Initial Study/Negative Declaration

Orangethorpe/Placentia Mixed Use Project

November 29, 2023

Prepared for:

City of Placentia
Development Services Department
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°F	degrees Fahrenheit
µg/kg	micrograms per kilogram
µg/L	micrograms per liter
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
Alquist-Priolo	Alquist-Priolo Earthquake Fault Zoning Act
AMSL	above mean sea level
AQMP	Air Quality Management Plan
AST	aboveground storage tank
bgs	below ground surface
BMP	best management practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	chlorofluorocarbon
CFG Code	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CMP	Congestion Management Program
CNDDB	California Rare Plant Rank
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COPC	chemicals of potential concern
CRHR	California Register of Historical Resources

cy	cubic yard
dB	decibel
dBA	A-weighted decibel
DMA	drainage management area
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DU	dwelling unit
ECOS	Environmental Conservation Online System
EIR	Environmental Impact Report
EV	electric vehicle
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
FRAP	Fire Resource and Assessment Program
GHG	greenhouse gas
GIS	geographic information system
gpm	gallons per minute
GPS	Global Positioning System
GSF	gross square feet
GSWC	Golden State Water Company
GWP	global warming potential
HFC	hydrofluorocarbon
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IS	Initial Study
ITE	Institute of Transportation Engineers
L_{dn}	day-night average sound level
L_{eq}	equivalent continuous sound level
LID	Low impact development
LIP	Local Implementation Plan
L_{max}	maximum sound level
L_{min}	minimum sound level
LOS	level of service
LRA	local responsibility area
LRMF	low-rise multi-family
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
MMRP	Mitigation Monitoring and Reporting Program
MMT	millions of metric tons

MND	Mitigated Negative Declaration
mpg	miles per gallon
mph	miles per hour
MSCP	Multiple Species Conservation Program
MT	metric ton
MWDOC	Municipal Water District of Orange County
N&M	Ninyo & Moore
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
ND	Negative Declaration
NO	nitric oxide
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O&M	operations and maintenance
O_3	ozone
OCTA	Orange County Transportation Authority
OCWD	Orange County Water District
OEHHA	California Office of Environmental Health Hazard Assessment
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PDWF	peak dry weather flows
PFC	perfluorocarbon
PM	particulate matter
PM_{10}	particulate matter measuring no more than 10 microns in diameter
$PM_{2.5}$	fine particulate matter measuring no more than 2.5 microns in diameter
PMC	Placentia Municipal Code
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
ppb	parts per billion
PPD	Placentia Police Department
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
Proposed Project	Orangethorpe/Placentia Mixed Use Project
PWQMP	Preliminary Water Quality Management Plan
PWWF	Peak wet weather flow
RAQS	Regional Air Quality Strategy
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental conditions
RHNA	Regional Housing Needs Assessment

ROG	reactive organic gas
ROW	right-of-way
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
RWRF	Regional Water Reclamation Facility
SAA	Streambed Alteration Agreement
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Sothern California Edison
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_x	sulfur oxides
SR-	State Route
SRA	source receptor area
SUSMP	Standard Urban Stormwater Mitigation Plan
SVOC	semivolatile organic compound
SWPPP	Stormwater Pollutant Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TAP	transportation assembly points
TCR	Tribal Cultural Resource
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Services
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Master Plan
v/c	volume to capacity
VdB	vibration decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	Waste Discharge Requirements
WQMP	Water Quality Management Plan
YLWD	Yorba Linda Water District
ZE	zero emissions

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in accordance with California Environmental Quality Act (CEQA) and the CEQA Guidelines for the proposed Orangethorpe/Placentia Mixed Use Project (Proposed Project). The primary intent of this document is to determine whether project implementation would result in potentially significant impacts to the environment.

The preparation of this IS/MND is governed by two principal sets of documents: CEQA (PRC Section 21000, et seq.) and the State of California (State) CEQA Guidelines (California Code of Regulations, Section 15000, et seq.). Specifically, the preparation of an IS/MND is guided by the State CEQA Guidelines; Section 15063 describes the requirements for initial studies, and Sections 15070–15075 describe the process for the preparation of an MND. Where appropriate and supportive to an understanding of the issues, reference will be made to either the CEQA statute or State CEQA Guidelines. This IS/MND contains all of the contents required by CEQA, which includes a project description, a description of the environmental setting, potential environmental impacts, mitigation measures for any significant effects, consistency with plans and policies, and names of preparers.

Note: The project has not been approved or denied. It is being reviewed for environmental impacts only. Approval of the project can take place only after the MND has been adopted.

This IS/MND is organized as follows:

- **Section 1: Project Description.** This section introduces the document and discusses the project description including location, setting, and specifics of the lead agency and contacts.
- **Section 2: Initial Study Checklist.** This section discusses the CEQA environmental topics and checklist questions and identifies the potential for impacts.
- **Section 3: List of Preparers.** This section lists the organizations and individuals who were consulted and/or prepared this IS/MND.
- **Section 4: References.** This section presents a list of reference materials consulted during preparation of this IS/MND.

Public Review

The IS/MND will be circulated for a 30-day public review period from November 29, 2023, to December 28, 2023. Due to the holiday closures during this period, comments will be accepted through January 4, 2024.

Comments regarding this IS/MND must be made in writing and submitted to Andrew Gonzales, Planning Manager, 401 East Chapman Avenue, Placentia, California 92870, or by email to agonzales@placentia.org.

Comments should focus on the proposed finding that the Proposed Project would not have a significant effect on the environment because revisions or mitigation measures have been made or agreed to by the Proposed Project proponent. If the commenter believes that the Proposed Project may have a significant environmental effect, it would be helpful for the commenter to identify the specific effect and explain why the effect would occur and why it would be significant.

Section 1 Project Description

The following Initial Study (IS) and Environmental Checklist presents information on the project and an evaluation of the probable environmental effects anticipated by the Orangethorpe/Placentia Mixed Use Project (Proposed Project). This Initial Study has been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended, and the CEQA Guidelines.

1.1 Project Location

The Proposed Project would be developed on a 2.72-acre site located at 776 S. Placentia Avenue and 777 W. Orangethorpe Avenue in Placentia, California, (Assessor Parcel Number 339-112-27). The Proposed Project Site would be accessed via both S. Placentia Avenue and W. Orangethorpe Avenue. The site is bordered by a Jack in the Box to the southwest corner, W. Orangethorpe Avenue to the south, S. Placentia Avenue to the west, a 3-story commercial building to the north, and an industrial building to the east, currently occupied by a spa and patio store.

1.2 Environmental Setting

The City of Placentia is located in northern Orange County, and encompasses about 4,238 acres (6.62 square miles, including rights-of way). Surrounding cities include Anaheim to the south, Yorba Linda to the east, Brea to the north, and Fullerton to the west. The Los Angeles County line lies to the west and north beyond the cities of Fullerton and Brea, the San Bernardino County line lies to the northeast beyond the City of Yorba Linda and unincorporated Orange County, and Riverside County lies to the east beyond unincorporated Orange County. Regional access to the City is provided by California State Routes 91 and 57.

1.2.1 Surrounding Land Uses

The Proposed Project Site is within Specific Plan 5 according to the City's General Plan Land Use map (City of Placentia 2018). Currently the Proposed Project Site consists of a commercial car dealership and auto repair building that is currently closed. The remainder of the Proposed Project Site is covered in the pavement associated for associated parking lots and roads. Existing vegetation on the Proposed Project Site is limited to a couple of ornamental palm trees at the front façade of the existing building and a few trees at the façade of the existing building facing W. Orangethorpe Avenue. There are industrial and commercial developments to the east, including the Coastal Spa and Patio Store to the east and industrial uses along Hundley Way. There are low-density residential development to the south and Twin Palms Mobile Home Park farther south. The Proposed Project Site is bordered by a Jack in the Box to the southwest corner, W. Orangethorpe Avenue to the south, S. Placentia Avenue to the west, a 3-story commercial building with the

maXum therapy and the interface rehab, inc. to the north, and the Coastal Spa and Patio Store building to the east. There are multiple auto body shops and car dealerships, along with hotels and fulfillment centers surrounding the Proposed Project Site. The City's GIS map shows that the Proposed Project Site sits on the edge of the City's planning boundaries, which indicates that any development to the west of the Proposed Project Site would be in the City of Fullerton.

1.2.2 Existing General Plan and Zoning

The Proposed Project Site is currently designated as Specific Plan (SP) by the City of Placentia General Plan Land Use Map and is zoned as Specific Plan 5 (SP-5).

1.3 Project Background, Purpose, and Scope

The Proposed Project would be developed on a 2.72-acre site located at 776 S. Placentia Ave and 777 W. Orangethorpe Avenue in Placentia, California also identified as Parcel 9 of the SP-5 project area at the northeast corner of S. Placentia Avenue and W. Orangethorpe Avenue. The Proposed Project would require Specific Plan and General Plan Amendments. The Proposed Project would allow for the construction and operation of a mixed use project that would include 248 residential units and up to 3,000 square feet of commercial uses (with related amenity uses, private and common open space uses), and a 7-level parking structure at the northeast corner of the Proposed Project Site. The Proposed Project would have a prominent street presence on W. Orangethorpe Avenue and S. Placentia Avenue. The Proposed Project would occur in the City of Placentia; see Figure 1, Regional Location, and Figure 2, Project Site.

This IS/MND serves as the environmental review for the Proposed Project, as required by the CEQA (Public Resources Code [PRC], Sections 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Sections 15000–15387). Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Placentia (City) is the lead agency charged with deciding whether or not to approve the Proposed Project.

The Proposed Project would be developed within the area governed by the City of Placentia's Specific Plan 5 (SP-5) project area. This area encompasses 11 parcels on approximately 19.13 acres at the northeast corner of S. Placentia Avenue and W. Orangethorpe Avenue.

The Proposed Project is within Parcel 9 of the SP-5 project area, which in 2019 received approvals for an amendment to modify the Specific Plan to add hospitality as an allowable use for Parcels 9 and 11 of SP-5 and to allow a maximum allowable structure height of 75 feet ("Approved Project"). The 2019 Adopted ND analyzed environmental impacts of the 2019 Approved Project. All impacts addressed in the Initial Study were determined to be less than significant without mitigation measures. Figure 3, Specific Site Plan 5 Area Map, shows the boundary of the 2019 Approved Project in addition to the Proposed Project Site boundary. The Proposed Project occurs at the corner of S. Placentia Avenue and W. Orangethorpe Avenue; see

Figure 4, Conceptual Perspectives. The Project applicant proposes to develop and operate 248 multi-family residential dwelling units and up to 3,000 square feet of commercial retail use; see Figure 5, Site Plan. This Proposed Project would include a 7-level parking structure at the northeast corner of the Proposed Project Site, a 5-story residential building with amenities including a mail and parcel room, leasing office, fitness area, club room, co-working space, and a central pool courtyard. Units for the Proposed Project would include studio, one-bedroom, and two-bedroom apartments. The Proposed Project would include approximately 37,586 square feet of common open space, and 9,566 square feet of private open space. Figures 6a and 6b show Proposed Project building floor plans for the Proposed Project, and Figures 7a and 7b shows conceptual elevations. The Proposed Project would also include ornamental landscaping and furniture as shown on Figure 8, Conceptual Landscape Plan. Fire access is shown on Figure 9, Fire Access Plan.

1.4 Project Description

The Proposed Project would allow for the demolition of the existing car dealership structures and parking lot and the new construction and operation of a five-story mixed use project that would include 248 residential units, up to 3,000 square feet of commercial uses, related amenity uses, private and common open space uses, and a 78-foot high, 7-level parking structure at the northeast corner of the Proposed Project Site.

The Proposed Project would change the allowable uses within the 2019 Approved Project through General Plan Amendment 2022-01, Specific Plan Amendment 2021-01, and Development Review Plan 2021-02. These entitlements will allow construction and operation of a mixed use development with 248 residential units, ground floor retail, and a parking structure.

General Plan Amendment 2022-01 will allow mixed use (residential-commercial development) as a permissible land use category within Parcel 9 of SP-5. Specifically, Table 2-4. Specific Plans, Table 2-5. General Plan/Zoning Relationship – Specific Plans and Table 2-7. General Plan Land Use Designation – Potential Development Buildout will require amending to allow for the introduction of residential uses at the density/intensity proposed.

Specific Plan Amendment 2021-01 will allow mixed use (residential-commercial development) within the SP-5 Parcel 9 boundaries and will establish development standards for new residential uses, including but not limited to gross lot area, FAR, height, residential density, dwelling unit size, parking, setbacks and lot coverage. An amendment to the SP-5 is also required to allow for parking structures as a permitted use in Parcel 9.

Development Review Plan 2021-02 will allow the Applicant to demolish the existing 35,073 square foot tilt-up on slab construction used car dealership and auto repair center building and associated asphalt parking lot and to construct and operate 248 multi-family residential dwelling

units and up to 3,000 square feet of commercial retail use on 2.72-acres. This Proposed Project would include a 7-level parking structure at the northeast corner of the Project Site, a 5-story residential building with amenities including a mail and parcel room, leasing office, fitness area, club room, co-working space, and a central pool courtyard. Units for the Proposed Project would include studio, one-bedroom, and two-bedroom apartments. The Proposed Project would include over 35,000 square feet of common open space, and 9,000 square feet of private open space. The Proposed Project would also include ornamental landscaping and furniture.

The residential units are organized around a central outdoor courtyard that includes the pool. The courtyard is programmed with passive, landscaped outdoor amenities including lounge chairs and seating, turf, a game lawn at the western portion of the courtyard, a retreat area with an outdoor kitchen, outdoor seating, and fire pit area. The retail plaza at the southeastern portion of the Project Site includes café tables, shade trees, pottery, umbrellas, and enhanced paving. A dog park is proposed along the eastern portion of the Project Site adjacent to the parking structure. There are trees lining the Project Site. The proposed building setback along S. Placentia Avenue is approximately 10-feet. The Proposed Project would include a density of approximately 91.2 dwelling units per acre. The Modified Project includes 342 parking stalls for residential and retail uses. The majority of the parking would occur within a parking structure in the northeast portion of the Project Site.

Earthwork activities will likely consist of removal and re-compaction with limited subterranean excavation. The Project Applicant has identified that the Proposed Project would export approximately 3,000 cubic yards of soil during the grading process. It is anticipated that any excess soils that need to be exported would be hauled to the Brea Olinda Landfill via State Route 57. Electrical and telecommunication utility connections are planned to be picked up from existing overhead poles on the west side of S. Placentia Avenue. Gas is planned to be connected to the existing gas main along S. Placentia Avenue. Sewer, water, and storm infrastructure would be connected to existing infrastructure in S. Placentia Avenue and W. Orangethorpe Avenue. The proposed two points of access are along W. Orangethorpe Avenue and S. Placentia Avenue. Ingress and egress would occur as right turns.

In order to accommodate the Proposed Project, a Specific Plan Amendment and General Plan Amendment are being requested by the Project applicant. The modification to the previous approval would require textual and graphical changes to the recently amended Specific Plan to enable the Proposed Project. The General Plan Amendment would modify the City of Placentia General Plan to incorporate mixed use (residential-commercial development) as an allowable land use category within the Land Use Element tables and footnotes for Specific Plan 5. The Specific Plan Amendment would modify Specific Plan 5 to permit “mixed use” as a permitted use on “Parcel No. 9” and establish development standards for mixed use projects. Currently, the Project Site does not accommodate residential density, and a new residential density range of 65

to 95 dwelling units per acre would be added to the Specific Plan under the Proposed Project. The Proposed Project would also include an FAR of 1.0 for the commercial portion. The modifications to the previous approval would be proposed as follows in **bold, underlined** text as shown below:

Proposed General Plan Amendment modifications:

Chapter 2. Land Use

2.4 Relationship to Other Plans and Programs

Table 2-4. Specific Plans

Name of Specific Plan	Description of Specific Plan
Specific Plan 5	The specific plan is intended to provide a site for retailers and businesses, which through the characteristics of their respective services offered, cater to the entire community. **This specific plan will also provide a site for mixed use (residential-commercial development) at Parcel 9.**

Table 2-5. General Plan/Zoning Relationship – Specific Plans

	Compatible Zoning Districts									
General Plan Land Use Designation	SP-1	SP-2	SP-3	SP-4	SP-5	SP-6	SP-7	SP-8	SP-9	SP-10
Low Density Residential						•	•			
Medium Density Residential				•			•	•		•
High Density Residential			•				•		•	
Office	•	•			•					
Commercial					•		•			
Mixed Use (Residential-Commercial)					•					
Day Care/Assisted Living									•	
Oil Extraction								•		
Open Space						•	•			
Flood Control							•			

Source: City of Placentia, May 2018

2.6 Land Use Intensity/Density

Table 2-7. General Plan Land Use Designation – Potential Development Buildout

Land Use Designation	Density Standard (du/ac) or Total Acres (acs)	Intensity Standard (FAR)[1]	Ultimate Buildout Dwelling Units[2]	Ultimate Build Out Square Footage[2]
Low Density Residential	6 du/ac		7,596	
Medium Density Residential	15 du/ac		5,895	
High Density Residential	25 du/ac		3,775	
Commercial	1372 acs	1.0 FAR		5,967,720
Old Town[3]	30-65 du/ac		810	181,250
Transit Oriented Development (TOD)	65-95 du/ac		564	30,000
Commercial-Manufacturing	44 acs	1.0 FAR		1,910,640
Office	25 acs	1.0 FAR		1,089,900
Industrial	315 acs	1.0 FAR		13,721,400
Specific Plans[5]	322 acs	Varies	**3,938**	570,200
Residential Planned Community	7.1 du/ac		2,272	
TOTAL			**24,850**	23,471,110

Source: City of Placentia, May 2018

Notes:

[1] Density standards represent the maximum gross density allowed. Net densities would be lower, dependent on zoning requirements and other regulatory considerations that limit the full development potential.

[2] Ultimate dwelling units and square footage estimates based upon existing acreage multiplied by gross density/intensity standards. The realistic buildout for the city is represented in the Environmental Impact Report for the General Plan update.

[3] Based on the Negative Declaration, (ND 2017-02), July 2017 the Old Town area would consist of the addition of 525 residential units, 85,000 square feet of commercial use, 40,000 square feet of retail use, and a 50-room hotel to the existing area. The existing number of units is 285.

[4] Based on Mitigated Negative Declaration, (MND 2017-01), April 2017, which assumed a 5,000 net vehicle trip cap. The cap of 5,000 vehicle trips (net) at buildout assumes that an estimated 752 dwelling units (DU) could be constructed under an all residential development scenario and stay within the 5,000-vehicle trip cap or, alternatively, a mix of 75% residential (564 DU) and 25% commercial (30,000 square feet of gross leasable area (GLA)) could also stay within the 5,000-vehicle trip cap. This table assumes the mix scenario. Any additional development above the 5,000-trip cap would require further environmental analysis and is not permitted until that is completed.

[5] Specific Plan category represents both residential and commercial development and was calculated taking potential buildout of each specific plan area and then totaling, as below:

- SP 1- SFD=1 Unit
- SP 2- SFD =1 Unit
- SP 3- Assisted Living – 5.80 45du/ac for 261 units
- SP 4- 8 affordable units
- SP 5- 19 acres; **16.28 acres** of retail, hotel, dealership 0.5 FAR assumption for 413,820 sf of commercial with **2.72 acres referred to as Parcel 9 allowing for mixed use (residential-commercial development):**
  - **Residential— 65 to 95du/ac = 248 units (assumption)**
  - **Commercial—1.0 FAR = 3,000sf (assumption)**
- SP 6- 4.1 acres, 6 du/ac for 24 units
- SP 7- 300 acres residential and commercial:
  - Low Density—163.85 ac 6 du/ac = 983 units
  - Medium Density—11.40 ac at 15du/ac = 171 units
  - Medium-High Density—36.97ac at 20du/ac (assumption) =739 units
  - High Density—37.34ac at 25du/ac = 933 units
  - Commercial—7.18ac 0.5 FAR (assumption) =156,380sf
- SP 8- 7 acres at 10.3 du/ac = 72 units
- SP 9- 10.35 ac at 40.5 du/ac = 419 units
- SP 10- 7.82 ac at 10 du/ac = 78 units

Proposed Specific Plan Amendment modifications:

Chapter 23.105 SPECIFIC PLAN 5

23.105.020 Purpose.

The specific plan is primarily intended to provide a site for retailers and businesses, which through the characteristics of their respective services offered, cater to the entire community. **Limited residential uses may be allowed to promote housing opportunities and to provide housing for all economic segments of the community consistent with the city's housing goals.** (Ord. 95-O-118, 1995)

23.105.050 Permitted uses for parcel 11.

The purpose of this parcel is to provide a site for motor vehicle dealerships, and for other selected other commercial uses. Hospitality uses listed in Section 23.105.030 shall be permitted. General retail, financial, office, medical, and restaurant uses including drive-through facilities listed in Section 23.105.030 shall be permitted.

23.105.055 Permitted uses for parcel 9.

This parcel may provide a site for motor vehicle dealerships, and for other selected other commercial uses. Hospitality uses listed in Section 23.105.030 shall be permitted. General retail, financial, office, medical, parking structure, and restaurant uses including drive-through facilities listed in Section 23.105.030 shall be permitted. **Mixed uses with residential, supporting retail and a parking structure may be permissible on Parcel 9 subject to the development standards specified under Section 23.105.160.**

23.105.070 Height.

Maximum allowable building height shall be seventy-five (75) feet. Rooftop amenities and architectural projections, such as and not limited to, clubhouses, swimming pools, tennis courts, open space areas, fitness centers, **and elevator towers** are permitted to project sixteen (16) ft. above the maximum height limit if integrated into the overall design of the project and the maximum rooftop building coverage is limited to forty (40) percent of the rooftop area. (Ord. O-2019-05 § 3, 2019; Ord. 95-O-118, 1995)

23.105.140 On-site parking.

Parking shall be provided per Chapter 23.78 for all areas covered by the specific plan, with the following exceptions:

(1) (A) Parking for parcels 1 and 2 shall be combined to meet requirements.

(B) Parking for parcels 3 and 4 shall be combined to meet requirements.

(2) Reciprocal parking shall be provided between parcels 1 and 2 and parcels 3 and 4. (Ord. 95-O-118, 1995)

(3) Parking requirements for mixed use**s** on Parcel 9 are **specified under Section 23.105.160.**

23.105.160 Development standards for Mixed Uses on Parcel 9.

	Standard	Notes
Architectural Review	**High quality architectural and urban design are required.**	**Third party review costs are the responsibility of the applicant.**
Floor Area Ratio	**1.0 commercial FAR maximum** **No residential FAR maximum (see Density Range)**	**For commercial land uses.** **For residential land uses.**
Density Range	**65 to 95 dwelling units per acre**	**For residential land uses.**
Dwelling Unit Size		
Studio unit	**500 sf minimum**	
1 bed unit	**575 sf minimum**	
2 bed unit	**800 sf minimum**	
3 bed unit	**1,000 sf minimum**	
Setbacks		
Front Yard	**10 feet minimum**	
Side Yard	**10 feet minimum**	
Rear Yard	**10 feet minimum**	**Subject to Fire & Life Safety Department requirements, a minimum of 4 feet shall be landscaped and maintained free of obstructions.**
Parking Minimums		**Parking shall meet the requirements for individual land uses, except that guest and retail parking may be shared.** **Up to 1/3 of the total parking stalls in a project may be compact.**
Retail	**4 spaces per 1,000 sf**	
Residential		
Studio unit	**1 parking space per dwelling unit**	
1 bed unit	**1 parking space per dwelling unit**	
2 bed unit	**1 ½ parking spaces per dwelling unit**	
3 bed unit	**2 parking spaces per dwelling unit**	
Guest spaces	**1 parking space per 5 dwelling units**	
Disabled Accessible	**Per California Building Code Requirement**	

	Standard	Notes
Bike Parking	**2 bicycle storage units for every 5 dwelling units for the first 20 dwelling units and 1 for every 5 additional dwelling units.**	
Loading Spaces		**Shall meet the minimum loading space requirements of Section 23.78.050.**
Parking Structure		**No freestanding parking structure permitted without an accompanying land use.**
Electric Vehicle Charging Stations	**Per CalGreen/California Building Code requirements.**	
Common or Private Open Space		
Amount per residential use	**An average of at least 75 sf/unit, calculated across the entire proposed project.**	**Common open space can be active or passive.** **Required setbacks may not be counted as common open space.** **Common open space may be interior amenity areas, such as and not limited to, clubhouse, fitness, and co-working space. Exterior common open space shall be landscaped and requires an approved landscape plan.** **Private open space, when included, may be provided in balconies appurtenant to a dwelling unit. The minimum depth dimension shall be three feet.**

1.4.1 Multimodal Transportation in Project Area

The Proposed Project Site is located within 0.5 miles of Orange County Transportation Authority (OCTA) Bus Route 57 and Bus Route 30. The nearest stop to the Proposed Project Site is located at State College Boulevard and Orangethorpe Avenue, approximately 0.45 miles west of the Proposed Project Site.

