
SITE ADDRESS: 1601 South Anaheim Boulevard, Anaheim, CA

ASSESSOR’S PARCEL NUMBER: 082-220-09

PROJECT NAME: Anaheim Radisson Blu Hotel

LEAD AGENCY NAME AND ADDRESS:
City of Anaheim, 200 South Anaheim Boulevard, Suite 162, Anaheim, CA 92805

CONTACT PERSON AND PHONE NUMBER:
Elaine Thienprasiddhi, Senior Planner
714.765.4568

PROJECT LOCATION:
The Project Site is located at 1601 South Anaheim Boulevard in the City of Anaheim, Orange County, California, as shown in Exhibit 1—Regional Location Map. The Project Site is located northeast of Interstate 5 (I-5) Freeway, adjacent to the northbound freeway on-ramp at the terminus of Anaheim Way. The 3.18-acre Project Site consists of APN 082-220-09 and the adjacent land to the east that Caltrans relinquished to the City for street purposes when the Anaheim Boulevard on-ramp to Interstate 5 was realigned. The City proposes to vacate and abandon a portion of the street to its ultimate right-of-way configuration and combine the vacated portion with APN 082-220-09.

The triangular-shaped Project Site is located in the central portion of the City of Anaheim, east of The Anaheim Resort (Exhibit 2—Local Vicinity Map). The Project Site is adjacent to commercial development to the north, the I-5 freeway to the south and west, and industrial uses to the east, across Anaheim Boulevard. The Project Site would be accessed regionally from the I-5 freeway via Katella Avenue/Anaheim Way/Disney Way to the southeast, and locally from Anaheim Boulevard.

PROJECT APPLICANT’S NAME AND ADDRESS:
Rob Mitchell
Greenlaw Partners, LLC
18301 Von Karman Avenue, Suite 250
Irvine, CA 92612

Walter C. Bowen
BDC/Anaheim, LLC
1331 NW Lovejoy Street
Portland, OR 97209

PROJECT AGENT:
Donald D. Lamm, AICP
Diamond Star Associates, Inc.
4100 MacArthur Boulevard, Suite 330
Newport Beach, CA 92660
THIS PAGE INTENTIONALLY LEFT BLANK
GENERAL PLAN DESIGNATION:

The Project Site is designated Commercial—General Commercial by the City of Anaheim General Plan Land Use Plan, as shown in Exhibit 3—City of Anaheim General Plan Land Use Map. The General Commercial land use designation allows a floor area ratio (FAR) of up to 0.50. As authorized in Anaheim Municipal Code (AMC) 18.08.045, the Applicant is requesting an increase in the maximum FAR to 1.93, subject to the City’s approval of a Conditional Use Permit.

ZONING:

The Project Site is within the Commercial—General (C-G) Zone, as shown in Exhibit 4—City of Anaheim Zoning Map. The intent of the “C-G” Zone is to allow a variety of land uses, including hotels. The C-G Zone typically includes highway-serving uses such as fast food restaurants, auto-oriented uses such as tire and auto parts stores, and stand-alone retail uses. This zone implements the General Commercial land use designation in the General Plan.

The Project Site is located within the South Anaheim Boulevard Corridor (SABC) Overlay Zone, which serves as the major link between Downtown, The Platinum Triangle, and The Anaheim Resort. Land uses in the area include residential, commercial, office and industrial uses, as well as the nearby Western Medical Center Hospital.

In order to address the area’s revitalization needs, the City adopted a redevelopment plan and the SABC Overlay Zone. The Land Use Plan for this area is consistent with the goals of these plans. The regulation and development standards that apply to the underlying zone of the property in the SABC Overlay Zone shall remain the same.

The City of Anaheim Municipal Code Section 18.24.010 establishes the SABC Overlay Zone. The purpose of the SABC Overlay Zone is to provide supplemental land use options and development standards for the improvement of the South Anaheim Boulevard Corridor. The SABC Overlay Zone is not intended to provide for the conversion, reuse, or remodeling of existing industrial buildings or other buildings not developed in accordance with the standards of the SABC Overlay Zone. Inclusion in the SABC Overlay Zone will provide the benefit of enhanced economic opportunities resulting from expanded land uses. The intent of the SABC Overlay Zone is to accomplish the following major objectives:

1. To provide a mechanism for the orderly development of property within the South Anaheim Boulevard Corridor portion of the Commercial/Industrial Redevelopment Project Area in order to eliminate blight and blighting influences.

2. To provide the long-term, preferred land use strategy and development standards for the area.

3. To encourage development of regional commercial uses to locate south of Ball Road.

4. To encourage Boulevard and Neighborhood Residential uses north of Ball Road, with neighborhood commercial development at intersections.

5. To ensure that new development relates well to existing residential neighborhoods.

6. To promote adequate levels of light, air, and density of development, and efficient circulation of pedestrian and vehicular traffic (Ord. 5920 § 1 (part); June 8, 2004).

Caltrans relinquished the eastern portion of the Project Site to the City for street purposes in 1996 when it realigned the Anaheim Boulevard on ramp to the northbound I-5 freeway. The City proposes to vacate and abandon a portion of the street to its ultimate right-of-way configuration of a six-lane Primary Arterial with
Class II Bike Lane. The vacated portion of the street would acquire the “C-G” zoning designation of the adjacent parcel consistent with AMC 18.90.050.030, Vacation of a Street or Alley. The City will then process a Lot Line Adjustment to create two parcels, one of which would be the Project Site, as shown in Exhibit 5a—Lot Line Adjustment - Existing and Exhibit 5b—Lot Line Adjustment - Proposed.

PROJECT DESCRIPTION:

The Applicant proposes to construct a 12-story, 155-foot-6-inch-tall, high-quality hotel with 326 guest rooms, 267,671 gross square feet of hotel floor area, and a four-level, 127,700 gross square foot parking garage with 348 parking spaces (Proposed Project). The Proposed Project would be located on approximately 3.18 acres (138,767 square feet) at 1601 S. Anaheim Blvd, Anaheim, CA (Project Site) (Exhibit 6—Site Plan). The Proposed Project would include hotel amenities on the ground level, such as a swimming pool, 3,552-square-foot restaurant, meeting space, fitness room, coffee shop, and gift shop. The 12th floor includes a rooftop pool, sun deck, and 3,171-square-foot restaurant and bar. The Radisson Blu-branded hotel would be constructed using modern, high-quality architecture.

SITE ACCESS:

As shown on Exhibit 7—Circulation Plan, vehicular ingress and egress to the Project Site would be provided by a single, un-signalized, restricted-access (right-in/right-out only) private drive that connects to Anaheim Boulevard on the east side of the Project Site. The Anaheim General Plan Circulation Element classifies Anaheim Boulevard a Primary Arterial with Class II Bike Lanes. Pedestrians would access the Project Site via Anaheim Boulevard from the public sidewalk. Within the Project Site, private sidewalks would provide pedestrian access to the parking structure and outdoor amenities.

UTILITIES:

As shown On Exhibit 8—Utility Plan, the Proposed Project would be served with all required public services and utilities, including water, wastewater, electricity, natural gas, telephone, cable, police and fire protection services, solid waste collection, etc. There are existing sewer and water pipes within Anaheim Boulevard, adjacent to the Project Site. An existing storm drain pipe runs along the eastern boundary of the Project Site. The Applicant is proposing to construct a sewer pipe, storm drain, water pipe and fire water pipe on the Project Site to connect with existing pipes along Anaheim Boulevard. The drainage for the Proposed Project would direct storm water away from the proposed building into various drain inlets and vegetative swales, and eventually into an infiltration detention basin and/or dry well for percolation. The Proposed Project would treat stormwater with various methods throughout the Project Site (e.g., dry well insert, vegetation). The Proposed Project would convey overflow stormwater to the public storm drain system via a junction structure/catch basin at the southeast corner of the Project Site, which connects to a 60-inch storm drain that runs along South Anaheim Boulevard (Exhibit 9—Grading Plan).

PROJECT SETTING AND SURROUNDING LAND USES:

The Project Site is approximately 3.18 acres of vacant land. Prior to 1963, an orchard, with several outbuildings, and a residence occupied the Project Site. Between 1963 and 1972, an on-ramp between Anaheim Boulevard and the I-5 freeway, as well as commercial buildings and pavement, were constructed on the south end of the site. By 1980, the on-ramp had been removed by Caltrans. Between 1980 and 1995, the buildings on the site had been removed. In 2003, the current configuration of the property between South Anaheim Boulevard and the I-5 freeway was completed with the freeway widening. The Project Site has remained unoccupied and predominately unaltered since 2003. The Project Site is currently undeveloped, contains rudimentary vegetation, and has a generally flat terrain.

Surrounding land uses include commercial development to the north, the I-5 freeway to the south and west, and industrial uses to the east, across Anaheim Boulevard.
DISCRETIONARY ACTIONS:
The following discretionary actions would be required:

- Conditional Use Permit (CUP 2017-05927) to allow a hotel with a greater building height and higher floor area ratio than allowed by the Code.
- Variance (VAR 2018-05106) for fewer trees along the Interstate 5 frontage than required by the Code.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED:
California Department of Transportation (Caltrans)
Source: Census 2000 Data, The CaSIL.

Exhibit 1
Regional Location Map
Exhibit 2
Local Vicinity Map
Aerial Base

Source: NAIP Aerial Imagery.
Exhibit 5a
Lot Line Adjustment - Existing


FIRSTCARBON SOLUTIONS™

00550062 • 03/2018 | 5a_lot_line_adjustment_existing.cdr
Exhibit 6
Site Plan

THIS PAGE INTENTIONALLY LEFT BLANK
Exhibit 7
Circulation Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- Aesthetic/Visual
- ☑ Biological Resources
- Greenhouse Gas Emissions
- Land Use/Planning
- Population/Housing
- Transportation/Traffic
- ☑ Mandatory Findings of Significance

- Agricultural & Forestry
- ☑ Cultural Resources
- Hazards & Hazardous Materials
- Mineral Resources
- Public Services
- ☑ Tribal Cultural Resources
- Air Quality
- ☑ Geology/Soils
- Hydrology/Water Quality
- Noise
- Recreation
- Utilities/Service Systems

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

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

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

________________________  __________
Signature of City of Anaheim Representative  Date

Elaine Thienprasiddhi, Senior Planner  714-765-4568
Printed Name/Title  Phone No.
EVALUATION OF ENVIRONMENTAL IMPACTS:

1) 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.

2) A list of “Supporting Information Sources” must be attached and other sources used or individuals contacted should be cited in the Narrative Summary for each section.

3) Response Column Heading Definitions:
   a) **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.
   
   b) **Potentially Significant Unless Mitigation Incorporated** applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.
   
   c) **Less Than Significant Impact** applies where the project creates no significant impacts, only less than significant impacts.
   
   d) **No Impact** applies where a project does not create an impact in that category. 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 proposed (e.g., the project falls outside of 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 will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

4) Earlier analyses may be used where, pursuant to a tiering, program EIR, Master EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15062(c)(3)(D)). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   
   b) Impacts Adequately Addressed. Identify which effects from the 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.

5) Incorporate into the checklist any references to information sources for potential impacts (e.g., the General Plan, zoning ordinance). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

6) 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 significant.
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. AESTHETICS—Would the project:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Have a substantial adverse effect on a scenic vista?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>b) Substantially damage scenic resources, including, but not limited to, trees, rocks,</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>rock outcroppings, and historic buildings within a State scenic highway or local</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>scenic expressway, scenic highway, or eligible scenic highway?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>c) Substantially degrade the existing visual character or quality of the site and its</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>surroundings?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) Create a new source of substantial light or glare which would adversely affect</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>day or nighttime views in the area?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Narrative Summary:**

Information and analysis for Aesthetic impacts are, in part, based on the City of Anaheim General Plan and the Shade and Shadow Analysis. The Green Element of the General Plan discusses the visual amenities and scenic highways surrounding the Project area. The Project is located within an urbanized area of Anaheim. Surrounding land uses include commercial and industrial uses.

a) **Less than significant impact.** The Green Element of the City of Anaheim General Plan states that the contours of the Hill and Canyon Area and the Santa Ana Mountains are visible from most areas of Anaheim. Other scenic amenities, such as golf courses and the Santa Ana River, provide visual relief from the built environment and are important visual amenities and landmarks. The General Plan does not identify any scenic vistas or views located within proximity of the Project Site. The Santa Ana River is located approximately 1.8 miles to the east. The nearest golf course (River View Golf Course [1800 W Santa Clara Ave, Santa Ana, California]) is located approximately 2.8 miles southeast of the Project Site. The Santa Ana Mountains and Hill and Canyon Area are 6 miles or more to the east.

The surrounding area is highly urbanized land containing commercial developments that do not exhibit any significant visual resources or scenic vistas. Depending on the vantage point of the viewer, the 12-story luxury hotel and associated four-story parking lot may provide insignificant obstruction of views of mountains. However, the Proposed Project would not be out of character or scale with surrounding development, which includes the I-5 Freeway, Country Inn & Suites, Residence Inn, Candlewood Suites, Motel 6, La Quinta Inn, Peacock Suites, and WorldMark Anaheim. The Proposed Project will not adversely affect distant scenic views. As such, impacts would be less than significant.

b) **No impact.** According to the City of Anaheim General Plan Figure C-3 Scenic Highways, State Route 55 (SR-55) and SR-91 are designated scenic highways from the City boundary to Weir Canyon Road. The SR-91 from Weir Canyon Road to the eastern City boundary is designated an eligible scenic highway. Santa Ana Canyon Road and Weir Canyon Road are designated as scenic expressways. However, the Project Site is not located along any designated or eligible scenic highway/expressways. The Project Site is located on a vacant lot, and there are no scenic resources such as trees, rock outcroppings, or historic buildings on-site. Additionally, the Project Site and surrounding area are not characterized by unique visual resources or historic structures, and, therefore, no impact would occur to scenic or historic resources.

c) **Less than significant impact.** The existing visual character of the surrounding area is highly urbanized and defined by commercial development. No unique visual resources exist on the Project Site or in its surroundings. Project implementation would introduce the construction of a luxury 12-story hotel and associated four-story parking structure.

Exhibit 10a—View of Hotel Entrance at Ground Level Facing West; Exhibit 10b—Birds Eye View Facing Northeast; and Exhibit 10c—View of Hotel From Southbound I-5 Facing Southeast illustrate the building elevation and perspectives of the proposed hotel and parking structure, both of which are proposed to be primarily clad with a pre-cast concrete panel system. Elements of the building are accentuated with a contrasting, darker cladding color. Landscaping has been carefully organized and scaled to promote a more pedestrian frontage along Anaheim Boulevard and set the tone of a resort hotel that extends throughout the Project Site. The Proposed Project has been designed to enhance the existing character of the surrounding area. The architectural and landscape elements and design would ensure that the development of the Proposed Project would not be detrimental to the surrounding area or uses.

The Applicant is requesting a Conditional Use Permit for a structural height higher than allowed by the Code (75 feet). Anaheim Municipal Code Section 18.08.0101 states that the proposed increase in structural height shall not create significant impacts onto surrounding properties related to glare, shadow, noise, and privacy. The Applicant prepared a Shade and Shadow Study (Exhibit 11—Shade and Shadow Study) that analyzed the shade and shadow impacts of the Proposed Project during Spring/Fall Equinox, Summer Solstice, and Winter Solstice. The proposed building would cast shadows toward the west during mornings of Spring/Fall Equinox, and would cast shadows toward the east during evenings. During the Summer Solstice, shadows are mostly confined to the Project Site and do not have an impact on nearby buildings. During the Winter Solstice, the building would cast longer shadows toward the northwest in the mornings and toward the...
### Environmental Issues

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

Northeast in the evenings. The buildings most impacted by shadows created by the Proposed Project would be the industrial building across Anaheim Boulevard and the commercial building north of the Project Site. However, the shadows cast by the Proposed Project would move away from these buildings in less than two hours and would not significantly impact these land uses.

Although the Proposed Project would alter the visual character of the site, the development would enhance the existing area by introducing attractive, high-quality building design, and would provide aesthetically appealing views on-site. The visual changes would not degrade the visual character or quality of the site or its surroundings. Additionally, no unique visual resources exist on the Project Site or the surrounding area. Implementation of the Proposed Project would alter, but would not degrade, the existing visual character; therefore, no mitigation measures are necessary.

d) **Less than significant impact.** The Project Site is located in an area that is built-up land and currently generates levels of light and glare typical of commercial uses. Existing lighting conditions in the project area include light emanating from building interiors, security lights, and surrounding commercial land uses, street lighting, as well as lighting associated with the adjacent Interstate 5 (I-5) Freeway. Given the urban nature of the area and the existing amount of light and glare generated by the surrounding uses, the amount of light and glare from the Proposed Project would not be substantially noticeable from the existing conditions. Furthermore, the Applicant proposes to construct a 14-foot-tall wall on the southern half of the western property boundary, along the I-5 Freeway north on-ramp that will address sight lines from the freeway. The northern half of the western property boundary would be a parking structure with an architecturally interesting treatment, as shown in Exhibit 10c—*View of Hotel From Southbound I-5 Facing Southeast*. The City reviewed glass samples submitted by the Applicant and determined that the glass materials used for Proposed Project would not create significant glare.

Thus, the Applicant would implement all of the project lighting within parking areas and driveways (for security and safety) under the supervision of the City’s Planning and Building Department, thereby ensuring that any potential light spillover impacts to sensitive uses would be less than significant.
Exhibit 10a
View of Hotel Entrance at Ground Level Facing West

Source: GBD Architects, Incorporated.
Source: GBD Architects, Incorporated.

Exhibit 10b
Birds Eye View Facing Northeast
THIS PAGE INTENTIONALLY LEFT BLANK
Exhibit 10C

View of Hotel From Southbound I-5 Facing Southeast

Source: GBD Architects, Incorporated.
THIS PAGE INTENTIONALLY LEFT BLANK
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

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

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
</tbody>
</table>

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
</tbody>
</table>

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>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))?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
</tbody>
</table>

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>d) Result in the loss of forest land or conversion of forest land to non-forest use?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
</tbody>
</table>

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
</tr>
</tbody>
</table>

**Narrative Summary:**
Information and analysis for Agricultural and Forest Services impacts are based on the City of Anaheim General Plan and the California Department of Conservation Farmland Mapping and Monitoring Program. 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. Such information includes 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.

**ENVIRONMENTAL ANALYSIS**

a) **No impact.** The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) identifies the Project Site as Urban and Built-Up Land. The Project Site and surrounding area is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Under the City’s Zoning Map, the site is designated for General Commercial uses. Therefore, there would be no impact to the conversion of farmland to non-agricultural use.

b) **No impact.** The City’s Zoning Map classifies the Project Site as General Commercial and it is not under a Williamson Act contract per the California Department of Conservation’s Williamson Act Map; therefore, there would be no impact to agricultural use or a Williamson Act contract.

c) **No impact.** The City of Anaheim does not contain any land that is zoned for forest land or timberland. The Project Site is zoned for General Commercial and is currently vacant; therefore, there would be no impact to land zoned for forest or timberland.

d) **No impact.** The Project Site is currently vacant and zoned for General Commercial; therefore, there would be no impact to forest land.

e) **No impact.** The Project Site is currently vacant and zoned for General Commercial; therefore, there would be no impact to the existing environment that could result in conversion of Farmland to non-agricultural use, or conversion of forest land to non-forest use.
**Environmental Issues**

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

**III. AIR QUALITY**—Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan? □ □ □ ✓
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? □ □ □ ✓
- c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? □ □ □ ✓
- d) Expose sensitive receptors to substantial pollutant concentrations? □ □ □ ✓
- e) Create objectionable odors affecting a substantial number of people? □ □ □ ✓

**Narrative Summary:**

The air quality analysis is included as Appendix A, *Air Quality and Greenhouse Gas Analysis Report*, FirstCarbon Solutions (FCS), February 21, 2018, and was conducted to determine air quality impacts associated with the development of the Proposed Project on project-specific modeling using the California Emissions Estimator Model (CalEEMod) version 2016.3.2.

The Project Site is located within the City of Anaheim and the South Coast Air Basin (SoCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The applicable air quality plan for the Project Site is the SCAQMD’s 2016 Air Quality Management Plan. The SCAQMD works directly with the Southern California Association of Governments (SCAG), local governments, and state and federal agencies to maintain and attain air quality standards.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. This assessment utilized the significance thresholds recommended by the SCAQMD. The SCAQMD significance thresholds are applicable to a project’s construction and operational regional emissions and local emissions, as shown in Table 1—*SCAQMD Regional Air Quality Significance Thresholds*. Impact III.b discusses the SCAQMD’s localized significance thresholds.

**Table 1: SCAQMD Regional Air Quality Significance Thresholds**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Mass Daily Thresholds (pounds/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Construction</td>
</tr>
<tr>
<td>NO\textsubscript{X}</td>
<td>100</td>
</tr>
<tr>
<td>VOC</td>
<td>75</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>150</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>55</td>
</tr>
<tr>
<td>SO\textsubscript{X}</td>
<td>150</td>
</tr>
<tr>
<td>CO</td>
<td>550</td>
</tr>
</tbody>
</table>

Notes:

NO\textsubscript{X} = oxides of nitrogen; VOC = volatile organic compounds; SO\textsubscript{X} = sulfur oxides; CO = carbon monoxide

PM\textsubscript{10} = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less

PM\textsubscript{2.5} = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less

Source: *SCAQMD CEQA Air Quality Handbook* (SCAQMD, 1993.)
Environmental Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

ENVIRONMENTAL ANALYSIS

Would the project:

a) Less than significant impact. The SCAQMD released the 2016 Air Quality Management Plan (AQMP) in March 2017. The 2016 AQMP evaluates integrated strategies and control measures to meet the National Ambient Air Quality Standards (NAAQS) and to explore new and innovative methods to reach its goals. Some of these approaches include utilizing a strategy with fair-share reductions at the federal, state, and local levels. To evaluate whether or not a project conflicts with, or obstructs the implementation of the applicable air quality plan (2016 AQMP for the South Coast Air Basin), the SCAQMD CEQA Air Quality Handbook states that there are two key indicators. The indicators identified by the criteria are discussed below.

