF in collaboration with Sacramento Metropolitan Air Quality Management District.

California Air Resources Board. 2017, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. https://www.arb.ca.gov/cc/shortlived/shortlived.htm.

———. 2022. 2022 Scoping Plan for Achieving Carbon Neutrality, https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf.

———. 2023. Area Designations Maps/State and National. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

7. References

California Department of Conservation (DOC). 2016. Mines Online. https://maps.conservation.ca.gov/mol/index.html.

———. 2017. State of California Williamson Act Contract Land. https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf.

———. 2022. California Important Farmland Finder (CIFF). https://maps.conservation.ca.gov/dlrp/ciff/.

———. 2022. CalGEM GIS Well Finder. https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-116.42689/36.65438/6.

California Department of Education (CDE). 2022. 2021-22 Enrollment by Grade, Henry (Patrick) Elementary Report (30-66423-6027387). https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=30664236027387&agglevel=school&year=2021-22.

California Department of Forestry and Fire Protection. 2023. Fire Hazard Severity Zone (FHSZ) Mapper. https://egis.fire.ca.gov/FHSZ/.

California Department of Resources Recycling and Recovery (CalRecycle). 2019a. Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility. https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility.

———. 2019b. SWIS Facility/Site Summary Olinda Alpha Landfill (30-AB-0035), https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/2093.

———. 2019c. Landfill Tonnage Reports. https://www2.calrecycle.ca.gov/LandfillTipFees/.

———. 2019d. Estimated Solid Waste Generation Rates. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates.

California Department of Water Resources (DWR). 2017, June 13. Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes.

———. 2023a. Dam Breach Inundation Map Web Publisher. https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2.

———. 2023b. SGMA Data Viewer. https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevels.

California Energy Commission (CEC). 2019. SoCalGas Natural Gas Planning Area – California Energy Demand 2020-2030 Baseline Forecast – Mid Demand Case. https://efiling.energy.ca.gov/GetDocument.aspx?tn=231608&DocumentContentId=63428.

7. References

California Irrigation Management Information System (CIMIS). 2023. CIMIS Station Reports. https://cimis.water.ca.gov/Default.aspx.

California Natural Resources Agency (CNRA). 2018, November. Final Statement of Reasons for Regulatory Action. http://resources.ca.gov/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf

California Office of Historic Preservation (OHP). 2022. California Historic Resources. https://ohp.parks.ca.gov/ListedResources/?view=name&criteria=irvine.

California Stormwater Quality Association (CASQA). 2015. Construction BMP Handbook.

Federal Emergency Management Agency (FEMA). 2009, December 3. FEMA Flood Map Service. Map ID # (06059C0131J). https://msc.fema.gov/portal/search?AddressQuery=1123%20W%20Romneya%20Dr%2C%20Anaheim%2C%20CA%2092801#searchresultsanchor.

Federal Highway Administration. 2006, August. Construction Noise Handbook.

Federal Highway Administration (FHWA). 2006, January. FHWA Roadway Construction Noise Model (RCNM) User's Guide.

Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment.

Governor's Office of Planning and Research (OPR). 2008, June. CEQA and Climate Change: Addressing Climate Change through CEQA Review. Technical Advisory. http://www.opr.ca.gov/ceqa/pdfs/june08-ceqa.pdf.

King County Department of Natural Resources and Parks Wastewater Treatment Division (King County). 2014, July. Updated Planning Assumptions for Wastewater Flow Forecasting.

Kourny Engineering & Testing, Inc. 2022, August 22. Geotechnical Engineering Investigation Report.

National Park Service (NPS). 2020, September. National Register of Historic Places. https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466.

New Zealand Transport Agency. 2012. Ground Vibration from Road Construction.

Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

Orange County Public Works (OC Public Works). 2022, May 27. Stormwater Network Map. https://data-ocpw.opendata.arcgis.com/datasets/stormwater-network-map.

7. References

Orange County Water District (OCWD), City of La Habra, and Irvine Ranch Water District. 2017, January 1. Basin 8-1 Alternative. https://www.ocwd.com/wp-content/uploads/basin-8-1-alternative-final-report-1-1.pdf

Southern California Association of Governments (SCAG). 2020, September 3. Connect SoCal Plan: The 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy of The Southern California Association of Governments. https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx.

South Coast Air Quality Management District (SCAQMD). 2008, July. Final Localized Significance Threshold Methodology. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

———. 2010, September 28. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf.

———. 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2.

———. 2022, December. 2022 Air Quality Management Plan. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=10.

Toth, William J (Toth). 1979, August. Noise Abatement Techniques for Construction Equipment. Prepared for US Department of Transportation National Highway Traffic Safety Administration.

8. List of Preparers

LEAD AGENCY

Anaheim Elementary School District

Alexander Kang, Facilities Coordinator

CEQA CONSULTANT

PlaceWorks

Dwayne Mears, AICP, Principal

Jorge Estrada, Senior Associate II (Project Manager)

Alen Estrada-Rodas, Associate II

John Vang, JD, Senior Associate II

Kristie Nguyen, Associate I

Alejandro Garcia, Senior Associate I

Mike Watson, PG, Senior Geologist

Dina El Chammas, Senior Engineer II

Cary Nakama, Graphic Artist

Gina Froelich, Senior Editor

Cathy Nero, Document Specialist

8. List of Preparers

This page intentionally left blank.