1.4.2 Project Phasing

The Proposed Project would occur in one phase. This phase would deliver all of the dwelling units along with the parking structure, leasing office, amenities, and primary courtyard.

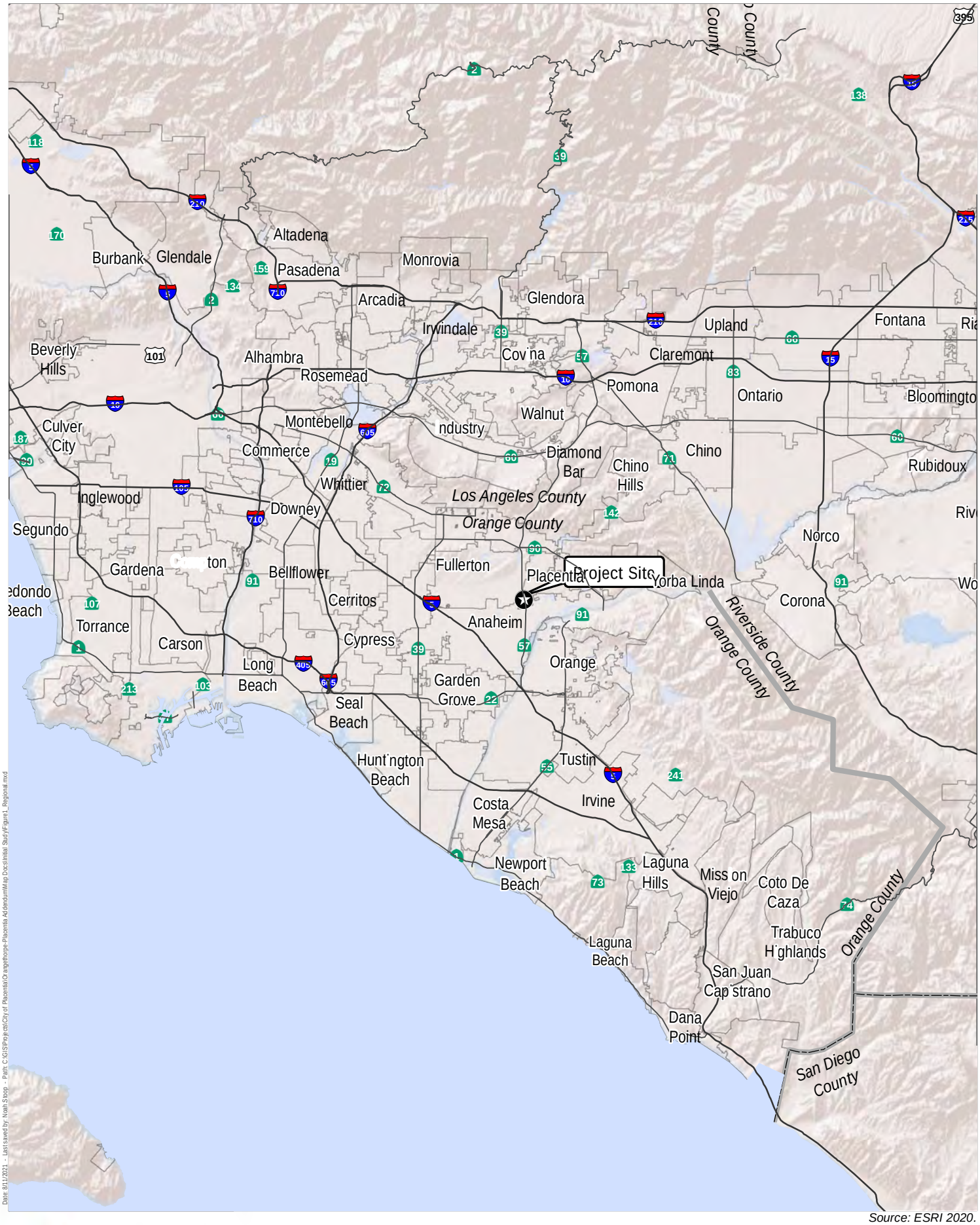
1.5 Project Approvals and Permits

The City is the lead agency under CEQA and has the principal approval authority over the Proposed Project. A responsible agency is a public agency other than the lead agency that has

responsibility for carrying out or approving a project (CEQA Guidelines, Section 15381, and PRC Section 21069). The following discretionary actions would be required to implement the Proposed Project (Table 1, Anticipated Discretionary Actions/Approvals).

Table 1. Anticipated Discretionary Actions/Approvals

Lead Agency	Action
City of Placentia	General Plan Amendment Specific Plan Amendment Development Plan Review approval Demolition and building permits Grading permits
Responsible Agencies	**Action**
Department of Toxic Substances Control	Permits for regulatory compliance regarding clean-up of on-site hazardous materials
South Coast Air Quality Management District	Permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants
Regional Water Quality Control Board	Issue National Pollutant Discharge Elimination System Permit to implement the Proposed Project



Source: ESRI 2020.

Harris & Associates

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Figure 1

Regional Location

Orangethorpe-Placentia Mixed Use Project

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Source: Eagle Imagery 2017.

Harris & Associates

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Figure 2

Project Site

Orangethorpe-Placentia Mixed Use Project

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The adjacent General Plan Area Plan(s), Land Use Designation(s), and Zoning(s), if any:

Direction	General Plan Designation	Zoning District	Existing Land Use
Project Site	Parcels 1 to 7: SP - Specific Plan, Parcels 8 to 10: C - Commercial & Parcel 11: I - Industrial	SP-5	Commercial, Office & Hospitality
North	I - Industrial	M - Manufacturing	Industrial
South	I - Industrial, C-Commercial & LDR- Low Density Residential	M- Manufacturing, C-2 – Community Commercial, C-1, Neighborhood Commercial, R-1 (MHP), Single Family Residential (Mobile Home Park), & R-1, Single Family Residential	Commercial, Mobile Home Park & Single Family Residences
East	R-O-W and I - Industrial	R-O-W and M- Manufacturing	State Route 57 & Industrial
West**	Industrial	C-M, M-O & M-P-200	Commercial

** City of Fullerton

Source: Architecture Design Relationships 2021.

Figure 3

Specific Site Plan 5 Area Map

Orangethorpe-Placentia Mixed Use Project

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AERIAL VIEW LOOKING NORTHEAST 1

VIEW ON ORANGETHORPE AVE LOOKING NORTH 2

VIEW ON PLACENTIA AVE LOOKING NORTHEAST 3

VIEW ON PLACENTIA AVE LOOKING SOUTHEAST 4

Source: Architecture Design Relationships 2021.

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Figure 4

Conceptual Perspectives

Orangethorpe-Placentia Mixed Use Project

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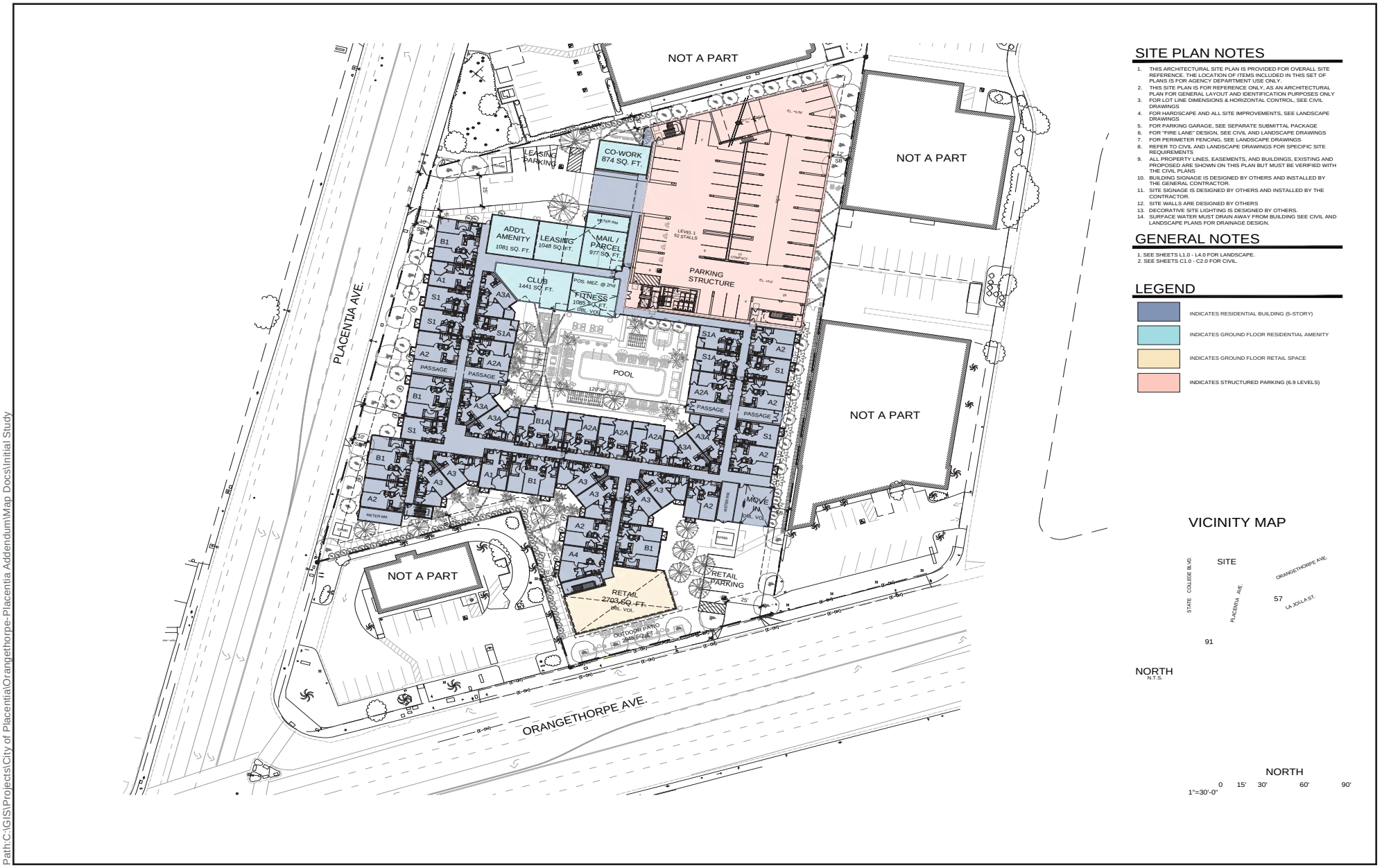

SITE PLAN NOTES

1. THIS ARCHITECTURAL SITE PLAN IS PROVIDED FOR OVERALL SITE REFERENCE. THE LOCATION OF ITEMS INCLUDED IN THIS SET OF PLANS IS FOR AGENCY DEPARTMENT USE ONLY.
2. THIS SITE PLAN IS FOR REFERENCE ONLY, AS AN ARCHITECTURAL PLAN FOR GENERAL LAYOUT AND IDENTIFICATION PURPOSES ONLY
3. FOR LOT LINE DIMENSIONS & HORIZONTAL CONTROL, SEE CIVIL DRAWINGS
4. FOR HARDSCAPE AND ALL SITE IMPROVEMENTS, SEE LANDSCAPE DRAWINGS
5. FOR PARKING GARAGE, SEE SEPARATE SUBMITTAL PACKAGE
6. FOR "FIRE LANE" DESIGN, SEE CIVIL AND LANDSCAPE DRAWINGS
7. FOR PERIMETER FENCING, SEE LANDSCAPE DRAWINGS
8. REFER TO CIVIL AND LANDSCAPE DRAWINGS FOR SPECIFIC SITE REQUIREMENTS
9. ALL PROPERTY LINES, EASEMENTS, AND BUILDINGS, EXISTING AND PROPOSED ARE SHOWN ON THIS PLAN BUT MUST BE VERIFIED WITH THE CIVIL PLANS
10. BUILDING SIGNAGE IS DESIGNED BY OTHERS AND INSTALLED BY THE GENERAL CONTRACTOR.
11. SITE SIGNAGE IS DESIGNED BY OTHERS AND INSTALLED BY THE CONTRACTOR.
12. SITE WALLS ARE DESIGNED BY OTHERS
13. DECORATIVE SITE LIGHTING IS DESIGNED BY OTHERS.
14. SURFACE WATER MUST DRAIN AWAY FROM BUILDING SEE CIVIL AND LANDSCAPE PLANS FOR DRAINAGE DESIGN.

GENERAL NOTES

1. SEE SHEETS L1.0 - L4.0 FOR LANDSCAPE.
2. SEE SHEETS C1.0 - C2.0 FOR CIVIL.

LEGEND

- INDICATES RESIDENTIAL BUILDING (5-STORY)
- INDICATES GROUND FLOOR RESIDENTIAL AMENITY
- INDICATES GROUND FLOOR RETAIL SPACE
- INDICATES STRUCTURED PARKING (6.9 LEVELS)

VICINITY MAP

NORTH

0 15' 30' 60' 90'

1"=30'-0"

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Source: Architecture Design Relationships 2021.

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Figure 5

Site Plan

Orangethorpe-Placentia Mixed Use Project

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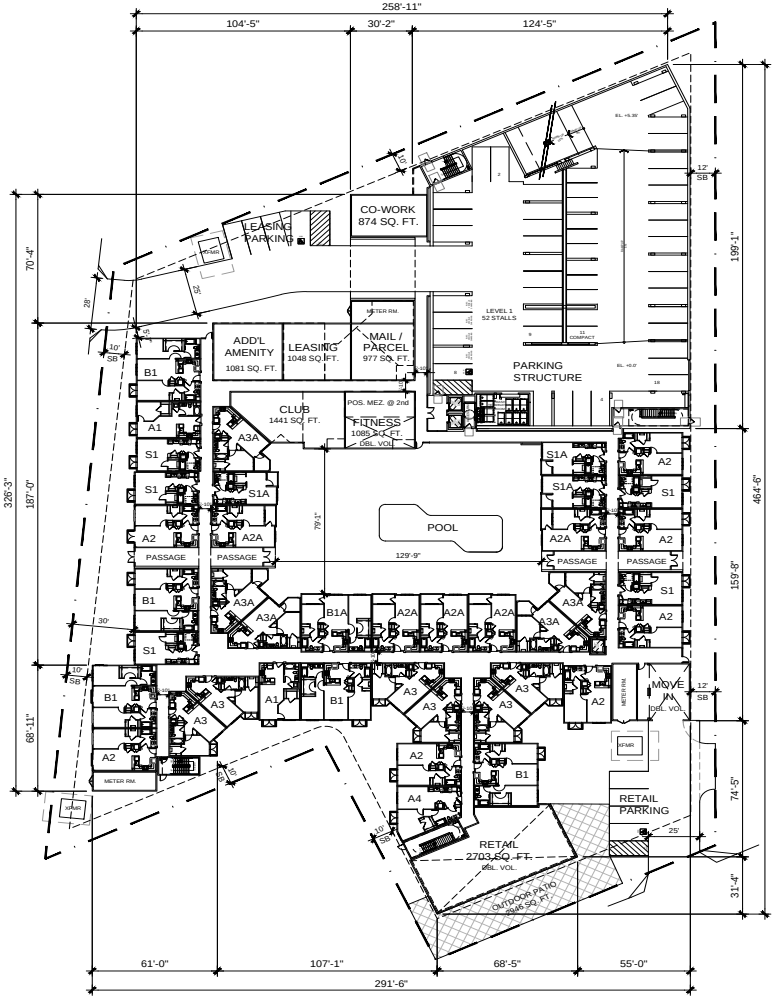
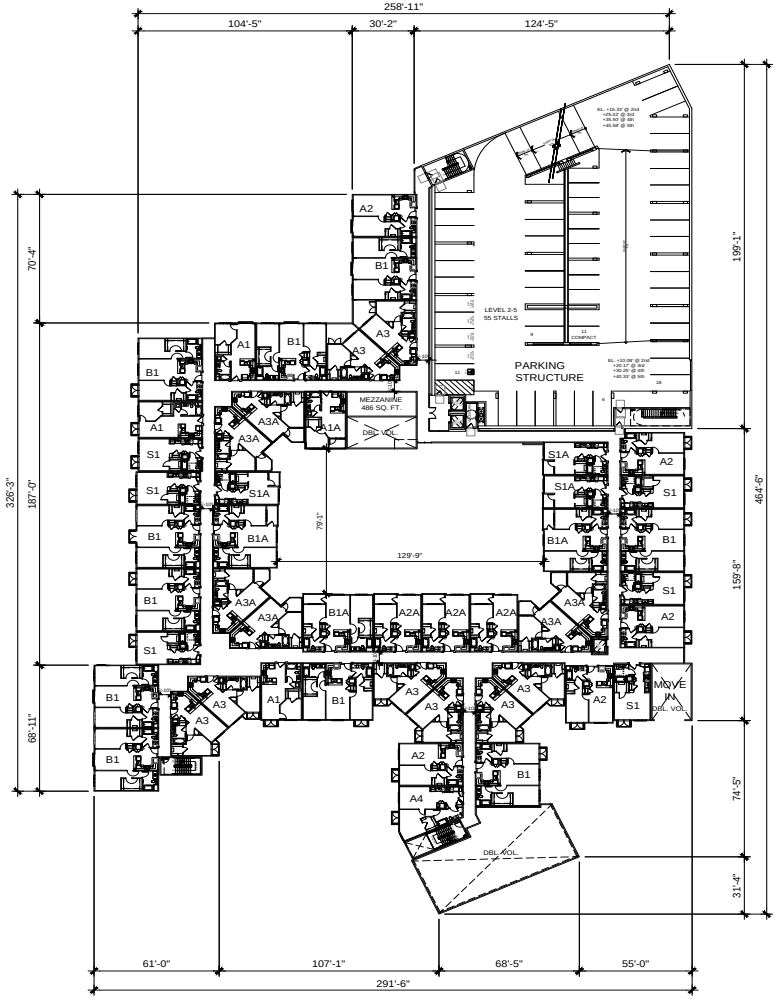


BUILDING LEVEL 1



BUILDING LEVEL 2

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Source: Architecture Design Relationships 2021.

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Figure 6a

Building Floor Plans – 1 & 2

Orangethorpe-Placentia Mixed Use Project

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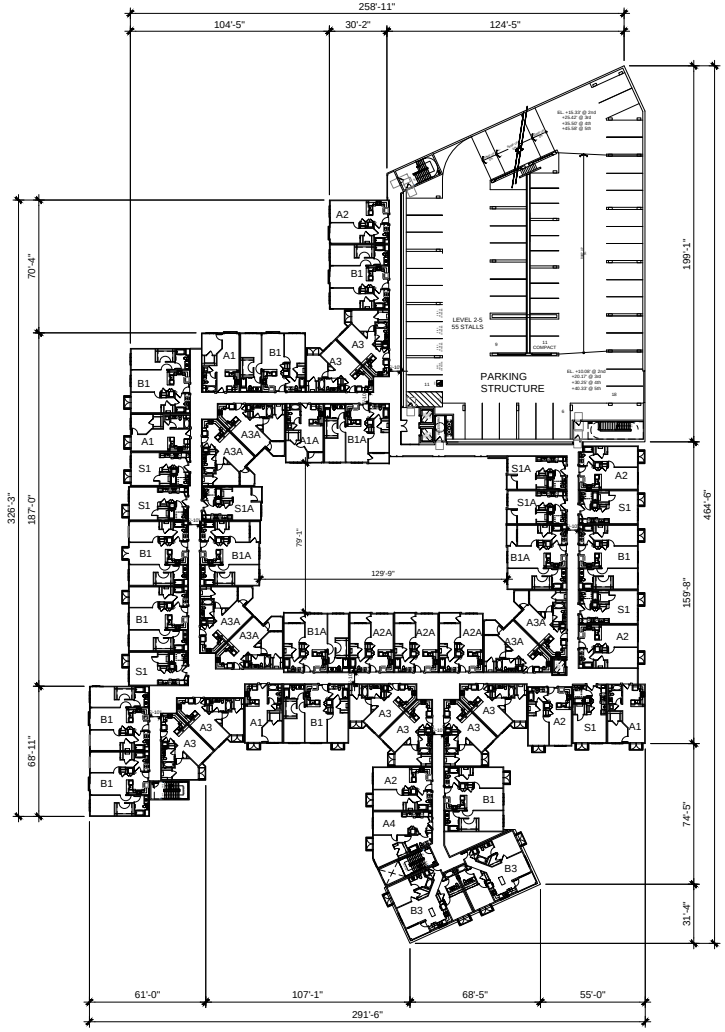
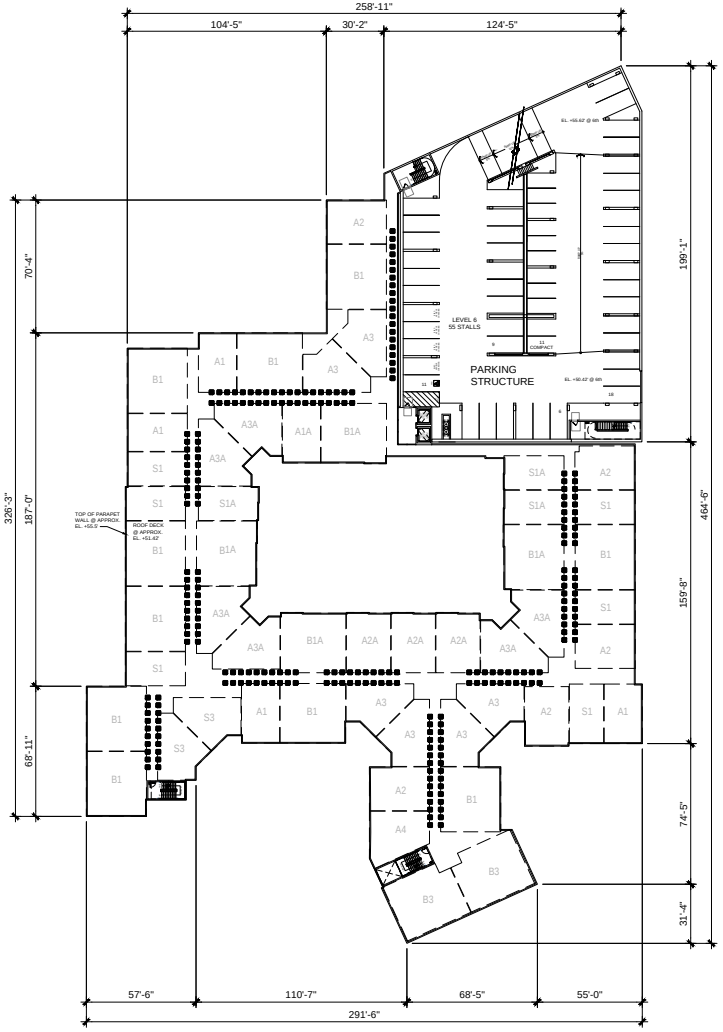
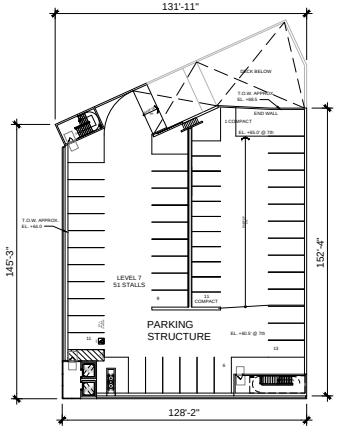


BUILDING LEVELS 3-5



BUILDING LEVEL 6 (LEVEL 7 SIM.)