- Indicator: Whether the project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Project applicability: This indicator is applicable and assessed below.
- Indicator: Whether the project would be inconsistent with the population, housing, and employment growth assumptions utilized in preparation of the air quality plan.
- Project applicability: This indicator is applicable and assessed below.

Considering the recommended criteria in the CEQA Handbook, this analysis uses the following criteria to address the indicators above and determine the project’s significance:

Step 1: Project’s contribution to air quality violations (SCAQMD’s first indicator);
Step 2: Assumptions in AQMP (SCAQMD’s second indicator); and
Step 3: Compliance with applicable emission control measures in the AQMPs.

Step 1: Project’s Construction to Air Quality Violations

According to the SCAQMD, a project is consistent with the AQMP if it would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP (SCAQMD AQMP 2017, page 12-3). As shown in Impacts III.b and III.c below, the Proposed Project would not generate regional or localized construction or operational emissions that would exceed SCAQMD’s thresholds of significance.

If a project’s emissions do not exceed the SCAQMD regional thresholds for VOC, NOx, CO, SOx, PM10, or PM2.5, it follows that the project’s emissions would not exceed the allowable limit for each project in order for the region to attain and maintain ambient air quality standards, which is the primary goal of air quality plans. As shown in Table 2—Construction Localized Significance Analysis and Table 3—Operational Localized Significance Analysis below, the Proposed Project’s construction and operational emissions would not exceed SCAQMD regional thresholds of significance on a daily basis. These thresholds are considered the allowable limit for a project not to contribute substantially or cause an air quality violation. Therefore, the Proposed Project would not result in a significant impact and would be consistent with the goals of the applicable AQMP. Impacts would be less than significant.

Step 2: Assumptions in AQMP

According to Chapter 12 of the SCAQMD CEQA Air Quality Handbook, the purpose of the General Plan consistency finding is to determine whether a project would be inconsistent with the growth assumptions incorporated into the air quality plan and, thus, whether it would interfere with the region’s ability to comply with federal and California air quality standards. In other words, if a project is consistent with the applicable General Plan land use designation, and if the General Plan was adopted prior to the applicable AQMP, then the growth and emissions projections for the project would be consistent with the growth and emissions projections assumed in the AQMP.

The current General Plan land use designation on the Project Site is General Commercial. The current zoning designation on the property is General Commercial (C-G). The C-G zone is intended to allow a variety of commercial land uses, including highway-serving uses such as fast food restaurants, auto-oriented uses such as auto parts stores, and stand-alone retail uses. The C-G zone also allows for convenience uses such as grocery stores, drug stores, appliance stores, neighborhood-serving restaurants, and community centers.

The Proposed Project is a hotel, which would be consistent with the C-G general plan and zoning designation. Therefore, the Proposed Project would not exceed the growth or intensity of use assumptions within the AQMP. Impacts would be less than significant.

Step 3: SCAQMD Rules and Regulations

The AQMP establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and federal standards. The rules and regulations that apply to the Proposed Project include, but are not limited to, Standard Conditions (SC) AQ-1. With adherence to these Standard Conditions, impacts would be less than significant.
Environmental Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

b) Less than significant impact. This impact relates to localized criteria pollutant impacts. SCAQMD has set localized significance thresholds (LSTs) for project construction emissions for Particulate Matter (PM$_{10}$), CO, and Nitrogen dioxide (NO$_2$). PM$_{10}$ could be emitted as fugitive dust during earth-disturbing activities, CO hotspots are related to increases in on-road vehicle congestion, and NO$_2$ contributes to impacts to human health and the formation of atmospheric ozone.

Construction

The CalEEMod model version 2016.3.2 was used to estimate construction emissions. The construction schedule and equipment assumptions are provided in Impact III.c. The emissions analysis incorporates required regulatory compliance, such as SCAQMD Rule 403. Note that because of the way the CalEEMod model is constructed, compliance with SCAQMD Rule 403 is reflected as mitigation in the output, although compliance with Rule 403 is mandatory and not considered mitigation under CEQA.

The SCAQMD has published a “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds” (SCAQMD 2011c). The CalEEMod model calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. In order to compare the CalEEMod model reported emissions against the LST lookup tables, the CEQA document should contain in its project design features or its mitigation measures the following parameters:

1. The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.
2. The maximum number of acres disturbed on the peak day.
3. Any emission control devices added onto off-road equipment.
4. Specific dust suppression techniques used on the day of construction activity with maximum emissions.

During grading activities, fugitive dust can be generated from the movement of dirt on the Project Site. The CalEEMod model estimates dust from dozers moving dirt around, dust from graders or scrapers leveling the land, and loading or unloading dirt into haul trucks. Each activity is calculated differently in the CalEEMod model, based on the number of acres traversed by the grading equipment.

Only some pieces of equipment generate fugitive dust in the CalEEMod model. The CalEEMod manual identifies various types of equipment and the acreage disturbed in an 8-hour day:

- Crawler tractors, graders, and rubber tired dozers: 0.5 acre per 8-hour day
- Scrapers: 1 acre per 8-hour day

Therefore, the following acres are the quantity disturbed per day, per phase, according to the acreage disturbed quantities listed above:

- Site Preparation = 2.5 acres/day
- Grading 1 = 2.5 acres/day
- Grading 2 = 2.5 acres/day

Based on the SCAQMD guidance on applying the CalEEMod model to LSTs, the LST thresholds for 2.5 acres were utilized for the construction LST analysis. It should be noted that the LST lookup tables provides values for 1-acre, 2-acre, and 5-acre sites. As such, the thresholds for 2.5 acres were interpolated from the 2-acre and 5-acre thresholds.

The nearest sensitive receptor is located approximately 183 meters (600 feet) north of the Project Site. The LST look-up tables provides thresholds for sensitive receptors located at 25 meters, 50 meters, 100 meters, 200 meters, and 500 meters. As a conservative measure, LSTs for sensitive receptors located at 100 meters were utilized in this analysis.

The localized assessment methodology limits the emissions in the analysis to those generated from on-site activities. The on-site emissions during construction are compared with the LSTs and summarized in Table 2. As shown therein, the construction of the project would not exceed the SCAQMD’s localized construction significance thresholds.

| Table 2: Construction Localized Significance Analysis |
|----------------------------------|--------|--------|--------|--------|
| Activity                        | NO$_X$ | CO     | PM$_{10}$ | PM$_{2.5}$ |
| Site Preparation—2018           | 28.9   | 15.7   | 3.9     | 2.5     |
| Geopiers—2018                   | 9.9    | 6.8    | 0.5     | 0.5     |
| Grading 1—2018                  | 30.4   | 17.1   | 3.9     | 2.6     |
| Building Construction 1—2018    | 31.1   | 21.7   | 1.6     | 1.5     |
### Environmental Issues

<table>
<thead>
<tr>
<th>Activity</th>
<th>On-site Emissions (pounds per day)</th>
<th>NOX</th>
<th>CO</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Construction 1—2019</td>
<td></td>
<td>28.3</td>
<td>21.4</td>
<td>1.5</td>
<td>1.4</td>
</tr>
<tr>
<td>Architectural Coating—2019</td>
<td></td>
<td>1.8</td>
<td>1.8</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>Grading 2—2019</td>
<td></td>
<td>26.7</td>
<td>15.4</td>
<td>3.8</td>
<td>2.4</td>
</tr>
<tr>
<td>Paving—2019</td>
<td></td>
<td>12.6</td>
<td>12.5</td>
<td>0.7</td>
<td>0.6</td>
</tr>
<tr>
<td>Building Construction 2—2019</td>
<td></td>
<td>29.6</td>
<td>21.7</td>
<td>1.7</td>
<td>1.5</td>
</tr>
</tbody>
</table>

#### Maximum Daily On-site Emissions

<p>| | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Localized Significance Threshold</td>
<td>153</td>
<td>2,023</td>
<td>45</td>
<td>13</td>
<td></td>
</tr>
</tbody>
</table>

| Exceeds Threshold? | NO | NO | NO | NO |

Notes:
The maximum daily on-site emissions for NOX and CO would occur during the overlap of the Architectural Coating, Paving, and Building Construction 2 construction activities. The maximum daily emissions of particulate matter occur with the Grading 1 activity.
Credit for Rule 403 Fugitive Dust has been taken in the estimation of PM$_{10}$ and PM$_{2.5}$ emissions.
LSTs derived for SRA 17, distance to sensitive receptor of 100 meters and a disturbed area of 2.5 acres
Source: CalEEMod and FirstCarbon Solutions; see Appendix A.

As shown, the project would not exceed the LSTs for NOX, CO, PM$_{10}$, and PM$_{2.5}$. Therefore, the project would not expose receptors to substantial criteria pollutant concentrations from construction activities. Impacts would be less than significant.

### Operations

The project’s operational emissions occur from a variety of sources, such as area, energy, mobile, and stationary. A majority of long-term operational emissions occur off-site as mobile-source emissions. The localized assessment methodology limits the emissions that are analyzed to those generated from on-site activities. Therefore, only on-site operational emissions were used to compare with SCAQMD’s operational LSTs. A trip length of 0.1 mile was used in the modeling to account for on-site emissions from mobile sources as representative of the travel distances of motor vehicles within the Project Site.

Similar to the construction analysis described above, the project’s daily on-site emissions during operation are compared with the applicable LSTs and summarized in Table 3.

### Table 3: Operational Localized Significance Analysis

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>NOX</th>
<th>CO</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area</td>
<td>0.0</td>
<td>0.1</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Energy</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Mobile</td>
<td>3.0</td>
<td>5.8</td>
<td>0.1</td>
<td>0.0</td>
</tr>
<tr>
<td>Stationary</td>
<td>10.1</td>
<td>5.8</td>
<td>0.3</td>
<td>0.3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>13.1</td>
<td>11.6</td>
<td>0.4</td>
<td>0.4</td>
</tr>
</tbody>
</table>

| Localized Significance Threshold | 153 | 2,023 | 12 | 4 |

| Exceeds Significance Threshold? | No | No | No | No |

Notes:

1. For each source, the maximum emissions between summer and winter are shown.
2. NOX = nitrogen oxides; VOC = volatile organic compounds; CO = carbon monoxide
3. PM$_{10}$ = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less
4. PM$_{2.5}$ = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers

Source of thresholds: South Coast Air Quality Management District 2009, for SRA 17, 100 meters, 2.5-acre site. Emission totals may vary slightly due to rounding.
Source: CalEEMod and FirstCarbon Solutions; see Appendix A.

As shown in Table 3, on-site project operational-related emissions prior to mitigations would not exceed the operational LSTs.
Environmental Issues | Potentially Significant Impact | Less Than Significant Impact | Less Than Significant with Mitigation | No Impact
--- | --- | --- | --- | ---

Therefore, the Proposed Project would not expose receptors to substantial criteria pollutant concentration from operational-related activities. Impacts would be less than significant.

**Carbon Monoxide Hot Spot Analysis**

Carbon monoxide (CO) “hot spot” thresholds ensure that emissions of CO associated with traffic impacts from a project in combination with CO emissions from existing and forecasted regional traffic do not exceed state or federal standards for CO at any traffic intersection impacted by the project.

The largest contributor of CO emissions during project operations is typically from motor vehicles. A CO hotspot represents a condition where high concentrations of CO may be produced by motor vehicles accessing a congested traffic intersection under heavy traffic volume conditions. The CO hotspot thresholds are represented by the most stringent state or federal CO ambient air quality standard:

- 1-hour CO standard: 20 ppm (state)
- 8-hour CO standard: 9 ppm (state/federal)

The analysis prepared for CO attainment in the SoCAB by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the SoCAB. CO attainment was thoroughly analyzed as part of the SCAQMD’s 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) (SCAQMD 1992). As discussed in the 1992 CO Plan, peak CO concentrations in the SoCAB are due to unusual meteorological and topographical conditions, and are not due to the impact of particular intersections. Considering the region’s unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated were Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day.

As determined in the traffic impact analysis, under Opening Year (2019) Plus Project conditions, the maximally impacted intersection (Harbor Blvd. & Ball Rd.) would service approximately 6,208 vehicles during the PM peak hour (Iteris 2018). Using a conservative factor of 10 to calculate daily vehicles, this maximally impacted intersection would service approximately 62,080 vehicles per day, which is substantially less than the 100,000 vehicles determined in SCAQMD’s CO hotspot analysis. Therefore, the Proposed Project plus cumulative traffic would not contribute a substantial amount of traffic to existing or future intersections that could result in a CO hotspot. Therefore, the operational CO impact would be less than significant.

c) **Less than significant impact.** This impact discusses whether the Proposed Project would result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. In order to determine these impacts, the project’s regional criteria pollutant impacts are assessed. The non-attainment regional pollutants of concern are ozone, PM	extsubscript{10}, and PM	extsubscript{2.5}. Ozone is not emitted directly into the air; rather, it is a regional pollutant formed by a photochemical reaction in the atmosphere. Ozone precursors, VOC and oxides of nitrogen (NOX) react in the atmosphere in the presence of sunlight to form ozone. Therefore, the SCAQMD does not have a recommended ozone threshold, but has regional thresholds of significance for VOC and NOX.

Emissions from projects in the SoCAB can potentially contribute to the existing emission burden and possibly affect the attainment and maintenance of ambient air quality standards. Therefore, the SCAQMD has established regional significance thresholds applicable to project construction and operational emissions. Projects within the SoCAB with regional emissions in excess of any of the applicable regional thresholds below are considered to have a significant regional air quality impact. Project-generated construction and operational emissions were estimated using the CalEEMod model version 2016.3.2. Emissions model output is included in Appendix A to this report.

**Construction Emissions**

The construction activities associated with the Proposed Project include site preparation, Geopiers use, grading, building construction, paving, and architectural coating. The Proposed Project would be constructed over approximately 1 year and 2 months, beginning as early as May 2018. The CalEEMod model construction phase lengths were based on information provided by the Applicant. Where information was not provided, the appropriate CalEEMod model defaults were utilized. A conceptual construction schedule and associated equipment list is provided in Table 4—*Conceptual Construction Schedule* and Table 5—*Project Construction Equipment Assumptions*, respectively.
### Table 4: Conceptual Construction Schedule

<table>
<thead>
<tr>
<th>Construction Activity</th>
<th>Construction Schedule</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Start Date</td>
<td>End Date</td>
<td>Working Days</td>
<td></td>
</tr>
<tr>
<td>Site Preparation</td>
<td>5/1/2018</td>
<td>5/7/2018</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Grading 1</td>
<td>5/8/2018</td>
<td>5/21/2018</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Architectural Coating</td>
<td>2/1/2019</td>
<td>7/4/2019</td>
<td>110</td>
<td></td>
</tr>
<tr>
<td>Paving</td>
<td>6/1/2019</td>
<td>9/6/2019</td>
<td>70</td>
<td></td>
</tr>
<tr>
<td>Building Construction 2</td>
<td>7/1/2019</td>
<td>7/3/2019</td>
<td>3</td>
<td></td>
</tr>
</tbody>
</table>

Source: CalEEMod Output (Appendix A).

### Table 5: Project Construction Equipment Assumptions

<table>
<thead>
<tr>
<th>Activity Name</th>
<th>Equipment</th>
<th>Number</th>
<th>Hours per day</th>
<th>Horsepower</th>
<th>Load Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Preparation</td>
<td>Excavators</td>
<td>1</td>
<td>8</td>
<td>158</td>
<td>0.38</td>
</tr>
<tr>
<td></td>
<td>Graders</td>
<td>1</td>
<td>8</td>
<td>187</td>
<td>0.41</td>
</tr>
<tr>
<td></td>
<td>Rubber Tired Dozers</td>
<td>1</td>
<td>8</td>
<td>247</td>
<td>0.40</td>
</tr>
<tr>
<td></td>
<td>Tractors/Loaders/Backhoes</td>
<td>3</td>
<td>6.5</td>
<td>122</td>
<td>0.37</td>
</tr>
<tr>
<td>Geopiers</td>
<td>Other Construction Equipment</td>
<td>1</td>
<td>8</td>
<td>600</td>
<td>0.42</td>
</tr>
<tr>
<td></td>
<td>Other Construction Equipment</td>
<td>1</td>
<td>8</td>
<td>138</td>
<td>0.42</td>
</tr>
<tr>
<td></td>
<td>Other Construction Equipment</td>
<td>1</td>
<td>8</td>
<td>142</td>
<td>0.42</td>
</tr>
<tr>
<td>Grading 1</td>
<td>Excavators</td>
<td>1</td>
<td>8</td>
<td>158</td>
<td>0.38</td>
</tr>
<tr>
<td></td>
<td>Graders</td>
<td>1</td>
<td>8</td>
<td>187</td>
<td>0.41</td>
</tr>
<tr>
<td></td>
<td>Rubber Tired Dozers</td>
<td>1</td>
<td>8</td>
<td>247</td>
<td>0.40</td>
</tr>
<tr>
<td></td>
<td>Tractors/Loaders/Backhoes</td>
<td>3</td>
<td>6.5</td>
<td>122</td>
<td>0.37</td>
</tr>
<tr>
<td>Building Construction 1</td>
<td>Cranes</td>
<td>1</td>
<td>7</td>
<td>231</td>
<td>0.29</td>
</tr>
<tr>
<td></td>
<td>Forklifts</td>
<td>2</td>
<td>6</td>
<td>100</td>
<td>0.20</td>
</tr>
<tr>
<td></td>
<td>Generator Sets</td>
<td>2</td>
<td>7.5</td>
<td>9</td>
<td>0.74</td>
</tr>
<tr>
<td></td>
<td>Other Construction Equipment</td>
<td>3</td>
<td>6.5</td>
<td>172</td>
<td>0.42</td>
</tr>
<tr>
<td></td>
<td>Tractors/Loaders/Backhoes</td>
<td>3</td>
<td>6.5</td>
<td>122</td>
<td>0.37</td>
</tr>
<tr>
<td>Architectural Coating</td>
<td>Air Compressors</td>
<td>1</td>
<td>6</td>
<td>78</td>
<td>0.48</td>
</tr>
</tbody>
</table>
### Environmental Issues

<table>
<thead>
<tr>
<th>Activity Name</th>
<th>Equipment</th>
<th>Number</th>
<th>Hours per day</th>
<th>Horsepower</th>
<th>Load Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grading 2</td>
<td>Excavators</td>
<td>1</td>
<td>8</td>
<td>158</td>
<td>0.38</td>
</tr>
<tr>
<td></td>
<td>Graders</td>
<td>1</td>
<td>8</td>
<td>187</td>
<td>0.41</td>
</tr>
<tr>
<td></td>
<td>Rubber Tired Dozers</td>
<td>1</td>
<td>8</td>
<td>247</td>
<td>0.40</td>
</tr>
<tr>
<td></td>
<td>Tractors/Loaders/Backhoes</td>
<td>3</td>
<td>6.5</td>
<td>122</td>
<td>0.37</td>
</tr>
<tr>
<td>Paving</td>
<td>Cement and Mortar Mixers</td>
<td>2</td>
<td>6</td>
<td>9</td>
<td>0.56</td>
</tr>
<tr>
<td></td>
<td>Pavers</td>
<td>1</td>
<td>8</td>
<td>130</td>
<td>0.42</td>
</tr>
<tr>
<td></td>
<td>Paving Equipment</td>
<td>2</td>
<td>6</td>
<td>132</td>
<td>0.36</td>
</tr>
<tr>
<td></td>
<td>Rollers</td>
<td>2</td>
<td>6</td>
<td>80</td>
<td>0.38</td>
</tr>
<tr>
<td></td>
<td>Tractors/Loaders/Backhoes</td>
<td>1</td>
<td>6.5</td>
<td>122</td>
<td>0.37</td>
</tr>
<tr>
<td>Building Construction 2</td>
<td>Cranes</td>
<td>1</td>
<td>7</td>
<td>231</td>
<td>0.29</td>
</tr>
<tr>
<td></td>
<td>Forklifts</td>
<td>2</td>
<td>6</td>
<td>100</td>
<td>0.20</td>
</tr>
<tr>
<td></td>
<td>Generator Sets</td>
<td>2</td>
<td>7.5</td>
<td>9</td>
<td>0.74</td>
</tr>
<tr>
<td></td>
<td>Other Construction Equipment</td>
<td>3</td>
<td>6.5</td>
<td>172</td>
<td>0.42</td>
</tr>
<tr>
<td></td>
<td>Tractors/Loaders/Backhoes</td>
<td>3</td>
<td>6.5</td>
<td>122</td>
<td>0.37</td>
</tr>
</tbody>
</table>

Source: CalEEMod Output (Appendix A).

The Property Owner/Developer would be required to adhere to standard SCAQMD regulations, such as implementing SCAQMD Rule 403 (see Standard Conditions in Impact III.a, which would reduce fugitive dust emissions. Table 6—Regional Construction Air Pollutant Emissions by Activity summarizes construction-generated emissions with standard conditions incorporated. For the assumptions used in generating the emissions, please refer to Appendix A.

The information shown in Table 6 indicates that the SCAQMD regional emission thresholds would not be exceeded for construction emissions. Therefore, the short-term construction emissions would have a less than significant impact.