PARKING LEVEL 7

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Source: Architecture Design Relationships 2021.

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Figure 6b

Building Floor Plans – 3-7

Orangethorpe-Placentia Mixed Use Project

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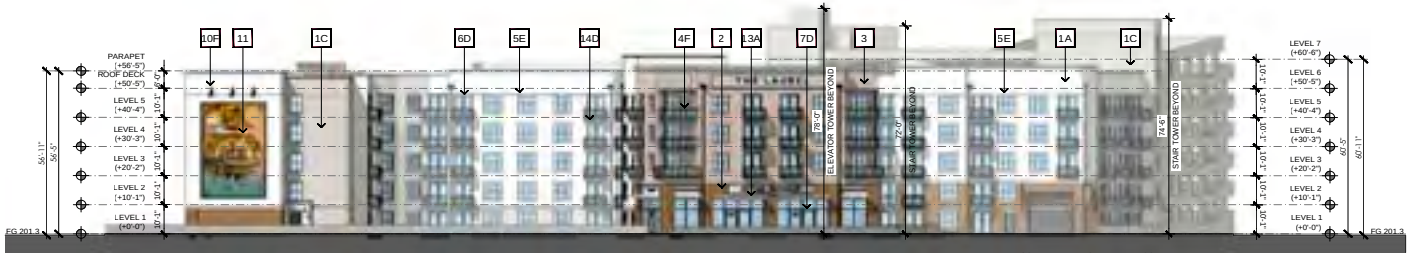
WEST ELEVATION 1



SOUTH ELEVATION 2

MATERIAL LEGEND

1	PAINTED STUCCO - 20/30 FINISH	8	DECORATIVE SIGNAGE
2	BRICK VENEER 1	9	EXTERIOR METAL DOWNSPOUT
3	BRICK VENEER 2	10	ACCENT LIGHT FIXTURE
4	METAL RAILING WITH MESH GRID	11	DECORATIVE MURAL
5	FOAM TRIM	12	DECORATIVE MARQUEE
6	VINYL WINDOW/ DOOR	13	METAL CANOPY
7	STOREFRONT WINDOW/ DOOR	14	METAL DECK

A	OFF-WHITE	E	GRAY 2
B	ROSE-GRAY	F	CHARCOAL
C	GRAY 1	G	BRICK RED
D	SLATE		

Source: Architecture Design Relationships 2021.

Harris & Associates

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Figure 7a

Conceptual West & South Building Elevation

Orangethorpe-Placentia Mixed Use Project

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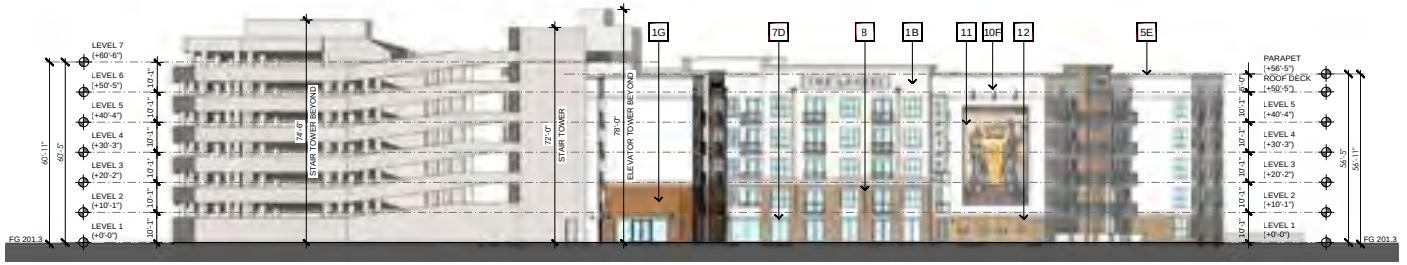
EAST ELEVATION 1



NORTH ELEVATION 2

MATERIAL LEGEND			
1	PAINTED STUCCO - 20/30 FINISH	8	DECORATIVE SIGNAGE
2	BRICK VENEER 1	9	EXTERIOR METAL DOWNSPOUT
3	BRICK VENEER 2	10	ACCENT LIGHT FIXTURE
4	METAL RAILING WITH MESH GRID	11	DECORATIVE MURAL
5	FOAM TRIM	12	DECORATIVE MARQUEE
6	VINYL WINDOW/ DOOR	13	METAL CANOPY
7	STOREFRONT WINDOW/ DOOR	14	METAL DECK
A	OFF-WHITE	E	GRAY 2
B	ROSE-GRAY	F	CHARCOAL
C	GRAY 1	G	BRICK RED
D	SLATE		

Source: Architecture Design Relationships 2021.

Harris & Associates

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Figure 7b

Conceptual East & North Building Elevation

Orangethorpe-Placentia Mixed Use Project

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CONCEPTUAL LANDSCAPE PLAN

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Source: Architecture Design Relationships 2021.

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Figure 8
Conceptual Landscape Plan

Orangethorpe-Placentia Mixed Use Project

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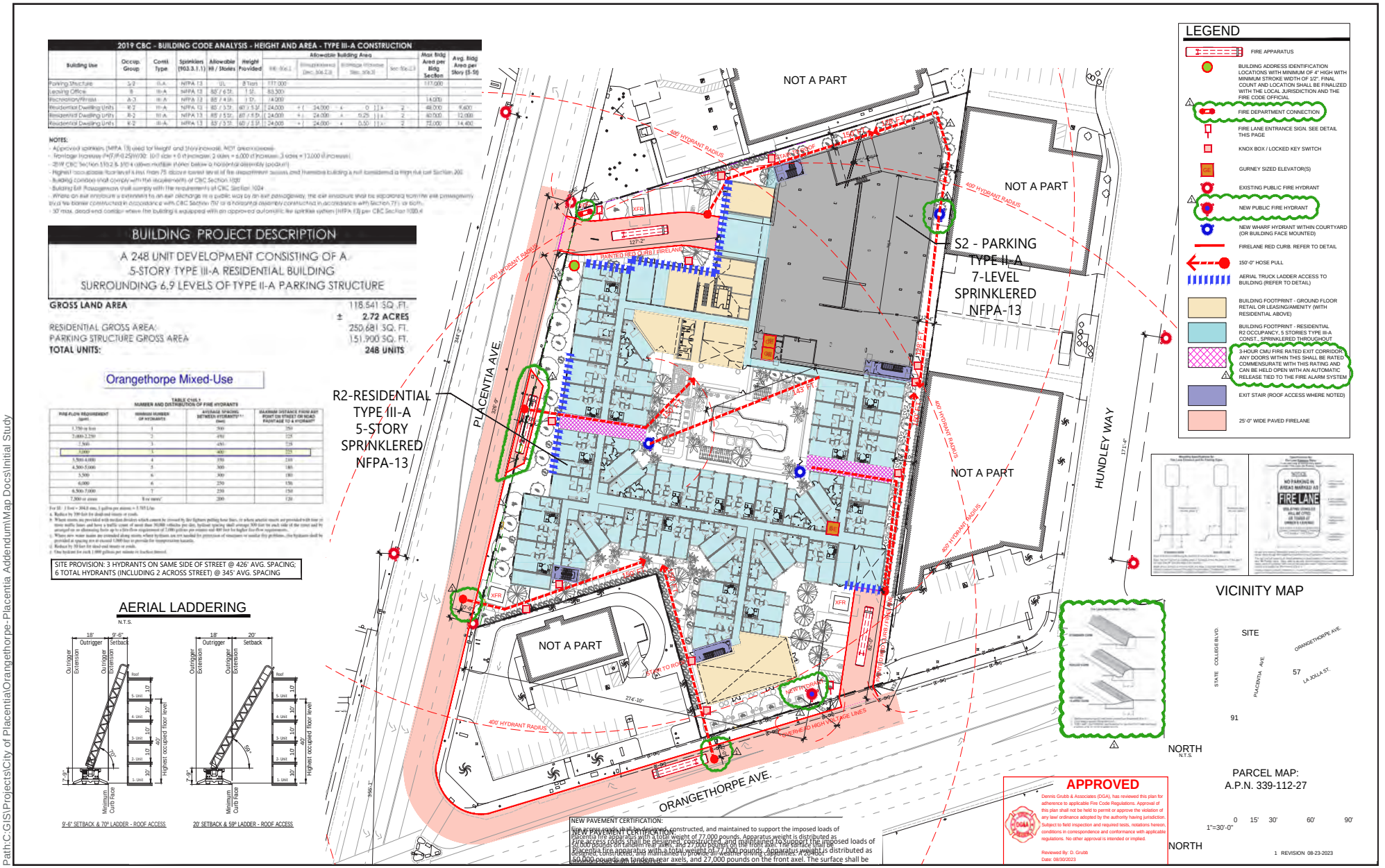

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Source: Architecture Design Relationships 2023.

Harris & Associates

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Figure 9

Fire Access Plan

Orangethorpe-Placentia Mixed Use Project

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Section 2 Initial Study Checklist

The following discussion of potential environmental effects was completed in accordance with Section 15063 of the CEQA Guidelines to determine if the Proposed Project may have a significant effect on the environment.

2.1 Project Information

1. Project title:	Orangethorpe/Placentia Mixed Use Project
2. Lead agency name and address:	City of Placentia 401 East Chapman Avenue Placentia, California 92870
3. Contact person name, address, and phone number:	Andrew Gonzales, Planning Manager 401 East Chapman Avenue Placentia, California 92870 (714) 993-8124
4. Project location:	776 S. Placentia Avenue & 777 W. Orangethorpe Avenue APN 339-112-27 33° 51’ 39.00” N and 117° 52’ 56.20” W
5 Project sponsor’s name and address:	Dennis Buccola and Gilad Ganish Orangethorpe Investment Partners LLC 2881 East La Cresta Avenue Anaheim, California 92806
6. General Plan designation:	Specific Plan (SP)
7. Zoning:	SP-5 – Specific Plan 5
8. Description of project:	Refer to Section 1, Project Description, of this IS/MND.
9. Surrounding land uses and setting:	Refer to Section 1 of this IS/MND.
10. Other public agencies whose approval is required:	Department of Toxic Substances Control, South Coast Air Quality Management District and Regional Water Quality Control Board

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?	Tribal consultation has been completed in accordance with Senate Bill 18 and Assembly Bill 52.

2.2 Environmental Factors Potentially Affected

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

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

2.3 Lead Agency Determination

On the basis of this initial evaluation:

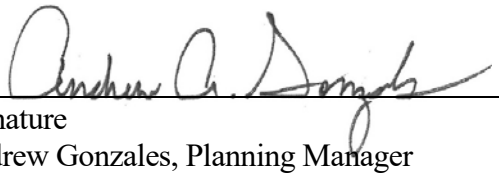
☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent (state), including implementation of the mitigation measures identified herein. 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.



11/27/2023

Signature — Date

Andrew Gonzales, Planning Manager
City of Placentia

2.4 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. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation 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

2.4.1 Cumulative Impacts

Cumulative impacts must be discussed in an ND or MND where potential impacts are "cumulatively considerable." CEQA Guidelines, Section 15064(h)(2), provides that a lead agency may determine in an Initial Study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus not significant. When a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable through mitigation measures in a mitigated negative declaration, the Initial Study must briefly indicate and explain how the contribution has been rendered less than cumulatively considerable. (CEQA Guidelines, Section 15064(h)(2).) Finally, CEQA Guidelines, Section 15064(h)(4), provides that the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the Proposed Project's incremental effects are cumulatively considerable. (CEQA Guidelines 15064(h)(4).)

Cumulative impacts are addressed within this Initial Study using the General Plan projections approach. On October 1, 2019, the City of Placentia City Council adopted a new, updated General Plan, a key planning document that will shape the future of your community by providing direction for growth and change in Placentia. The General Plan includes goals, policies and implementation actions addressing important community needs ranging from land use and mobility, to public safety. Some of the newer General Plan elements include Economic Development, Sustainability and Health and Wellness. The associated General Plan EIR projected that housing units would increase from 18,179 units in 2018 to 24,702 at General Plan buildout, for a total increase of 6,523 units. Additionally, the City's adopted Housing Element states that through the Regional Housing Needs Assessment (RHNA) process, the City has been assigned a total housing need of 4,398 dwelling units during the 2021–2029 time frame. Although the Proposed Project requires a General Plan Amendment and Specific Plan Amendment, the proposed 248 residential units are well within the General Plan buildout projections and will help the City's housing goals identified in the Housing Element.

2.4.2 Aesthetics

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

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

No Impact. The Proposed Project Site is not located within a designated scenic vista area, and there are no scenic vistas designated in the City. As such, visual changes at the Proposed Project Site would not adversely affect scenic vistas. The Proposed Project would allow for the demolition of existing structures and the new construction and operation of a five-story mixed use project that would include 248 residential units, up to 3,000 square feet of commercial uses, related amenity uses, private and common open space uses, and a 7-level parking structure at the northeast corner of the Proposed Project Site. The Proposed Project would be located in an already urbanized area which is visually dominated by commercial and industrial land uses. The Proposed Project would be subject to visual and aesthetic requirements as a result of the proposed code and Specific Plan Amendment. In accordance with Placentia Municipal Code (PMC), Section 23.105.070 – Height, a maximum allowable building height shall be seventy-five (75) feet. Rooftop amenities and architectural projections, such as and not limited to, clubhouses, swimming pools, tennis courts, open space areas, fitness centers, are permitted to project sixteen (16) ft. above the maximum height limit if integrated into the overall design of the project and the maximum rooftop building coverage is limited to forty (40) percent of the rooftop floor area. The proposed five-story residential building and commercial area would not exceed 75 feet, including the 7-level parking structure that is 69 feet tall, with stair towers extending 8 feet above this which is allowed currently under the Specific Plan 5 project area requirements as detailed above.

Additionally, as identified in the City of Placentia General Plan EIR, the City is about 98 percent built-out. As designated in the General Plan EIR, the Proposed Project would be subject to compliance with the regulations, guidelines, and development review process, as well as the proposed General Plan goals and policies. These regulations and guidelines are intended to diminish conflicts between new development and visual resources. Therefore, the Proposed Project would not result in any negative impacts to the City's visual environment and no significant impacts are anticipated.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Proposed Project Site is not adjacent to a designated state scenic highway or eligible state scenic highway as identified on the California Scenic Highway Mapping System. Thus, the Proposed Project would not damage the integrity of existing visual resources or historic buildings located along a State Scenic Highway and no impact would result.

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

No Impact. The Proposed Project area is urbanized and the Proposed Project Site is currently developed. As the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality, the Proposed Project would have no impact. Additionally, the Proposed Project would result in increased building heights on the Proposed Project Site, but the overall changes that are proposed would be designed to create visually attractive and compatible uses consistent with the policies identified in the City's Specific Plan 5. This would include the incorporation of new landscaping and streetscape. As a result, implementation of the Proposed Project would improve the overall visual character of the Proposed Project Site.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. There are existing light sources in the vicinity of the Proposed Project Site include exterior lighting on site and from surrounding uses. Vehicles on the adjacent streets also contribute to nighttime lighting. The Proposed Project Site would create new sources of light and glare in the Proposed Project area due to greater intensity and density of development. However, all future developments and land use activities would be required to comply with all applicable regulations, including Placentia Municipal Title 23 (Zoning). In accordance with Placentia Municipal Code (PMC), Section 23.78.080 – Lights, all lighting within the parking lot or building lights are required to direct light away from the public right-of-way and any adjoining residential uses. The General Plan EIR has identified that new development could cause light and glare impacts through new light sources, however, with implementation of the goals and policies

identified in the General Plan, impacts would be less than significant. This includes compatibility with surrounding land uses, circulation network, and existing development constraints for the Proposed Project. This would also include improvements in urban design to ensure that the Proposed Project is both architecturally attractive and functionally compatible. New light sources would be directed on site and would not create glare or adversely affect the surrounding uses. Therefore, no significant light and glare impacts are anticipated.

2.4.3 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Impact Analysis

a. Would the project 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 will be located in a fully developed urbanized area. The map of Important Farmland in California (DOC 2010) prepared by the Department of Conservation does not identify the Proposed Project as being Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No Williamson Act contracts are active for the Proposed Project Site.

Therefore, because the Proposed Project Site has not been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, no impact to farmland would occur.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Proposed Project Site is not zoned for agricultural use and no active Williamson Act contract applies to land in Specific Plan 5. Implementation of the Proposed Project would not conflict with agricultural zones or a Williamson Act contract. No impact would occur and no mitigation is necessary.

c. Would the project 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. PRC Section 12220(g) identifies forest land 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. The Proposed Project Site and surrounding properties are not currently being managed or used for forest land as identified in PRC Section 12220(g). Additionally, the General Plan EIR has identified that there are no forest resources at risk of undergoing a change to an alternate land use. The USDA Forest Service vegetation maps for the Proposed Project identify it as urban type, indicating that it is not capable of growing industrial wood tree species. Therefore, development of the Proposed Project will have no impact to any timberland zoning.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Proposed Project Site is developed; thus, there will be no loss of forest land or conversion of forest land to non-forest use as a result of this Proposed Project. No impact will occur.

e. Would the project 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. The Proposed Project Site and surroundings are developed within an existing urban environment. The Proposed Project would not encroach onto agricultural land and would not encourage the conversion of existing farmland to non-agricultural uses. None of the surrounding sites contain existing forest uses. Development of the Proposed Project will not change the existing environment in a manner that will result in the conversion of forest land to a non-forest use. No impact will occur.

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2.4.4 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard)?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Proposed Project Site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. It is within the jurisdictional boundaries of South Coast Air Quality Management District (SCAQMD).

SCAQMD administers SCAB's Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP for the SCAB is the 2022 AQMP (SCAQMD 2022). On October 1, 2015, the U.S. Environmental Protection Agency (EPA) strengthened the National Ambient Air Quality Standards (NAAQS) for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion (ppb). The South Coast Air Basin is classified as an "extreme" nonattainment area for the 2015 Ozone NAAQS. The 2022 AQMP was developed to address the requirements for meeting this standard and was adopted December 2, 2022, by the South Coast AQMD Governing Board. The 2022 AQMP focuses on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities seeking to promote reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2022). While the 2016 AQMP was focused on addressing the 1997 8-hour and 2008 8-hour ozone standards, the 2022 AQMP focuses on attaining the 2015 8-hour ozone standards of 70 parts per billion (ppb). The 2022 AQMP builds upon measures already in place from the 2016 AQMP and includes a

variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), BMPs, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act measures to achieve the 2015 8-hour ozone standard.

The purpose of a consistency finding with regard to the AQMP is to determine if a project is consistent with the assumptions and objectives of the regional air quality plans and if it would interfere with the region's ability to comply with federal and state air quality standards. SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). These criteria are:

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP, or increments based on the year of project buildout and phase.

To address the first criterion, project-generated criteria air pollutant emissions have been analyzed for significance and are addressed under Section 2.4.4(b). As presented in Section 2.4.4(b), construction and operation of the Proposed Project would not generate criteria air pollutant emissions that exceed SCAQMD's thresholds.

The second criterion regarding the Proposed Project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the Proposed Project's land use designations and its potential to generate population growth. In general, projects are considered consistent with, and not in conflict with or obstructing implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Connect SoCal Plan (SCAG 2020). This document, which is based on general plans for cities and counties in the SCAB, is used by SCAQMD to develop the AQMP emissions inventory (SCAQMD 2022). The Connect SoCal Plan and the associated Regional Growth Forecast are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans. The Proposed Project would require a Specific Plan Amendment and General Plan Amendment. As the site was not initially contemplated for housing under SCAG's population, housing, or employment projections for the

Proposed Project Site, the Proposed Project would therefore assist the City in satisfy its housing obligations under SCAG's RHNA. The Proposed Project would not result in, nor cause, NAAQS or CAAQS violations nor would it result in any regional daily construction-source or operational-source emissions exceedances. The Proposed Project would support AQMP objectives to reduce trips, promote infill development, and balance jobs and housing, and would not conflict with implementation of the AQMP. According to the 2022 AQMP, in the Basin, mobile sources – heavy-duty trucks, ships, airplanes, locomotives, and construction equipment – account for 80 percent of NOx emissions. The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available zero emissions (ZE) and low NOx technologies and (2) developing new ZE and ultra-low NOx technologies for use in cases where the technology is not currently available. South Coast AQMD will prioritize distribution of incentive funding in Environmental Justice areas and seek opportunities to focus benefits on the most disadvantaged communities. In 2020, CARB released an updated Mobile Source Strategy. In September 2022, an updated State SIP Strategy was adopted. The 2022 State SIP Strategy includes measures and commitments to reduce emissions from State-regulated sources to support attainment of the 8-hour ozone standard of 70 ppb standard in all nonattainment areas across California. South Coast Air Basin and Coachella Valley have been classified as "extreme" and "severe" nonattainment for the 2015 ozone standard, respectively. As an "extreme" ozone nonattainment area, the South Coast AQMD has until August 3, 2038, to attain the 2015 ozone standard for the Basin, which is 20 years from the designation as an "extreme" nonattainment area. South Coast AQMD proposes a total of 49 control measures for the 2022 AQMP. The USEPA requires that all control measures in the attainment demonstration must be implemented no later than the beginning of the attainment year ozone season. The USEPA also defines the attainment year ozone season as the ozone season immediately preceding a nonattainment area's maximum attainment date, which is August 3, 2038, therefore, 2037 is the attainment year for the Basin. The residential and commercial measures are frequently referred to in the 2022 AQMP as "building measures," which are in line with California's aggressive climate goals to reduce greenhouse gases (GHG) emissions across various sectors. CARB has proposed a statewide zero GHG emissions standard for residential and commercial building appliances, which would have criteria pollutant co-benefits. South Coast AQMD has also developed multiple building-related control measures to address emissions from residential and commercial combustion equipment for space heating, water heating, cooking, and others that the Proposed Project would be in compliance with. In addition to complying with the building measures outlined in the 2022 AQMP, the Proposed Project would support AQMP objectives. As shown in Section 2.4.18 Transportation of this MND, the Project is in a low Vehicle Miles Travelled (VMT) Area and is expected to generate 24.4 VMT per service population, which is below the General Plan Buildout VMT Threshold of 29.2 VMT per service population, based on the City of

Placentia TIA Guidelines and the NOCC+ (North Orange County Collaborative) VMT Traffic Study Screening Tool. With low VMT generating characteristics, substantially lower than the North Orange County-wide average, the Project would have lower trip generating characteristics and would promote infill development. Taken together, the Proposed Project would not conflict with implementation of the AQMP. A less than significant impact will occur.

b. Would the project 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 Proposed Project is under the jurisdiction of the SCAQMD. The USEPA has classified air basins (or portions thereof) as being in "attainment," "non-attainment," or "unclassified" for each criteria air pollutant, based on whether or not the NAAQS have been achieved. Non-attainment areas are air basins that do not meet one or more of the CAAQS and are subject to additional restrictions as required by the USEPA. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a non-attainment or attainment designation. The USEPA classifies the SCAB as in attainment for the federal CO, NO_2, lead, PM_{10}, and SO_2 standards. The SCAB is classified as moderate to extreme non-attainment for the federal O_3 and $PM_{2.5}$ standard. Similar to the federal CAA, areas have been designated as attainment, non-attainment or unclassified with respect to the state AAQS. The SCAB is in non-attainment with the CAAQS for O_3, PM_{10}, and $PM_{2.5}$. The SCAB is designated as an attainment area for the CAAQS for CO, NO_2, SO_2, and lead (except Los Angeles). An analysis of cumulative air quality impacts from construction and operation of the Proposed Project is presented below.

Construction

Construction activities would result in temporary increases in air pollutant emissions. These emissions would be generated as fugitive dust emissions from earth disturbance during demolition and fine site grading and exhaust emissions from operation of heavy equipment and vehicles during construction. Paving activities would emit VOCs during off-gassing.

Daily air pollutant emissions during construction were estimated using the assumed worst-case activity data and the emission factors included in the California Emissions Estimator Model (CalEEMod), version 2020.4.0. Construction was assumed to require approximately 14 months of construction. Construction phases include demolition (1 month), site preparation (1 week), grading (1 week), building construction (10 months), paving (2 weeks), and architectural coatings (2 months). It was assumed that a total of 2.72 acres would be disturbed during demolition and grading. An approximately 40,000 sf of demolition was assumed to account for the demolition and hauling of the existing building on site. A net export of 3,000 cubic yards was assumed (Appendix A, Air Quality and GHG Modeling). The default haul trip length is 20 miles.

The CalEEMod model estimates construction fleet size based on the Proposed Project Site acreage and utilizes emissions factors from the CARB OFFROAD2011 database for the anticipated construction years. Modeling assumes implementation of the SCAQMD Rule 403 for fugitive dust control, which includes the following dust control measures during ground-disturbing activities: replacing ground cover in disturbed areas quickly, watering exposed surfaces at least two times daily, implementing equipment loading/unloading procedures to reduce fugitive dust, managing dust by watering two times daily, and reducing speed on unpaved roads to less than 15 miles per hour. Detailed modeling assumptions can be found in Appendix A.

Table 2, Construction Maximum Daily Air Pollutant Emissions, presents a summary of estimated maximum daily air pollutant emissions for each construction phase associated with the Proposed Project.

Table 2. Construction Maximum Daily Air Pollutant Emissions

Construction Phase	Pollutants (pounds per day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition	2.1	21.4	15.5	<0.1	2.3	1.2
Site Preparation	1.6	17.4	7.9	<0.1	4.8	2.1
Grading	2.4	37.3	14.7	<0.1	5.9	3.1
Building Construction	2.1	16.5	14.5	<0.1	1.3	0.9
Paving	0.7	6.8	9.2	<0.1	0.4	0.3
Architectural Coating	44.1	1.4	1.9	<0.1	0.1	0.1
Maximum Daily Emissions	44.1	37.3	15.5	<0.1	5.9	3.1
SCAQMD Regional Construction Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

As shown in Table 2, construction emissions associated with the Proposed Project would not exceed the SCAQMD's thresholds for any pollutant. Therefore, construction of the Proposed Project would not result in a cumulatively considerable increase of any criteria pollutant for which the Proposed Project region is in non-attainment under an applicable federal or state Ambient Air Quality Standards (AAQS). Impacts would be less than significant, and no mitigation is required.

Operation

Operational emissions for the Proposed Project were estimated using CalEEMod. Area sources of air pollutant emissions associated with the Proposed Project include fuel combustion emissions from space and water heating, fuel combustion emissions from landscape maintenance equipment, VOC emissions from periodic repainting of interior and exterior surfaces, and natural gas use. Increased volumes of vehicles also contribute to regional emissions of criteria pollutants. Vehicle use data, including average daily trips and average trip length, were obtained

from the project-specific traffic impact analysis (Appendix G, Transportation Study). It was assumed that no hearths would be installed in the proposed residences.

The total estimated operational emissions from the Proposed Project are provided in Table 3, Operational Daily Maximum Air Pollutant Emissions.

Table 3. Operational Daily Maximum Air Pollutant Emissions

Emission Source	Maximum Daily Emissions (pounds/day)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Natural Gas	0.1	0.8	0.4	<0.1	0.1	0.1
Landscape	0.6	0.2	21.5	<0.1	0.1	0.1
Consumer Products	5.4	-	--	-	0	0
Architectural Coatings	0.5	-	-	-	0	0
Vehicular Sources	5.2	5.5	50.0	0.1	12.4	3.3
Total Operational Emissions	11.8	6.5	71.9	0.1	12.6	3.5
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*

Notes: CO = carbon monoxide; NOx = nitrogen oxides; PM10 = respirable particulate matter; PM2.5 = fine particulate matter; SO2 = sulfur dioxide; VOC = volatile organic compound

Emission quantities are rounded to the nearest whole number.

As shown in Table 3 operational emissions from the Proposed Project would not exceed the significance criteria for any pollutant. The Proposed Project would not exceed any SCAQMD threshold or contribute to a substantial increase in regional air emissions. Therefore, operation of the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State AAQS and impacts would be less than significant.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. The SCAQMD defines "sensitive receptors" as residences, schools, daycare centers, and health facilities such as hospitals or retirement homes. A sensitive receptor includes long-term care hospitals, hospices, prisons, dormitories, or similar live-in housing (SCAQMD 2012). Sensitive population groups include children, older adults, people with acute illnesses, and people with chronic illnesses, especially those with cardiorespiratory diseases. The primary concerns regarding health effects for land development projects are CO from new vehicular traffic, and diesel particulate matter (DPMs) from diesel equipment and trucks. Additionally, the garage would be naturally ventilated.

Areas with high vehicle density, such as congested intersections and parking garages, have the potential to create high concentrations of CO, known as "CO hotspots." Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of

service or with extremely high traffic volumes. The Proposed Project would generate minimal truck trips during construction, approximately 600 trips over entire construction period, and the operation of residences and retail would generate relatively few trucks for delivery (see Appendix A). As discussed in Section 2.4.17, Transportation, and Appendix G, Transportation Study, the Proposed Project would not be a new significant traffic generator. Because the Proposed Project would not result in a significant contribution to congestion at a deficient intersection, the Proposed Project would not contribute to a CO hotspot.

In addition, the greatest potential for toxic air contaminants (TAC) emissions during project construction activities would be related to emissions of DPM associated with heavy equipment operations during site preparation, grading, and utilities construction activities. Generation of DPM from construction projects typically occurs in a single area for a short period of time. Health risks are generally evaluated over a 30-year exposure period. The duration of construction activities near any specific sensitive receptor would be temporary and short term. Impacts associated with temporary DPM emissions would be less than significant. Therefore, only the SCAQMD Localized significance thresholds (LSTs) are addressed in detail below.

The SCAQMD has developed a set of mass emissions rate lookup tables that can be used to evaluate localized impacts on nearby sensitive receptors that may result from on-site emission activities. These LSTs are developed based upon the size or total area of the emissions source from the construction equipment activities, the ambient air quality levels in each Source Receptor Area (SRA) in which the emission source is located, and the distance to the sensitive receptor. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor. LSTs are identified for NO2, CO, PM10, and PM2.5 generated at a project site. The nearest receptors to the Proposed Project Site are the mobile home residences approximately 120 feet to the south. According to the SCAQMD LST Look-Up Tables (SCAQMD 2009), the appropriate LST would be the thresholds for SRA 16 (North Orange County) at approximately 25 meters and a 2-acre disturbance area.

Construction

Table 4, Localized Significance On-Site Construction Emissions, shows that the emissions of the pollutants on the peak day of construction would result in concentrations of pollutants at the nearest residences. Per SCAQMD guidance (SCAQMD 2008), the LST analysis includes only on-site emissions, which consist of fugitive dust and off-road equipment emissions.

Table 4. Localized Significance On-Site Construction Emissions

Construction Emissions (lbs/day)	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	20.2	14.5	4.0	2.4
SCAQMD Localized Threshold	147	762	6	4
Threshold Exceeded?	No	No	No	No

Table 4 shows that the construction emission rates would not exceed the LSTs for the existing residences in the area surrounding the Proposed Project Site. Impacts would be less than significant.

Operation

The calculated emissions for the proposed operational activities are compared with the appropriate LSTs in Table 5, Localized Significance On-Site Operational Emissions. Similar to construction, the LST analysis for operational emissions includes on-site emissions only, including emissions from natural gas use, area sources, and a minimal portion of project-generated vehicle trips. It is assumed that on-site vehicle emissions are represented by the mileage between the site and nearest receptor. Based on this distance and the average project trip length, on-site vehicle emissions are assumed to be approximately one percent of total vehicle emissions.

Table 5. Localized Significance On-Site Operational Emissions

Operational Emissions (lbs/day)	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Total Operational Emissions	1.1	22.5	0.32	0.23
SCAQMD Localized Threshold	147	762	2	1
Threshold Exceeded?	No	No	No	No

As shown in Table 5, the operational emission rates would not exceed the LSTs for sensitive receptors in the Proposed Project area. Therefore, the proposed operational activity would not result in a locally significant air quality impact and impacts would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. Construction associated with the Proposed Project could result in minor amounts of odor compounds associated with diesel-heavy equipment exhaust. In addition, the Proposed Project could produce objectionable odors during construction from paving, painting, and equipment operation; however, these substances, if present, would be minimal and temporary. Impacts associated with odors during construction would not result in nuisance odors that would result in a significant impact.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities (SCAQMD 1993). The Proposed Project would allow for the construction and operation of a five-story mixed use project that would include 248 residential units, up to 3,000 square feet of commercial uses, a 7-level parking structure, related amenity uses, and private and common open space uses. Therefore, it would not create any new sources of substantial odor during operation. Therefore, there would be no long-term operational impacts associated with odors.

2.4.5 Biological Resources

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

Impact Analysis

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

No Impact. The Project Site is located in an urbanized area that has been previously developed. Additionally, as discussed in the General Plan EIR, the City of Placentia is almost entirely developed. Vacant land within the City of Placentia encompasses 54.5 acres, or 1.3 percent of the City's total acreage. The lack of vacant land within the City indicates that biological resources are limited within the City, and in most cases would remain undisturbed in the areas that are already developed. No native habitat is located on the Proposed Project Site or in the

immediately surrounding area. No endangered, rare, threatened, or special status plant or wildlife species designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), or California Native Plant Society (CNPS) are known to occur on this site. Additionally, as previously stated, the General Plan EIR has identified that the City is almost completely urbanized and landscaped with mostly non-native species. No known rare or endangered plant or animal species have been identified within the City based on a review of State and Federal data bases. No impact will occur.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

No Impact. The Proposed Project Site is located in an urbanized area that has been previously developed. The Proposed Project Site is occupied mainly by a parking lot and commercial uses and surrounded by developed land uses including other commercial uses and residential uses to the south. The Proposed Project Site does not contain any riparian habitat or other sensitive natural community. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, which are known to provide habitat for sensitive wildlife or plant species, or that are known to be important wildlife corridors. Riparian habitats are those occurring along the banks of rivers and streams. No sensitive natural community or riparian habitat are on site. The Proposed Project Site does not contain any riparian habitat, jurisdictional streambed or wetland areas, or sensitive natural community identified by USFWS or CDFW. Additionally, no significant biological resources are identified in the General Plan EIR for the City. No impact will occur.

c. Would the project 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. There are no state or federally protected wetlands located on or near the Proposed Project Site. Further, no federally defined waters of the United States or state occur within the Proposed Project Site. This includes the absence of federally defined wetlands and other waters (e.g., drainages) and state-defined waters (e.g., streams and riparian extent) (USFWS 2023). No impact will occur.

d. Would the project 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?

No Impact. Wildlife movement corridors facilitate movement of species between large patches of natural habitat. The Proposed Project Site is already fully developed except for non-native landscaping materials and, therefore, lacks suitable habitat for wildlife species and is not a native wildlife nursery site. There are some ruderal plant species and a handful of non-native ornamental trees with no sensitivity or protection required along the front façade and façade facing W. Orangethorpe Avenue that require removal prior to the Proposed Project development. However, the Proposed Project would be required to comply with the Migratory Bird Treaty Act. The Migratory Bird Treaty Act governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. It prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations. If removal of the vegetation occurs during nesting season (typically between February 1 and September 1), the project applicant is required to conduct nesting bird surveys in accordance with the CDFW requirements prior to removal of the trees. Compliance with the Migratory Bird Treaty Act would ensure that no significant impacts to migratory birds occur. If removal of the vegetation, including trees, occurs during nesting season, the project applicant is required to conduct nesting bird surveys in accordance with the CDFW requirements. Compliance with the MBTA would ensure that no significant impacts to migratory birds occur. Additionally, the Proposed Project Site is located within a highly urbanized area and would not interfere with the movement of any native residents, migratory fish, or wildlife species. No impact will occur.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. There are no local biological related policies or ordinances, such as a tree preservation policy or ordinance that is applicable to the Proposed Project. The Proposed Project Site includes a handful of existing non-native ornamental trees that are not subject to any policies or ordinances protecting biological resources, such as a tree preservation policy. The Proposed Project would also be consistent with the General Plan, as amended, and in conformity with all local policies and regulations within. Additionally, the Proposed Project Site is located in a highly urbanized and dense area. There are no expansive open space areas, natural features or sensitive natural plant communities, or riparian habitats for which to consider conservation. No impact will occur.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan because the City of Placentia does not have an adopted Habitat Conservation Plan according to the US Fish and Wildlife Service (USFWS), Environmental Conservation Online System (ECOS) mapping (USFWS 2022) or any Natural Community Conservation Plan areas apply to the Proposed Project Site according to the CDFW, California Regional Conservation Plans Map. No impact will occur.

2.4.6 Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 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:

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

The City of Placentia is an urbanized community and nearly all properties within the City (except for areas such as protected park lands) have been previously disturbed and/or developed. The Proposed Project Site is not listed in the National Register, State Landmark, California Register, or Point of Interest as identified by the California Historical Resources, Office of Historical Preservation (OHP 2021). As discussed in the General Plan EIR, the City of Placentia is almost entirely developed. Vacant land within the City of Placentia encompasses 54.5 acres, or 1.3 percent of the City's total acreage. The lack of vacant land within the City indicates that subsurface cultural resources would remain undisturbed in the areas that are already developed, with the exception of those parcels that may be redeveloped in the future. Additionally, the Proposed Project Site has been historically disturbed through grading, compaction and building or infrastructure construction. The Proposed Project would not promote, encourage or enable activities that could remove, degrade or in any way adversely impact local historic resources.

Historic Resources within the City are regulated and protected pursuant to the City's General Plan and Municipal Code. Additionally, the Proposed Project Site itself is already disturbed and developed. Currently the Proposed Project Site consists of a commercial car dealership and auto repair building that is currently closed. The remainder of the Proposed Project Site is covered in the pavement associated for associated parking lots and roads. Nor the commercial buildings nor the pavement hold cultural significance. A less than significant impact will occur.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant with Mitigation Incorporated. The Proposed Project Site has previously been disturbed. Any archaeological resources, which may have existed at one time (on or beneath the site), have likely been previously disturbed or destroyed. Additionally, the Proposed Project does not have a subterranean component and grading activities would be limited. Nonetheless, construction activities associated with project implementation have the potential to unearth undocumented resources. In the event that any evidence of a cultural resource is discovered, all work within the vicinity of the find should stop until a qualified archaeological consultant can assess the find and make recommendations. Mitigation Measure CUL-1, below, is added to the Proposed Project to protect potential archaeological resources. With inclusion of this measure, the potential impact relative to archaeological resources would be reduced to a less than significant level. With implementation of this Mitigation Measure CR-1, impacts related to cultural resources would be less than significant.

MM-CR-1 If evidence of an archaeological site or other suspected historical resource as defined by CEQA Guidelines § 15064.5, including darkened soil representing past human activity ("midden"), that could conceal material remains (e.g., worked stone, fired clay vessels, faunal bone, hearths, storage pits, or burials) are discovered during any project-related earth-disturbing activities, all earth-disturbing activities within 100 feet of the find shall be halted until the City of Placentia is notified. The project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology to assess the significance of the find. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-L) form and filed with the South Central Coastal Information Center (SCCIC). Construction activities may continue on other parts of the Proposed Project Site while evaluation and treatment of prehistoric archaeological resources takes place.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. California Health and Safety Code, Section 7050.5, requires that in the event that human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the County Coroner has conducted an investigation into the circumstances, manner, and cause of any death and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to their authorized representative. If the County Coroner determines that the remains are not subject to their authority and if the County Coroner has reason to believe the human remains are those of a Native American, they shall contact the Native American Heritage Commission by telephone within 24 hours. The Proposed Project would comply with existing law, and the potential impact to human remains will be less than significant.

2.4.7 Energy

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

Impact Analysis

a. Would the project 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 Proposed Project, like all development, would be responsible for an incremental increase in the consumption of energy resources during construction due to on-site use of construction equipment and vehicle and truck trips. CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis for Initial Study Checklist question relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- Criterion 1: The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.
- Criterion 2: The effects of the Project on local and regional energy supplies and on requirements for additional capacity.
- Criterion 3: The effects of the Project on peak and base period demands for electricity and other forms of energy.
- Criterion 4: The degree to which the Project complies with existing energy standards.
- Criterion 5: The effects of the Project on energy resources.
- Criterion 6: The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Construction-Related Energy

During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in

construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials, such as lumber and glass. Fossil fuels for construction vehicles and other energy-consuming equipment would be used during the different Project construction phasing. As indicated in Table 6, Project Construction Fuel and Gasoline Use, the overall fuel consumption during Project construction would be approximately 35,859 gallons during the entire construction period, which would result in a nominal increase in fuel use compared to the over 17 million gallons of fuel consumption for construction in the County estimated by the OFFROAD2021 (v1.0.4) Emissions Inventory (CARB 2023). As such, Project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (Criterion 2).

Table 6. Project Construction Fuel and Gasoline Use

Fuel Type	Gallons
Diesel Fuel	33,741
Motor Gasoline	2,118
Total	35,859

Sources: Appendix A; USEPA 2023 (conversion factors).

Notes: Includes fuel use from construction equipment, haul truck trips, vendor truck trips, and worker vehicle trips. Assumes a conversion factor of 10.21 kg/CO_2 for diesel fuel and 8.78 kg/CO_2 for motor gasoline.

Construction activities that would include the use of natural gas, petroleum, or electricity would be required to comply with CARB emissions requirements for construction equipment, which includes measures to reduce fuel-consumption, such as imposing limits on idling and requiring older engines and equipment to be retired, replaced, or repowered. In addition, the Proposed Project would be required to comply with all applicable regulations, including PMC Title 20 and Title 23 as well as the Conservation Element and Sustainability Element of the City's General Plan. In addition, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (Criterion 4).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than nonrecycled materials.[1] It is reasonable to assume that production of building materials, such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment, building materials, or methods that would be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during

[1] California Department of Resources Recycling and Recovery, Green Building Materials, https://www.calrecycle.ca.gov/greenbuilding/materials#Material.

construction would not represent a significant demand on energy resources (Criterion 5). Therefore, due to all of the above, including compliance with applicable regulations, there would not be wasteful, inefficient or unnecessary consumption of energy resources.

Operational Energy

The Proposed Project would involve energy use for 3,000 square feet of commercial and residential (248 units), associated structural parking, amenity areas, minimal new street and pathway lighting.

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the U.S. Based on project mobile GHG emissions calculated in CalEEMod (see Appendix A), and USEPA Emissions Factors (2023) project operations are estimated to consume approximately 221,412 gallons of fuel per year. The Project does not propose any unusual features that would result in excessive long-term operational fuel consumption (Criterion 2).

The Project would also consume fuel in the form of residents driving to and from the Project Site. Notwithstanding, the Project would include installation of 25 electric vehicle (EV) charging stations and designated EV parking spaces in compliance with the CALGreen Code, which would encourage and support the use of EVs and, thus, reduce the petroleum fuel consumption (Criterion 4 and Criterion 6).[2] Therefore, fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region, and impacts would be less than significant.

Building Energy Demand

The California Energy Commission (CEC) developed 2018 to 2030 forecasts for energy consumption and peak demand in support of the 2017 Integrated Energy Policy Report for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections.[3] The CEC forecasts that the Statewide annual average growth rates of energy demand between 2016 and 2030 would be 0.99 percent to 1.59 percent for electricity and 0.25 percent to 0.77 percent for natural gas. As shown in Table 7, Project Operational Energy Use, operational energy consumption of the Project would represent an

[2] Ten percent of parking spaces shall be EV capable. 25 percent of parking spaces require low power Level 2 receptacles, and five percent of parking spaces require higher power Level 2 chargers.
[3] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, February 2018.

approximately 0.01 percent increase in electricity consumption and 0.006 percent increase in natural gas consumption over the current Countywide usage, which would be significantly below the CEC's forecasts and the current Countywide usage (CEC 2023a, 2023b). Therefore, the Project would be consistent with the CEC's energy consumption forecasts. As such, the Project would not require additional energy capacity or supplies (Criterion 2). Additionally, the Project would consume energy during the same time periods as other residential developments and would consume energy evenly throughout the day. As a result, the Project would not result in unique or more intensive peak or base period electricity demand (Criterion 3).

Table 7. Project Operational Energy Use

Energy Type	Energy Use
Electricity (kWh/yr)	1,991,688
Natural Gas (KBTU/yr)	3,293,015

Source: Appendix A.

Notes: kWh/yr = kilowatt-hour per year; KBTU/yr = kilo British thermal unit per year.

The Project would be required to comply with 2022 Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including photovoltaic solar panels, appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the current Title 24 standards significantly reduces energy usage. The Title 24 Building Energy Efficiency Standards are updated every three years and become more stringent between each update; therefore, complying with the latest Title 24 standards would make the Project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards.

Furthermore, SCE is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent of total procurement by 2030.[4] Renewable energy is generally defined as energy that comes from resources, which are naturally replenished within a human timescale, such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects would not result in the waste of the finite energy resources (Criterion 5). Therefore, the Project would not cause wasteful, inefficient, and unnecessary consumption of building energy during Project operation, or preempt future energy development or future energy conservation, and the impact would be less than significant.

As discussed in the General Plan EIR, Southern California Edison (SCE) has existing electricity infrastructure located throughout the City, which would serve future development. SCE typically utilizes existing utility corridors to reduce environmental impacts (see Appendix C, Dry Utility

[4] California Public Utilities Commission, Renewables Portfolio Standard Program, https://www.cpuc.ca.gov/rps/.