### Table 6: Regional Construction Air Pollutant Emissions by Activity

<table>
<thead>
<tr>
<th>Activity</th>
<th>NOX</th>
<th>VOC</th>
<th>CO</th>
<th>SOX</th>
<th>PM₁₀</th>
<th>PM₂.⁵</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Preparation—2018</td>
<td>29.0</td>
<td>2.6</td>
<td>16.2</td>
<td>0.0</td>
<td>3.9</td>
<td>2.6</td>
</tr>
<tr>
<td>Geopiers—2018</td>
<td>9.9</td>
<td>1.0</td>
<td>7.1</td>
<td>0.0</td>
<td>0.6</td>
<td>0.5</td>
</tr>
<tr>
<td>Grading 1—2018</td>
<td>30.4</td>
<td>2.8</td>
<td>17.6</td>
<td>0.0</td>
<td>3.9</td>
<td>2.6</td>
</tr>
<tr>
<td>Building Construction 1—2018</td>
<td>40.4</td>
<td>4.2</td>
<td>31.5</td>
<td>0.1</td>
<td>4.3</td>
<td>2.3</td>
</tr>
<tr>
<td>Building Construction 1—2019</td>
<td>37.1</td>
<td>3.9</td>
<td>30.3</td>
<td>0.1</td>
<td>4.1</td>
<td>2.1</td>
</tr>
<tr>
<td>Architectural Coating—2019</td>
<td>2.0</td>
<td>13.7</td>
<td>3.2</td>
<td>0.0</td>
<td>0.6</td>
<td>0.3</td>
</tr>
<tr>
<td>Grading 2—2019</td>
<td>26.8</td>
<td>2.5</td>
<td>16.0</td>
<td>0.0</td>
<td>3.8</td>
<td>2.5</td>
</tr>
<tr>
<td>Paving—2019</td>
<td>12.7</td>
<td>1.4</td>
<td>13.2</td>
<td>0.0</td>
<td>1.1</td>
<td>0.7</td>
</tr>
<tr>
<td>Building Construction 2—2019</td>
<td>38.5</td>
<td>4.0</td>
<td>30.6</td>
<td>0.1</td>
<td>1.7</td>
<td>2.3</td>
</tr>
</tbody>
</table>
### Environmental Issues

| Activity                          | NO<sub>x</sub> | VOC | CO   | SO<sub>x</sub> | PM<sub>10</sub> | PM<sub>2.5</sub> |
|----------------------------------|----------------|-----|------|---------------|----------------|-----------------
| Maximum Daily Emissions         | 53.1           | 19.0| 47.1 | 0.1           | 4.9            | 3.3             |
| SCAQMD Air Quality Significance | 100            | 75  | 550  | 150           | 150            | 55              |
| Thresholds                      |                |     |      |               |                |                 |
| Exceeds Threshold?              | No             | No  | No   | No            | No             | No              |

Notes:
- NO<sub>x</sub> = oxides of nitrogen; VOC = volatile organic compounds; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides
- PM<sub>10</sub> = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less
- PM<sub>2.5</sub> = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers.
- The maximum daily emissions for NO<sub>x</sub>, VOCs, CO, SO<sub>x</sub>, and PM<sub>10</sub> occur during the overlap of the Architectural coating, Paving, and Building Construction 2 activities; the maximum daily emissions for PM<sub>2.5</sub> occur during the overlap of the Geopiers and Building Construction 1 activities.
- Credit for Rule 403 Fugitive Dust has been taken in the estimation of PM<sub>10</sub> and PM<sub>2.5</sub> emissions.
- Source of emissions: FCS 2018. For each source, the maximum emissions between summer and winter are shown. Emissions totals may vary slightly due to rounding.

## Operational Regional Emissions

The CalEEMod model was used to estimate operational emissions that would occur with the proposed land uses. Operational emissions are generated based on area, energy, and mobile sources. Area sources would include activities such as landscape maintenance, consumer product usage, and occasional application of architectural coatings. Energy sources would include electricity usage and natural gas combustion for space and water heating. Mobile sources would include vehicle trips associated with vehicles accessing the Project Site. Mobile trip characteristics are based on the Radisson Hotel Traffic Impact Study (Iteris 2018). In addition, emissions from the maintenance and testing of an emergency standby generator were also accounted for.

Operational emissions were estimated for the summer and winter seasons. The maximum operational emissions between the summer and winter seasons, as derived from CalEEMod model, are shown in Table 7—Regional Operational Emissions. Outputs for both seasons are found in Appendix A.

The information shown in Table 7 indicates that the SCAQMD regional emission thresholds would not be exceeded for operational emissions. Therefore, the long-term operational emissions would have a less than significant impact.

### Table 7: Regional Operational Emissions

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>VOC</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>CO</th>
<th>SO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area</td>
<td>5.8</td>
<td>0.0</td>
<td>0.1</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Energy</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Mobile</td>
<td>1.8</td>
<td>6.6</td>
<td>19.8</td>
<td>0.1</td>
<td>5.2</td>
<td>1.4</td>
</tr>
<tr>
<td>Stationary</td>
<td>2.3</td>
<td>10.1</td>
<td>5.8</td>
<td>0.0</td>
<td>0.3</td>
<td>0.3</td>
</tr>
<tr>
<td>Total</td>
<td>9.8</td>
<td>16.7</td>
<td>25.7</td>
<td>0.1</td>
<td>5.6</td>
<td>1.8</td>
</tr>
<tr>
<td>SCAQMD Air Quality Significance Thresholds</td>
<td>55</td>
<td>55</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
<tr>
<td>Exceeds Significance Threshold?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:
- For each source, the maximum emissions between summer and winter are shown.
- NO<sub>x</sub> = oxides of nitrogen; VOC = volatile organic compounds; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides
- PM<sub>10</sub> = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less
- PM<sub>2.5</sub> = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers.
- Source: CalEEMod and FirstCarbon Solutions, see Appendix A. Emissions may vary slightly due to rounding.
As shown in Impact III.b above, the Proposed Project would not exceed the localized significance thresholds for construction-generated criteria pollutants. Therefore, the project would not expose receptors to substantial criteria pollutant concentrations from construction microns (PM$_{2.5}$). On-site emissions of both DPM occur during construction from the operation of heavy-duty construction equipment activities. Impacts would be less than significant.

The Proposed Project would generate diesel exhaust, a source of DPM, during project construction. Diesel particulates are typically 2.5 microns (PM$_{2.5}$). The United States Environmental Protection Agency has since determined that severely damaged, otherwise non-friable materials can release significant amounts of asbestos fibers. Asbestos has been banned from many building materials under the Toxic Substances Control Act, the Clean Air Act, and the Consumer Product Safety Act. However, buildings that could emit asbestos emissions. Therefore, the Proposed Project would not conflict with SCAQMD, federal, and state regulations regarding asbestos limitations and impacts would be less than significant.

The nearest sensitive receptor is the mobile home community located approximately 183 meters/600 feet north of the Project Site.

The California Department of Conservation, Division of Mines and Geology (DMG) has a published guide for generally identifying areas that are likely to contain NOA (DMG 2011). The DMG map indicates NOA are not known to occur within the project area. Therefore, disturbance of NOA during project construction is not a concern for the Proposed Project and there would be no impact.

Asbestos-containing Materials
In the initial Asbestos National Emission Standards for Hazardous Air Pollutants rule promulgated in 1973, a distinction was made between building materials that would readily release asbestos fibers when damaged or disturbed (friable) and those materials that were unlikely to result in significant fiber release (non-friable). The United States Environmental Protection Agency has since determined that severely damaged, otherwise non-friable materials can release significant amounts of asbestos fibers. Asbestos has been banned from many building materials under the Toxic Substances Control Act, the Clean Air Act, and the Consumer Product Safety Act. However, most uses of asbestos for building material are not banned. The Project Site is vacant and would not require demolition of existing buildings that could emit asbestos emissions. Therefore, the Proposed Project would not conflict with SCAQMD, federal, and state regulations regarding asbestos limitations and impacts would be less than significant.

Construction: Localized Construction Impacts
As shown in Impact III.b above, the Proposed Project would not exceed the localized significance thresholds for construction-generated criteria pollutants. Therefore, the project would not expose receptors to substantial criteria pollutant concentrations from construction activities. Impacts would be less than significant.

Construction: Diesel Particulate Matter
The Proposed Project would generate diesel exhaust, a source of DPM, during project construction. Diesel particulates are typically 2.5 microns (PM$_{2.5}$). On-site emissions of both DPM occur during construction from the operation of heavy-duty construction equipment and from vendor trucks that operate on project sites.

Project activities that would generate DPM emissions are short-term in nature. Moreover, the current methodological protocols required by SCAQMD and ARB when studying the health risk posed by DPM assume the following: (a) 24-hour constant exposure; (b) 350 days

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>
| Conclusion           | The SCAQMD does not recommend quantified analysis of cumulative construction or operational emissions, nor does it provide separate methodologies or thresholds of significance to be used to assess cumulative construction or operational impacts. However, if an individual development project generates operational emissions that exceed the SCAQMD recommended daily thresholds, project-specific impacts would also cause a cumulative considerable increase in emissions for those pollutants for which the SoCAB is in non-attainment. As indicated in Table 6 and Table 7 above, the Proposed Project would not exceed SCAQMD thresholds during construction or operation. Therefore, impacts would be less than significant. As discussed above, the region is non-attainment for the federal and state ozone standards, the state PM$_{10}$ standards, and the federal and state PM$_{2.5}$ standards. Therefore, a project that would not exceed the SCAQMD thresholds of significance on a project-level would also not result in a cumulatively considerable contribution to these regional air quality impacts. This impact would be cumulatively less than significant. d) **Less than significant impact.** This discussion addresses whether the Proposed Project would expose sensitive receptors to naturally occurring asbestos (NOA), asbestos from building demolition, construction-generated localized criteria pollutant impacts, construction-generated diesel particulate matter (DPM), construction or operational related TACs, or operational CO hotspots. Sensitive Receptors
Those who are sensitive to air pollution include children, the elderly, and persons with pre-existing respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities (SCAQMD 2008a). Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as NO$_2$ and CO$_2$), commercial and/or industrial facilities would be considered sensitive receptors for those purposes. The nearest sensitive receptor is the mobile home community located approximately 183 meters/600 feet north of the Project Site.

Naturally Occurring Asbestos
Asbestos is a fibrous mineral which is both naturally occurring in ultramafic rock (a rock type commonly found in California), and used as a processed component of building materials. Because asbestos has been proven to cause a number of disabling and fatal diseases, such as asbestosis and lung cancer, it is strictly regulated because of its natural widespread occurrence or its use as a building material. In addition, the ARB approved an Air Toxic Control Measure for construction, grading, quarrying, and surface mining operations to minimize emissions of NOA. The regulation requires application of best management practices to control fugitive dust in areas known to have NOA and requires notification to the local air district prior to commencement of ground-disturbing activities.

The California Department of Conservation, Division of Mines and Geology (DMG) has a published guide for generally identifying areas that are likely to contain NOA (DMG 2011). The DMG map indicates NOA are not known to occur within the project area. Therefore, disturbance of NOA during project construction is not a concern for the Proposed Project and there would be no impact.

Asbestos-containing Materials
In the initial Asbestos National Emission Standards for Hazardous Air Pollutants rule promulgated in 1973, a distinction was made between building materials that would readily release asbestos fibers when damaged or disturbed (friable) and those materials that were unlikely to result in significant fiber release (non-friable). The United States Environmental Protection Agency has since determined that severely damaged, otherwise non-friable materials can release significant amounts of asbestos fibers. Asbestos has been banned from many building materials under the Toxic Substances Control Act, the Clean Air Act, and the Consumer Product Safety Act. However, most uses of asbestos for building material are not banned. The Project Site is vacant and would not require demolition of existing buildings that could emit asbestos emissions. Therefore, the Proposed Project would not conflict with SCAQMD, federal, and state regulations regarding asbestos limitations and impacts would be less than significant.

Construction: Localized Construction Impacts
As shown in Impact III.b above, the Proposed Project would not exceed the localized significance thresholds for construction-generated criteria pollutants. Therefore, the project would not expose receptors to substantial criteria pollutant concentrations from construction activities. Impacts would be less than significant.

Construction: Diesel Particulate Matter
The Proposed Project would generate diesel exhaust, a source of DPM, during project construction. Diesel particulates are typically 2.5 microns (PM$_{2.5}$). On-site emissions of both DPM occur during construction from the operation of heavy-duty construction equipment and from vendor trucks that operate on project sites.

Project activities that would generate DPM emissions are short-term in nature. Moreover, the current methodological protocols required by SCAQMD and ARB when studying the health risk posed by DPM assume the following: (a) 24-hour constant exposure; (b) 350 days
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
---|---|---|---|---
a year; (c) for a continuous period lasting 30 years. Therefore, considering the dispersion of the emissions and the short construction time frame, exposure to DPM would be less than significant.

**Operation: Toxic Air Pollutants**
The Proposed Project would include an emergency diesel generator that would be a source of DPM. The generator would operate for approximately 1 hour a month for testing purposes. Emissions associated with operation of the emergency generator would not be expected to result in a significant health risk impact. Therefore, impacts would be less than significant.

**Operation: CO Hotspot**
As shown in Impact III.b above, the Proposed Project would not create a localized CO hotspot. Therefore, the Proposed Project would not expose receptors to substantial CO concentrations from operational activities.

**Conclusion**
The Proposed Project would not expose receptors to substantial quantities or significant concentrations of asbestos from demolition or soils disturbance, construction-generated localized criterion pollutant concentrations, construction-generated DPM, operational TACs, or CO hotspots. Therefore, impacts would be less than significant.

c) **Less than significant impact.** Odors can cause a variety of responses. The impact of an odor often results from interacting factors such as frequency (how often), intensity (strength), duration (time), offensiveness (unpleasantness), location, and sensory perception.

Odor is typically a warning system that prevents animals and humans from consuming spoiled food or toxic materials. Odor-related symptoms reported in a number of studies include nervousness, headache, sleeplessness, fatigue, dizziness, nausea, loss of appetite, stomachache, sinus congestion, eye irritation, nose irritation, runny nose, sore throat, cough and asthma exacerbation (SCAQMD 2007).

The SCAQMD’s role is to protect the public’s health from air pollution by overseeing and enforcing regulations (SCAQMD 2007). The SCAQMD’s resolution activity for odor compliance is mandated under California Health & Safety Code Section 41700, and falls under SCAQMD Rule 402. The Public Nuisance Regulation states: “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”

During construction, diesel-powered vehicles and equipment in use on-site would create localized odors. These odors would be temporary and would not likely be noticeable for extended periods of time beyond the boundaries of the Project Site and impacts would be less than significant.

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The Proposed Project would consist of commercial development, and the operation would not introduce any new sources of odors to the project vicinity. Therefore, impacts would be less than significant.

**Standard Conditions**

**SCAQ-1:** Prior to the issuance of a building permit, the Property Owner/Developer shall include notes on the plans that the construction contractor shall comply with each of the following SCAQMD rules and regulations during construction:

- **SCAQMD Rule 402**—The construction contractor shall ensure that construction personnel shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property.

- **SCAQMD Rule 403**—All construction contractors shall comply with South Coast Air Quality Management District (SCAQMD) regulations, including Rule 403, Fugitive Dust. All grading (regardless of acreage) shall apply best available control measures for fugitive dust in accordance with Rule 403. To ensure that the Project is in full compliance with applicable SCAQMD dust regulations and that there is no nuisance impact off the site, the Property Owner/Developer would be required to implement each of the following measures below. Compliance with these rules would reduce impacts on nearby sensitive receptors.
  - Apply nontoxic chemical soil stabilizers according to manufacturers’ specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
  - Water active sites at least three times daily. (Locations where grading is to occur will be thoroughly watered prior to earthmoving.)
  - Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code section 23114.
## Environmental Issues

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce traffic speeds on all unpaved roads to 15 mph or less.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspension of all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bumper strips or similar best management practices shall be provided where vehicles enter and exit the construction site onto paved roads, or wash off trucks and any equipment leaving the site each trip.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Replanting disturbed areas as soon as practical.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>During all construction activities, construction contractors shall sweep on-site and off-site streets if silt is carried to adjacent public thoroughfares, to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **SCAQMD Rule 481**—During the application of building architectural coatings, all construction contractors shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:
  - (1) The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule, shall be exhausted only through filters at a design face velocity not less than 100 feet per minute, nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.
  - (2) Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
  - (3) An alternative method of coating application or control is used which, has effectiveness equal to or greater than the equipment specified in the rule.

- **SCAQMD Rule 1108**—During construction of the Proposed Project, all construction contractors shall purchase and utilize asphalts that comply with the VOC content specified in SCAQMD Rule 1108.

- **SCAQMD Rule 1113**—During construction and operation of the Proposed Project, all construction contractors shall purchase and utilize paints and paint solvents that comply with the VOC content specified in SCAQMD Rule 1113.

- **SCAQMD Rule 1143**—During construction and operation of the Proposed Project, all construction contractors shall purchase and utilize paint thinners and solvents that comply with the VOC content specified in SCAQMD Rule 1143.

- **SCAQMD Rule 1186**—The construction contractor shall limit the presence of fugitive dust on paved and unpaved roads through compliance with measures stated in SCAQMD Rule 1186, which includes but is not limited to the following:
  - Removing visible roadway accumulations on paved roads through street cleaning within 72 hours of notice of accumulation and completely removing the material as soon as feasible.
  - Using only SCAQMD Rule 1186-certified street sweeping equipment for routine street sweeping on public roads.
  - Treating unpaved roads through methods such as paving and chemical stabilization.

- **SCAQMD Rule 1470**—The construction contractor shall ensure that all stationary sources, with engines over 50 horsepower, that are used at the Project Site shall comply with the California Air Resources Board’s (ARB’s) Air Toxics Control Measure for Stationary Compression Ignition Engines, which is intended to control particulate matter emissions generated from stationary sources with engines over 50 horsepower.

### Mitigation Measures

None.

## IV. BIOLOGICAL RESOURCES—Would the project:

### a)

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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?
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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? | ☐ | ☐ | ☐ | ☑ |

**Narrative Summary:**
FirstCarbon Solutions prepared a Biological Resources Evaluation Report, dated January 11, 2018 and is included as Appendix B of this report. The Project Site is in a built-out portion of Anaheim that contains few biological resources. The Site is undeveloped and entirely surrounded by industrial and commercial complexes, development, and roadways. The Project Site is vacant and disturbed, and no longer supports natural native plant communities, nor is it connected to natural habitats. Some construction debris from previous activities at the Site is present at the surface (GeoDesign, Inc. 2017). The Project Site is flat and there is no natural topography such as slopes, canyons, mounds, gullies, draws, rivulets, terraces, channels, drainages, or other natural features.

**Study Methods**

**Literature Review**
An FCS biologist researched relevant literature, databases, agency websites, various previously completed reports and management plans, GIS data, maps, aerial imagery from public domain sources, and in-house records to (1) assess habitats, special-status plant and wildlife species, jurisdictional waters, critical habitats, and wildlife corridors that may occur in and near the Project Site, and (2) identify local or regional plans, policies, and regulations that may apply to the Project Site. Plant and wildlife species protected by federal agencies, state agencies, and nonprofit resource organizations, such as the California Native Plant Society (CNPS), are collectively referred to as “special-status species” in this report.1 Some of these plant and wildlife species are afforded special legal or management protection because they are limited in population size, and typically have a limited geographic range and/or habitat. The following data sources were accessed during the literature review.

- USGS 7.5-Minute Topographic Map Anaheim Quadrangle and current aerial imagery.
- California Natural Diversity Database (CNDDDB) provided by the California Department of Fish and Wildlife (CDFW 2017c).
- Information, Planning and Conservation (IPaC) provided by the United States Fish and Wildlife Service (USFWS) (USFWS 2017b).
- Inventory of Rare and Endangered Plants of California provided by the CNPS (CNPS 2017).
- National Wetlands Inventory (NWI) and Wetlands Mapper provided by the USFWS (USFWS 2017c).
- Biogeographic Information and Observation System (BIOS) provided by CDFW (CDFW 2017a and 2017b).
- Critical Habitat Portal provided by the USFWS (USFWS 2017a).
- City of Anaheim’s General Plan, zoning ordinances, and municipal codes.

**Field Survey**
Following the literature review, FCS’s biologist, Mr. Damien Edwards, conducted a reconnaissance-level biological survey on the Project Site on September 6, 2017. The survey included the following:

- Habitat assessment and plant community mapping
- General plant survey
- General wildlife survey
- Jurisdictional assessment.
- Wildlife movement evaluation

---

1 Avian species protected by the Migratory Bird Treaty Act (MBTA) are not considered “special-status species.”
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
---|---|---|---|---
The biologist conducted a pedestrian survey during the daylight hours and covered all accessible areas of the Project Site. The biologist characterized the existing habitat and searched for the presence of sensitive plant communities, special-status plants and wildlife, jurisdictional areas, and potential wildlife corridors. The purpose of the survey was not to extensively search for every species occurring within the Project Site, but to ascertain general site conditions and identify potentially suitable habitat areas for various special-status plant and wildlife species.

Existing Conditions
The Project Site is located in a developed portion of the City, is vacant, disturbed, and no longer supports natural native plant communities. The Project Site is flat and there are no natural topography such as slopes, canyons, mounds, gullies, draws, rivulets, terraces, channels, drainages, or other natural features.