Report) and has energy efficiency programs to reduce energy usage and maintain reliable service throughout the year. Additionally, the Proposed Project would be constructed in accordance with all applicable Title 24 standards. Title 24 energy code requirements and building electrification (e.g., Assembly Bill 3232), can help reduce NOx emissions. In addition, as part of the 2022 State Strategy for the State Implementation Plan, CARB has proposed a statewide zero GHG emissions standard for residential and commercial building appliances, which would have criteria pollutant co-benefits. South Coast AQMD has also developed multiple building-related control measures to address emissions from residential and commercial combustion equipment for space heating, water heating, cooking, and others. The CEC released the 2022 Title 24 California solar mandate changes including new requirements for solar Photovoltaic (PV), battery storage, and electric vehicle (EV) charging to encourage the installation of on-site clean energy for new buildings. New projects must install both solar PV and energy storage. Title 24 requires that new construction and major alterations include adding "EV Capable" parking spaces which have electrical panel capacity, a dedicated branch circuit and a raceway to the EV parking spot to support future installation of charging stations. A water heating system typically provides hot water for uses such as bathing, cleaning, cooking, and space heating. Common water heating systems include gas, electric, tank, and tankless designs, along with the controls, piping, and insulation required to feed hot water to the intended location. When installed for the Proposed Project, these systems would comply with the Building Energy Efficiency Standards (Energy Code). Furthermore, the goals and policies presented in the City's General Plan would prevent future wasteful, inefficient, or unnecessary consumption of energy resources. Specifically, the Conservation Element of the General Plan enforces Goal CON-5, which seeks to reduce emissions through reduced energy consumption and promotion of sustainable and renewable energy resources. Technology to move toward energy efficiency is mandated by federal and state laws. As previously stated, the Proposed Project would be subject to the Title 24 Building Energy Efficiency Standards, which apply to new construction and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting, as further discussed below. Compliance with the most recent applicable Building Energy Efficiency Standards would prioritize energy efficiency of the Proposed Project.

The Proposed Project does not include any features that would encourage the wasteful, inefficient, or unnecessary consumption of utilities. The Proposed Project would result in an increase in vehicle trips to and from the site but not to a significant extent as established in Section 2.4.18, Transportation, as the City's VMT Traffic Study Screening Tool was used to analyze the Proposed Project and supports the conclusion that the Proposed Project's traffic impacts would be less than significant. As noted in Section 2.4.18, the Project would result in lower VMT per service population compared to the North County average. Based on low VMT generating characteristics, substantially lower than the North Orange County-wide average, the Project would have lower trip generating characteristics and would promote infill development. Based on the NOCC and VMT

Traffic Study Screening Tool, according to the Transportation Study prepared by RK Engineering Group, Inc. the Proposed Project's VMT per service population is expected to be below the existing VMT per service population and is expected to be consistent with the OPR Technical Advisory, screening threshold of 15 percent or less. As such, with low VMT levels, the Project would use lower levels of energy in transportation due to the lower VMT per service population compared to the North County average. The Proposed Project proposes residential and commercial uses near transit including Bus Route 30 and Bus Route 57, along with the Placentia Metrolink Station. This would provide both employment and living opportunities near transit services. Connect SoCal seeks to stimulate development near transit and in priority growth areas. Feedback when developing Connect SoCal included support for locating more growth near transit and job centers and prioritization for infill and redevelopment within existing cities to accommodate future growth. The Proposed Project supports these objectives. Additionally, Connect SoCal sets forth a forecasted development pattern for the region, which, when integrated with the transportation network would reduce GHG emissions from automobiles. As demonstrated with the lower VMT rate per service population that is substantially lower than the North County average, the Proposed Project helps achieve this in that it provides higher density housing near transit. Operation of the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. A less than significant impact will occur.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The Proposed Project would be subject to state regulations for energy efficiency, namely, California's Building Energy Efficiency Standards and CALGreen, both of which are set forth in the California Code of Regulations, Title 24. California's Building Energy Efficiency Standards were established in 1978 and serve to enhance and regulate California's building standards. These standards include regulations for residential and nonresidential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated periodically (every three years) to incorporate and consider new energy efficiency technologies and methodologies. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The 2022 CALGreen standards became effective on January 1, 2023. The 2022 Building Energy Efficiency Standards also became effective on January 1, 2023. The California Energy Commission (CEC) updates the Energy Code every three years. On August 11, 2021, the CEC adopted the 2022 Energy Code. In December, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1,

2023, must comply with the 2022 Energy Code. The 2022 Building Energy Efficiency Standards (Energy Code), which went into effect January 1, 2023, introduced new requirements for low-rise multi-family (LRMF) buildings and includes the registration of new LRMF compliance documentation. The Proposed Project would meet Building Energy Efficiency Standards and CALGreen standards as required to reduce energy demand and increase energy efficiency.

At a regional level, the Proposed Project would be subject to the policies set forth in the Connect SoCal Plan (SCAG 2020). Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal Clean Air Act requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources. The goals of Connect SoCal fall into four core categories: economy, mobility, environment, and healthy/complete communities. The plan explicitly lays out goals related to housing, transportation technologies, equity and resilience in order to adequately reflect the increasing importance of these topics in the region. With regard to individual developments, such as the Proposed Project, the strategies and policies set forth in Connect SoCal include improved energy efficiency. As discussed previously, the Proposed Project would comply with the 2022 CALGreen standards and the Title 24 Building Energy Efficiency Standards. For these reasons, the Proposed Project would be consistent with Connect SoCal's goals.

The Proposed Project would follow applicable energy standards and regulations during construction. In addition, the Proposed Project would be built and operated in accordance with all existing, applicable regulations at the time of construction. As such, the Proposed Project would not conflict with existing energy standards and regulations. Electric and natural gas consumption practices for the Proposed Project would be in accordance with current City regulations and practices. As such, the Proposed Project would be considered consistent with the goals and policies of the City's Conservation and Sustainability Elements. Objectives from the Conservation and Sustainability Element of the City of Placentia General Plan are consistent with Electricity and Natural Gas services for the Proposed Project. A less than significant impact will occur.

2.4.8 Geology and Soils

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

Impact Analysis

a. Would the project 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 City of Placentia does not have any active faults located within its boundary, nor does the site lie within the boundaries of an "Earthquake Fault Zone" as

defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act. Though the Proposed Project is situated in a seismically active area that has historically been affected by generally moderate to occasionally high levels of ground motion, this can be reduced through required adherence to seismic design codes in the California Building Code. A less than significant impact will occur.

ii. Strong seismic ground shaking?

Less Than Significant Impact. As discussed in the General Plan EIR, although ground rupture is not considered to be a major concern for the City of Placentia, it is still likely that the city will be subject to some moderate to severe seismic shaking. The intensity of ground shaking would depend upon the magnitude of the earthquake, distance to the epicenter and the geology of the area between the epicenter and the City. Some degree of structural damage is likely to occur due to strong seismic shaking; however, the risk of substantial damage can be reduced through adherence to seismic design codes (2022 California Building Code). Similar to other areas located in the seismically active Southern California region, the City is susceptible to ground shaking during an earthquake. Numerous faults considered active or potentially active have been mapped in Southern California. However, as addressed in previously, the Proposed Project is not located within an active fault zone, and the Proposed Project Site would not be affected by ground shaking more than any other area in the seismically active region. The Proposed Project is required to be constructed in compliance with the 2022 California Building Code (effective January 1, 2023), which contains standards for building design to minimize the impacts from ground shaking. All land uses must conform to all applicable State and local building codes relative to seismic safety. A less than significant impact will occur.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load supporting capability when subjected to intense shaking. Any buildings or structures on these sediments may float, sink, or tilt as if on a body of water. The California Geological Survey (CGS) has designated certain areas within Southern California as potential liquefaction hazard zones. These are areas considered at a risk of liquefaction-related ground failure during a seismic event, based upon mapped surficial deposits and the presence of a relatively shallow water table. According to the Preliminary Geotechnical Investigation prepared for the Proposed Project, the Proposed Project Site is in an area of low liquefaction potential. Additionally, as discussed in the General Plan EIR, the City's building codes require structures in liquefaction areas to be designed to withstand the potential impacts that could be caused by liquefaction. The Proposed Project would be required to comply with applicable building codes that account for the possibility of liquefaction susceptibility, including all applicable provisions established in the current California Building Code, which sets forth specific engineering

requirements to ensure structural integrity, regardless of the specific geotechnical characteristics of a particular site. A less than significant impact will occur.

iv. Landslides?

Less Than Significant Impact. Susceptibility of slopes to landslides and other forms of slope failure depend on several factors, which are usually present in combination—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, and seismic activity. According to the General Plan, the majority of the City is relatively flat and characterized by slopes that are not high (less than 50 feet) or steep (generally sloping flatter than 1-1/2:1, horizontal to vertical). The Proposed Project is not situated on steep slopes. The Proposed Project would be required to comply with applicable building codes. As there would be an absence of steep slopes on the Proposed Project Site and compliance with Building Code regulations, the impact will be less than significant.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact.

Construction Impacts

Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms. The Proposed Project would involve earthwork and other construction activities that would disturb surface soils and temporarily leave exposed soil on the ground's surface. Common causes of soil erosion from construction sites include stormwater, wind, and soil being tracked off site by vehicles. The Proposed Project would export approximately 3,000 cubic yards of soil during the grading process, the top two to five feet of surface soil would be impacted for excavation and grading to create area for footings, the pool site, and recompacting. However, construction activities are short term in nature and would comply with all applicable state and local regulations for erosion control and grading. The Proposed Project would be required to comply with standard regulations, including SCAQMD 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 it does not remain visible in the atmosphere beyond the property line of the emissions source (SCAQMD 2005). Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off site (SCAQMD 1976). Additionally, as discussed in the General Plan EIR, construction associated with future development projects must comply with Chapter 20.40 of the City's Municipal Code, which requires necessary permits, plans, plan checks, and inspections to reduce the effects of sedimentation and erosion. In addition, construction associated with future development projects would be required to have erosion control plans approved by the City of Placentia Departments of Public Works, as well as Stormwater Pollution Prevention Plans (SWPPP). As part of these requirements, Best

Management Practices (BMPs) would be implemented during construction activities to reduce soil erosion to the maximum extent possible. The impact would be less than significant.

Operational Impacts

Once operational, the Proposed Project Site would be developed with 248 residential units, up to 3,000 square feet of commercial uses, related amenity uses, private and common open space uses, and a 7-level parking structure, and associated paved parking areas. Collectively, these on-site areas would reduce the potential for soil erosion and topsoil loss. The structural and paved improvements would be impervious areas lacking any exposed soils. Therefore, impacts associated with soil erosion and topsoil loss would be less than significant.

c. Would the project 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. Impacts related to liquefaction and landslides are discussed above in Section 2.4.8(a). Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to gravity and earthquake shaking combined. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. Due to the absence of any substantial change in grade and the lack of liquefiable soils according to the Preliminary Geotechnical Investigation, the potential for lateral spread occurring within the Proposed Project area is considered to be low. The Proposed Project would be constructed in compliance with all applicable building code requirements regarding soil stability. Additionally, the Preliminary Geotechnical Investigation performed for the Proposed Project identified preliminary recommendations to ensure that impacts from unstable geologic units or soils do not result in adverse impacts. This geotechnical evaluation is included as Appendix D, Preliminary Geotechnical Investigation, of this Initial Study. A less than significant impact will occur.

d. Would the project 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. Soil conditions at the present consist of young alluvial fan deposits overlain by approximately three to four feet of undocumented artificial fill. These materials are typically moist to damp and loose to medium dense. Based on laboratory test results prepared for the Proposed Project, the near-surface soils are generally anticipated to possess a Very Low expansion potential. The Proposed Project would export approximately 3,000 cubic yards of soil

during the grading process, the top two to five feet of surface soil would be impacted for excavation and grading to create area for footings, the pool site, and recompacting Additionally, the Proposed Project would be required to comply with applicable building codes that account for the possibility of expansive soils. Therefore, the Proposed Project would not be on expansive soil, and substantial risks to life or property due to expansive geologic unit would be less than significant. No impact will occur.

e. Would the project 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. Development of the Proposed Project would not require the installation of a septic tank or alternative wastewater disposal system. The Proposed Project would use the existing local sewer system. Therefore, no impact would result from septic tanks or other on-site wastewater disposal systems. No impact will occur.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. The Proposed Project Site has been previously disturbed. The likelihood of affecting paleontological resources within the Proposed Project Site is considered low. Additionally, the Proposed Project does not have a subterranean component and grading activities are expected to be limited. Nonetheless, it is always possible that intact paleontological resources are present at subsurface depths that were not impacted by previous grading activities. For instance, at depths below human-transported fill materials, there is a greater likelihood of encountering sediments that are old enough to contain significant paleontological resources. Given these factors, the likelihood of impacting paleontological resources within the Proposed Project Site is considered low above the original ground surface, increasing with depth, however Mitigation Measure GEO-1 will still be implemented under the Proposed Project. With incorporation of Mitigation Measure GEO-1, potential impacts to paleontological resources would be reduced to a less than significant level.

MM-GEO-1 If fossils or fossil bearing deposits are encountered during ground-disturbing activities, work within a 25-foot radius of the find shall halt (buffer area) and a professional vertebrate paleontologist (as defined by the Society for Vertebrate Paleontology) (the Qualified Paleontologist) shall be contacted immediately to evaluate the find. The paleontologist shall have the authority to stop or divert construction, as necessary. Documentation and treatment of the discovery shall occur in accordance with Society of Vertebrate Paleontology standards. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing

and evaluation of the find. All significant fossils shall be collected by the Qualified Paleontologist. Collected fossils shall be prepared to the point of identification and cataloged before they are submitted to their final repository. Any fossils collected shall be curated at a public, nonprofit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, photographs, and a technical report shall also be filed at the repository and/or school.

2.4.9 Greenhouse Gas Emissions

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

Impact Analysis

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

Less Than Significant Impact. Global climate change refers to changes in average climatic conditions on Earth, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. The GHGs defined under California's Assembly Bill 32 include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6).

The City has not adopted a qualified Climate Action Plan (CAP) for guidance on determining the significance of project GHG emissions. Therefore, the analysis has been prepared in accordance with the SCAQMD guidance related to GHG emissions. To provide guidance to local agencies on determining significance for GHG emissions in their CEQA documents, the SCAQMD formed a GHG CEQA Significance Threshold Working Group. In December 2008, the working group developed a tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency.

A Proposed Project would be evaluated against the following tiers and a determination would be made as to which tier would be most appropriate for the individual project:

- **Tier 1** consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA. If the project qualifies for an exemption, no further action is required. The project is not exempt from CEQA; therefore, Tier 1 does not apply.
- **Tier 2** consists of determining whether or not the project is consistent with a GHG Reduction Plan that may be part of a local government plan. The GHG Reduction Plan must, at a minimum, comply with AB 32 GHG reduction goals, include an emissions inventory agreed upon by either CARB or the SCAQMD, have been

analyzed under CEQA and have a certified final CEQA document, and have monitoring and enforcement components. If the Proposed Project is consistent with the qualifying GHG Reduction Plan, it is not significant for GHG emissions. The City does not have a qualified CAP, therefore, Tier 2 does not apply.

- **Tier 3** includes a screening level threshold of 3,000 MT CO2e per year that is intended to achieve a regional emissions capture rate of 90 percent. That is, most future projects would be required to implement GHG reduction measures while excluding small projects that would contribute a relatively small fraction of the cumulative statewide GHG emissions. Consistent with the SCAQMD method, construction emissions should be amortized over a 30-year project life and added to operational emissions.
- **Tier 4,** Performance Standards, is used if emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. SCAQMD proposes a 2020 efficiency target of 4.8 MT CO2e per year per service population for project-level analyses. The GHG efficiency metric calculates rate of emissions by dividing annualized GHG emissions by the service population, which is the sum of residents and employees. Efficiency targets represent the maximum quantity of emissions each resident and employee in California could emit in various years based on emission levels necessary to achieve the statewide GHG emissions reduction goals.

  The Tier 3 screening threshold of 3,000 MT CO2e per year and Tier 4 efficiency target of 4.8 MT CO2e per year per service population were developed to achieve the State's 2020 GHG reduction goals. The Proposed Project would be operational following 2020; therefore, these thresholds have been scaled consistent with State goals detailed in SB 32, Executive Order B-30-15, and Executive Order S-3-05 to reduce GHG emissions by 40 percent below 1990 levels by 2030 based on the Proposed Project's expected operational year of 2024. Though the SCAQMD has not published a quantified threshold beyond 2020, this assessment uses the scaled threshold of 2,520 MT CO2e per year for Tier 3 or 4.0 MT CO2e/yr/SP under Tier 4.

Single projects do not generally generate enough GHG emissions on their own to influence global climate change; therefore, the GHG impact analysis measures the Proposed Project's contribution to the cumulative environmental impact. Implementation of the Proposed Project would contribute to global climate change directly through GHG emissions from construction through vehicle engine exhaust from construction equipment, on-road truck trips, and worker commuting trips. Operational sources of GHG emissions include energy use (electricity and natural gas), area sources (landscaping equipment), vehicle use, solid waste generation, and water conveyance and treatment.

Construction

Project construction emissions were estimated using CalEEMod and assumptions consisted with the air quality analysis described in Section 2.4.4, Air Quality. GHG emissions related to the construction of the Proposed Project would be temporary. Total estimated construction emissions, and emissions amortized over a 30-year period, are provided by phase in Table 8, Estimated Construction Emissions.

Table 8. Estimated Construction Emissions

Construction Phase	CO_2e Emissions (metric tons)
Demolition	28.4
Site Preparation	1.6
Grading	16.3
Building Construction	304.5
Paving	6.5
Architectural Coating	5.8
Total Construction Emissions	363.1
Amortized Construction Emissions	12.1

Operation

Table 9, Estimated Annual Operational Emissions, summarizes the estimated annual emissions from operation of the project calculated using CalEEMod with assumptions consistent with the air quality analysis described in Section 2.4.4.

As shown in Table 9, the Proposed Project would generate approximately 2,651.2 MT CO2e per year, which exceeds the Tier 3 screening threshold of 2,520 MT CO2e per year. As such, the Proposed Project is compared to the Tier 4 efficient metric threshold of 4.0 MT CO2e/yr/SP. The Proposed Project's service population was calculated by taking the Proposed Project residential population calculated in CalEEMod of 744 persons and adding the retail employee service population of 7 persons. The employee service population was calculated from the jobs per square-footage information published by SLO County Air Pollution Control District (2012) which provides the most relevant data published by a public agency for the purposes of reducing GHG. The Proposed Project's emissions efficiency was calculated by dividing total Proposed Project emissions by the total service population of 751 to attain the annual per service population emissions of 3.5 MT CO2e. As discussed above, a project would have less than significant GHG emissions if it would result in total operation and construction GHG emissions of less than the applicable SCAQMD threshold tier. The Proposed Project emissions would be less than the Tier 4 efficiency metric threshold and would therefore result in a less than significant impact.

Table 9. Estimated Annual Operational Emissions

Emissions Source	Total CO_2e Emissions (MT CO_2e)
Electricity	355.0
Natural Gas	176.8
Solid Waste	68.2
Water Use	90.6
Area Sources	4.5
Mobile Sources	1,944.0
Total Operation	2,639.1
Amortized Construction Emissions	12.1
Total Project Emissions	2651.2

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

Less Than Significant Impact. There are numerous State plans, policies and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. Executive Order (EO) S-3-05 (June 2005) established GHG targets for the State, including returning to year 2000 emission levels by 2010; 1990 levels by 2020; and 80 percent below 1990 levels by 2050. In 2016, the State Legislature passed SB 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the State Legislature passed companion legislation AB 197, which provides additional direction for developing the Scoping Plan. The 2017 Scoping Plan update incorporates the 2030 target set by EO B-30-15 and codified by SB 32. AB 1279, the California Climate Crisis Act, enacted in September 2022, updates the goals of AB 32. The bill established a statewide goal to achieve net-zero GHG emissions by 2045 and achieve and maintain net-negative GHG emissions thereafter. Additionally, the bill established a specific target for statewide anthropogenic GHG emissions to be reduced to at least 85 percent below the 1990 levels by 2045.

CARB adopted an update to the Scoping Plan in November 2022, the 2022 Scoping Plan, which assesses progress toward the SB 32 2030 target and identifies a path to achieving carbon neutrality by 2045. Though it does not include a threshold for local agencies for individual projects, the 2022 Scoping Plan does encourage infill development with the goal of reducing VMT. The 2022 Scoping Plan contains a series of priority strategies including those aimed at VMT reduction by enabling more compact infill development. The Proposed Project is infill development and would result in an overall reduction in VMT. Therefore, the Proposed Project would be consistent with key strategies of the 2022 Scoping Plan.

Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. The Proposed Project would be required to adhere to the most recent adopted California Building Code (Title 24), including the California Green Building Standards Code. The Proposed Project would be subject to the California Green Building Standards Code, which requires new buildings to reduce water consumption, employ building commissioning to increase building system efficiencies for large buildings, divert construction waste from landfills, and install low pollutant- emitting finish materials. The Proposed Project does not include any feature that would interfere with implementation of these State and City codes and plans (i.e., substantially alter energy demands). The City of Placentia does not have any additional plans, policies, standards, or regulations related to climate change and GHG emissions. Also, no other government-adopted plans or regulatory programs in effect at this time have established a specific performance standard to reduce GHG emissions from a single building project. The Proposed Project would not permit any land use operations that would conflict with any plans, policies or regulations related to the reduction of greenhouse gas emissions. Therefore, the Proposed Project does not conflict with those plans and regulations. A less than significant impact will occur.

2.4.10 Hazards and Hazardous Materials

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

Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction of the Proposed Project would likely involve the use of some hazardous materials, such as vehicle fuels, solvents, paints, oils, and grease. Operation of the Proposed Project would involve an unquantifiable, but limited, use of potentially hazardous materials typical of residential uses, including cleaning fluids, detergents, solvents, adhesives, sealers, paints, fuels/lubricants, and fertilizers and/or pesticides for landscaping. The use, storage, transport, and disposal of hazardous materials by construction workers, tenants, and residents of the Proposed Project would be required to comply with existing regulations of several agencies, including the DTSC, U.S. Environmental Protection Agency, Occupational

Safety and Health Administration, California Department of Transportation, and City codes. As such, the impact will be less than significant.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated. 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 the following: improper handling or use of hazardous materials or hazardous wastes, 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.

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

As discussed above, existing regulations address the potential off-site construction-related hazards associated with demolition of the existing on-site structures. During future construction of the Proposed Project, BMPs would be required to be implemented by the City as well as standard construction controls and safety procedures that would avoid or minimize the potential for accidental release of substances. Construction materials, debris, trash, fuel, paint, and stockpiles become pollution sources when it rains. Basic pollution prevention practices can significantly reduce the amount of pollution leaving construction sites. MM-HAZ-1 which includes simple construction practices would be implemented.

Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by the Placentia Fire and Life Safety Department, and the local Certified Unified Program Agency for hazardous materials in the region.

The General Plan EIR also discusses that compliance with measures established by federal, State and local regulatory agencies is considered adequate to offset the negative effects related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials in the City. In addition, the General Plan Safety Element goals and policies would further reduce accidental release of hazardous materials impacts. An Asbestos-Containing Materials and Lead-Containing Materials Survey Report (see Appendix B, Asbestos-Containing Materials and Lead-Containing Materials Survey Report) was completed for the Proposed Project where an asbestos survey was performed in accordance with the USEPA's "Method for the Determination of Asbestos in Bulk Building Materials" and SCAQMD's Rule 1403. 88 bulk samples of suspect Asbestos-Containing Materials/Asbestos-Containing Construction Materials (ACMs/ACCMs) representing 25 identified homogenous areas in the survey area of the Proposed Project Site. ACM Class I, Regulated ACM, and Friable ACM were found in the survey area. MM-HAZ-2 would be implemented as part of the Proposed Project.

In October 2021, FREY Environmental, Inc. completed an additional subsurface soil and soil vapor investigation (see Appendix I, Additional Subsurface Soil and Soil Vapor Investigation and Conceptual Site Model) of the Proposed Project Site. A significant amount of assessment and remediation work has been conducted at the site since 1988. The extent of chemicals of potential concern (COPC) in soil, soil vapor, and groundwater present beneath the site, whether due to historical site use(s) or the migration of COPC from off-site sources, have been very well assessed. Concentrations of tetrachloroethylene (PCE) is shallow soil vapor that exceed some regulatory criteria appear to be spread throughout the site and appear to decrease slightly from

west to east across the site. COPC in soil vapor are sufficiently assessed through historical and recent assessment of the site and, soil vapor, which as it pertains to proposed future development, is adequately assessed. Recalcitrant concentrations of COPC in soil, groundwater, and soil vapor have been demonstrated to prove minimal to no risk to sensitive receptors except for the potential risk of PCE in soil vapor to intrude into future residential buildings. According to this investigation, no additional environmental assessment or active remediation was found to be required at the time of investigation for the site.