Land Cover Types
Ruderal/disturbed habitat was the only land cover type on the Project Site, as determined by the literature review and field survey. Ruderal/disturbed habitats contain areas that are heavily to sparsely vegetated by non-native ruderal weedy species or lack vegetation completely. They are not considered sensitive plant communities and they provide little to no habitat value for wildlife. Ruderal vegetation is adapted to frequent disturbances. Ruderal habitats are persistent in California where habitat has been affected by human activities, resulting in a dominance of weedy annual, non-native species (ruderal plants). Ruderal plants can easily colonize areas that are devoid of vegetation. The Project Site is dominated with exotic grasses and Russian thistle (Salsola tragus). Disturbed habitat refers to bare areas that have little to no vegetation growing on them but continue to retain a soil substrate. These areas have been physically disturbed by human activity. Vegetation, if any, is most likely non-native. Disturbed areas contain compacted soils and are generally the result of severe or repeated mechanical perturbation.

Special-Status Plants
No listed, sensitive, or rare plant species were observed within the Project Site during the field survey. In addition, the literature review and field survey determined that the Project Site lacks suitable habitats, soils, and/or other factors to support special-status plant species.

Special-Status Wildlife
No listed or sensitive wildlife species were observed within the Project Site during the field survey. In addition, the literature review and field survey concluded that the Project Site lacks suitable and adequate biological and physical features that are needed to support special-status wildlife species. No wildlife were observed during the survey.

Trees
Trees on north edge property at or near fence include eucalyptus (Eucalyptus sp.), Mexican fan palm (Washingtonia robusta), Brazilian pepper tree (Schinus terebinthifolius), bougainvillea (Bougainvillea spectabilis) and mule fat (Baccharis salicifolia ssp. salicifolia). Trees growing just outside the fence along the freeway ramp include Canary Island pine (Pinus canariensis), crepe myrtle (Lagerstroemia sp.), and a few street trees along Anaheim Boulevard, including Mexican fan palm and locust (Robinia sp.).

Jurisdictional Areas
The literature review determined that the Project Site does not contain National Wetlands Inventory (NWI) wetlands. The jurisdictional assessment determined that the Project Site does not contain hydrological features, wetlands, marshes, vernal pools, channels with a bed or bank, or evidence of an ordinary high water mark (OHWM); therefore, the Project Site does not contain federal or state wetlands, waters, or habitats that are potentially subject to the jurisdictional authority of the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and CDFW.

Critical Habitats
The literature review determined that the Project Site is not located within a designated or proposed critical habitat for listed plant or wildlife species.

Wildlife Corridors
The literature review determined that the Project Site is not located within a CDFW designated Essential Habitat Connectivity Area or a Natural Landscape Block. The field survey determined that the Project Site does not function as a wildlife movement corridor. The Project Site does not contain wildlife travel routes, such as a riparian strip, ridgeline, or drainage; or wildlife crossings, such as a tunnel, culvert, or underpass. In addition, the Project Site is not located adjacent to nor does it connect large blocks of habitat. The Project Site does not represent a wildlife movement corridor because the site is disturbed and is completely surrounded by other development, walls, fencing, and roadways. These permanent structures serve as significant barriers to wildlife movement through the Project Site and region.

Nursery Sites
The Project Site does not support resident or migratory fish species and no native wildlife nursery sites or rookeries were observed within the Project Site during the field survey.

Impact Analysis
a) Less than significant impact with mitigation. The Proposed Project is not anticipated to have direct or indirect impacts on special-status plants or wildlife, and is anticipated to have no 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 CDFW or USFWS.
### Environmental Issues

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>While the Project Site is disturbed, it is vacant land with vegetation that could potentially provide cover, foraging, and nesting habitat for resident and migratory birds that have adapted to urban areas, such as mourning doves (<em>Zenaida macroura</em>) and killdeer (<em>Charadrius vociferus</em>). These species are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (§§ 3503, 3503.5, 3513, and 3800), which render it unlawful to take native breeding birds, and their nests, eggs, and young. The Proposed Project has the potential to result in direct impacts on breeding birds if project activities occur during the breeding bird season and birds are nesting within the Project Site and/or immediate vicinity at that time. Temporary direct impacts on breeding birds could occur from increased noise, vibration, and dust during construction, which could adversely affect the breeding behavior of some birds and lead to the loss (take) of eggs and chicks, or nest abandonment. Impacts on nesting birds would be considered potentially significant and must be avoided to comply with the Migratory Bird Treaty Act and California Fish and Game Code. Therefore, implementation of Mitigation Measure (MM) BIO-1 would avoid, eliminate or reduce direct impacts on breeding birds to less than significant levels. Impacts would be less than significant with mitigation.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) <strong>No impact.</strong> Riparian habitats are those on, relating to, or near the banks of a river, stream, creek, spring, seep, pond or lake. The Project Site is completely dry and does not support aquatic features, natural or man-made water bodies, wetlands or jurisdictional areas necessary to support riparian vegetation. Sensitive plant communities (sensitive habitats) are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental impacts of projects (CDFG 2009). No riparian habitat or other sensitive natural communities were observed on the Project Site. As such, no impacts would occur.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) <strong>No impact.</strong> The Project Site is completely dry and does not support aquatic features, natural or man-made water bodies, wetlands or jurisdictional areas; therefore, there would be no direct or indirect impacts on federally protected wetlands through direct removal, filling, hydrological interruption, or other means. As such, no impacts would occur.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) <strong>No impact.</strong> The Project Site does not contain and is not connected to an established wildlife corridor; therefore, the Project is not anticipated to have direct or indirect impacts on wildlife corridors or wildlife movement. The Project Site does not support resident or migratory fish species or wildlife nursery sites; as such, no impacts would occur.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) <strong>Less than significant impact.</strong> The Proposed Project would include removal of existing ornamental trees from the Project Site. The Anaheim Municipal Code identifies two ordinances pertaining to the removal of trees. The Proposed Property Owner/Developer would comply with Section 13.12.060 of the Anaheim Municipal Code related to replacement of removed street trees. This section requires any street tree removed to be replaced if a replacement is deemed possible, with the replacement species selected in accordance with the Official Tree Species List and Tree Master Plan. In addition, Section 13.12.070, Street Trees in New Developments, would apply to the Proposed Project. This section requires any new private development project, where there is a parkway between the sidewalk and curb, to plant street trees.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 18.18.040, Tree Preservation, of the Anaheim Municipal Code is related to the City’s Scenic Corridor (SC) Overlay Zone. The Project Site is not located with the City of Anaheim’s Scenic Corridor Overlay Zone; therefore, the Project would not be in conflict with the City’s tree preservation ordinance.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Based on compliance with local requirements, there would be less than significant impacts associated with the City’s tree preservation ordinance.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>f) <strong>No impact.</strong> The Project Site is not located within the boundary of and does not contain undeveloped natural lands subject to an adopted Habitat Conservation Plan (HCP), Natural Communities Conservation Plan Subregion (NCCP) or other approved local, regional, or state HCP; therefore, the Project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. As such, no impacts would occur.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Mitigation Measures

**Construction during Breeding Season and Pre-construction Breeding Bird Surveys**

Prior to the issuance of a grading and/or building permit for activities during the avian nesting season (February 1 through August 1), the Property Owner/Developer shall submit a survey for active nests to the City of Anaheim Planning and Building Department conducted by a qualified biologist a maximum of 30 days prior to the activities to determine the presence/absence, location, and status of any active nests on or adjacent to the Project Site. If no active nests are discovered or identified, no further mitigation is required. In the event that active nests are discovered on-site, a suitable buffer determined by the biologist (e.g., 30 to 50 feet for passerines) shall be established around any active nest. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Limits of construction to avoid a nest shall be established in the field by the biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed regarding the ecological sensitivity of the fenced area. The results of the survey shall be documented and filed with the City of Anaheim within 5 days after the survey.
V. CULTURAL RESOURCES—Would the project:

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the CEQA Guidelines and/or identified on the Qualified Historic Structures list of the Anaheim Colony Historic District Preservation Plan (April 15, 2010)?</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>d) Disturb any human remains, including those interred outside of dedicated cemeteries?</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

Narrative Summary:
FCS prepared a Phase I Cultural Resource Assessment, dated November 17, 2017 included as Appendix B. The Project Site is approximately 3.18 acres of vacant land. Prior to 1963 the site was occupied by an orchard with several outbuildings and a residence. Between 1963 and 1972 an on-ramp between South Anaheim Boulevard and Interstate 5 was constructed and commercial buildings and pavement were constructed on the south end of the site. By 1980, the on-ramp had been removed by Caltrans. Between 1980 and 1995 the buildings at the site had been removed. In 2003 the current configuration of the property between South Anaheim Boulevard and Interstate 5 was completed. The site has remained unoccupied and predominately unaltered since 2003. The Project Site is currently undeveloped, contains natural vegetation, and has a generally flat terrain. Because of the heavily disturbed nature of surface sediments, it is unlikely that intact cultural resources would be found during shallow excavations; however, more intact sediments may be encountered at depths beyond 8 feet. These sediments would be encountered during deep trenching and excavations associated with the construction of the basement.

a), b) Less than significant impact with mitigation. FCS conducted a records search at the SCCIC on August 29, 2017 for the Proposed Project. Appendix Sources consulted to identify historic properties included the current inventories of the National Register of Historic Places, California Register of Historical Resources, California Historical Landmarks, and California Points of Historical Interest. FCS also reviewed the Historic Resource Inventory and archival maps to determine the existence of previously documented cultural resources. The record search included a 0.25-mile buffer around the perimeter of the Project Site. The results of the combined records searches indicate that there have been three cultural resources studies conducted within a 0.25-mile radius of the Project Site, but none included any portion of the Project Site. The records search did not identify any cultural resources on or within a 0.25-mile radius of the Project Site. The Property Owner/Developer would implement Resort Mitigation Measure (MM) 5.4-1 in the event of the inadvertent discovery of historic or archaeological resources and impacts would be less than significant.

c) Less than significant impact with mitigation. The results of the paleontological records search indicate that surface grading or very shallow excavations in the uppermost few feet of the younger Quaternary alluvial sediments on the Project Site are unlikely to uncover significant fossil vertebrate remains. Deeper excavations on the Project Site that extend down into older deposits, however, may well encounter significant vertebrate fossils. Any substantial excavations below the uppermost layers, therefore, should be closely monitored to quickly and professionally collect any specimens without impeding development. As previously noted, the uppermost sediments on the site have undergone extensive grading activities over the years and lack integrity. Deeper excavation associated with the construction of the basement feature may encounter intact older Quaternary sediments containing fossil remains. For excavations in excess of 8 feet deep, the Property Owner/Developer would implement Resort MM 5.4-2 in the event of the inadvertent discovery of paleontological resources and impacts would be less than significant.

d) Less than significant impact. There is always the possibility that ground-disturbing activities during construction may uncover previously unknown buried human remains. In the event of an accidental discovery or recognition of any human remains, the Property Owner/Developer shall take the following steps in accordance with Public Resource Code (PRC) Section 5097.98:

1. The Property Owner/Developer shall halt further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” of the deceased Native American. The most likely descendant may make recommendations to the Property Owner/Developer, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98, or

2. Where the following conditions occur, the Property Owner/Developer shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the Project area in a location not subject to further subsurface disturbance:
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>The NAHC is unable to identify a most likely descendant or the most likely descendant failed to make a recommendation within 48 hours after being notified by the commission;</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The descendant identified fails to make a recommendation; or</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

With the implementation of Standard Condition SC CUL-1, potential impacts would be less than significant and no mitigation is required.

**Mitigation Measures**

**Resort MM 5.4-1**

Prior to issuance of each grading permit, the property owner/developer shall submit a letter identifying the certified archaeologist that has been hired to ensure that the following actions are implemented:

- a. The archaeologist must be present at the pre-grading conference in order to establish procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of artifacts if potentially significant artifacts are uncovered. If artifacts are uncovered and determined to be significant, the archaeological observer shall determine appropriate actions in cooperation with the property owner/developer for exploration and/or salvage.
- b. Specimens that are collected prior to or during the grading process will be donated to an appropriate educational or research institution.
- c. Any archaeological work at the site shall be conducted under the direction of the certified archaeologist. If any artifacts are discovered during grading operations when the archaeological monitor is not present, grading shall be diverted around the area until the monitor can survey the area.

A final report detailing the findings and disposition of the specimens shall be submitted to the City Engineer. Upon completion of the grading, the archaeologist shall notify the City as to when the final report will be submitted.

**Resort MM 5.4-2**

Prior to issuance of each grading permit, the property owner/developer shall submit a letter identifying the certified paleontologist that has been hired to ensure that the following actions are implemented:

- a. The paleontologist must be present at the pre-grading conference in order to establish procedures to temporarily halt or redirect work to permit the sampling, identification, and evaluation of fossils if potentially significant paleontological resources are uncovered. If artifacts are uncovered and found to be significant, the paleontological observer shall determine appropriate actions in cooperation with the property owner/developer for exploration and/or salvage.
- b. Specimens that are collected prior to or during the grading process will be donated to an appropriate educational or research institution.

Any paleontological work at the site shall be conducted under the direction of the certified paleontologist. If any fossils are discovered during grading operations when the paleontological monitor is not present, grading shall be diverted around the area until the monitor can survey the area.

**Standard Conditions**

**SC CUL-1**

In the event of an accidental discovery or recognition of any human remains, Public Resource Code (PRC) Section 5097.98 must be followed. In this instance, once project-related earthmoving begins and if there is accidental discovery or recognition of any human remains, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98. If the NAHC is unable to identify a most likely descendant or the most likely descendant failed to make a recommendation within 48 hours after being notified by the commission, or the landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner then the landowner or his/her authorized representative shall rebury the Native American
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

- human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the Project area in a location not subject to further subsurface disturbance.

VI. GEOLOGY AND SOILS—Would the project:

a) Expose people or structures to 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.

   Based on USGS mapping, the nearest mapped faults to the site are the Newport-Inglewood fault, which is located 9.5 miles to the southwest. The site is also not located within an Alquist-Priolo Earthquake Fault Zone. As such, fault rupture is not considered a hazard at the site. Impacts would be less than significant.

ii) Strong seismic ground shaking?

- Less than significant impact.

   As with all areas of Southern California, the Project Site would be subject to strong ground shaking associated with seismic activity. The nearest mapped fault to the site is the Newport-Inglewood fault, which is located 9.5 miles to the southwest. The Project Site is not located within an earthquake fault zone. In addition, the Proposed Project would involve all new structures and would be required to conform to the seismic design parameters of the California Building Code (CBC). Compliance with the seismic design parameters as outlined in the most recent CBC would ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

- Less than significant impact.

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

- Less than significant impact.

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

- Less than significant impact.

d) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial risks to life or property?

- Less than significant impact.

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

- No impact.

Narrative Summary:

Information and analysis for Geology and Soil impacts are based on the geotechnical engineering report prepared for the Project Site by GeoDesign, Inc. (February 23, 2018), included in Appendix C. Geotechnical investigations evaluate the engineering properties of the subsurface materials and their in situ characteristics, and provide engineering recommendations and design criteria for site preparation, foundation design, and the design of various site improvements. The report analyzed the Proposed Project which includes a 12-story hotel with a partial, one-level, below-grade basement and an adjacent low-rise parking garage with one level of below-grade parking, and provided recommendations.

- Exposure of people or structures to potential substantial adverse effects:

  i) **Less than significant impact.** Based on USGS mapping, the nearest mapped faults to the site are the Newport-Inglewood fault, which is located 9.5 miles to the southwest. The site is also not located within an Alquist-Priolo Earthquake Fault Zone. As such, fault rupture is not considered a hazard at the site. Impacts would be less than significant.

  ii) **Less than significant impact.** As with all areas of Southern California, the Project Site would be subject to strong ground shaking associated with seismic activity. The nearest mapped fault to the site is the Newport-Inglewood fault, which is located 9.5 miles to the southwest. The Project Site is not located within an earthquake fault zone. In addition, the Proposed Project would involve all new structures and would be required to conform to the seismic design parameters of the California Building Code (CBC). Compliance with the seismic design parameters as outlined in the most recent CBC would ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. Impacts would be less than significant.

  iii) **Less than significant impact.** Liquefaction is caused by a rapid increase in pore water pressure that reduces the effective stress between
soil particles to near zero. Liquefaction is affected by soil type, soil density, and grain size; confining pressure; depth to groundwater; and intensity and duration of ground-shaking. Liquefaction is most common in areas with shallow groundwater (less than 50 feet below ground surface [bgs]) dominated by granular, unconsolidated materials. In general, loose, saturated sand soil with low silt and clay content is the most susceptible to liquefaction.

The soil characteristics of the Project Site include approximately 3 to 5 feet of fill directly beneath the ground surface. The fill consists of silt to silty sand that was likely associated with previous activities at the site. The fill is generally free of organic material and is dry to moist.

The fill is underlain by alluvial soils consisting of silty sand, sandy silt, and silty clay. The alluvium below the fill and to a depth of approximately 25 feet bgs consists primarily of sand with variable silt content. The sand is loose to dense with varying amounts of silt. Stiff, clayey silt is present below the sand to depths of approximately 30 to 35 feet bgs. Below the silty clay is predominately sand with variable silt and interbedded layers of silt and clay to the maximum depth explored (between 34.0 and 51.5 feet bgs). The sand is typically medium dense to dense.

Groundwater was not observed in any of the explorations completed at the Project Site. The high seasonal groundwater at the Project Site is expected to be more than 50 feet bgs. Based on subsurface conditions, depth to groundwater, and analysis, liquefaction is determined not to be a design consideration, as stated in the geotechnical engineering report. Impacts would be less than significant.

iv) **Less than significant impact.** The Project Site slopes gently downward from north to south with relief of approximately 3 feet across the Project Site. Based on the flat nature of the site, landslide hazards are not a design consideration. Impacts would be less than significant.

b) **Less than significant impact with mitigation.** According to the geotechnical engineering report, the on-site soils are moderately susceptible to erosion. Construction activities such as grading and excavation would result in ground disturbance during construction. During construction, compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit and SWPPP would ensure that any erosion and siltation impacts are minimized to a less than significant level. As discussed more in detail in Impact IX.9a, the Property Owner/Developer would be required to comply with structural and nonstructural best management practices (BMPs) as prescribed in the Preliminary Water Quality Management Plan (PWQMP) to minimize impacts from erosion or siltation during operation.

MM GEO-1 would be incorporated to ensure that erosion impacts during construction and operation of the Proposed Project would be reduced to a less than significant level.

c) **Less than significant impact with mitigation.** Seismically induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking. For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. Lateral spreading is a liquefaction-related seismic hazard and occurs on gently sloping or flat sites underlain by liquefiable sediment adjacent to an open face, such as a riverbank. Liquefied soil adjacent to an open face can flow toward the open face, resulting in lateral ground displacement. There are no major open faces close to the site, and the liquefaction potential at the site is low. Accordingly, the potential for lateral spreading at the site is not a design consideration for the Project.

The geotechnical engineering report concluded that the Project Site is suitable for the Proposed Project, including the 12-story hotel, associated parking structure, and basement. Pursuant to MM GEO-1, the Property Owner/Developer would incorporate the design criteria and Project specifications recommended in the Geotechnical Report into the Project plans. The Geotechnical Report recommends conventional footing bearings on rammed aggregate piers to support the hotel, associated parking garage, and the basement. Allowable bearing pressures for conventional spread footings supported by rammed aggregate can be increased by 33 percent for short-term loads resulting from wind or seismic forces. Rammed aggregate piers are a design-build system and specialty construction contractors should confirm the recommended allowable bearing pressures and aggregate pier configurations.

As discussed in MM GEO-2, prior to the issuance of a grading permit, the Property Owner/Developer would be required to submit a grading plan to the City for review to demonstrate compliance with the City’s grading requirements. Additionally, all grading operations would be conducted in conformance with the Anaheim Municipal Code, Title 17—Land Development and Resources, and the most recent version of the Uniform Building Code.

Compliance with current standards of practice, and the implementation of MM GEO-1 and MM GEO-2 would result in impacts that would be less than significant.

d) **Less than significant impact.** Expansive soils contain significant amount of clay particles that swell and shrink periodically when exposed to liquid and then dried. The expansion potential of the soils was determined by performing expansion index testing on two representative soil samples. The two representative soil samples have both have very low expansion index. Therefore, impacts would be less than significant.

e) **No impact.** The Proposed Project does not include the use of septic tanks. Sewage is collected by City collector facilities and conveyed to trunk sewers owned and maintained by the Orange County Sanitation District, which then treats the sewage at regional facilities.
There is an existing sewer pipe and water pipe along South Anaheim Boulevard that would serve the Project Site. Therefore, no impacts would occur.

**Standard Conditions**

**SC GEO-1**
Prior to the issuance of grading permits or building permits for shoring, the Property Owner/Developer shall submit plans to the City Engineer for review and approval to ensure compliance with the recommendations contained in the 2017 geotechnical engineering report prepared for the Project Site by GeoDesign, Inc. (Appendix C).

**SC GEO-2**
Prior to the issuance of a grading permit, the Property Owner/Developer shall submit a grading plan to the City Engineer for review and approval to ensure compliance with the City’s grading requirements.

VII. GREENHOUSE GAS EMISSIONS

—Would the project:

<table>
<thead>
<tr>
<th></th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>🟢</td>
<td>🟢</td>
<td>🟢</td>
<td>🟢</td>
</tr>
</tbody>
</table>

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

Narrative Summary:

The greenhouse gas (GHG) analysis is included as Appendix A, Air Quality and Greenhouse Gas Analysis Report, FirstCarbon Solutions, February 21, 2018, and was conducted to determine air quality impacts associated with the development of the Proposed Project on project-specific modeling using the California Emissions Estimator Model (CalEEMod) version 2016.3.2.

a) Less than significant impact. This impact addresses whether the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

The SCAQMD has yet to adopt the interim significance thresholds for GHGs for local lead agency consideration (SCAQMD draft local agency threshold); however, the thresholds are supported by substantial evidence and are widely used by lead agencies within the SCAQMD. The current SCAQMD draft thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA;
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant greenhouse gas emissions;
- Tier 3 consists of screening values, and the lead agency can choose either option #1 or option #2, but must be consistent with all projects within its jurisdiction. A project’s construction emissions are averaged over 30 years and are added to a project’s operational emissions. If a project’s emissions are under one of the following screening thresholds, then the project is less than significant:
  - All land use types: 3,000 MT CO₂e per year
  - Based on land use type: residential: 3,500 MT CO₂e per year; commercial: 1,400 MT CO₂e per year; industrial: 10,000 MT CO₂e; or mixed use: 3,000 MT CO₂e per year
- Tier 4 has the following options:
  - Option 1: Reduce emissions from business as usual by a certain percentage; this percentage is currently undefined;
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures;
  - Option 3, 2020 target for service populations (SP), which includes residents and employees: 4.8 MT CO₂e/SP/year for projects and 6.6 MT CO₂e/SP/year for plans; 2035 target: 3.0 MT CO₂e/SP/year for projects and 4.1 MT CO₂e/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

Project Impact

To determine whether the project is significant, the GHG analysis uses the SCAQMD draft local agency tiered threshold. The threshold is as follows:

- Tier 1: The project is not exempt under CEQA; go to Tier 2.
- Tier 2: There is no greenhouse gas reduction plan applicable to the project; go to Tier 3.
- Tier 3: Project greenhouse gas emissions compared with the threshold: 3,000 MT CO₂e per year (see analysis below), if the project exceeds this threshold; go to Tier 4.Tier 4, option 1: Reduce greenhouse gas emissions from business as usual by 30 percent from
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
--- | --- | --- | --- | ---

BAU (see analysis below).

Project-related GHG emissions would include emissions from direct and indirect sources. The Proposed Project would result in direct and indirect emissions from construction activities, area sources, energy sources, stationary sources, water consumption, waste disposal, and mobile sources. Similar to the Air Quality section, CalEEMod Version 2016.3.2 was used to estimate the project’s GHG emissions. Sources for operational emissions include:

- Motor Vehicles—These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the Project Site;
- Natural Gas—These emissions refer to the GHG emissions that occur when natural gas is burned on the Project Site. Natural gas uses include heating water, space heating, dryers, stoves, or other uses;
- Indirect Electricity—These emissions refer to those generated by off-site power plants to supply electricity required for the Proposed Project;
- Water Transport—These emissions refer to those generated by the electricity required to transport and treat the water to be used on the Project Site;
- Waste—These emissions refer to the GHG emissions produced by decomposing waste generated by the Proposed Project; and
- Stationary—These emissions refer to the GHG emissions produced by the emergency generator operating at the Project Site.

**Construction**

The Proposed Project would emit GHGs from upstream emission sources and direct sources (combustion of fuels from worker vehicles and construction equipment). For assumptions used in estimating these emissions, please refer to Appendix A of this report. The emissions modeling represents a conservative analysis, and is used to assess the project's potential GHG impacts.

Greenhouse gas emissions from all phases of project construction are shown in Table 8—*Construction Greenhouse Gas Emissions*.

**Table 8: Construction Greenhouse Gas Emissions**

<table>
<thead>
<tr>
<th>Construction Activity</th>
<th>MT CO₂e</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Preparation—2018</td>
<td>7</td>
</tr>
<tr>
<td>Geopiers—2018</td>
<td>13</td>
</tr>
<tr>
<td>Grading 1—2018</td>
<td>14</td>
</tr>
<tr>
<td>Building Construction 1—2018</td>
<td>528</td>
</tr>
<tr>
<td>Building Construction 1—2019</td>
<td>233</td>
</tr>
<tr>
<td>Architectural Coating—2019</td>
<td>35</td>
</tr>
<tr>
<td>Grading 2—2019</td>
<td>14</td>
</tr>
<tr>
<td>Paving—2019</td>
<td>66</td>
</tr>
<tr>
<td>Building Construction 2—2019</td>
<td>10</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>921</strong></td>
</tr>
<tr>
<td><em>Amortized over 30 years</em>¹</td>
<td><strong>31</strong></td>
</tr>
</tbody>
</table>

Notes:

¹ Construction GHG emissions are amortized over the 30-year life of the project.

MT CO₂ = metric tons of CO₂ equivalent

Source: CalEEMod Output (see Appendix A).

**Operation**

Operational or long-term emissions occur over the life of the project. The Proposed Project benefits from its location near existing pedestrian infrastructure, transit, and its proximity to the city center for easy accessibility. These measures are represented in CalEEMod as mitigation measures; however, they are not considered mitigation for CEQA, as they are required by regulation or are a result of the project’s location. Table 9—*Operational Greenhouse Gas Emissions* contains the estimated GHG emissions for the Proposed Project. As provided in Table 9, the Proposed Project’s estimated GHG emissions would not exceed the SCAQMD threshold of 3,000 MT CO₂e per year. Therefore, the impact would be less than significant.
Environmental Issues

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

Table 9: Operational Greenhouse Gas Emissions

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>Emissions (MT CO₂e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area</td>
<td>0</td>
</tr>
<tr>
<td>Energy</td>
<td>654</td>
</tr>
<tr>
<td>Mobile</td>
<td>1,022</td>
</tr>
<tr>
<td>Stationary</td>
<td>26</td>
</tr>
<tr>
<td>Waste</td>
<td>56</td>
</tr>
<tr>
<td>Water</td>
<td>31</td>
</tr>
<tr>
<td>Amortized Construction</td>
<td>31</td>
</tr>
</tbody>
</table>

**Total Project Emissions**

<table>
<thead>
<tr>
<th>Emissions Source</th>
<th>Emissions (MT CO₂e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Emissions</td>
<td>1,867</td>
</tr>
<tr>
<td>SCAQMD Threshold</td>
<td>3,000</td>
</tr>
</tbody>
</table>

**Significant?**

| Significant? | No |

Note:

MT CO₂e = metric tons of carbon dioxide equivalent
Source of emissions: CalEEMod Output (see Appendix A).
Source of thresholds: SCAQMD 2008c.

b) **Less than significant impact.** As shown in Table 9, the Proposed Project would result in the generation of 1,867 MT CO₂e per year, which is below the SCAQMD’s threshold of 3,000 MT CO₂e per year. Therefore, the Proposed Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions and impacts would be less than significant.

**AB 32 Scoping Plan**

The ARB’s adopted AB 32 Scoping Plan (Scoping Plan) states, “The 2020 goal was established to be an aggressive, but achievable, mid-term target, and the 2050 GHG emissions reduction goal represents the level scientists believe is necessary to reach levels that would stabilize climate” (ARB 2008a). The year 2020 GHG emission reduction goal of AB 32 corresponds with the mid-term target established by Executive Order S-3-05, which aims to reduce California’s fair-share contribution of GHGs in 2050 to levels that would stabilize the climate.

The Scoping Plan identifies recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As shown in Table 10—Scoping Plan Measures Consistency Analysis, the Proposed Project is consistent with the applicable strategies and the recommendations of AB 32 to achieve statewide reductions in greenhouse emissions, and impacts would be less than significant.

Table 10: Scoping Plan Measures Consistency Analysis

<table>
<thead>
<tr>
<th>Scoping Plan Reduction Measure</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. California Cap-and-Trade Program Linked to Western Climate Initiative. Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California’s program meets all applicable AB 32 requirements for market-based mechanisms.</td>
<td>Not applicable. Although the Cap-and-Trade system is ongoing, the Proposed Project is not one targeted by the Cap-and-Trade system regulations, and, therefore, this measure does not apply to the project.</td>
</tr>
<tr>
<td>2. California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.</td>
<td>Not directly applicable. This is a statewide measure that cannot be implemented by a project applicant or lead agency. However, the standards would be applicable to the light-duty vehicles that would access the Project Site.</td>
</tr>
<tr>
<td>Environmental Issues</td>
<td>Scoping Plan Reduction Measure</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>3. Energy Efficiency. Maximize energy efficiency building and appliance standards;</td>
<td>Consistent. This is a measure for the State to increase its energy efficiency standards in new</td>
</tr>
<tr>
<td>SEE additional efficiency including new technologies, policy, and implementation</td>
<td>buildings. The Proposed Project is required to build to the latest standards and would increase</td>
</tr>
<tr>
<td>SECHC energy efficiency from all retail providers of electricity in California.</td>
<td>its energy efficiency through compliance.</td>
</tr>
<tr>
<td>4. Renewable Portfolio Standard. Achieve 33 percent renewable energy mix statewide.</td>
<td>Not applicable. This is a statewide measure that cannot be implemented by a project applicant</td>
</tr>
<tr>
<td>SEE Renewable energy sources include (but are not limited to) wind, solar,</td>
<td>or lead agency. Anaheim Public Utilities is required to increase its percent of power supply</td>
</tr>
<tr>
<td>SEE geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.</td>
<td>from renewable sources to 33 percent by the year 2020 pursuant to the Renewable Portfolio</td>
</tr>
<tr>
<td>5. Low Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.</td>
<td>Consistent. This measure is to increase solar throughout California, which is being done by</td>
</tr>
<tr>
<td>SEE Not directly applicable. This is a statewide measure that cannot be implemented</td>
<td>various electricity providers and existing solar programs. The project would comply with Title 24,</td>
</tr>
<tr>
<td>SEE Not directly applicable. The standards would be applicable to the light-duty</td>
<td>which requires new buildings to be “solar ready.”</td>
</tr>
<tr>
<td>SEE not directly applicable. The project does not propose any changes to maritime,</td>
<td></td>
</tr>
<tr>
<td>SEE rail, or intermodal facilities or forms of transportation.</td>
<td></td>
</tr>
<tr>
<td>9. Million Solar Roofs Program. Install 3,000 Megawatts of solar-electric capacity</td>
<td>Consistent. This measure is to increase solar throughout California, which is being done by</td>
</tr>
<tr>
<td>SEE under California’s existing solar programs.</td>
<td>various electricity providers and existing solar programs. The project would comply with Title 24,</td>
</tr>
<tr>
<td>10. Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency</td>
<td>Not directly applicable. This is a statewide measure that cannot be implemented by a project</td>
</tr>
<tr>
<td>SEE measures.</td>
<td>applicant or lead agency. The standards phase in over model years 2014 through 2018 and are</td>
</tr>
<tr>
<td>11. Industrial Emissions. Require assessment of large industrial sources to</td>
<td>applicable to the vehicles that access the Project Site.</td>
</tr>
<tr>
<td>SEE determine whether individual sources within a facility can cost-effectively</td>
<td></td>
</tr>
<tr>
<td>SEE reduce greenhouse gas emissions and provide other pollution reduction</td>
<td></td>
</tr>
<tr>
<td>SEE co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil</td>
<td></td>
</tr>
<tr>
<td>SEE and gas extraction and gas transmission. Adopt and implement regulations to</td>
<td></td>
</tr>
<tr>
<td>SEE control fugitive CH4 emissions and reduce flaring at refineries.</td>
<td></td>
</tr>
<tr>
<td>12. High Speed Rail. Support implementation of a high-speed rail system.</td>
<td>Not applicable. This is a statewide measure that cannot be implemented by a project applicant</td>
</tr>
<tr>
<td>13. Green Building Strategy. Expand the use of green building practices to reduce</td>
<td>or lead agency. The Proposed Project would not preclude the implementation of this strategy.</td>
</tr>
<tr>
<td>SEE the carbon footprint of California’s new and existing inventory of buildings.</td>
<td></td>
</tr>
<tr>
<td>14. High Global Warming Potential Gases. Adopt measures to reduce high global</td>
<td>Not applicable. This measure is applicable to the high global warming potential gases that would</td>
</tr>
<tr>
<td>SEE warming potential gases.</td>
<td>be used by sources with large equipment (such as in commercial refrigerators) that are not part</td>
</tr>
<tr>
<td>15. Recycling and Waste. Reduce CH4 emissions at landfills. Increase waste</td>
<td>Consistent. The project would utilize City of Anaheim recycling services.</td>
</tr>
<tr>
<td>SEE diversion, composting, and commercial recycling. Move toward zero waste.</td>
<td></td>
</tr>
</tbody>
</table>
### Environmental Issues

<table>
<thead>
<tr>
<th>Scoping Plan Reduction Measure</th>
<th>Project Consistency</th>
</tr>
</thead>
<tbody>
<tr>
<td>16. Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.</td>
<td>Not applicable. The Project Site is not forested; therefore, no preservation is possible.</td>
</tr>
<tr>
<td>17. Water. Continue efficiency programs and use cleaner energy sources to move and treat water.</td>
<td>Consistent. The project would comply with the California Energy Code and the California Updated Model Landscape Ordinance. With adherence to these regulations, the project will consume energy and water in an efficient manner.</td>
</tr>
<tr>
<td>18. Agriculture. In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.</td>
<td>Not applicable. The Project Site is not designated or in use for agriculture purposes. No grazing, feedlot, or other agricultural activities that generate manure occur on-site or are proposed to be implemented by the project.</td>
</tr>
</tbody>
</table>


In summary, the Proposed Project incorporates a number of features that would minimize GHG emissions. These features are consistent with project-level strategies identified by the ARB’s Scoping Plan. As shown in Table 9, annual project-generated annual emissions would fall below the draft SCAQMD threshold of 3,000 MT CO2e per year. As such, the Proposed Project would not significantly hinder or delay the State’s ability to meet the reduction targets contained in AB 32 or conflict with implementation of the Scoping Plan. The Proposed Project promotes the goals of the Scoping Plan through implementation of design measures that reduce energy consumption, water consumption, and reduction in vehicle miles traveled. Therefore, the Proposed Project does not conflict with any plans to reduce GHG emissions. The impact would be less than significant.

**Mitigation Measures**

None.

### VIII. HAZARDS AND HAZARDOUS MATERIALS—Would the project:

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>☐</th>
<th>☐</th>
<th>☑</th>
<th>☐</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td>☐</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td></td>
<td>☑</td>
</tr>
<tr>
<td>e) For a project located within an airport land use plan (Los Alamitos Armed Forces Reserve Center or Fullerton Municipal Airport), would the project result in a safety hazard for people residing or working in the project area?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>f) For a project within the vicinity of a private airstrip, heliport or helistop, would the project result in a safety hazard for people residing or working in the project area?</td>
<td>☐</td>
<td>☐</td>
<td></td>
<td>☑</td>
</tr>
<tr>
<td>g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>
The Site. In addition, the likelihood of contamination on the Project Site from an off-site source is low, based on constraining factors such as

D. The Proposed Project would include soil disturbance. The Phase I ESA did not identify any Recognized Environmental Conditions for

Environmental Site Assessment (ESA). The Phase I ESA was prepared by Group Delta, dated March 10, 2017 and is included as Appendix

Information and analysis for the Hazards and Hazardous Materials impacts are from the General Plan, online research and a Phase I

Narrative Summary:

the former agricultural use on the site and potential presence of residual organochlorine pesticides

As previously discussed above under Impact VIII.a, the Property Owner/Developer would use those hazardous materials that are typically necessary for construction of commercial developments (building materials, cleaners, paints, fuel for equipment, etc.). Thus, the Proposed Project would involve the routine transport, use, and disposal of hazardous materials throughout the construction phases. The Property Owner/Developer would comply with all applicable local, state, and federal regulations governing hazardous materials, such as BMPs established by the City of Anaheim and Santa Ana Regional Water Quality Control Board (SARWQCB). Compliance with these regulations would ensure that hazardous material wastes generated during the construction phase would be properly disposed of by qualified professionals. In addition, there are no existing buildings on the Project Site to be demolished; hence, there would be no release of asbestos-containing materials, lead-based paint (LBP), or polychlorinated biphenyls (PCBs) associated with demolition of buildings built before the 1978 federal ban of LBP. Therefore, short-term, construction-related impacts would be less than significant.

Construction

During the construction phase of the Proposed Project, the Property Owner/Developer would use those hazardous materials that are typically necessary for construction of commercial developments (building materials, cleaners, paints, fuel for equipment, etc.). Thus, the Proposed Project would involve the routine transport, use, and disposal of hazardous materials throughout the construction phases. The Property Owner/Developer would comply with all applicable local, state, and federal regulations governing hazardous materials, such as BMPs established by the City of Anaheim and Santa Ana Regional Water Quality Control Board (SARWQCB). Compliance with these regulations would ensure that hazardous material wastes generated during the construction phase would be properly disposed of by qualified professionals. In addition, there are no existing buildings on the Project Site to be demolished; hence, there would be no release of asbestos-containing materials, lead-based paint (LBP), or polychlorinated biphenyls (PCBs) associated with demolition of buildings built before the 1978 federal ban of LBP. Therefore, short-term, construction-related impacts would be less than significant.

The proposed 12-story hotel would include outdoor ground level amenities such as a swimming pool, sun deck, and social areas, while the roof includes a pool and deck area. The resort would include up to 15,000 square feet of restaurant space, split between a ground floor restaurant and rooftop restaurant and bar. The hotel would use small quantities of typical cleaning solvents used for janitorial purposes, landscaping, and maintenance materials, which could be considered hazardous if used inappropriately. Other than these typical cleaning solvents, no hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Proposed Project. The use of these products would be nominal and employees would be required to be educated on the proper uses of these solvents. The Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant.

b) Less than significant impact with mitigation. As previously discussed above under Impact VIII.a, the Property Owner/Developer would be required to comply with all applicable federal, state and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste during the construction phase to reduce the likelihood and severity of accidents during transit. Proper handling of the use and disposal of hazardous materials associated with hospitality uses would reduce the potential for exposure. Operation of the Proposed Project would not involve the transport, use, or disposal of large quantities of hazardous materials. The use of hazardous materials on the Project Site post-construction would consist of those commonly used in a hospitality setting for routine maintenance and cleaning. Proper handling of the use and disposal of hazardous materials would reduce the potential for exposure. In addition, transport of hazardous materials is subject to strict regulations established by the California Department of Toxic Substances Control.

The Phase I ESA identifies the former agricultural use on the site and potential presence of residual organochlorine pesticides and arsenic to reside in the soils. In addition, the historic presence of the I-5 Freeway and the former on/off-ramp on the site located along the southwestern boundary presents the potential for aerially deposited lead to exist in site soils. However, the Phase I did not identify any Recognized Environmental Concerns (RECs), and only identified the potential soil issues as “Areas of Concern” for potential future residential development. The Proposed Project does not include residential development. Commercial and industrial properties are subject to far less stringent regulatory limits for constituents of concern in soils than properties proposed for residential use. In addition, a significant period of time (at least 50 years) has elapsed since the site was utilized for agricultural purposes, and any residual pesticides would have likely attenuated over time to levels well below regulatory limits. Thus, no further investigation or soil sampling is warranted for the proposed commercial hotel development. However, there were leaking underground storage tanks that were removed from the Project Site and received case closure in 1992. MM HAZ-1 would reduce potential impacts to worker safety to less than significant levels by requiring preparation of a Soil Management Plan prior to the issuance of grading permits. The

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

i) Would the project include a new or retrofitted stormwater treatment control Best Management Practice (BMP), (e.g., water quality treatment basin, constructed treatment wetlands, etc.), the operation of which could result in significant environmental effects (e.g., increased vectors and noxious odors)?

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>i) Would the project include a new or retrofitted stormwater treatment control Best Management Practice (BMP), (e.g., water quality treatment basin, constructed treatment wetlands, etc.), the operation of which could result in significant environmental effects (e.g., increased vectors and noxious odors)?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>
implementation of a Soil Management Plan would ensure proper worker training and disposal of any petroleum-hydrocarbon impacted soils that are discovered during grading or excavation activities. With the implementation of MM HAZ-1, impacts would be less than significant.

c) **Less than significant impact.** The Project is not located within 0.25 mile of an existing or proposed school site and is not projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The nearest school is Paul Revere Elementary School, located approximately 0.24 mile north of the Project Site, at 140 W Guinida Lane, Anaheim. The second nearest school is Calvary Chapel School, located approximately 0.27 mile northeast of the Project Site, at 270 E Palais Road, Anaheim. As discussed in the response to Impact VIII.a, the Project does not include uses that require the handling or storage of large amounts of hazardous materials. Therefore, impacts would be less than significant.

d) **No impact.** Based on the California Department of Toxic Substances Control, EnviroStor Site/Facility Search, the Project Site is not included on a list of hazardous materials sites pursuant to Government Code Section 65962.5. The Project Site was not identified in the database search as a site of environmental concern. Development of the Proposed Project would not create a significant hazard to the public or the environment and no impacts would occur.

e) **No impact.** The Proposed Project will not be placed within a public airport land use plan area or within 2 miles of a public airport land use plan area, and is not subject to a safety hazard. The nearest public use airport is Fullerton Municipal Airport located approximately 5.87 miles northwest of the Project Site. The second nearest public use airport is John Wayne Airport located approximately 8.78 miles southeast of the Project Site. According to the Orange County Airport Land Use Commission Planning Areas Map, the Proposed Project would not result in a safety hazard for people residing or working in the Project area as a result of its proximity to a public airport. Therefore, no impacts associated with public use airports would occur.

f) **No impact.** The Proposed Project is not within the vicinity of a private airstrip. The nearest heliport is the UCI Medical Center Heliport, located approximately 1.61 miles southeast of the Project Site. The second heliport is the North Net Training Authority Heliport, located approximately 1.63 miles southeast of the Project Site (Airnav.com 2017). Since the Project is not within the vicinity of a private airstrip, it would not result in a safety hazard for people residing or working in the Project area. No impact would occur.

g) **Less than significant impact.** The General Plan Safety Element (May 2004) states that the City has an emergency preparedness plan that complies with State law and interfaces with other cities and counties within Southern California. The General Plan outlines operations and coordination procedures with other agencies, including a warning system, emergency broadcast system, Emergency Operations Center, and shelter system. The City also participates in the Standardized Emergency Management System administered by the Governor’s Office of Emergency Services, and coordinates multiagency responses to disasters.