Following the subsurface soil and soil vapor investigation conducted in October of 2021, in March 2022, FREY Environmental, Inc. completed a Phase I Environmental Assessment (Phase I ESA) (see Appendix J, Phase I Environmental Site Assessment) of the Proposed Project Site.

Ninyo & Moore (N&M) prepared a Phase I ESA for the site, dated May 11, 2021. In addition, a draft Phase I ESA by Tetra Tech, dated June 2021 was provided to FREY. Based on the findings and conclusions in the Phase I ESAs both Ninyo and Moore and Tetra Tech recommended further subsurface investigation to evaluate the RECs. Additionally, Tetra Tech noted that because LUST case closure was granted for commercial use of the property, consultation with a regulatory agency may be required as part of property redevelopment for residential use.

Following recommendations in the 2021 Phase I ESAs, additional subsurface investigations, including two rounds of soil and soil vapor sampling and a geophysical survey, were conducted at the site in 2021 by Tetra Tech and/or FREY to assess the following on-site environmental concerns:

- The former use of the site for auto repair and the handling of related hazardous substances,
- The presence of hydraulic hoists,
- The former presence of a spray paint booth and the potential use of solvent,
- The potential former presence of a clarifier, and
- The potential existence of a waste oil UST on site.

The results of the 2021 subsurface investigation indicate that petroleum hydrocarbons do not exist in the shallow soil and soil vapor at the site in concentrations that would impact sensitive receptors such as workers or occupants during and after redevelopment of the property. However, concentrations of PCE in shallow soil vapor that exceed some regulatory criteria appear to be spread throughout the site, decreasing slightly from west to east across the site. The rather homogeneous concentrations of PCE in soil vapor spread across the site, as documented by the 2021 investigation, as well as work conducted at the site in relation to the now closed LUST cleanup case, do not suggest an on-site source but rather indicate a likely off-site source. As stated above, and as shown in the October 2021 Frey Analysis, concentrations of PCE appear to decrease slightly from west to east across the site. Given that the limited low concentrations

are somewhat homogenous horizontally and vertically, it is unlikely that an on-site point source would have contributed to the presence of PCE in the soil vapor (October 2021 Frey Analysis, 22). The October 2021 Frey Analysis also states that there are eight open cleanup facilities located within a one-mile radius of the Project site that are related to solvents and list PCE as one of the primary contaminants of concern. The majority of the facilities are located west and northwest of the Project site. (October 2021 Frey Analysis, 22) As such, evidence points to a likely off-site source. Additionally, no USTs or clarifiers were identified in the areas investigated. Based on the results of the 2021 investigation, the above noted site conditions/uses are not recognized environmental conditions (RECs). No other on-site RECs, HRECs, or CRECs were identified during the conduct of this Phase I ESA. However, to protect on-site workers during grading, Mitigation Measure HAZ-3 has been incorporated into the Proposed Project.

The Phase I ESA identified minor amounts of hazardous materials present on site for use by the car detailing business and the minor staining observed on the interior concrete pavement in various areas of the former auto repair areas and on the exterior asphalt parking area are considered de minimis conditions. The former use of the site as an auto repair shop with the storage of hazardous substances in aboveground storage tanks (ASTs) and the presence of hydraulic hoists are of potential environmental concerns. However, these concerns were assessed in 2021, and as such, there appears to be no significant impact on subsurface soil and soil vapor beneath the site by former hazardous substance use related to the former auto repair businesses on the site nor by the use and presence of the hydraulic hoists.

Additionally, no off-site RECs were identified in the immediate vicinity of the Proposed Project Site according to the Phase I and the site inspection conducted on February 15, 2022. No additional environmental assessment or active remediation appears required at this time for the site. It is, however, recommended that due to the occurrence of PCE concentrations in soil vapor as demonstrated from the most recent investigations conducted in 2021, a soil vapor intrusion barrier with a venting system be installed. Therefore, MM-HAZ-4 would be implemented as part of the Proposed Project.

A less than significant impact with mitigation would occur. With the implementation of the Mitigation Measures HAZ-1 through HAZ-4, the Proposed Project would not create a significant hazard to the public or the environment. Therefore, impacts associated with a hazardous materials site would be less than significant with mitigation.

MM-HAZ-1 The following are some simple practices that would be included in the Proposed Project and implemented on site:

- Keep potential sources of pollution out of the rain as practicable (e.g., inside a building, covered with plastic or tarps, or sealed tightly in a leak-proof container).

- Clearly identify a protected, lined area for concrete truck washouts. This area should be located away from streams, storm drain inlets, or ditches and should be cleaned out periodically.
- Park, refuel, and maintain vehicles and equipment in one area of the site to minimize the area exposed to possible spills and fuel storage. This area should be well away from streams, storm drain inlets, or ditches. Keep spill kits close by and clean up any spills or leaks immediately, including spills on pavement or earthen surfaces.
- Practice good housekeeping. Keep the construction site free of litter, construction debris, and leaking containers. Keep all waste in one area to minimize cleaning.
- Never hose down paved surfaces to clean dust, debris, or trash. This water could wash directly into storm drains or streams. Sweep up materials and dispose of them in the trash. Never bury trash or debris!
- Dispose of hazardous materials properly

MM-HAZ-2 A California Division of Occupational Safety and Health (DOSH/Cal-OSHA) Certified Asbestos Consultant should be contracted to conduct monitoring and clearance of any removal/abatement of Asbestos-Containing Materials/Asbestos-Containing Construction Materials (ACMs/ACCMs) and materials containing asbestos.

MM-HAZ-3 To protect construction workers contact or ingestion of contaminated soils during grading, the following note shall be placed on grading plans prior to issuance of grading permits: "Disposable gloves shall be worn by personnel who need to have contact with contaminated soil during grading and excavation. Consideration shall be given to the requirement for tear resistant gloves; Overalls shall be worn if there is the potential for contaminated soil to contact other parts of the body (legs, arms etc.); Boot covers shall be worn by personnel who need to traverse contaminated soils during grading and excavation or washable boots worn with a boot wash in place and utilized."

MM-HAZ-4 A soil vapor intrusion barrier with a venting system shall be installed beneath proposed future residential buildings located on the Site, in accordance with Regional Water Quality Control Board (RWQCB), the Department of Toxic Substances Control (DTSC).

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The Proposed Project Site is not located within a quarter mile of an existing or proposed school. Additionally, any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, State, and local agencies and regulations,

including the USEPA, the DTSC, the California OSHA, Caltrans, the Resource Conservation and Recovery Act, and the SCAQMD. Therefore, impacts associated with the emitting or handling of hazardous materials within 0.25 miles of a school would be less than significant.

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

Less Than Significant with Mitigation Incorporated. California Government Code, Section 65962.5, requires the compiling of lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. A review of known electronic database listings for possible hazardous waste generating establishments, as well as sites with known environmental concerns was conducted. Facilities were identified by county, State, or federal agencies that generate, store, or dispose of hazardous materials. The Proposed Project area has two sites located on the State of California Hazardous Waste and Substances Site List pursuant to Government Code, Section 65962.5. DTSC EnviroStor database was accessed. Two sites, Jack in the Box (Parcel 10) and the former Brian Chuchua Jeep dealership (Parcel 9), were the subject of investigations for leaking underground tank leaks (SWRCB 2022). Both cases have been closed in conformance with State law and were overseen by the Orange County Local Oversight Program (Orange County LOP) and no further action is deemed necessary. Additionally, the Phase I prepared for the Proposed Project identified that no additional environmental assessment or active remediation appears required at this time for the Site. With the implementation of the Mitigation Measures HAZ-1 through HAZ-3 described above, the Proposed Project would not create a significant hazard to the public or the environment. Therefore, impacts associated with a hazardous materials site would be less than significant with mitigation.

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

No Impact. There are no private or public airports located within 2 miles of the Proposed Project area. The closest airport is Fullerton Municipal Airport, about 5.5 miles to the west of the Proposed Project Site. The Proposed Project would not alter air traffic patterns or encourage future developments that could conflict with established Federal Aviation Administration (FAA) flight protection zones. Therefore, the Proposed Project would not result in safety hazards from proximity to airports for people living in the Proposed Project area or excessive noise for people residing or working in the Proposed Project area. No impact will occur.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. As mentioned in the City General Plan, the Proposed Project would be required to comply with the City of Placentia Emergency Operations Plan. The plan provides a strategy for the City's planned response to emergency situations. The City's General Plan Safety Element shows evacuation routes for the City (City of Placentia 2019). According to the Safety Element, the City of Placentia has elected to provide pre-designated evacuation routes and Transportation Assembly Points (TAPs) for members within or traveling through the community. TAPs are pre-designated locations for members of the community who may not have access to adequate transportation, require special assistance, have access and/or functional needs; and/or they are, or are with, an unaccompanied minor(s). TAPs are provided to ensure that equal access to evacuation transportation is provided to all members of the community. Without diversified methods of evacuation, the most vulnerable populations will not have adequate access to services and safety afforded to members of the community with private, functioning methods of transportation; therefore, the TAPs have been strategically located throughout the City to allow for all members of the community to have access to these resources.

The Proposed Project is not located along any of the City's evacuation routes or identified TAPs identified in the City's General Plan. Additionally, the Proposed Project would not alter the surrounding roadways that would interfere with emergency response in the Proposed Project area. Due to the Proposed Project's local and regional connectivity, in the unlikely event of an emergency, the Proposed Project-adjacent roadway facilities would be expected to serve as emergency evacuation routes for first responders and residents. The Proposed Project is infill development on an already developed site and would not block existing roads or alter traffic patterns on adjacent streets. The Proposed Project would provide emergency access to the site via W. Orangethorpe Avenue and S. Placentia Avenue. The Proposed Project would not adversely affect operations on the local or regional circulation system, and as such, would not influence the use of these facilities as emergency response routes. A less than significant impact will occur.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Proposed Project Site is located within an urbanized area of the City of Placentia and is not located within a fire hazard zone, as identified on the latest Fire Hazard Severity Zone (FHSZ) maps prepared by the California Department of Forestry and Fire Protection (CAL FIRE 2020). There are no wildland conditions in the urbanized area that the Proposed Project Site is located. No impact will occur.

2.4.11 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
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?	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. As discussed in the General Plan EIR, there are three sources of activities that can degrade water quality within the City. The first is municipal wastewater generation, the second is direct discharges for industrial operations or accidental spills, and the third is from nonpoint sources related to stormwater discharges in the City. The City and Orange County Water District (OCWD) require new development, as well as possible future redevelopment projects, to fund new sewer connections and pay for connection to the Regional Water Reclamation Facility (RWRF). There are no industrial operations proposed. Regarding accidental spills, the City and County fund response teams to remediate spills and the generator of an accidental spill can be charged for cleanup activities. As in the case of municipal

wastewater management, the existing systems in place and implementation of the General Plan goals and policies, ensure that direct discharges of pollutants from industrial facilities or from accidental spills will not cause significant adverse water quality degradation.

Construction

Construction of the Proposed Project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the Proposed Project Site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater. The California Green Building Code (CALGreen) requires the implementation of stormwater controls and development of a SWPPP for projects less than one acre to minimize the amount of sediment and other pollutants from being discharged in stormwater runoff during construction, as well as various temporary BMPs designed to prevent erosion and siltation, as well as the off-site conveyance of various on-site constituents. The Proposed Project would also be required to be consistent with all chapters of the City's General Plan and all applicable federal, State and local water quality standards and regulations. Therefore, construction impacts associated with water quality standards will be less than significant.

Operation

Once operational, the Proposed Project Site would be developed with 248 residential units, up to 3,000 square feet of commercial uses, related amenity uses, private and common open space uses, and a parking structure, and associated paved parking areas. Collectively, these on-site areas would reduce the potential for soil erosion and topsoil loss. The structural and paved improvements would occur on impervious areas lacking any exposed soils. According to the Preliminary Water Quality Management Plan (PWQMP) prepared for the Proposed Project, the impervious area will be reduced by approximately 14 percent due to the existing imperviousness percentage being around 95 percent and the proposed imperviousness percentage being 81 percent. The reduction in impervious surface for the Proposed Project combined with an area drain system and longer time of concentration result in less runoff from the site in the 2-year storm event The required project-specific Water Quality Management Plans (WQMP), preliminary and/or final, to be prepared consistent with the prevailing terms and conditions of the City's Local Implementation Plan (LIP), Orange County Drainage Area Management Plan (OC DAMP), and Model WQMP at the time of project application, would ensure that hydrology and water quality impacts are less than significant. Moreover, as part of project design features, low impact development (LID) and water quality treatment solutions would be prescribed in the project specific WQMP to improve water quality. NPDES Municipal Stormwater Permits require

new development and significant redevelopment projects to incorporate post-construction BMPs to comply with the local Standard Urban Stormwater Mitigation Plan (SUSMP) or WQMP to reduce the quantity of rainfall runoff and improve the quality of water that leaves a site. As required by the RWQCB, the Proposed Project would be required to minimize the short and long-term impacts on receiving water quality from new developments and significant re-developments through submittal of a WQMP, emphasizing implementation of LID principles and addressing hydrologic conditions of concern, prior to issuance of any grading or building permits. These requirements would ensure that adequate BMPs would be implemented to ensure that violation of any water quality standards or waste discharge requirements do not occur. See Appendix E, Preliminary Water Quality Management Plan.

b. Would the project 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 Proposed Project is within the service boundaries of, and would be served by, the Golden State Water Company (GSWC). According to the City's General Plan EIR, groundwater represented an average of 44 percent of the total water supply to the Placentia-Yorba Linda System and the remainder was provided by imported water from the Municipal Water District of Orange County (MWDOC). GSWC operates several groundwater wells within the Orange County Groundwater Basin. The Basin is managed by the OCWD, which regulates the amount of groundwater pumped from the Basin and sets the Basin Production Percentage for all pumpers, including GSWC. The Proposed Project will require the use of water for dust suppression during project demolition, grading and construction. The amount of water that will be required to control dust during grading and construction will be minimal and not significantly impact existing groundwater supplies. Once completed, the Proposed Project will require potable water to serve the residential and commercial uses, water the landscaping and provide required fire flow. Additionally, the City is a highly urbanized community with the water system infrastructure fully in place to accommodate future development consistent with the General Plan and Specific Plan 5. Therefore, impacts associated with groundwater supplies will be less than significant.

The Proposed Project involves the construction of 248 residential units, up to 3,000 square feet of commercial uses, related amenity uses, private and common open space uses, and a parking structure as well as associated paved parking areas. The Proposed Project Site is not considered an important location for groundwater recharge. Additionally, as discussed in the General Plan EIR, given the new LID BMPs that are required to be implemented on these properties when proposed for development, the potential for reducing recharge is considered minimal. As presented in the Project Preliminary WQMP, the Proposed Project would also install a system to capture and filter stormwater underground of up to 80 percent average annual capture efficiency

without depleting or interfering with groundwater levels. Also note that implementation of LID BMPs would actually increase on-site retention of runoff and increase groundwater recharge. The Proposed Project would not substantially impair groundwater recharge necessary to replenish the City's water supply; thus, impacts related to groundwater recharge will be less than significant.

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

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

Less Than Significant Impact. There are no streams or rivers located on or near the Proposed Project Site.

Construction

Temporary soil disturbance would occur during project construction, due to earthmoving activities such as excavation and grading. This would loosen sediment and could expose on-site soils to erosion or siltation. However, as previously mentioned, the SWPPP is required for plan check and approval by the City's Public Works Department, prior to provision of permits for the Proposed Project, and would include construction BMPs to reduce erosion or siltation. Typical BMPs for erosion or siltation, include use of silt fencing, fiber rolls, gravel bags, stabilized construction driveway, and stockpile management.

Operation

The Proposed Project Site is located within a developed area, with industrial and commercial developments to the east and low-density residential development to the south. Additionally, as described in the General Plan EIR, the drainage system for the City has been installed and future development will deliver flows to the adjacent roadways and into this existing drainage system. Therefore, development of the Proposed Project would not alter the existing drainage pattern in the Proposed Project area and would not result in substantial erosion or siltation on- or off-site. Impacts would be less than significant. As mentioned previously and described in the Preliminary WQMP, the reduction in impervious surface for the Proposed Project combined with an area drain system and longer time of concentration result in less runoff from the site A less than significant impact will occur.

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. Construction activities would entail demolition, grading, excavation, and other ground-disturbing activities, which could temporarily expose on-site soils to erosion or siltation. However, the Proposed Project would comply with existing local, State,

and federal regulations related to drainage and runoff. According to the Preliminary WQMP, the Proposed Project drainage includes building runoff being collected by roof drains and tied to the storm drain, collecting runoff from the rest of the property. Runoff will be conveyed via surface flow and piping to modular wetland systems for propriety biotreatment before being discharged off the site. The Proposed Project Site is split into two drainage areas, the first being 2.38 acres consisting of the northern portion of the Proposed Project Site, which is the tributary area to an 8x16' Modular Wetland System that lies along the western property line. The other drainage area is at the southern end of the Proposed Project Site and is a 0.34 acres tributary area to a 4x4' Modular Wetland System that is along a wall near the retail space at the southern corner of the Proposed Project Site. As such, the Proposed Project would not result in flooding on or off site. Additionally, the Proposed Project would be required to comply with the NPDES Construction General Permit, which would require implementation of BMPs and erosion control measures, thereby reducing the effects of construction activities on erosion and drainage patterns. According to the PWQMP prepared for the Proposed Project, the impervious area will be reduced by approximately 14 percent due to the existing imperviousness percentage being around 95 percent and the proposed imperviousness percentage being 81 percent, resulting in less runoff on site. Additionally, the Proposed Project would redevelop an already disturbed and developed area and therefore would not substantially increase the rate or amount of surface runoff in a manner, which would result in a flooding on or off-site. A less than significant impact will occur.

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. The Proposed Project occurs on an urbanized area that is already highly impervious. The Proposed Project would not adversely affect provision for retention and infiltration of stormwater consistent with the City's LID policies. As mentioned, the Proposed Project would actually result in a reduction of imperviousness and therefore would result in less runoff on site. Additionally, the Proposed Project would comply with existing local, State, and federal regulations related to drainage and runoff. A less than significant impact will occur.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The Proposed Project Site does not contain any streams or rivers having the potential to be altered by the Proposed Project. The Proposed Project Site has been previously graded and is located within a highly urbanized area. Additionally, the Federal Emergency Management Agency (FEMA) produces maps (Flood Insurance Rate Map) that identify areas that are located in flood zones. The flood map for the area is number 06059C0132J. The Proposed Project area is within Zone X (FEMA 2009). A less than significant impact will occur.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. Tsunamis are seismic sea waves generated by sudden movements of the sea floor caused by submarine earthquakes, landslides, or volcanic activity. The tsunami inundation area nearest to the Proposed Project Site is in the Bolsa Chica Channel and extends upstream to the Barber City Channel confluence, near the intersection of Bolsa Chica Road and Rancho Road in the City of Westminster approximately 13.5 miles southwest of the Proposed Project Site. Seiches are waves that oscillate in enclosed water bodies, such as reservoirs, lakes, ponds, or semi-enclosed bodies of water. Seiches may be triggered by moderate or large submarine earthquakes or by large onshore earthquakes. The former Anaheim Union Reservoir is the nearest waterbody to the Proposed Project Site in which a seiche could form; however, as discussed previously, the Proposed Project Site is outside of the flood hazard zone mapped for this waterbody No significant impacts from an earthquake-induced seiche would occur. Mud and debris flows are mass movements of dirt and debris that occur after intense rainfall, earthquakes, and severe wildfires. The speed of a slide depends on the amount of precipitation and steepness of the slope.

The City of Placentia, and therefore, the Proposed Project lies outside of a zone influenced by the inundation of seiche, tsunami, or mudflow. A less than significant impact will occur.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Proposed Project Site is located within the jurisdiction of the Santa Ana RWQCB Basin Plan. Construction activities would comply with applicable requirements of the Santa Ana RWQCB, including compliance with Stormwater Pollution Prevent Plan-mandated BMPs. Compliance with regional and local regulations related to water quality control plans would reduce potential water quality impairment of surface waters. Therefore, the Proposed Project would not conflict with a water quality control plan or sustainable groundwater management plan. A less than significant impact will occur.

2.4.12 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Impact Analysis

a. Would the project physically divide an established community?

No Impact. The Proposed Project would allow for the demolition of the existing car dealership and auto repair structures and the new construction and operation of a five-story mixed use project that would include 248 residential units, up to 3,000 square feet of commercial uses, related amenity uses, private and common open space uses, and a 7-level parking structure at the northeast corner of the Proposed Project Site. The Proposed Project would be located in an already urbanized area which is visually dominated by commercial and industrial land uses with residential uses south of the Proposed Project. The Proposed Project would not directly or indirectly divide any established community as no existing neighborhood or community exists on site; existing residential uses would remain to the south; and existing commercial and industrial uses would remain to the east, north and west. The Proposed Project would create cohesion with other residential and commercial uses in the area while creating visually attractive and compatible uses.

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

Less Than Significant Impact. The Proposed Project Site has an existing General Plan land use designation, and a zoning designation of Specific Plan 5 permitting motor vehicle dealerships and hospitality uses for Parcel 9 of the Proposed Project Site. The Proposed Project would modify the Specific Plan 5 project area to also include mixed uses in addition to the existing permitted uses and would include a General Plan Amendment. The General Plan Amendment would modify the City of Placentia General Plan to incorporate Mixed Use (Residential-Commercial) as an allowable land use category within the Land Use Element tables and footnotes for Specific Plan 5. As such, there would be no inconsistency with the General Plan, including the Land Use Element since the General Plan would be amended to accommodate the land use characteristics of the Project. The density that the Project proposes would be similar to the density that the City permits within the TOD designation. Recently, the City adopted the

2021 to 2029 Housing Element (City Council Resolution No. R-2022-16). As shown in Housing Element Table 2-3 – Regional Housing Needs Assessment, 2021-2029 the City has a Regional Housing Needs Assessment (RHNA) allocation of 4,398 dwelling units. As of June 2023, the City has permitted only 185 dwelling units, or approximately 4.2 percent of its required RHNA allocation. See https://www.hcd.ca.gov/planning-and-community-development/housing-open-data-tools/housing-element-implementation-and-apr-dashboard. Additionally, the Housing Element recognizes one of the constraints for housing development are local processing and permit procedures. "Considerable holding costs can be associated with delays in processing development application and plans. Three levels of decision-making bodies govern the review process in Placentia: The Zoning Administrator, the Planning Commission and the City Council." Housing Element, p. 3-32. The Housing Element describes the Development Plan Review process that would be applicable to the Project. As stated on p. 3-32 of the Housing Element, minimum standards for Development Plan Review would need to be met through the entitlement process. As such, the Project would assist the City in achieving Housing Element compliance.

The Specific Plan Amendment would modify Specific Plan 5 to permit Mixed Use (Residential-Commercial) as a permitted use on "Parcel No. 9" and establish development standards for mixed use projects. This would include new objective standards, such as a new allowable density added to the Specific Plan of 65 to 95 dwelling units per acre. There are residential uses directly south of the Project Site and commercial uses to the west. The modified zoning designation and proposed residential and retail uses would be compatible with development patterns in the area, as described in the previous response. Thus, impacts related to conflict with a policy adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant. The Proposed Project Site and surrounding area are urbanized and do not support any sensitive habitat and/or species that are protected by an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or State habitat conservation plan (USFWS 2022). A textual change to the Zoning Code is necessary for the Proposed Project to modify the Specific Plan imbedded therein as residential uses and a parking structure are not currently permitted uses under the existing Specific Plan. The modification to the previous approval would require textual changes to the recently amended Specific Plan within the Zoning Code to enable the Proposed Project. The Proposed Project would be subject to visual and aesthetic requirements as a result of the proposed Zoning Code and General Plan Amendment. Development of the Proposed Project Site would not conflict with local, regional, or State resource preservation and/or conservation policies. A less than significant impact will occur.

2.4.13 Mineral Resources

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

Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Proposed Project is located within a fully urbanized City of Placentia. As discussed in the General Plan EIR, the City does not contain any known important mineral resources other than existing oil wells which are not located proximate to the Proposed Project Site. The Proposed Project does not propose any alteration of local mineral resource land uses and there are no mineral resource activities that would be altered or displaced by Proposed Project implementation. No impact will occur.

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

No Impact. The Proposed Project Site is not a locally important mineral resource recovery site according to maps obtained through the California Department of Conservation and CGS. Therefore, implementation of the Proposed Project would not result in the loss of availability of a locally important mineral resource. No impact will occur.

2.4.14 Noise

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

Impact Analysis

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

Less Than Significant Impact. The California Department of Transportation defines "noise" as sound that is loud, unpleasant, unexpected, or undesired. Sound pressure levels are quantified using a logarithmic ratio of actual sound pressures to a reference pressure squared, called "bels." A bel is typically divided into tenths, or decibels (dB). Sound pressure alone is not a reliable indicator of loudness because frequency (or pitch) also affects how receptors respond to sound. To account for the pitch of sounds and the corresponding sensitivity of human hearing to them, the raw sound pressure level is adjusted with a frequency-dependent A-weighting scale that is stated in units of decibels (dBA) (Caltrans 2013).

The City of Placentia's General Plan lists sensitive receptors as locations where human populations (especially children, senior citizens, and sick persons) are present, and where there is a reasonable expectation of lower levels of human exposure to noise. Current land uses located within the City of Placentia that are sensitive to intrusive noise include residential uses, schools, libraries, hospitals, churches, and parks. Additionally, the City's Municipal Code has noise controls that are applicable to the Proposed Project. The Proposed Project Site and surroundings are developed within an existing urban environment, the nearest residential uses/sensitive receptors to the Proposed Project Site exist to the south, approximately 120 feet from the Proposed Project.

According to the City's General Plan, the predominant source of noise in the City is vehicular traffic. The City's General Plan Noise Element reports results of traffic noise modeling of 24-hour average noise levels (as dBA CNEL) at 100 feet from the centerlines of roadway segments throughout the City in 2040. The Proposed Project Site is located at the intersection of S. Placentia Avenue and W. Orangethorpe Avenue. According to the City's General Plan Noise Element, the Proposed 2040 General Plan Conditions for the Placentia Avenue Orangethorpe Avenue to Crowther Avenue roadway segment is 66.4 dBA at 100 feet from the roadway centerline. Existing conditions for the segment according to the Noise Element is 65.4 dBA at 100 feet from the roadway centerline.

Noise ordinance limits generally apply to "stationary" sources such as mechanical equipment or vehicles operating on private property. Applicable noise standards must be met at the nearest residential property line. For residential use, the noise standard is 55 dBA daytime and 50 dBA nighttime. For commercial use, the noise standard is 65 dBA.

The General Plan Noise Element has the following applicable goals and associated policies for addressing noise issues in the community:

- **Goal N-1:** Reduce noise impacts from transportation noise sources.
  - **Policy N-1.3:** Enforce all applicable City, State, and federal noise standards.
- **Goal N-2:** Incorporate noise considerations into land use planning decisions.
  - **Policy N-2.1:** Land use planning decisions should be guided by the "normally acceptable" and "conditionally acceptable" community noise exposures, as established by the Office of Planning and Research and shown on Table 5 [of the City's Noise Element].
  - **Policy N-2.2:** Require noise-reduction techniques and mitigation measures in site planning, architectural design, and construction where new projects do not meet the land use compatibility standards in Table [8-5].
  - **Policy N-2.3:** Discourage and, if necessary, prohibit the exposure of noise-sensitive land uses to noisy environments. Incorporate noise-reduction features during site planning to mitigate anticipated noise impacts on affected noise-sensitive land uses.
  - **Policy N-2.5:** Require proposed development and building projects to demonstrate compliance with the Noise Element and Noise Ordinance prior to project approval. Inform building permit applicants of the relevant sections of the Noise Element and Ordinance.

- **Goal N-3:** Minimize noise spillover from commercial uses into nearby residential neighborhoods.
  - **Policy N-3.1:** Require adherence to City and State exterior noise requirements, specifying exterior and interior noise levels.
  - **Policy N-3.6:** Require adherence to City and State building codes that specify indoor noise levels.
- **Goal N-5:** Develop measures to control objectionable noise impacts.
  - **Policy N-5.3:** Where possible, resolve existing and potential conflicts between various noise sources and other human activities.
  - **Policy N-5.4:** Require sound attenuation devices on construction equipment.
  - **Policy N-5.5:** Encourage additional sound attenuation measures to reduce noise impacts to sensitive uses.
  - **Policy N-5.7:** Require construction activity to comply with City Noise Ordinance. Ensure adequate noise control measures at all construction sites through good sound attenuation practices.

Relevant case law indicates that impacts of the existing environment on a project are not considered an impact under CEQA. However, to ensure consistency with the City's General Plan Policy N-2.2 above, the following condition of approval shall be incorporated into the Proposed Project:

> To ensure consistency with General Plan Policy N-2.2, the Proposed Project shall incorporate the following noise-reduction techniques:
>
> - Sound insulating windows would be required to reduce the interior noise levels to less than 45 dBA CNEL, where exterior noise levels exceed 60 dBA CNEL.
> - All windows and patio doors shall be double-paned insulated window assembly with a minimum 25 dBA OITC (Outdoor to Indoor Transmission Class).
> - Exterior doors (if facing the S. Placentia Avenue or W. Orangethorpe Avenue) shall be solid core with a full set of acoustic seals.
> - If necessitated by the architectural design of a structure, special insulation or design features shall be installed to meet the required interior ambient noise level.
> - All multi-family recreation areas shall be located on the interior of the project away from S. Placentia Avenue or W. Orangethorpe Avenue.

To the extent that the foregoing applies to the Proposed Project, the Proposed Project design and operational characteristics are compatible with the Noise Element's goals, objectives and policies. Additionally, the Proposed Project would comply with the regulations set forth in the City of Placentia's Municipal Code. The City of Placentia's regulations with respect to noise are

included in Municipal Code, Chapters 10.32 (Noise), 23.76 (Noise Control), and 23.81 (General Regulations and Exceptions).

Construction

Future construction activities related to the provisions of this Proposed Project could involve various types of short-term noise impacts from trucks, earthmoving equipment, and paving equipment. However, all construction activities and land use operations must be performed in compliance with the City's Municipal Code. Construction of the Proposed Project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction phase, distance between the noise source and receiver, and intervening structures. Sound levels from typical construction equipment range from 76 dBA to 88 dBA Leq at 50 feet from the source (FTA 2018). Noise from construction equipment generally exhibits point source acoustic characteristics. Strictly speaking, a point source sound decays at a rate of 6 dBA per doubling of distance from the source. The rule applies to the propagation of sound waves with no ground interaction.

Section 23.81.170 (Grading, construction and maintenance of real property) of the Chapter 23.81 (General Regulations and Exceptions) is the relevant ordinance controlling construction noise for the City of Placentia. According to the Section 23.81.170, all grading of any real property shall be permitted only between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, and between the hours of 9:00 a.m. and 6:00 p.m. on Saturday, and shall be prohibited at any time on Sunday and on all federal holidays, unless other hours are approved by the chief building official or city engineer upon receipt of evidence that an emergency exists which would constitute a hazard to persons or property.

Operation

Project implementation would not alter the noise provisions or exempt any future land uses or improvements from local noise controls. The normal activities associated with the Proposed Project are anticipated to include roof-top mechanical ventilation equipment, parking vehicle movements, and outdoor open space activity. Project-related stationary-source noise levels at the nearby sensitive receiver locations will satisfy the City of Placentia exterior noise level standards. On-site noise generation would be consistent with nearby land uses. The local noise standards would continue to regulate all future land use construction and operational noise levels. Additionally, as discussed in the General Plan EIR, the Noise Element includes policy that requires construction activity to comply with City Noise Ordinance and would ensure that adequate noise control measures are implemented at all construction sites through good sound attenuation practices. Impacts will be less than significant.

According to the Transportation Study prepared by RK Engineering Group, Inc., the Proposed Project is projected to generate 2,016 daily trips. In order to increase the existing noise levels by 3 dBA, which would be considered significant, the existing traffic volume would need to be doubled. The General Plan EIR determined that existing ADT for the S. Placentia Avenue Orangethorpe Avenue to Crowther Avenue roadway segment was 17,400. The Proposed Project would only increase traffic volumes on this segment by approximately 12 percent, which represents less than a 1 dB increase in noise volume, which is not detectable to the human ear. Therefore, the Proposed Project would not result in a substantial dBA increase and therefore would not result in a significant increase with regard to noise. Additionally, as previously discussed, the Proposed Project would comply with the City of Placentia's regulations with respect to noise as detailed in Municipal Code, Chapters 10.32 (Noise), 23.76 (Noise Control), and 23.81 (General Regulations and Exceptions). Impacts would be less than significant.

b. Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. A significant impact would occur if project construction or operation results in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Excessive groundborne vibration is typically associated with activities such as blasting used in mining operations, or the use of pile drivers during construction. The primary concern associated with groundborne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of groundborne vibration are trains, and construction activities such as blasting, pile driving, and heavy earthmoving equipment. The Proposed Project would be constructed using typical construction techniques and would be short term in nature.

No pile driving for construction is anticipated. The Proposed Project would be constructed using typical construction techniques and would be short term in nature. Due to the intervening width of W. Orangethorpe Avenue and the distance to sensitive receptors, any potential vibration impact would be below the Federal Transit Administration's vibration impact thresholds. Thus, significant vibration impacts would not occur. Additionally, project implementation would occur in compliance with local noise and vibration controls. A less than significant impact will occur.

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. No airport land use plans apply to the area, and the Proposed Project is not located within 2 miles of an airport. The closest airport is Fullerton Municipal Airport, about 5.5 miles to the west of the Proposed Project Site. The Proposed Project falls outside any airport's noise

contours for excessive noise. Therefore, residents or workers would not be exposed to excessive airport noise levels. No impact will occur.

2.4.15 Population and Housing

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

Impact Analysis

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

Less Than Significant Impact. The U.S. Census Bureau data provides that in 2019 there were 16,583 housing units within the City of Placentia. The average household size within the City was 3.09 persons per household. The City of Placentia is anticipated to grow by 6,600 residents and 2,200 housing units between 2016 and 2045 (SCAG 2020). The Proposed Project's service population was calculated by taking the Proposed Project residential population calculated in CalEEMod of 744 persons and adding the retail employee service population of 7 persons. The employee service population was calculated from the jobs per square-footage information published by SLO County Air Pollution Control District (2012). This would result in a population of 751 persons. This would result in approximately a 1.5 percent increase in population which is not considered a substantial direct increase because it is within the anticipated growth rate and consists of an infill development within an urban area that would be served by existing infrastructure. In addition, indirect growth is related to the expansion of infrastructure, such as water, sewer or street systems that would serve areas beyond the proposed development. As described previously, the Proposed Project would be served by existing infrastructure that the Proposed Project would connect to.

Additionally, the City's General Plan Housing Element has identified the need to locate housing near transportation, employment and services. Program HE-1.2 of the Housing Element specifically mentions that the City should encourage and coordinate affordable housing and multi-family housing near transportation options, major employment centers and services. As noted earlier, the Proposed Project Site is located less than ½ mile walking distance to the intersection of OCTA Lines 30 and 57. Further, the Proposed Project Site is located less than one mile away from the proposed Placentia Metrolink train station (projected to open in 2025)

located at Crowther Avenue and Melrose Street.[5] "Once constructed, this will be the 13th station serving the 91 line, which will run from Los Angeles Union Station to downtown Riverside. The Placentia Metrolink station will be the closest station in proximity to Cal State Fullerton and will provide passengers with an alternative to the Fullerton Metrolink station."[6] According to the Orange County Register, it is anticipated that the under construction station would be completed in 2024.[7] Cal State Fullerton has more than 35,000 students,[8] and is located less than 1.25 miles to the north from the Proposed Project Site, providing and the Project would provide housing opportunities for staff, faculty, and students close to the school. The Proposed Project proposes to develop retail services which would provide a means for employment and multi-family residential housing. Program HE-1.8 of the City's Housing Element states that through the RHNA process, the City has been assigned a total housing need of 4,398 dwelling units in the 2021–2029 time frame. Therefore, the Proposed Project would not result in inducement of substantial population growth, either directly or indirectly, and impacts would be less than significant. The Proposed Project would not displace any existing housing or necessitate the construction of housing elsewhere. A less than significant impact will occur.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Proposed Project would not displace any existing housing or necessitate the construction of housing elsewhere. No impact will occur.

5 See https://www.placentia.org/705/Metrolink-Station-and-Parking-Structure, accessed April 10, 2023.
6 Id.
7 https://www.ocregister.com/2020/01/06/murals-construction-are-revitalizing-placentias-downtown-and-historic-area/ accessed June 20, 2023.
8 See https://www.usnews.com/best-colleges/california-state-university-fullerton-137#:~:text=Overview,campus%20size%20is%20236%20acres, accessed April 10, 2023.

2.4.16 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Impact Analysis

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

Fire protection?

Less Than Significant Impact. Placentia Fire and Life Safety Department provides fire protection and emergency medical response services in the City of Placentia. The primary mission of the Department is the delivery of life safety services. The Department provides 24-hour emergency response to a wide variety of critical situations, including fires, medical emergencies, accidents, and miscellaneous public assistance requests. Fire services are provided at two fire stations including: Fire Station 1: 110 South Bradford Avenue, and Fire Station 2: 1530 North Valencia Avenue. The Proposed Project would be subject to fire code review during the building plan check process. Additionally, as discussed in Section 2.4.15(b), Population and Housing, the Proposed Project would result in a 1.5 percent increase in population which is not considered a substantial direct increase because it is within the anticipated growth identified in the adopted General Plan and consists of an infill development within an urban area. Although the Proposed Project would potentially result in a slight increase in calls for service to the Proposed Project Site in comparison to the existing conditions, as previously indicated, this increase is expected to be nominal and not to result in the need for new facilities. Additionally, the Placentia Fire & Life Safety Department FY 2020–21 Inaugural Report does not identify a need for additional

facilities to serve the projected population. The Fire Master Plan and Fire Flow Analysis have been reviewed for code compliance and were approved on August 30, 2023 (See Appendix K). Conditions were included upon review of the Proposed Project with which the Project would comply. These conditions include: fire sprinkler flow and system requirements; Class I standpipe requirements; firefighter access tunnel requirements; KNOX emergency key box requirements; suite number and address requirements; fire extinguisher requirements; and emergency parking zone designations. Overall, it is anticipated that the Proposed Project would be adequately served by existing facilities, equipment, and personnel. The payment of applicable development impact fees, and would specifically comply with 5.02.050 Public safety impact fees as identified in the City's Municipal Code, the implementation of fire suppression measures in compliance with City Fire codes, and proximity to existing Fire Station #1 (located at 110 South Bradford Avenue, approximately 1.5 miles from the Proposed Project Site) will ensure that impacts to fire safety service will be less than significant.

Police protection?

Less Than Significant Impact. Police protection services in the City are provided by the Placentia Police Department (PPD), headquartered at 401 East Chapman Avenue. As discussed in Section 2.4.15(b), the Proposed Project would not induce substantial population growth in the City. Although the Proposed Project would potentially result in a slight increase in calls for service to the Proposed Project Site in comparison to the existing conditions, this increase is expected to be nominal and not to result in the need for new police facilities. The PPD Strategic Plan 2021–2023 does not identify a need for additional facilities to serve the projected population at General Plan buildout. The payment of applicable development impacts fees, and would specifically comply with 5.02.050 Public safety impact fees as identified in the City's Municipal Code, implementation of safety, lighting and defensible space measures as well as proximity to the Police Station (located at Civic Center less than 2 miles from the Proposed Project Site, will ensure that impacts to police protection services will be less than significant.

Schools?

Less Than Significant Impact. The City is served by the Placentia-Yorba Linda Unified School District. Pursuant to the Leroy F. Green School Facilities Act (AB 2926), the Proposed Project would be required to pay developer fees prior to the issuance of building permits, at the current rate. This fee will help support provision of school services for the community as a whole. As previously mentioned, the Proposed Project would not induce substantial population growth in the City. This 1.5 percent increase in population is not considered a substantial direct increase because it is within the anticipated growth rate and consists of an infill development within an urban area that would be served by existing services. As such, a significant increase in school-age children requiring public education is not expected to occur, and there would be no need for the development of additional schools. However, pursuant to Government Code, Section 65995 et seq.

(which was passed as Senate Bill 50 in 1998), school districts may collect development fees. According to Government Code, Section 65996, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." A less than significant impact will occur.

Parks?

Less Than Significant Impact. Parks and recreational services are managed by the Community Services Department. The City has a total of 16 parks operated by the Community Services Department, including two parkettes, seven neighborhood parks, three community parks, three special use facilities, and one subregional park. The two closest parks to the Proposed Project Site are McFadden Park, approximately 0.5 miles southeast of the Proposed Project Site and Chapman Park, approximately 0.6 miles northwest of the Proposed Project Site. The Proposed Project would result in an increase in population, however, as previously stated, it would not induce substantial population growth in the City. Additionally, the Proposed Project includes over 6,000 square feet of amenity uses, 37,587 square feet of common open space uses, and 9,566 square feet of private open space uses. This would accommodate the population increase that would occur under the Proposed Project. Additionally, the Proposed Project would pay applicable development impact fees, and would specifically comply with 5.02.060 Park and recreation impact fees as identified in the City's Municipal Code. The Proposed Project would also be required to pay development impact fees. A less than significant impact will occur.

Other public facilities?

Less Than Significant Impact. No other impacts have been identified that would require the provision of new or physically altered governmental facilities. The Proposed Project would be subject to sewer, transportation, and stormwater impact fees. Additionally, as previously mentioned, the 1.5 percent population increase projected for the Proposed Project would not result in a significant increase in population in the city, and it is not anticipated that a substantial increase in patronage at libraries, community centers, and other public facilities would result. Nonetheless, availability and accessibility of electronic library services would reduce the need and demand for library facilities. Similarly, other municipal services are typically funded through user fees, property tax or sales tax revenues to which the future residents of the Proposed Project would contribute. A less than significant impact will occur.

2.4.17 Recreation

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

Impact Analysis

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

Less Than Significant Impact. As discussed in Section 2.4.15(b), the Proposed Project would not induce substantial population growth in the City. As such, the Proposed Project would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of recreational facilities would occur or be accelerated. The Proposed Project would also include over 6,000 square feet of amenity uses, 37,587 square feet of common open space uses, and 9,566 square feet of private open space uses that would accommodate the population increase resulting from the Proposed Project. The Proposed Project is proximate to many parks, the closest of which include McFadden Park (approximately 0.5 miles away from the Proposed Project Site), Chapman Park (approximately 0.6 miles away from the Proposed Project Site), Santa Fe Park (approximately 0.7 miles away from the Proposed Project Site). Additionally, due to the anticipated limited number of construction personnel, short-term impacts to local recreational facilities would not occur. Additionally, the Proposed Project would pay applicable development impact fees, and would specifically comply with 5.02.060 Park and recreation impact fees as identified in the City's Municipal Code. Therefore, substantial physical deterioration of these facilities would not occur or be accelerated with implementation of the Proposed Project. A less than significant impact will occur.

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

Less Than Significant Impact. The Proposed Project would create a larger demand for recreation uses than existing conditions. However, the Proposed Project includes over 6,000 square feet of amenity uses, 37,587 square feet of common open space uses, and 9,566 square feet of private

open space uses. These facilities would accommodate on-site recreational needs. Further, the physical impacts of the on-site recreational amenities have been analyzed herein in this IS/MND. The Proposed Project would also be required to pay respective development fees, it would specifically comply with 5.02.060 Park and recreation impact fees as identified in the City's Municipal Code. The Proposed Project would not include the construction or expansion of recreational facilities. A less than significant impact will occur.

2.4.18 Transportation

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

Impact Analysis

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. The following analysis is based off the Transportation Study by RK Engineering Group, Inc.; see Appendix G. In accordance with the Orange County Congestion Management Program (CMP), a traffic impact analysis is required for CMP purposes for all proposed developments generating 2,400 or more daily trips (or 1,600 daily trips for developments with direct access to a CMP Highway System link). Trip generation represents the amount of traffic that is attracted and produced by a development.

Trip generation is typically estimated based on the trip generation rates from the latest Institute of Transportation Engineers (ITE) Trip Generation Manual. The 11th Edition (ITE 2021) of the ITE Manual was utilized for this trip generation analysis. This publication provides a comprehensive evaluation of trip generation rates for a variety of land uses. Based on the ITE trip generation rates, the Proposed Project is forecast to generate approximately 1,835 daily trips. As shown in Table 10, Proposed Project Trip Generation Estimates, the Proposed Project is forecast to generate approximately 1,835 daily trips, including approximately 106 AM peak hour trips and approximately 146 PM peak hour trips. It should be noted, based on the NOCC+ VMT Traffic Study Screening Tool, which uses slightly different trip generation rates, the Proposed Project would generate 1,985 daily trips.

Table 10. Proposed Project Trip Generation Estimates

Land Use	Average Daily Trips
Proposed Project	
Multi-Family Housing (Low-Rise) (220)	1,672
Retail Shopping Center (822)	163
Proposed Project Total[1]	1,835

Notes:

[1] based on NOCC and VMT Traffic Study Screening Tool the number of daily trips would actually be 1,985

As shown in Table 11, Project Trip Generation, based on the ITE trip generation rates, the Proposed Project is forecast to generate approximately 1,835 daily trips, including approximately 106 AM peak hour trips and approximately 146 PM peak hour trips.

Table 11. Project Trip Generation

Trip Generation Rates									
			AM Peak Hour			PM Peak Hour			Daily
Land Use	Quantity	Units	In	Out	Total	In	Out	Total	Trips
Mutlifamily Housing (Low-Rise) (220)	248	DU	24	75	99	79	47	126	1,672
Retail Shopping Center (822)	3.00	TSF	4	3	7	10	10	20	163
		Total	28	78	106	89	57	146	1,835

Source: ITE 2021.

Notes: DU = dwelling units; TSF = Thousand Square Feet

The Proposed Project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Existing transit service in the City is provided by the OCTA. OCTA Route 30 travels along Orangethorpe Avenue within the City of Placentia. OCTA Route 57 travels along State College Boulevard and Bristol Street. These routes operate with a Monday through Friday headway of 5-27 minutes at Orangethorpe Avenue and State College Boulevard. A Class II bikeway is planned along the length of Orangethorpe where it traverses the City. Class II bicycle facilities are signed, and striped bicycle lanes located to the right of the vehicle traffic lane along a roadway. Bicycle lanes are typically located along collector and arterial roadways that provide connections through the City street system. Construction of the Proposed Project would not remove or alter the existing sidewalks, bicycle lanes, or transit service access. The Proposed Project would include sidewalks along the on-site roadways. The Proposed Project would not conflict with circulation or mobility plans related to transit. A less than significant impact will occur.