Anaheim Boulevard is not specifically identified as an emergency route in the City of Anaheim General Plan. Anaheim Boulevard is designated and functions as a primary arterial within the City’s transportation network and would likely serve this function during an emergency response or evacuation. Construction activities may temporarily restrict local vehicular traffic, which could affect emergency response or evacuation. These impacts would be short-term, however, and would cease upon completion of the Proposed Project. The Property Owner/Developer would be required to prepare a construction traffic control plan in order to receive a right-of-way construction permit from the City. As such, less than significant impacts are anticipated to occur with regard to emergency access during Project construction.

As detailed in Impact XVI, Transportation/Traffic, once operational, any impacts related to the addition of Project-related traffic would be less than significant; therefore, the Proposed Project would not interfere with the movement of emergency vehicles along local roadways during operations. The Proposed Project would not create a new significant impact or a substantial increase in the severity of previously identified effects. Impacts would be less than significant.

h) **No impact.** The Project Site is located in an urban, developed area and would not be subject to wildland fire risks. According to the City of Anaheim General Plan Safety Element, the Project Site is not located within a designated Special Protection Area or Very High Fire Hazard Severity Zone. Therefore, no impact would occur, and no mitigation would be required.

i) **Less than significant impact.** According to the Preliminary WQMP prepared for the Proposed Project by KPFF Consulting Engineers (Appendix E), structural BMPs in the form of an underground infiltration facility and a catch basin planter box would be used to capture stormwater runoff. The Proposed Project would also include a vegetative bioswale that would be used to treat stormwater runoff. The WQMP prepared for the Proposed Project also includes non-structural BMPs such as activity restrictions, street sweeping, and common area landscape maintenance and litter control, which would ensure proper maintenance. These operation and maintenance requirements would designate the party responsible for the management of all Source Control, Site Design, and Treatment Control BMPs and establishes the frequency and specific activities necessary for the maintenance of each BMP. As a result, significant environmental effects resulting from the Proposed Project regarding vectors and odors are limited and potential impacts would be less than significant.

**Mitigation Measures**

**MM HAZ-1**  
Prior to issuance of grading permits, the Property Owner/Developer shall submit a Soil Management Plan to the Public...
Works Department, Development Services Division, for review and approval. The Soil Management Plan shall address the handling, removal, and transport of potentially impacted soil during development activities, which shall provide, at a minimum, training for workers to identify stained or odiferous soils. The following procedures shall be included in the plan:

- The Property Owner/Developer shall halt work and evaluate any suspected petroleum-contaminated media prior to continuation of grading and development activities.
- If any on-site soils are found to contain constituents of concern in excess of applicable regulatory limits for commercial/industrial development, a properly licensed abatement professional shall remove these soils according to applicable regulations.
- The Property Owner/Developer shall provide to the City a copy of any confirmatory sampling results indicating that no further action is required prior to commencing grading activities.

IX. HYDROLOGY AND WATER QUALITY—Would the project:

a) Violate any water quality standards or waste discharge requirements?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐

e) 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?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐

f) Otherwise substantially degrade water quality?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☐
   - No Impact: ☒

j) Inundation by seiche or mudflow?  
   - Potentially Significant Impact: ☐
   - Less Than Significant Impact: ☐
   - Mitigation: ☒
   - No Impact: ☐
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
--- | --- | --- | --- | ---

k) Substantially degrade water quality by contributing pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling, or storage, delivery areas, loading docks or other outdoor work areas?

l) Substantially degrade water quality by discharge which affects the beneficial uses (i.e., swimming, fishing, etc.) of the receiving or downstream waters?

m) Potentially impact stormwater runoff from construction activities?

n) Potentially impact stormwater runoff from post-construction activities?

o) Create the potential for significant changes in the flow velocity or volume of stormwater runoff to cause environmental harm?

p) Create significant increases in erosion of the project site or surrounding areas?

**Narrative Summary:**

Information and analysis for Hydrology and Water Quality impacts are based on the Preliminary Water Quality Management Plan (KPFF Consulting Engineers 2017), Drainage Plan (KPFF Consulting Engineers 2017), and Sewer Study (Psomas 2017) prepared for the Proposed Project, included in Appendix E. The topography of the Project Site is relatively flat with existing grades at approximately 140 feet above mean sea level (MSL). The Project Site currently drains from northwest to the southeast via sheet flow. The Project Site is currently 100 percent pervious, and implementation would reduce the percentage of pervious area to 17 percent. Stormwater would be directed away from the proposed hotel into various drain inlets and vegetative swales and eventually into an infiltration detention basin and/or dry well for percolation.

a) **Less than significant impact.** The City approved the Preliminary Water Quality Management Plan (PWQMP) on April 18, 2017 for the Proposed Project, which is included in Appendix E. The Project Site is in the Anaheim Bay-Huntington Harbor Watershed, in the Santa Ana Regional Water Quality Control Board’s jurisdiction.² The Proposed Project is required to comply with the requirements of the NPDES MS4 Permit (Order No. R8-2009-0030) and NPDES Permit No. CAS618030, as amended by Order No. R8-2010-0062. The County of Orange, incorporated cities of Orange County including Anaheim, and the Orange County Flood Control District are co-permitees under the MS4 Permit. The General MS4 Permit requires that new development or significant redevelopment projects use BMPs, including site design planning, source control, and stormwater treatment facilities, to protect the quality of receiving waters.

**Construction Impacts**

Construction activities related to the Proposed Project would disturb approximately 3.25 acres. Site grading and other soil disturbing activities during Project construction could temporarily increase the amount of soil erosion and siltation entering the local stormwater drainage system. Stormwater runoff could contain soil and sediments released during grading and excavation activities, and petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. Other common pollutants that can result from construction activities include solid or liquid chemical spills; concrete and related cutting or curing residues; wastes from paints, stains, sealants, solvents, detergents, fluxes, acids, lime, plaster, and cleaning agents; and heavy metals from equipment.

To minimize these potential impacts, the Property Owner/Developer would be required to comply with the NPDES General Construction Permit as well as prepare a Storm Water Pollution Prevention Plan (SWPPP). The General Construction Permit also requires that prior to the start of construction activities, the Property Owner/Developer must file Permit Registration Documents with the State Water Resources Control Board, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post construction water balance calculations. In addition, the Property Owner/Developer must comply with the City of Anaheim’s existing regulatory requirements, including Chapter 10.09 of the Municipal Code, “National Pollution Discharge Elimination System (NPDES),” which is designed to reduce pollutants in stormwater discharges, and Chapter 17.04, “Grading, Excavations, Fill, Watercourses,” which requires the Property Owner/Developer to obtain a grading permit and submit a soil report and detailed drainage study.

Standard erosion control measures would be implemented as part of the SWPPP for the Proposed Project, as it would disturb more than 1 acre. The SWPPP includes an erosion control plan that prescribes measures such as phasing grading, limiting areas of disturbance, designating restricted-entry zones, diverting runoff away from disturbed areas, protecting sensitive areas, protecting outlets, and requiring revegetation or mulching. The SWPPP includes BMPs to reduce water quality impacts, including various measures to control

### Environmental Issues

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>on-site erosion; reduce sediment flows into stormwater; control wind erosion; reduce tracking of soil and debris into adjacent roadways and off-site areas; and manage wastes, materials, wastewater, liquids, hazardous materials, stockpiles, equipment, and other site conditions to prevent pollutants from entering the storm drain system.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implementation of the provisions of the NPDES permit and compliance with City grading requirements would minimize construction impacts from the Proposed Project. This would ensure that any impacts to downstream waters resulting from construction activities associated with the Project would be less than significant. In addition to the requirements of the NPDES permit, grading and building permits include elements that require the reduction of erosion and sedimentation impacts during construction. Full compliance with applicable local, state, and federal regulations would reduce water quality impacts associated with construction to a less than significant level.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operational Impacts</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Project Site is currently undeveloped. Operation of the Proposed Project could release urban pollutants such as bacteria/viruses, heavy metals, nutrients, pesticides, toxic organic compounds, sediment, trash and debris, and oil and grease to the stormwater system. Construction of the Proposed Project would also reduce the amount of pervious area from 3.25 acres to 0.57 acre, a decrease of 83 percent of pervious surfaces. However, appropriate BMPs, including a catch basin planter box and an underground infiltration facility, would be incorporated during operation to further reduce the amount of polluted runoff to receiving waters.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A WQMP was prepared for the Proposed Project, as required by the City, that complies with the County of Orange 2011 Model WQMP template and the County of Orange Technical Guidance Document (2013 Revision). The WQMP is included as Appendix E to this initial study. The WQMP specified BMPs and low impact development (LID) measures that would minimize the effects of the Project on regional hydrology, runoff flow rates and/or velocities, and pollutant loads.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The WQMP for the Proposed Project incorporates various BMPs to reduce water quality impacts, such as infiltration, evapotranspiration, rainwater harvesting, biotreatment, and non-structural and structural control BMPs.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Preparation and implementation of the WQMP satisfies MS4 permit requirements and would ensure that the Project complies with water quality regulations for stormwater runoff. Implementation of these programs and regulatory requirements would reduce stormwater pollutants that could affect water quality. Drainage and surface water discharges from the Proposed Project would not violate any water quality standards or waste discharge requirement. No significant water quality impacts would occur and no mitigation measures are required.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) Less than significant impact. The approximately 3.25-acre Project Site is currently undeveloped. Development of the Proposed Project would result in a decrease in pervious surfaces from 3.25 acres to 0.57 acre, a decrease of 83 percent. The reduction in pervious area would result in reduced on-site groundwater recharge.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>However, the Proposed Project would not withdraw directly from the groundwater basin. According to the City’s 2015 Urban Water Management Plan, the City of Anaheim owns and operates a network of groundwater wells to supply potable water to their users. The City receives approximately 70 percent of its water supply from groundwater and 30 percent from imported water. The same water supply mix is anticipated to be available to the City through 2040. The Proposed Project could lead to an increased demand for water, which could lead to an increase in groundwater pumping. However, a replenishment assessment fee is levied on cities in accordance with the Orange County Water District Act for the amount of groundwater extracted, and this fee is used by Orange County Water District (OCWD) for various groundwater replenishment programs to ensure that no overdraft of local groundwater resources occurs. OCWD’s groundwater is recharged primarily through artificial replenishment, not natural recharge. Thus, water demand from the Proposed Project would not deplete groundwater resources and impacts would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) Less than significant impact. The Project Site is currently undeveloped and 100 percent permeable. As shown previously on Exhibit 9—Grading Plan, the Project Site drains from the northwest to the southeast in the existing condition via sheet flow. At Project completion, the amount of pervious area would be reduced from 3.25 acres to 0.57 acre, which is a decrease of 83 percent. Project development would include construction of underground storm drains and infiltration basins. The infiltration basins would be designed to store and infiltrate runoff from an 85th-percentile, 24-hour storm event, which would generate about 0.85 inch of rainfall. Stormwater would be directed away from the proposed building into various drain inlets and vegetative swales and eventually into an infiltration detention basin and/or dry well for percolation. Stormwater would be treated in various methods throughout the site (dry well insert, vegetation). Overflow stormwater would then be conveyed to the public storm drain system via a junction structure/catch basin at the southeast corner of the lot which connects to a 60-inch storm drain that runs along Anaheim Boulevard. Flow would be diverted to the public storm drain system through an outlet pipe engineered to deliver stormwater to the public system at a rate not to exceed the existing rate during a 10-year storm event. The volume of stormwater leaving the site would not exceed the existing condition. As such, the Project would follow the same drainage pattern as under existing conditions.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>As discussed in Impact IX.a, the Property Owner/Developer would be required comply with structural and nonstructural BMPs as prescribed in the WQMP to minimize impacts from erosion or siltation during operation. Moreover, on-site stormwater runoff would be intercepted by a storm drain system designed to carry the first flush flows to the subsurface infiltration system, where it would be treated</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
and infiltrated into the subsoil on-site prior to entering the regional storm drain system as outlined in the WQMP. An underground infiltration basin would be incorporated. During construction, compliance with the requirements of the NPDES General Construction Permit and SWPPP would ensure that any erosion and siltation impacts would be minimized to a less than significant level. Implementation of applicable construction and post-construction BMPs—as described below under Standard Conditions, and in the SWPPP and WQMP—would ensure that erosion and/or siltation impacts during construction and Project operation would be reduced to a less than significant level.

d) **Less than significant impact.** As described above in Impact IX.c, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant.

e) **Less than significant impact.** As discussed in Impact IX.c, the proposed drainage infrastructure would capture sufficient stormwater during a 10-year storm event, such that stormwater on-site would be delivered to the public system at a rate not to exceed the existing rate. Therefore, because the Project would follow the same drainage pattern as under existing conditions, the Proposed Project would not result in an impact to the capacity of the stormwater drainage system.

Furthermore, the Property Owner/Developer would comply with the NPDES Construction General Permit to control construction-related pollutants and would implement structural and non-structural BMPs throughout the Project Site to achieve long-term water quality. Therefore, impacts would be less than significant.

f) **Less than significant impact.** The Proposed Project includes BMPs that would alleviate the degradation of water quality during the construction and operational phases of the Proposed Project. As such, impacts would be less than significant.

g) **Less than significant impact.** The Project Site is in Federal Emergency Management Agency Flood Zone X, which is defined as having a 0.2 percent annual chance of flooding or as the 500-year floodplain (Flood Insurance Rate Map ID# 06059C0141J). The Proposed Project would not place housing within a 100-year flood hazard area. As such, impacts would be less than significant.

h) **Less than significant impact.** As discussed above, the Project Site is outside of the 100-year flood zone. Thus, the Project would not place structures in the 100-year flood hazard area. Impacts would be less than significant.

i) **No impact.** According to the City General Plan Safety Element Figure S-7—*Dam Inundation Map*, the Project is not within the general limits of the flood impact zone associated with Prado Dam failure, Carbon Canyon Dam failure, or Walnut Canyon Reservoir Dam failure. As such, the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. There would be no impact.

j) **Less than significant impact.** Seiches are large waves generated in enclosed bodies of water in response to ground shaking. The Project Site is surrounded by a relatively flat and urbanized area and not adjacent to any enclosed body of water, such as a lake or reservoir. A tsunami is a long sea wave caused by an earthquake or other geologic submarine disturbance. The Project Site is located over 11 miles from the Pacific Ocean, and would not likely be impacted by a tsunami. Because of the location of the Project Site, and topography of the surrounding locale, it is also not likely that mudflows will inundate the site. As such, the impact would be less than significant.

k–m) **Less than significant impact.** As discussed in Impact IX.a, potential pollutants from the Proposed Project would include bacteria/viruses, heavy metals, nutrients, pesticides, toxic organic compounds, sediment, trash and debris, and oil and grease. The Property Owner/Developer would be required to comply with the MS4 NPDES Permit and the NPDES Construction General Permit. The MS4 Permit regulates stormwater and urban runoff discharge from developments to natural and constructed storm drain systems in the City of Anaheim. The Construction General Permit requires the development and implementation of a SWPPP that includes (1) erosion and sediment-control BMPs that meet or exceed measures required by the Construction General Permit and (2) BMPs that control other potential construction-related pollutants. California Building Code and grading permit requirements include provisions that require reduction of erosion and sedimentation impacts during construction. Lastly, the Property Owner/Developer would comply with all applicable local, state, and federal regulations. As such, impacts would be less than significant.

n) **Less than significant impact.** As discussed in Impact IX.a, the Property Owner/Developer would be required to incorporate various post-construction BMPs and LID measures that would minimize the stormwater runoff effects. Therefore, there would be no stormwater runoff impacts from post-construction activities.

o) **Less than significant impact.** The Proposed Project would be designed to accommodate the changes in flow velocity or volume of stormwater runoff so that it would not cause environmental harm through pollutants or flooding. The Property Owner/Developer would comply with the applicable regional and local regulations concerning water quality and drainage system design. Impacts would be less than significant.

p) **Less than significant impact.** Construction activity associated with the Proposed Project may result in wind-driven soil erosion and loss of topsoil due to grading activities. However, all construction and grading activities would comply with the City’s grading ordinance through the use of BMPs. Upon completion, the Project Site would be developed with a hotel, paved surfaces, and landscaping, which would prevent substantial erosion from occurring. With the adherence to local policies and ordinances, impacts would be less than significant.
Environmental Issues

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Standard Conditions

**SC HYD-1** Prior to issuance of a well permit to install a dry well, the Property Owner/Developer shall register the dry well as a Class V Injection Well with the United States Environmental Protection Agency (U.S. EPA).

**SC HYD-2** Prior to the issuance of a grading permit, the Property Owner/Developer shall include a note on the plans listing all of the following BMPs:

**Infiltration BMPs:**
- Infiltration trenches
- Infiltration basins

**Evapotranspiration, Rainwater Harvesting BMPs:**
- Aboveground cisterns and basins

**Biotreatment BMPs:**
- Vegetated swales

**Nonstructural Source Control BMPs:**
- Education for property owners, tenants and occupants
- Activity restrictions
- Common area landscape management
- BMP maintenance
- Spill contingency plan
- Common area litter control
- Employee training
- Housekeeping of loading docks
- Common area catch basin inspection
- Street sweeping private streets and parking lots

**Structural Source Control BMPs:**
- Provide storm drain system stenciling and signage
- Design and construct trash and waste storage areas to reduce pollution introduction
- Use efficient irrigation systems and landscape design, water conservation, smart controller, and source control
- Dock areas

---

**X. LAND USE AND PLANNING**—Would the project:

a) Physically divide an established community? □ □ □ ✓

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? □ □ ✓ □

c) Conflict with any applicable habitat conservation plan or natural community conservation plan? □ □ □ ✓

**Narrative Summary:**
Information and analysis for Land Use impacts are based on the City of Anaheim’s General Plan and Municipal Code. The Proposed Project involves the construction of a 12-story, 155-foot, 6-inch-tall, high-quality hotel consisting of up to 326 guest rooms, 267,701 gross square feet of hotel floor area, and a four-level, 127,700-gross-square-foot parking garage with 348 parking spaces on approximately 3.18 acres. The Project Site is designated Commercial—General Commercial by the City of Anaheim General Plan Land Use Plan. The Project
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site is within the Commercial—General (C-G) Zone.</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

a) **No impact.** The Project Site is currently zoned Commercial-General, which allows a variety of land uses and does not necessarily serve the adjacent neighborhood or surrounding clusters of neighborhoods. A portion of the Project Site was relinquished to the City when Caltrans realigned the Anaheim Boulevard on-ramp to the northbound I-5. The City intends to vacate the portion of the street to establish southbound Anaheim Boulevard at its ultimate right of way of a Primary Arterial with a Class II Bike Lane, the cross section of which is 63 feet from the centerline. The remaining portion of the relinquished “remnant” parcel will be vacated, and assume the C-G zoning of the adjacent lot per AMC 18.90.050.030, Vacation of a Street or Alley. The City would then combine the “remnant” parcel with APN 082-220-09 via Lot Line Adjustment, as shown in Exhibit 5b—Lot Line Adjustment Proposed.

The Project Site is located within the South Anaheim Boulevard Corridor Overlay Zone (the SABC Overlay Zone), which serves as the major link between Downtown, The Platinum Triangle and The Anaheim Resort. Parcels north of the Project Site are zoned General-Commercial and are occupied by various commercial uses such as cafes and an adult day health care center. Parcels east of the Project Site are zoned Industrial and are currently occupied by industrial uses such as a trading company and an upholstery company. The I-5 Freeway abuts the Project to the southwest. Further west of the Project Site is the Anaheim Resort Specific Plan (SP 92-2) and the Disneyland Resort Specific Plan (SP 92-1). As stated above, a variety of land uses currently exist around the Project Site and the implementation of the Proposed Project would not disrupt the established community.

The Project Site is located within an urbanized area of Anaheim and is not large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example of such a barrier would be a project that involved a continuous right-of-way, such as a roadway, that would divide a community and impede access between parts of the community. Therefore, implementation of the Project would not disrupt or divide the physical arrangement of the established community in which the Project Site is located. There would be no impact.

b) **Less than significant impact.** The Proposed Project is consistent with applicable land use plans and zoning designations. Adopted land use regulations applicable to the Project Site include the City’s General Plan and Zoning Code. Following is an analysis of the Proposed Project’s consistency with these land use regulations.

**General Plan Consistency**
As shown in Exhibit 3—City of Anaheim General Plan Land Use Map, the Project Site is designated General Commercial and the Proposed Project is an allowable use in the General Commercial land use designation. The General Commercial land use designation allows development of a floor area ratio (FAR) of up to 0.50. Pursuant to AMC 18.08.045., the Applicant is requesting an increase in the maximum FAR to 1.93, which is permitted subject to the approval of a Conditional Use Permit in accordance with AMC 18.66.

The Proposed Project is consistent with the following Goals and Policies outlined in the Land Use Element of the General Plan:

- **Goal 3.1:** Pursue land uses along major corridors that enhance the City’s image and stimulate appropriate development at strategic locations.
  - **Policy 2)** Concentrate commercial uses at key intersections.
- **Goal 3.2:** Maximize development opportunities along transportation routes.
  - **Policy 3)** Encourage and provide incentives for the consolidation of parcels to create development sites that are large enough to support quality development.
- **Goal 5.1:** Create and enhance dynamic, identifiable places for the benefit of Anaheim residents, employees and visitors.
  - **Policy 1)** Encourage mixed-use and commercial development that provides:
    a) Safe, protected places for pedestrians to walk;
    b) Attractive surroundings;
    c) Opportunities for social interaction;
    d) Comfortable places to sit and relax; and
    e) Interplay between the interior uses of buildings and outdoor activities, such as sidewalk cafes or tastefully designed outdoor merchandise displays.
- **Goal 6.1:** Enhance the quality of life and economic vitality in Anaheim through strategic infill development and revitalization of existing development.
  - **Policy 2)** Promote the assembly of parcels to allow for more efficient development patterns wherever adjacent neighborhoods are not adversely impacted.
- **Goal 14.1:** Establish the South Anaheim Boulevard Corridor as a revitalized commercial and residential area that serves as a link between Downtown, The Platinum Triangle and The Anaheim Resort.
  - **Policy 4)** Promote commercial uses between Ball Road and the Santa Ana (I-5) Freeway that take advantage of freeway accessibility and visibility and proximity to The Anaheim Resort and The Platinum Triangle.
The Proposed Project would not conflict with any provision of the General Plan and no impacts would occur.

**Zoning Consistency**
The Project Site is within the General Commercial (C-G) Zone, as shown in Exhibit 4—City of Anaheim Zoning Map. The intent of the “C-G” Zone is to allow a variety of land uses. Areas within the C-G Zone do not necessarily serve the adjacent neighborhood or surrounding clusters of neighborhoods. In addition to neighborhood serving commercial uses, the C-G Zone typically includes highway-serving uses such as fast food restaurants, auto-oriented uses such as tire stores and auto parts stores, and stand-alone retail uses. This zone implements the General Commercial land use designation in the General Plan.

A portion of the Project Site was relinquished to the City when Caltrans realigned the Anaheim Boulevard on-ramp to the northbound I-5. The City intends to vacate the portion of the street to establish southbound Anaheim Boulevard at its ultimate right of way of a Primary Arterial with a Class II Bike Lane, the cross section of which is 63 feet from the centerline. The remaining portion of the relinquished “remnant” parcel will be vacated, and assume the C-G zoning of the adjacent lot per AMC 18.90.050.030, Vacation of a Street or Alley. The City would then combine the “remnant” parcel with APN 082-220-09 via Lot Line Adjustment, as shown in Exhibit 5b—Lot Line Adjustment Proposed.

**Variance**
The Applicant is requesting a Variance (VAR2018-05106) to the tree requirements in AMC 18.46.030 to reduce the number of trees required in the landscape setback along the frontage of the I-5 on-ramp. Trees cannot be planted along the southern portion of that property line due to an underground electrical utility easement.

**Conditional Use Permit**
The Applicant has requested a Conditional Use Permit (CUP2017-05927) for a hotel use, taller building height, and increased floor area ratio.

The Proposed Project would not require a zone change, and would comply with all provisions of the City of Anaheim zoning code with approval of a Conditional Use Permit allow for a hotel use, taller building height, and increased floor area ratio, and a Variance for the landscape setback. Less than significant impacts would occur and no mitigation would be required.

c) **No impact.** According to the City of Anaheim General Plan Environmental Impact Report, portions of the City of Anaheim, including the Hill and Canyon Area, are within the Orange County Central/Coastal Natural Communities Conservation Plan Subregion (NCCP) and Habitat Conservation Plan (HCP). This NCCP/HCP was approved by CDFG and USFWS in 1996 to address protection and management of coastal sage scrub habitat, coastal sage scrub obligate species, and other covered habitats and species, including coastal sage scrub, oak woodlands, chaparral, tecate cypress forest, and cliff and rock. The Project Site is not located within the NCCP/HCP. Therefore, no impacts would occur.

**XI. MINERAL RESOURCES**—Would the project:

| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☐ | ☐ | ☐ | ☒ |

**Narrative Summary:**
The information and analysis for Mineral Resources impacts are based on the City of Anaheim’s General Plan. The Project Site is located in an urbanized area of Anaheim and no known mineral resources are present on-site.

a) **No impact.** Figure G-3, Mineral Resource Map, of The City’s Green Element of the General Plan identifies mineral resources in the northeastern part of the City as MRZ-2 and Regionally Significant Aggregate Resource Area. The MRZ-2 designation represents “areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.” However, the Project Site is not located in either of these zones; therefore, Project implementation would not affect mineral deposits. Additionally, the City consists of mostly urbanized land and does not contain any active mining operations. The Project Site is zoned for General Commercial use and Project implementation would not result in the loss of availability of a known mineral resource; thus, no impacts would occur.

b) **No impact.** The City’s General Plan designates the area a General Commercial zone and does not permit mineral extraction. Furthermore, the Project Site is in an urbanized commercial area that does not support mineral extraction operations; therefore, no impacts would occur.
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
--- | --- | --- | --- | ---

**XII. NOISE**—Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?  
☐ ☑ ☐ ☐

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?  
☐ ☐ ☑ ☐

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?  
☐ ☐ ☑ ☐

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?  
☐ ☑ ☐ ☐

e) For a project located within an airport land use plan (Los Alamitos Armed Forces Reserve Center or Fullerton Municipal Airport), would the project expose people residing or working in the project area to excessive noise levels?  
☐ ☑ ☐ ☐

f) For a project within the vicinity of a private airstrip, heliport or helistop, would the project expose people residing or working in the project area to excessive noise levels?  
☐ ☐ ☐ ☑

**Narrative Summary:**
Information and analysis for noise impacts are based on the Noise Impact Report prepared for the Project by FCS (2018), which is included in Appendix F. The noise impact report determines the off-site and on-site noise impacts associated with the Proposed Project. The analysis is based on a more conservative (higher) trip generation assumption. Existing noise sources at the Project Site include stationary noise from surrounding land uses and traffic noise along roadway segments. These surrounding land uses generate noise from truck deliveries, loading/unloading activities, and typical parking lot activities.

**a) Less than significant impact with mitigation.** Noise levels in the Project area would be influenced by construction activities and from the ongoing operation of the Proposed Project.

**Short-term Construction Impacts**
Two types of short-term noise impacts could occur during the construction of the Proposed Project. First, construction crew commutes and the transport of construction equipment and materials to the Project Site would incrementally increase noise levels on access roads leading to the Project Site. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer-term (hourly or daily) ambient noise levels would be small. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the Project Site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction on the Project Site. Typical operating cycles for construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings. Impact equipment such as impact pile drivers is not expected to be used during construction, however, the Geopier construction will be utilized for the foundation of the proposed structure. The Geopier rammed aggregate pier installation is constructed by drilling out a volume of compressible soil to create a cavity and then vibratory ramming of select aggregate into the cavity in thin lifts using the patented beveled tamper.

The site preparation and grading phase of the Project is expected to require the use of rubber rubber-tired dozers, tractors, front-end loaders, backhoes, excavators, and graders. The building construction phase is expected to require the use of cranes, forklifts, portable generators, tractors, front-end loaders, backhoes, and welder torches.

Construction of the Proposed Project is expected to require the use of scrapers, bulldozers, water trucks, haul trucks, and pickup trucks. Based on the FHWA reference noise level data, the maximum noise level generated by each scraper is assumed to be 85 dBA Lmax at 50 feet from this equipment. Each bulldozer would also generate 85 dBA Lmax at 50 feet. The maximum noise level generated by graders is approximately 85 dBA Lmax at 50 feet. Geopier rammed aggregate pier construction is documented to generate maximum noise levels of up to 98 dBA Lmax at 10 feet from the operating equipment (Geopier Foundation Company 2018); these noise levels would attenuate to below 84 dBA Lmax at 50 feet from the operating equipment. Each doubling of the sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, a reasonable
worst-case combined noise level during this phase of construction would be 90 dBA $L_{\text{max}}$ at a distance of 50 feet from the acoustic center of a construction area. This would result in a reasonable worst-case hourly average of 86 dBA $L_{\text{eq}}$.

The nearest off-site receptor are mobile homes located to the north of the Project Site, approximately 600 feet from where heavy construction equipment would potentially operate during construction. At this distance, construction noise levels would range up to approximately 68 dBA $L_{\text{max}}$, with a relative worst-case hourly average of 64 dBA $L_{\text{eq}}$, if multiple pieces of heavy construction equipment operate simultaneously.

The City of Anaheim Municipal Code outlines the City’s standards for noise-producing construction activities. According to this ordinance, construction and building repair activities are exempt from the applications of the Municipal Code between the hours of 7:00 a.m. and 7:00 p.m. With restriction of construction activities to the hours of 7:00 a.m. and 7:00 p.m., and implementation of best management noise reduction techniques and practices in Mitigation Measure (MM) NOI-1, construction noise impacts to sensitive receptors in the vicinity of the Project Site would be reduced to less than significant.

**Long-term operational impacts**

Mobile source operation noise impacts

For transportation noise levels, the City’s “normally acceptable” land use compatibility standard is 65 dBA CNEL. For interior noise levels, the State of California’s interior noise standard is 45 dBA CNEL.

The FHWA highway traffic noise prediction model (FHWA RD-77-108) was used to evaluate existing and future traffic noise conditions in the vicinity of the Project Site. The projected future traffic noise levels adjacent to the Project Site were analyzed to determine compliance with the City’s noise and land use compatibility standards. The daily traffic volumes were obtained from the traffic analysis prepared for the Project (Iteris, Inc. 2017). The resultant noise levels were weighed and summed over a 24-hour period in order to determine the CNEL values. The traffic noise modeling input and output files are included in Appendix A of the Noise Impact Report. Table 12—Traffic Noise Model Results Summary shows a summary of the traffic noise levels for existing, existing plus project, General Plan build buildout (2035), and General Plan buildout (2035) plus project conditions as measured at 50 feet from the centerline of the outermost travel lane.

**Table 11: Traffic Noise Model Results Summary**

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Existing No Project (dBA) CNEL</th>
<th>Existing Plus Project (dBA) CNEL</th>
<th>Increase over Existing No Project (dBA)</th>
<th>General Plan Buildout (2035) No Project (dBA) CNEL</th>
<th>General Plan Buildout (2035) Plus Project (dBA) CNEL</th>
<th>Increase over General Plan Buildout (2035) No Project (dBA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ball Road—Harbor Boulevard and Anaheim Boulevard</td>
<td>67.8</td>
<td>67.8</td>
<td>0.0</td>
<td>68.4</td>
<td>68.4</td>
<td>0.0</td>
</tr>
<tr>
<td>Disney Way—I-5 SB Off-ramp and Anaheim Boulevard</td>
<td>61.7</td>
<td>61.8</td>
<td>0.1</td>
<td>64.3</td>
<td>64.3</td>
<td>0.0</td>
</tr>
<tr>
<td>Katella Avenue—Harbor Boulevard and Clementine</td>
<td>67.8</td>
<td>67.8</td>
<td>0.0</td>
<td>69.9</td>
<td>69.9</td>
<td>0.0</td>
</tr>
<tr>
<td>Katella Avenue—Clementine Street and Haster Street/Anaheim Boulevard</td>
<td>68.0</td>
<td>68.0</td>
<td>0.0</td>
<td>70.2</td>
<td>70.3</td>
<td>0.1</td>
</tr>
<tr>
<td>Katella Avenue—Haste r Street/Anaheim Boulevard and I-5 SB Loop Off-ramp</td>
<td>67.8</td>
<td>67.8</td>
<td>0.0</td>
<td>68.6</td>
<td>68.6</td>
<td>0.0</td>
</tr>
<tr>
<td>Anaheim Boulevard—Ball Road and Cerritos Avenue</td>
<td>66.4</td>
<td>66.5</td>
<td>0.1</td>
<td>67.7</td>
<td>67.7</td>
<td>0.0</td>
</tr>
<tr>
<td>Anaheim Boulevard—Cerritos Avenue and Anaheim Way</td>
<td>69.1</td>
<td>69.4</td>
<td>0.3</td>
<td>70.0</td>
<td>70.2</td>
<td>0.2</td>
</tr>
<tr>
<td>Anaheim Boulevard—Anaheim Way and Manchester Avenue</td>
<td>68.4</td>
<td>68.6</td>
<td>0.2</td>
<td>69.2</td>
<td>69.3</td>
<td>0.1</td>
</tr>
<tr>
<td>Anaheim Boulevard—Manchester Avenue and Katella Avenue</td>
<td>66.8</td>
<td>66.9</td>
<td>0.1</td>
<td>66.8</td>
<td>66.9</td>
<td>0.1</td>
</tr>
<tr>
<td>Anaheim Way—Anaheim Boulevard and Disney Way Westbound Ramp</td>
<td>66.5</td>
<td>66.6</td>
<td>0.1</td>
<td>67.5</td>
<td>67.6</td>
<td>0.1</td>
</tr>
</tbody>
</table>
Environmental Issues

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anaheim Way—Disney Way Westbound Ramp and Katella Avenue</td>
<td>66.2</td>
<td>66.3</td>
<td>0.1</td>
<td>68.3</td>
</tr>
<tr>
<td>Interstate 5—north of Anaheim Boulevard</td>
<td>80.6</td>
<td>80.6</td>
<td>0.0</td>
<td>80.6</td>
</tr>
</tbody>
</table>

Note:
- CNEL (dBA) is stated as measured at 50 feet from the centerline of the outermost travel lane.
- Boulevard 80.6 80.6 0.0
- Interstate 5—north of Anaheim
- Ramp and Katella Avenue 66.2 66.3 0.1
- Anaheim Way—Disney Way Westbound
- Hanna Way and Katella Avenue 68.3 68.4 0.1
- Anaheim Way—Disney Way Westbound
- Katella Avenue 68.3 68.4 0.1
- Source: FirstCarbon Solutions, 2017.

The traffic noise model results show that projected traffic noise levels along Anaheim Boulevard adjacent to the Project Site would range up to 69.4 dBA CNEL as measured at 50 feet from the centerline of the outermost travel lane under existing plus project conditions; and up to 70.2 dBA CNEL under General Plan buildout (2035) plus project conditions. Figure N-2—Land Use Compatibility for Community Noise Exposure (Exterior) of the City's General Plan identifies “normally acceptable,” “conditionally acceptable,” “normally unacceptable,” and “clearly unacceptable” exterior noise levels for various land uses. The Proposed Project is within the Transient Lodging-Motels, Hotels land use category. The projected traffic noise levels along Anaheim Boulevard adjacent to the Project Site are within the City’s “normally unacceptable” range for new Transient Lodging-Motels, Hotels land use developments. Under these conditions, new construction and development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise insulation features included in the design, and outdoor areas must be shielded.

Interior Noise Standards
The proposed hotel façade facing Anaheim Boulevard would be exposed to traffic noise levels ranging up to 70 dBA CNEL under General Plan buildout (2035) plus project traffic conditions. The façades of the hotel with direct line of sight to Interstate 5 would be exposed to traffic noise levels ranging up to 75.5 dBA CNEL.

According to design details available at the time of this analysis, the Proposed Project will include mechanical ventilation systems that will permit windows to remain closed. In addition, the proposed exterior façade design calls for a Vision Systems C600 glazing system, which has a Sound Transmission Class (STC) rating of 40. The proposed wall assembly would meet a minimum STC-52 rating, with a design equivalent of two layers of 1/8-inch gypsum board on the interior walls, and exterior sheathing of not less than 3/4-inch thick, with 3-inch-thick batt or sprayed insulation in the wall-cavity, and metal framing. Therefore, the proposed window and wall assembly would achieve a minimum STC-40 rating.

With these design features, traffic noise levels would be reduced to meet the interior noise standard of 45 dBA CNEL (75.5 - 40 = 35.5). Therefore, traffic noise impacts to interior areas of the Proposed Project would be less than significant.

Exterior Noise Standards
Outdoor uses must meet the exterior noise level standard of 70 dBA CNEL for Transient Lodging-Motels, Hotels land uses as stated in Figure N-2, Land Use Compatibility for Community Noise Exposure (Exterior) (Anaheim General Plan, Noise Element, page N-7, 2004). The pool area would be exposed to traffic noise levels of up to 75.5 dBA CNEL at the points nearest I-5. The Proposed Project would include construction of a 14-foot-high soundwall along the Project Site’s western and southern boundaries along the I-5 on-ramp that would attenuate traffic noise by up to 80 dBA to 67.5 dBA CNEL. Therefore, the 14-foot soundwall design feature would reduce traffic noise impacts to outdoor use areas of the Project Site to less than significant levels.

Stationary source operational noise impacts
The Proposed Project would include new stationary noise sources, such as typical parking lot activities. According to the AMC Section 6.70.010, no person within the City shall create any sound radiated for extended periods from any premises which produces a sound pressure level at any point on the property line in excess of 60 dBA $L_{eq}$ in accordance with the noise measurement requirements listed in the noise ordinance.

Typical parking lot activities include people conversing, doors shutting, or vehicles idling, which generate noise levels of approximately 60 dBA to 70 dBA $L_{max}$ at 50 feet. These activities would occur sporadically throughout the day, as visitors and staff arrive and leave the parking structure and porte-cochere. These noise levels are typical of what is currently experienced in the vicinity of the Project Site from existing parking lot activities. Parking lot activities could be located as close as 600 feet to the nearest sensitive off-site receptors, which are the mobile homes located north of the Project Site. At this distance, noise generated by typical parking lot activities would attenuate to approximately 48 dBA $L_{max}$. Therefore, parking lot activities would not exceed the City’s noise performance standard of 60 dBA $L_{eq}$. The impact of noise from project-related parking lot activities on sensitive off-site receptors would be less than significant.

At the time of preparation of this analysis, details were not available pertaining to proposed rooftop mechanical ventilation systems for the Project. Such details include unit specifications stating the noise rating of each unit that would be used and their proposed locations in the rooftop or ground level. Therefore, a reference noise level for typical rooftop mechanical ventilation systems was used. Noise levels from typical rooftop mechanical ventilation equipment are anticipated to range up to approximately 60 dBA $L_{eq}$ at a distance of 25 feet. Rooftop mechanical ventilation systems could be located as close as 600 feet of the nearest off-site receptors, the mobile homes.
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
---|---|---|---|---
Located north of the Project Site. At this distance, noise generated by rooftop mechanical ventilation equipment would attenuate to approximately 32 dBA Leq at the nearest off-site residential receptors. Therefore, mechanical ventilation equipment operational noise levels would not exceed the City’s noise performance standard of 60 dBA Leq. The impact of mechanical ventilation equipment operational noise levels on sensitive off-site receptors would be less than significant.

In conclusion, with the implementation of MM NOI-1, impacts related to exposure of persons to or generation of noise levels in excess of standards would be less than significant.

b) Less than significant impact. Project-related construction and operational groundborne vibration impacts are analyzed separately below. Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings.

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving, and operating heavy earthmoving equipment.

**Short-term construction vibration impacts**

Of the variety of equipment used during construction, the vibratory rollers that are anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Large vibratory rollers produce groundborne vibration levels ranging up to 0.210 inch per second (in/sec) peak particle velocity (PPV) at 25 feet from the operating equipment. Geopier construction would be utilized for the foundation construction of the proposed structures. The Geopier rammed aggregate pier installation is constructed by drilling out a volume of compressible soil to create a cavity and then vibratory ramming of select aggregate into the cavity in thin lifts using the patented beveled tamper. This method is documented to generate peak particle velocities of up to 0.75 in/sec PPV at 5 feet from the operating equipment (Geopier Foundation Company 2018), which under typical soil conditions would attenuate to below 0.07 in/sec PPV at 25 feet from the operating equipment.

The nearest off-site receptor is the commercial buildings located north of the Project Site, approximately 55 feet from the nearest construction footprint where large vibratory rollers would potentially operate. At this distance, groundborne vibration levels could range up to 0.064 PPV from operation of a large vibratory roller. This is below the industry standard construction vibration damage criteria of 0.2 PPV for this type of structure—buildings of non-engineered timber and masonry construction.

The nearest off-site receptor to the parking deck construction footprint is the commercial buildings located approximately 55 feet to the north of the nearest possible Geopier foundation installation locations. At this distance, groundborne vibration levels could range up to 0.02 in/sec PPV from operation of the Geopier installation operations. This is well below the industry standard construction vibration damage criteria of 0.2 in/sec PPV for this type of structure—buildings of non-engineered timber and masonry construction.

The nearest off-site receptor to the hotel construction footprint is the commercial buildings located approximately 150 feet north of the nearest possible Geopier foundation installation locations. At this distance, groundborne vibration levels could range up to 0.004 in/sec PPV from operation of the Geopier installation operations. This is well below the industry standard construction vibration damage criteria of 0.2 in/sec PPV for this type of structure—buildings of non-engineered timber and masonry construction.

The nearest off-site sensitive receptors are the residential land uses located approximately 600 feet north of the Project Site. At this distance, the highest construction-related groundborne vibration levels would attenuate to below 0.002 PPV, well below the FTA vibration damage impact criteria for even the most sensitive type of structures. Therefore, construction-related groundborne vibration impacts would be considered less than significant as measured at the nearest residential land use.

Construction-related groundborne vibration impacts would be less than significant as measured from the closest off-site structures and no mitigation is required.

**Operational vibration impacts**

Implementation of the Proposed Project would not include any permanent sources that would expose persons in the vicinity of the Project Site to groundborne vibration levels that could be perceptible without instruments at any nearby existing sensitive land use. In addition, there are no existing significant permanent sources of groundborne vibration in the vicinity of the Project Site to which the Proposed Project would be exposed. Therefore, operational groundborne vibration level impacts would be less than significant.

c) Less than significant impact. As noted in the characteristics of noise discussion, audible increases in noise levels generally refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is the minimum change considered readily perceptible to the human ear in outdoor environments. A significant impact would occur if construction of the proposed hotel resulted in noise levels that would create ambient noise levels more than 5 dBA above existing background noise levels in the vicinity of the Project Site.