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

Less Than Significant Impact. Senate Bill (SB) 743 mandates that VMT replace LOS as the transportation metric under CEQA. As a result, the City of Placentia updated their Traffic Impact Analysis Guidelines (City of Placentia 2021) to reflect the appropriate VMT methodologies,

thresholds of significance, and feasible mitigation measures for CEQA documents. The California Governor's Office of Planning and Research (OPR) issued a Technical Advisory in December 2018 which described their recommended procedures and methodology for VMT analysis (OPR 2018). A key element of SB 743, signed in 2013, is the elimination of automobile delay and LOS as the sole basis of determining CEQA impacts. Pursuant to CEQA Guidelines, Section 15064.3, VMT is the most appropriate measure of transportation impacts.

Consistent with the recommendations of the City of Placentia TIA Guidelines, January 2021, screening thresholds may quickly identify whether or not a project should be expected to have a less than significant impact without conducting a detailed project-level assessment.

The following two types of screening criteria have been applied to screen the proposed project from a project-level assessment:

- Low VMT Area Screening
- Project Type Screening based on Local-Serving Uses

Low VMT Area Screening

Per the City of Placentia TIA Guidelines, residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.

Per the City of Placentia TIA Guidelines, the NOCC+ (North Orange County Collaborative) VMT Traffic Study Screening Tool may be used to identify if a project is in a low VMT-generating area.

Based on the NOCC+, the Proposed Project is expected to generate 24.4 VMT per service population, which is below the General Plan Buildout VMT Threshold of 29.2 VMT per service population.

As a result, the Proposed Project would screen out based on the Low VMT Area Screening criteria and may be presumed to have a less than significant impact on VMT under CEQA.

Project Type Screening based on Local-Serving Uses

Per the City of Placentia TIA Guidelines, some project types may be presumed to have a less than significant impact absent substantial evidence to the contrary. The following land uses are considered by the City to be local-serving in nature, and therefore can be screened out from project-level assessment:

- Local-serving K-12 public schools
- Local parks
- Day care centers
- Local-serving retail uses less than 50,000 square feet, including:
  - Gas stations
  - Banks
  - Restaurants
  - Shopping Center
- Local-serving hotels (e.g. non-destination hotels, 150 rooms or less)
- Student housing projects on or adjacent to college campuses
- Local-serving assembly uses (places of worship, community organizations)
- Community institutions (public libraries, fire stations, local government)
- Affordable, supportive, or transitional housing
- Assisted living facilities
- Senior housing (as defined by HUD)
- Projects generating less than 110 daily trips
  - To confirm whether a Project generates 110 daily trips or less, the analyst should refer to the NOCC+ tool

Additionally, the City's TIA Guidelines state that local-serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary, due to its effect of reducing vehicle travel by improving the convenience of shopping close to home.

The Proposed Project would contribute 3,000 square feet of commercial retail use. These retail land uses have been identified by the City as being local-serving and therefore having the presumption of a less than significant impact. As a result, the retail portion of the Proposed Project is screened out based on the Project Type Screening based on Local-Serving Land Uses and may be presumed to have a less than significant impact on VMT under CEQA.

Based on the NOCC+ (North Orange County Collaborative) VMT Traffic Study Screening Tool provided by the City of Placentia, the Proposed Project is screened out based on both the Low VMT Area Screening and the Project Type Screening and may be presumed to have a less than significant impact on VMT under CEQA. Therefore, no additional traffic analysis is required to satisfy the California Environmental Quality Act (CEQA) requirements for the project under state law.

As discussed above, the Proposed Project is presumed to have a less than significant traffic impact based on the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA

and the City of Placentia TIA Guidelines. The City's VMT Traffic Study Screening Tool was used to analyze the Proposed Project and supports the conclusion that the Proposed Project's traffic impacts would be less than significant.As discussed above, the Proposed Project is presumed to have a less than significant traffic impact based on the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA and the City of Placentia TIA Guidelines. The City's VMT Traffic Study Screening Tool was used to analyze the Proposed Project and supports the conclusion that the Proposed Project's traffic impacts would be less than significant. Based on the NOCC and VMT Traffic Study Screening Tool, according to the Transportation Study prepared by RK Engineering Group, Inc. the Proposed Project's VMT per service population is expected to be below the existing VMT per service population and is expected to be consistent with the OPR Technical Advisory, screening threshold of 15 percent or less.

As a result, the Proposed Project is presumed to have a less than significant impact on VMT under CEQA. Therefore, no further VMT analysis is required. A less than significant impact will occur.

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project substantially increased an existing hazardous geometric design feature or introduced incompatible uses to the existing traffic pattern. All residential and commercial projects within the City of Placentia are required to comply with the Placentia Fire and Life Safety Department's Fire Department Access & Water Requirements for Commercial & Residential Development. The Proposed Project has been designed to meet all applicable on-site access and sight-distance requirements and the Proposed Project plans have been plan checked by the Placentia Fire and Life Safety Department. Therefore, the Proposed Project would not create or encourage any hazardous transportation-related design features or incompatible uses. Additionally, the Proposed Project ensures that emergency access would be adequate for the Proposed Project. A less than significant impact would occur.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. During construction, surrounding roadways would continue to provide emergency access to the Proposed Project Site and surrounding properties. The Proposed Project would comply with applicable City regulations, such as the requirement to comply with the City's fire code to provide adequate emergency access as required by the Placentia Fire and Life Safety Department, as well as the California Building Standards Code. The site design includes access and fire lanes that would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. Where an exit enclosure is extended to an exit discharge or public way by an exit passageway, the exit enclosure would be separated

from the exit passageway by a fire barrier constructed in accordance with CBC Section 707 or a horizontal assembly constructed in accordance with Section 711, or both. Therefore, the Proposed Project would not result in inadequate emergency access. Additionally, the Fire Master Plan has been reviewed for code compliance and approved on August 30, 2023 (see Appendix K). The Proposed Project would not propose or encourage any specific land uses or developments or transportation network modifications that would have the `potential to result in deficient or inadequate emergency access routes. A less than significant impact will occur.

2.4.19 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Impact Analysis

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

Less Than Significant Impact. A significant impact may occur if a project were to cause a substantial adverse change in the significance of a Tribal cultural resource listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources as defined in PRC Section 5020.1(k). The Proposed Project Site is located in a highly urbanized and developed part of the City. The CEQA Guidelines, Section 15064.5, define "historic resources" as resources listed in the CRHR, or determined to be eligible by the California Historical Resources Commission for listing in the CRHR. The criteria for eligibility are generally set by the Historic Sites Act of 1935, which established the National Register which recognizes properties that are significant at the national, State, and local levels. To be

eligible for listing in the National Register, a district, site, building, structure, or object that must possess integrity of location, design, setting, materials, workmanship, feeling and association relative to American history, architecture, archaeology, engineering, or culture. 9 In addition, unless the property possesses exceptional significance, it must be at least 45 years old to be eligible. The Proposed Project Site has been graded previously and contains disturbed soil and is occupied mainly by a parking lot and commercial uses and surrounded by developed land uses including other commercial uses. This structure and associated parking are not associated with a significant event in American history, architecture, archaeology, engineering, or culture.

As such, the Proposed Project Site would not be eligible for listing in the National Register of Historic Places or CRHR, and thus, would not be considered a historical resource as defined by CEQA. The impact would be less than significant.

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

Less Than Significant with Mitigation Incorporated. No known burial sites exist within the vicinity of the Proposed Project Site and surrounding area. Therefore, the potential for impact on known human remains or a resource determined to be significant by a California Native American Tribe is low. No resources have been identified on the Proposed Project Site pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. The Proposed Project is subject to Assembly Bill 52 and Senate Bill 18. Assembly Bill 52 (AB 52) applies when a project has a notice of preparation or an intent to adopt a negative declaration or mitigated negative declaration. The Proposed Project does include a Specific Plan Amendment and a General Plan Amendment. As such, the Proposed Project is subject to Senate Bill 18 (SB 18). Mitigation Measures TCR-1, TCR-2, and TCR-3 will be implemented to assure that the impact remains less than significant. As required by AB 52 (PRC Section 21080.3.1 et seq.), the City notified all Native American tribes provided by the California Native American Heritage Commission (NAHC) and on the City's AB 52 tribal consultation list of the Proposed Project, inviting the tribes to consult on the Proposed Project. The City has received one response from the Gabrieleño Band of Mission Indians – Kizh Nation, who requested the following mitigation measures.

MM-TCR-1 Prior to issuance of a grading permit, the applicant shall retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities:

A. The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., 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.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency 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.

C. The monitor will 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 Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency 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 to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

E. 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 monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM-TCR-2 Prior to issuance of grading permit, the following notes shall be listed on the grading plans for the Proposed Project:

Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in PRC 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 Public Resources Code, Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code, Section 7050.5, dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code, Section 5097.98, shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code, section 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines, Section 15064.5(f).)

E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM-TCR-3 Prior to issuance of grading permit, the following notes shall be listed on the grading plans for the project:

Procedures for Burials and Funerary Remains

A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and

objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within 6 months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

2.4.20 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact Analysis

a. Would the project 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. The Proposed Project would generate demand for water, sewer conveyance, wastewater treatment, solid waste disposal, and other services. The City of Placentia is an urbanized setting in which all utilities and services are fully in place and where future demands for utilities and service systems have been anticipated in the General Plan goals, policies and programs for future growth.). The Proposed Project does include a Specific Plan Amendment and a General Plan Amendment. A textual change to the Zoning Code for Specific Plan 5 and a General Plan Amendment is necessary, however, for the Proposed Project to modify the Specific Plan allowable uses and to modify the allowable uses listed in the Land Use Element of the General Plan for SP-5 to allow the Proposed Project's residential mixed use. Residential and commercial wastewater rarely contains constituents that would cause a wastewater treatment plant to exceed RWQCB requirements as established in Waste Discharge Requirements (WDR).

In addition, the construction of a new 18" sewer main was completed in September 2023. No adverse impact from generation of wastewater on-site would result from the Proposed Project.

With regard to electrical services at full buildout, the Proposed Project's operational phase would require electricity for building operation (appliances, lighting, etc.). There is an existing overhead pole line on the west side of the Proposed Project, across S. Placentia Avenue. According to the Dry Utility Report prepared by Moran (see Appendix C), a new electric service will be provided from the existing SCE overhead pole line across S. Placentia Avenue. In addition, the Proposed Project would be required to comply with Title 24 standards or the most recent standards at the time of building permit issuance. The energy-using fixtures within the Proposed Project would likely be newer technologies, using less electrical power. For this infill project, infrastructure in place to serve the Proposed Project.

Telecommunication services would be provided by AT&T. The Proposed Project will be fed from the existing overhead pole across S. Placentia Avenue (see photos in Appendix C). Associated conduits from the overhead pole into the Proposed Project would be implemented.

Television services would be provided by Charter/Spectrum Communications. The Proposed Project will be fed from the existing overhead pole across S. Placentia Avenue. Associated conduits from the overhead pole into the Proposed Project would be implemented.

SoCal Gas Company would provide gas services for the Proposed Project. Gas has an existing system that runs north and south on S. Placentia Ave on the west side of the Proposed Project. An interception at the existing system on S. Placentia Avenue closest to the proposed location assumed to be near the S. Placentia Avenue side of the Proposed Project. There is an existing gas line on W. Orangethorpe that looks to be serving the existing building.

AT&T, Charter/Spectrum Communications, and SoCalGas have all received and responded to Will Serve Request letters for the Proposed Project (see Appendix C).

GSWC has provided a Will Serve Letter, included in the appendix of the Water Study (see Appendix H, Water Study), stating water service is available for the proposed development and can be provided from the existing water facility in S. Placentia Avenue.

GSWC provided a pressure range of 76 – 95 psi in the existing 12" water main in S. Placentia Avenue. Based on a discussion with Idez Castro, GSWC considers pressures above 40 psi to be adequate for domestic and fire service. Additionally, the Proposed Project Site is in a relatively flat area and GSWC currently does not have any issues providing water service to the existing developments. Therefore, improvements to the existing water system in S. Placentia Avenue are not anticipated to be required. A less than significant impact will occur.

In accordance with the MS4 permit and the 2011 Model WQMP, the Proposed Project Site has been divided into Drainage Management Areas (DMAs) to be utilized for defining drainage areas and sizing LID and other treatment control BMPs. Proposed Project Site is split into two drainage areas, the first being 2.38 acres consisting of the northern portion of the Proposed Project Site, which is the tributary area to an 8x16' Modular Wetland System that lies along the western property line. The other drainage area is at the southern end of the Proposed Project Site and is a 0.34 acres tributary area to a 4x4' Modular Wetland System that is along a wall near the retail space at the southern corner of the Proposed Project Site. The proposed development would have more pervious area, and as a result, generate less stormwater runoff. The Proposed Project would maintain existing drainage patterns and discharge locations. In addition, the Proposed Project would require a National Pollutant Discharge Elimination System permit and consequently develop and implement a SWPPP.

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

Less Than Significant Impact. As previously stated, GSWC has provided a Will Serve Letter, included in the appendix of the Water Study (see Appendix H), stating water service is available for the proposed development and can be provided from the existing water facility in S. Placentia Avenue. As discussed in the City's General Plan EIR, the City of Placentia receives direct water service from the Yorba Linda Water District (YLWD) and the GSWC. Water supplied is a blend of groundwater and imported water. Both water service providers prepare Urban Water Master Plans (UWMPs) that include demand forecasts and supply reliability forecasts for normal, dry and multiple year dry conditions. The YLWD 2015 UMWP predicts 100 percent reliability for normal year and single dry year demands from 2020 through 2040. A less than significant impact will occur.

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

Less Than Significant. The City of Placentia has installed a new 18" sewer in S. Placentia Avenue to replace the 12" sewer line that did not have capacity for the peak wet weather flow (PWWF) associated with the Proposed Project. The project was completed in September 2023.

Based on sewer monitoring data included in Appendix F, Sewer Analysis Report, prepared for the Proposed Project, the 12" sewer main in S. Placentia Avenue was 39 percent full for the existing peak dry weather flows (PDWF) and was over-capacity for existing peak wet weather flow (PWWF). The calculations and results demonstrated that the existing 12" sewer system in S. Placentia Avenue provides sufficient capacity for PDWF for the Proposed Project conditions. However, the analysis showed that the existing 12" sewer line would not have capacity for the PWWF associated with the Proposed Project.

According to the Sewer Analysis prepared for the Proposed Project, the wastewater flow is estimated at 130.56 gallons per minute in average dry weather, and 236.10 in peak dry weather. With completion of the 18" sewer main, the Proposed Project wastewater flows will be accommodated.

The more pertinent calculations show the recently completed 18" sewer in S. Placentia Avenue, which runs adjacent to the Proposed Project Site, will not be adversely impacted by the PDWF or PWWF associated with the Proposed Project. This is a part of the Crowther Sewer Pipeline Project that is needed to serve the redevelopment of the Packing House District Transit-Oriented Development Project which was approved in 2017.

Based on a discussion with City's contractor for the Sewer Improvement Project in September 2023, the construction of the proposed 18" sewer main was completed on September 15, 2023. The comparison is: (a) 22 percent full for existing PDWF and 26 percent full with the Proposed Project and (b) 45 percent full for the existing PWWF and 47 percent full with the Proposed Project. Therefore, the now completed 18" sewer main in S. Placentia Avenue has capacity for all wastewater flows anticipated from the Proposed Project, and no additional sewer upgrades will be required. Therefore, potential sewer impacts are less than significant.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Trash collected from the City is disposed at several landfills throughout the State, though the majority (about 96.8 percent) of the City's solid waste was disposed at the Olinda Alpha Landfill. The balance of the City's solid waste is disposed at the Azusa Land Reclamation Landfill, the Commerce Refuse-to Energy Facility, the El Sobrante Landfill, the Frank R. Bowerman Sanitary Landfill and the Prima Deshecha Landfill.

Proposed Project construction would generate solid waste requiring disposal at local landfills. Materials generated during construction of the Proposed Project would include paper, cardboard, metal, plastics, glass, concrete, lumber scraps and other materials. During construction, bulk solid waste, excess building material, fill, etc., would be disposed of in a manner consistent with State of California Integrated Waste Management Act of 1989.

According to the City's General Plan EIR, the current permitted solid waste disposal is 8,000 tons per day at Olinda Alpha Landfill, 1,000 tons per day at Commerce Refuse-To-Energy Facility, 8,000 tons per day at Azusa Land Reclamation Landfill, 16,054 tons per day at El Sobrante Landfill, and 11,500 tons per day at Bowerman Landfill. According to OC Waste and Recycling, and 4,000 tons per day at the Prima Deshecha Landfill. According to CalRecycle, the generation rate for residential uses with regard to solid waste is 12.23 pounds per household per day and the generation rate for commercial is 5 pounds per 1,000 square feet per day. With 248 residential units and 3,000 square feet of residential space proposed for the Proposed Project, it

would result in resulting in approximately 3,195 pounds of solid waste per day or approximately 1.6 tons per day. The Proposed Project's estimated generation of solid waste per day during project operation represents a fraction of the daily capacity at the landfills.

The State of California has established 50 percent as the minimum waste reduction rate for all cities. However, the goal has been updated to divert 75 percent (previously 50 percent) of California's waste stream away from the landfill and instead toward recycling by the year 2020. The City of Placentia is considered to be in compliance with the State's target disposal rates for both residential and employment generated solid waste. The Proposed Project would be required to comply with federal, State, and local statutes and regulations related to solid waste. Consequently, the Proposed Project would be consistent with the General Plan and would result in less than significant impacts relative to solid waste capacity and regulations. Additionally, the Proposed Project will comply with all federal, State, and local statutes and regulations related to solid waste. The Proposed Project would be required to comply with applicable federal, State, and local regulations regarding the proper disposal of solid waste generated on site, including AB 939, AB 341, and the California Green Building Code (24 CCR Part 11) as each relates to solid waste and recycling. During future construction of the Proposed Project, BMPs would be required to be implemented by the City as well as standard construction controls and safety procedures that would avoid or minimize the potential for accidental release of substances; see Section 2.4.10(b) for BMPs to avoid or minimize the potential for accidental release of substances. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by the Placentia Fire and Life Safety Department, and the local Certified Unified Program Agency for hazardous materials in the region. Additionally, as described in the General Plan EIR, generation of solid wastes will increase as a result of increase in population and employment opportunities; however, it was determined that nearby landfills have adequate capacity to handle the additional waste generated as the City reaches buildout. A less than significant impact will occur.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. See response to XIX (d) above. Additionally, collection, transportation, and disposal of solid waste generated by the Proposed Project would comply with all applicable federal, State, and local statutes and regulations. The State of California has established 50 percent as the minimum waste reduction rate for all cities. However, the goal has been updated to divert 75 percent (previously 50 percent) of California's waste stream away from the landfill and instead toward recycling by the year 2020. The City of Placentia is considered to be in compliance with the State's target disposal rates for both residential and employment generated solid waste. A less than significant impact will occur.

2.4.21 Wildfire

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

Impact Analysis

The Proposed Project Site is not located in a FHSZ Local Responsibility Area (LRA). Review of the CAL FIRE Resource and Assessment Program (FRAP) maps for state responsibility areas indicates that the Proposed Project Site is not located in a state responsibility area (CAL FIRE 2022). Moreover, the City of Placentia does not contain any areas classified as very high fire hazard severity zones (VHFHSZs) in state responsibility areas.

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As mentioned in the City's General Plan, the Proposed Project would be required to comply with the City of Placentia Emergency Operations Plan. The plan provides a strategy for the City's planned response to emergency situations. The City's General Plan Safety Element shows evacuation routes for the City (City of Placentia 2019). The Proposed Project would comply with applicable City regulations, such as the requirement to comply with the City's fire code to provide adequate emergency access as required by the Placentia Fire and Life Safety Department, as well as the California Building Standards Code. The Proposed Project would be required to submit for review by the Fire Department: Fire Master Plan, Water Improvement Plan/Underground Fire Main Plan, Architectural Plan, Fire Sprinkler Plan, Fire Alarm Plan, Prior to the issuance of building permits, the City of Placentia would review project site plans, including location of all buildings, fences, access driveways and other features that may affect emergency access. Due to the Proposed Project's local and regional connectivity, in the unlikely event of an emergency, the Proposed Project -adjacent roadway facilities would be expected to

serve as emergency evacuation routes for first responders and residents. The Proposed Project would not adversely affect operations on the local or regional circulation system, and as such, would not influence the use of these facilities as emergency response routes. Therefore, the Proposed Project would not be expected to impair emergency plans, exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. A less than significant impact will occur.

b. Would the project, 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 Proposed Project Site is not on a slope that would expose project occupants to pollutant concentrations from wildfire. Additionally, according to the California Department of Forestry and Fire Protection's (CAL FIRE's) FHSZ Map of the County (CAL FIRE 2020), the Proposed Project is in a local responsibility non-Very High Fire Hazard Safety Zone. Development of the Proposed Project would not expose people or structures to a significant risk from wildland fires. No impact will occur.

c. Would the project 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 propose the installation of new infrastructure that would exacerbate fire risk. The Proposed Project would be located on an infill site surrounded by urban development. Consequently, the Proposed Project would not require installation or maintenance of roads, fuel breaks, emergency water sources, power lines or other utilities that could exacerbate fire risk. In addition, the Proposed Project Site is not in or immediately near state responsibility areas or lands classified as Very High Hazard Severity Zones according to CAL FIRE's California Fire Hazard Severity Zone Maps (CAL FIRE 2020). No impact will occur.

d. Would the project 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 Proposed Project is not in an area that is susceptible to landslides. In addition, the Proposed Project Site is not in or immediately near state responsibility areas or lands classified as Very High Hazard Severity Zones according to CAL FIRE's California Fire Hazard Severity Zone Maps (CAL FIRE 2022). No impact will occur.

2.4.22 Mandatory Findings of Significance

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

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Impact Analysis

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 with Mitigation Incorporated. The Proposed Project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. There is potential for inadvertent finds of Native American archaeological resources during project grading. Potential impacts to Native American resources would be mitigated by MM-TCR-1. With implementation of this mitigation measure, a less than significant impact will occur.

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 with Mitigation Incorporated. The Proposed Project would result in potential significant impacts, prior to mitigation, relative to cultural resources, hazards and hazardous materials, and tribal cultural resources. MM-CUL-1, MM-GEO-1, MM-HAZ-1, MM-TCR-1, MM-TCR-2, and MM-TCR-3 are added to the Proposed Project to reduce these impacts to less than significant levels.

Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

a. Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
b. The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

In the short term, there would be a potential for cumulative effects if other development projects were implemented concurrently with the Proposed Project. As discussed, based on growth projections identified in the City's General Plan and General Plan EIR, the Proposed Project would be within the anticipated growth rate.

The Proposed Project consists of providing infill commercial and residential uses on an existing parcel within a developed area. The overall changes that are proposed would be designed to create visually attractive and compatible uses consistent with the policies identified in the City's Specific Plan 5. As described above, all of the potential impacts related to implementation of the Proposed Project would be less than significant or reduced to a less than significant level with implementation of mitigation measures. In addition, the cumulative effect of the Proposed Project taken into consideration within SP-5 is limited, due to the scale and infill nature of Proposed Project. Furthermore, the Proposed Project would develop an area that has been previously disturbed. Consequently, the Proposed Project's Mandatory Finding of Significance relative to contribution to cumulative impacts would be less than significant with mitigation incorporated.

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

Less Than Significant with Mitigation Incorporated. As determined in the analysis in this Initial Study, the potential significant impacts relative to hazards and hazardous materials could be reduced to a less than significant impact through implementation of MM-HAZ-1. A less than significant impact would occur.

Section 3 List of Preparers

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3.3 Individuals and Organizations Consulted

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