As shown on Table 12, the highest traffic noise level increase of 0.3 dBA with implementation of the Proposed Project would occur along Anaheim Boulevard from Cerritos Avenue to Anaheim Way under existing plus project conditions. This increase is below the level that is considered a perceptible change in outdoor environments (a 3 dBA increase), and is well below a 5 dBA increase that would be considered a
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Substantial permanent increase in noise levels compared with noise levels that would exist without the Project. Therefore, project-related traffic noise impacts on existing ambient noise levels would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>As discussed in Impact XII.a above, new stationary noise sources resulting from implementation of the Proposed Project would not result in noise levels above existing background noise levels as measured at off-site sensitive receptors. Therefore, project-related stationary sources would not result in a substantial permanent increase compared with noise levels existing without the Project, and noise impacts on off-site receptors would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>d) Less than significant impact with mitigation.</strong> Implementation of the Project would result in short-term increases in ambient noise levels due to construction activities. Construction noise impacts were analyzed in the impact discussion under Impact XII.a, above. Project-related construction activities could result in high intermittent noise levels of up to approximately 68 dBA $L_{max}$ at the closest noise-sensitive land uses.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Restricting construction activities to the hours of 7:00 a.m. and 7:00 p.m., as well as implementing best management noise reduction techniques and practices outlined in Mitigation Measure (MM) NOI-1, would ensure that construction noise impacts would not result in substantial temporary increases at the off-site sensitive receptors above standards established in the General Plan or Municipal Code. Therefore, construction noise impacts on to sensitive receptors in the Project vicinity of the Project Site would less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>e) Less than significant impact.</strong> The nearest public airport to the Project Site is the Fullerton Municipal Airport, located approximately 5.9 miles northwest of the Project Site. Given the distance from and orientation of the airport runways, the Project Site is located well outside of the 65 dBA CNEL airport noise contours. While aircraft noise is occasionally audible on the Project Site from aircraft flyovers, aircraft noise associated with nearby airport activity would not expose people residing or working near the Project Site to excessive noise levels. Therefore, implementation of the Proposed Project would not expose persons residing or working in the vicinity of the Project Site to noise levels from airport activity that would be in excess of normally acceptable standards for Transient Lodging-Motels, Hotels land use development. Impacts associated with public airport noise would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>f) No impact.</strong> The Project Site is not located within the vicinity of a private airstrip. Therefore, no impacts associated with private airstrip noise would occur.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Mitigation Measures**  
**MM NOI-1**  
Prior to issuance of a grading permit, the Property Owner/Developer shall include notes on the grading and construction plans that include the following measures and the construction contractor shall adhere to all of the following:

- Equip all equipment driven by internal combustion engines with mufflers in good condition and appropriate for the equipment.
- Prohibit the unnecessary idling of internal combustion engines (i.e., idling in excess of 5 minutes).
- Utilize “quiet” models of air compressors and other stationary noise sources where technology exists.
- Locate all stationary noise-generating equipment as far as practicable from sensitive receptors and place equipment so that emitted noise is directed away from adjacent residences at all times during project grading and construction. Locate construction staging areas to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the Project Site.
- Restrict all on-site construction activities, including deliveries and engine warm-up, to the hours of 7:00 a.m. to 7:00 p.m. daily.

---

**XIII. POPULATION AND HOUSING—Would the project:**

| a) Induce substantial 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 housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☑ |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☑ |

**Narrative Summary:**
Information and analysis for Population and Housing impacts are from the City of Anaheim General Plan. According to the United States Census Bureau, the City has a population of 351,043 in 2016. The Housing Element of the General Plan anticipates a population of 369,107
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
---|---|---|---|---

residents by 2020.

a) **Less than significant impact.** The Proposed Project includes the construction of a 12-story hotel and four-story parking structure. Amenities within the hotel include a swimming pool, fitness room, meeting space, coffee shop, and gift shop. The rooftop of the hotel will also include a swimming pool, sundeck, restaurant and bar.

The Anaheim Resort Specific Plan Master EIR No. 313 approved the number of new hotel rooms within the ARSP (Anaheim Resort Specific Plan) area to 18,802, increasing the number of anticipated new employees to 20,870 (at a generation rate of 1.11) According to this factor, 326 rooms in the hotel would generate approximately 362 new employees. The kinds of labor force skills required for the proposed hotel and restaurant uses are those from the hospitality industry and are of the types that are typically filled by workers who are already present in the local labor force. Anaheim is a part of the Los Angeles-Long Beach-Anaheim metropolitan area where individuals can reside and find employment within a reasonable distance or can readily change jobs without changing their place of residence. Therefore, it is reasonable to expect that the Proposed Project would draw employees from the local labor force population readily available in the City and surrounding communities. In an unlikely scenario where the Proposed Project results in population increase due to workers relocating to the City, total employment for the Proposed Project could increase overall population of the City by less than 0.1 percent in 2020.

It is not anticipated that the construction of the hotel and its amenities will significantly impact the City’s population. In addition, the Project Site is currently undeveloped, contains natural vegetation, and has a generally flat terrain. No homes, businesses, or extensions of roads or other infrastructure are proposed as part of the Project. There is no anticipated significant population growth either directly or indirectly.

b) **No impact.** As stated above, the Project Site is currently undeveloped and implementation of the Proposed Project would not displace any existing housing. No impacts would occur.

c) **No impact.** The Project Site is currently undeveloped. The Proposed Project consists of the construction of a 12-story hotel and four-story parking structure. The Proposed Project would not require the construction of replacement housing as there are no people or housing being displaced. No impacts would occur.

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

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
</tr>
</tbody>
</table>

**Narrative Summary:**
Information and analysis for Public Services impacts are from the City of Anaheim General Plan, Anaheim Fire and Rescue, and Anaheim Police Department. The existing public facilities would sufficiently serve the Proposed Project.

**Fire Protection—Less than significant impact**
The City of Anaheim Fire and Rescue (AF&R) provides fire protection services to the Project Site. According to the City of Anaheim General Plan EIR, the AF&R operates 11 fire stations and employs a total of 231 safety and 54 full-time personnel. The Department staffs 12 engine companies, 10 of which are designated paramedic companies; five truck companies; one contract paramedic company; one hazardous materials unit; one technical rescue unit; and two Battalions, housed in Fire Station 6 (Euclid Fire Station) and Station 8 (Riverdale Station). The AF&R maintains a response time goal that requires the first engine company to respond within 5 minutes to 90 percent of all incidents and 8 minutes to the remaining 10 percent of incidents. The AF&R also requires a maximum of 10 minutes for the 

---

3 https://www.bls.gov/lau/laufaq.htm
The Proposed Project includes the construction of a hotel with 326 rooms and associated amenities. As discussed in Impact XIII, Population (FY 2015/16 City of Anaheim Budget), the response time of patrol units to Priority 1 emergency calls throughout the jurisdiction is 8.5 minutes (FY 14/15 City of Anaheim Budget).

The nearest police station to the Project Site is the Resort Station, which is located approximately 0.92 mile west of the site. The approximate average time from the police station to the Project Site is 8.5 to 11 minutes. There are four police stations in the City of Anaheim, which are located as follows: Central Station, located at 425 S. Harbor Boulevard; East Station, located at 8201 E. Santa Ana Canyon Road; Resort Station, located at 1520 S. Disneyland Drive; and West Station, located at 3150 W. Lincoln Avenue. The nearest fire station to the Project Site is Anaheim Fire Station #3 located at 1717 South Clementine Street, which is approximately 0.24 mile southwest of the Project Site. According to the Anaheim Fire and Rescue Standards of Cover, this station houses Paramedic Engine 3 and Truck 3. Both Engine 3 and Truck 3 cross-staff an Urban Search and Rescue unit and Water Rescue Boat. As discussed in Impact XIII, Population and Housing, the Proposed Project could potentially increase the City’s population by less than 0.1 percent in 2020. The Proposed Project also does not include any construction of housing that would result in an increase of new residents and an increase in demands for fire protection services.

The Property Owner/Developer would be required to comply with applicable building and fire codes and pay the appropriate impact fees in effect at the time building permits are issued, which would offset any incremental demand in calls for service. Therefore, development of the Project Site would not result in the need for new or physically altered fire protection facilities. Impacts to fire services would be less than significant.

**Police Protection—Less than significant impact**

Law enforcement and crime prevention services are provided by the Anaheim Police Department (APD). Police services provided include patrol, investigations, traffic enforcement, traffic control, vice and narcotics enforcement, airborne patrol, crime suppression, community policing, tourist oriented policing, and detention facilities. The APD currently has 408 sworn officers (FY 17/18 City of Anaheim Budget). Officers operate out of four stations and patrol an area of 49.7 square miles, divided into four districts (West, Central, South, and East). The police stations are located as follows: Central Station, located at 425 S. Harbor Boulevard; East Station, located at 8201 E. Santa Ana Canyon Road; Resort Station, located at 1520 S. Disneyland Drive; and West Station, located at 3150 W. Lincoln Avenue. The nearest police station to the Project Site is the Resort Station, which is located approximately 0.92 mile west of the site. The approximate average response time of patrol units to Priority 1 emergency calls throughout the jurisdiction is 8.5 minutes (FY 14/15 City of Anaheim Budget). Anaheim Police is in its second year of a commitment to hire 40 officers in 4 years and was expected to hire 10 new officers in 2015/16 (FY 2015/16 City of Anaheim Budget).

The Proposed Project includes the construction of a hotel with 326 rooms and associated amenities. As discussed in Impact XIII, Population and Housing, the Proposed Project could potentially increase the City’s population by less than 0.1 percent in 2020. The Proposed Project also does not include any construction of housing that would result in an increase of new residents and an increase in demands for police protection services. The Proposed Project would not be expected to result in significant additional calls for service. As discussed above, Anaheim Police is actively hiring police officers to serve the City of Anaheim. In addition, building plans submitted for the Proposed Project would be reviewed during the plan check process to ensure that adequate lighting, safety and security features are included in the Project design. The Property Owner/Developer would also pay the appropriate police impact fees in effect at the time building permits are issued, which would offset any incremental demand in calls for service. Therefore, development of the Project Site would not result in the need for new or physically altered police protection facilities. Impacts to police services would be less than significant.

**Schools—Parks—Other public facilities—No impact**

As discussed in Impact XIII, Population and Housing, the Proposed Project could potentially increase the City’s population by less than 0.1 percent in 2020. The Proposed Project also does not include any construction of housing that would result in an increase of new residents or students that would increase the demand for schools, parks or other public facilities. The Property Owner/Developer would pay all applicable impact fees and would therefore not result in physical impacts associated with the provision of, or the need for, new or physically/ altered governmental facilities. As such, no impacts to schools, parks or recreational facilities, or other public facilities, including libraries, would occur.

**XV. RECREATION—Would the project:**

a) 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) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?  
   ☐  ☐  ☐  ☑

**Narrative Summary:**

Information and analysis for Recreation impacts are based on the City of Anaheim General Plan. The City of Anaheim provides a wide variety of parks and recreation facilities. The Anaheim Parks Division of the Community Services Department is responsible for the maintenance and upkeep of 57 existing parks totaling nearly 800 acres. North of the Project Site is Paul Revere Elementary School, which includes a public park. Also near the Project Site is the 24.6-acre Boysen Park (951 S. State College Boulevard).
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
--- | --- | --- | --- | ---
a) **Less than significant impact.** As indicated in the Anaheim General Plan, Green Element, Figure G-1—*Green Plan*, the Project Site is not located within a Park Deficiency Area. The Proposed Project would include the development of a 12-story hotel consisting of 326 guest rooms. As stated in the Population and Housing section; it is estimated that the hotel would generate approximately 362 new employees, which could increase overall population of the City by less than 0.1 percent. Impacts of the Proposed Project to the City’s park and recreational facilities would be less than significant.

b) **No impact.** As shown on Exhibit 6—*Site Plan*, the resort hotel property would include amenities on the ground level, such as a swimming pool and fitness room, which would serve guests of the hotel. The Proposed Project would not require the expansion or construction of other off-site recreational facilities. No impacts resulting from the construction or expansion of recreational facilities would occur.

### XVI. TRANSPORTATION/TRAFFIC—Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

e) Result in inadequate emergency access?

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Narrative Summary:

Iteris, Inc. prepared the Radisson Hotel Traffic Impact Study (TIS), dated March 8, 2018 for the Proposed Project, which is included as Appendix G of this document.

The analysis focused on weekday AM (7:00–9:00 a.m.) peak period and PM (4:00–6:00 p.m.) peak-period traffic volumes. These periods represent when the highest cumulative total traffic on the adjacent street system occurs. The study area includes the following 12 intersections and 11 roadway segments:

### Intersections

1. Harbor Boulevard and Ball Road
2. Harbor Boulevard and Katella Avenue
3. Clementine Street and Katella Avenue
4. I-5 Southbound Off-ramp and Disney Way
5. Anaheim Boulevard and Ball Road
6. Anaheim Boulevard and Cerritos Avenue
7. Anaheim Boulevard and Hotel Driveway
8. Anaheim Boulevard and I-5 Northbound On-ramp/Anaheim way
9. Anaheim Boulevard and Disney Way
10. Anaheim Boulevard/Haster Street and Katella Avenue
11. I-5 Southbound Loop Off-ramp/Manchester Avenue and Katella Avenue
12. I-5 Northbound Off-ramp/Anaheim Way and Katella Avenue
### Environmental Issues

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

### Roadway Segments

1. Ball Road between Harbor Boulevard and Anaheim Boulevard
2. Disney Way between I-5 Southbound Off-ramp and Anaheim Boulevard
3. Katella Avenue between Harbor Boulevard and Clementine Street
4. Katella Avenue between Clementine Street and Haster Street/Anaheim Boulevard
5. Katella Avenue between Haster Street/Anaheim Boulevard and I-5 Southbound Loop Off-ramp
6. Anaheim Boulevard between Ball Road and Cerritos Avenue
7. Anaheim Boulevard between Cerritos Avenue and Anaheim Way
8. Anaheim Boulevard between Anaheim Way and Manchester Avenue
9. Anaheim Boulevard between Manchester Avenue and Katella Avenue
10. Anaheim Way between Anaheim Boulevard and Disney Way Westbound Ramp
11. Anaheim Way between Disney Way Westbound Ramp and Katella Avenue

### LOS and Significance Criteria

#### City of Anaheim

In accordance with City of Anaheim Traffic Impact Studies Criteria, a signalized intersection is deemed significantly impacted and requires mitigation based on an increase in V/C ratio under Project conditions as shown in Table 13—City of Anaheim Intersection Significant Impact Criteria. A V/C ratio of 0.90 (LOS D) shall be the lowest acceptable LOS at intersections:

<table>
<thead>
<tr>
<th>LOS</th>
<th>V/C Ratio</th>
<th>Project-Related Increase in V/C Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
<td>0.701–0.800</td>
<td>Equal to or greater than 0.500</td>
</tr>
<tr>
<td>D</td>
<td>0.801–0.900</td>
<td>Equal to or greater than 0.030</td>
</tr>
<tr>
<td>E, F</td>
<td>&gt; 0.900</td>
<td>Equal to or greater than 0.010</td>
</tr>
</tbody>
</table>

#### Project Trip Generation

The empirical resort hotel trip generation rates developed for the City of Anaheim Resort Area Hotels (developed by Iteris for the Anaheim Plaza Hotel TIA dated March 29, 2016) were used to establish project-generated traffic. The rooftop restaurant is only available to hotel guests and would not generate additional trips. As shown in Table 14—Proposed Project Trip Generation, the Proposed Project is forecasted to generate 91 new AM peak-hour trips, 78 new PM peak-hour trips, and 1,155 new weekday daily trips.

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Quantity</th>
<th>Unit 1</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
<th>Daily</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed Hotel 2</td>
<td>326 Rooms</td>
<td></td>
<td>49 In</td>
<td>42 Out</td>
<td>91 Total</td>
</tr>
</tbody>
</table>

Notes:

1. Rooms = number of hotel rooms.
2. Anaheim Resort Area Hotel Trip Rates were developed using empirical data collected in 2015.

---

- 80 -
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
--- | --- | --- | --- | ---

**Existing Conditions**
Existing AM and PM peak-period intersection turning movement count data and daily roadway segment count data were obtained for weekday conditions during the month of August 2017, after nearby schools resumed session.

The TIS conducted LOS analyses to evaluate existing intersection operations during the weekday AM and PM peak hours. All intersections were analyzed using ICU methodology, and additional HCM analyses were completed for the five (5) freeway ramp terminals and one (1) unsignalized Project driveway.

**ICU LOS**
The City of Anaheim General Plan utilizes the ICU methodology for LOS. All of the study intersections were evaluated using ICU methodology, with two sources of significant impact criteria including the City of Anaheim and the Orange County CMP. The CMP criteria guidelines take precedence over the City of Anaheim guidelines at the three (3) CMP identified intersections:

1. Harbor Boulevard/Katella Avenue
2. I-5 Southbound Off-ramp/Manchester Avenue/Katella Avenue
3. I-5 Northbound Off-ramp/Anaheim Way/Katella Avenue

All analyzed study intersections are currently operating at LOS D or better under Existing Conditions.

**HCM LOS**
The following Caltrans intersections and Project driveways were evaluated using HCM 2010 methodologies in addition to ICU methodology:

4. I-5 Southbound Off-ramp/Disney Way
5. Anaheim Boulevard/Hotel Driveway
6. Anaheim Boulevard/I-5 Northbound On-ramp/Anaheim Way
7. Anaheim Boulevard/Disney Way I-5 Southbound Loop Off-ramp/Manchester Avenue/Katella Avenue
8. I-5 Northbound Off-ramp/Anaheim Way/Katella Avenue

The above study intersections are currently operating at LOS D or better except for Anaheim Boulevard/I-5 Northbound On-ramp/Anaheim Way, which is currently operating at LOS F during the AM peak hour. The LOS deficiency is due to insufficient green time assigned to southbound through traffic under existing signal timing at this location.

**Roadway Segment Analysis**
Roadway segment LOS analysis was completed for the ADT for existing conditions. All roadway segments are currently operating at LOS C or better.

**Queuing Analysis**
Queuing analysis was completed for all Caltrans off-ramp approaches using HCM methodologies. All Caltrans off-ramp approaches currently have adequate storage to accommodate existing traffic conditions.

**Existing “Plus Project” Conditions**
Trips generated by the Project were assigned to the surrounding roadway system based on the distribution patterns to forecast the project-related peak-hour traffic at each of the study intersections.

LOS analyses were conducted to evaluate existing plus project intersection operations during the weekday AM and PM peak hours. These results were compared with existing conditions without the Project in order to assess any significant traffic impacts of the Project.

**ICU LOS**
The Proposed Project is not forecasted to result in any significant impacts to the analyzed study intersections under existing plus project conditions.

**HCM LOS**
All Caltrans intersections and Project driveway were evaluated using HCM 2010 methodologies. The study intersections are projected to operate at LOS D or better, except for the intersection of Anaheim Boulevard/I-5 Northbound On-ramp/Anaheim Way which is projected to continue operating at LOS F during the AM peak hour in existing plus project traffic conditions. This existing LOS deficiency is due to insufficient green time assigned to southbound through traffic under signal timing at this location.

**Roadway Segment Analysis**
Roadway segment LOS analysis was completed for the ADT for existing conditions. All roadway segments are currently operating at LOS C or better.

**Queuing Analysis**
All Caltrans off-ramp approaches were evaluated using HCM methodologies. All Caltrans off-ramp approaches are projected to have
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
---|---|---|---|---

adequate storage to accommodate existing plus project traffic conditions.

**Open Year 2019 “No Project” Conditions**
Future baseline intersection turning movement volumes were developed for Opening Year 2019 based on the existing traffic volumes, an ambient growth rate, and the added trips from the cumulative projects within the study area.

**Ambient Growth**
Ambient traffic growth is the traffic growth that will occur in the study area due to general employment growth, housing growth, and growth in regional through trips in Southern California. An ambient growth rate of 1 percent per year in the study area was assigned to vehicular traffic, consistent with the City’s direction.

**Cumulative Projects**
In addition to ambient growth assumed for the study area, the Opening Year (2019) traffic forecast is based on known cumulative projects. The cumulative projects included were obtained from the Anaheim Resort Development Status document, provided by the City of Anaheim, and dated August 21, 2017. The Anaheim Resort Development Status is documented in Appendix D of the Traffic Impact Study, including a figure showing the location of all Anaheim Resort projects currently under development.

**ICU LOS**
All of the study intersections operate at LOS D or better for Opening Year (2019) “No Project” conditions.

**HCM LOS**
All Caltrans intersections and project driveway were evaluated using HCM methodologies. All study intersections are projected to operate at LOS D or better. For the purpose of evaluating project-related impacts, signal timing splits were optimized under future scenarios in the traffic impact study, as timing will likely be updated to accommodate changing demand over time.

**Roadway Segment Analysis**
Roadway segment LOS analysis was completed for the ADT for existing conditions. All roadway segments are currently operating at LOS D or better.

**Queuing Analysis**
All Caltrans off-ramp approaches were evaluated using HCM methodologies. All Caltrans off-ramp approaches are projected to have adequate storage to accommodate opening year traffic conditions.

**Open Year 2019 With Project Conditions**
Trips generated by the project were assigned to the surrounding roadway system. Project trips were then added to the Opening Year baseline volumes to represent the Opening Year 2019 “Plus Project” conditions.

LOS analyses were conducted to evaluate opening year plus project intersection operations during the weekday AM and PM peak hours. All signalized intersections were analyzed using ICU methodology, and additional HCM analyses were completed at the Caltrans freeway ramp terminals and the project driveway. Opening year “plus project” traffic operations were compared to opening year conditions without the project in order to assess any significant traffic impacts as a result of the project.

**ICU LOS**
The analyzed intersections are forecast to operate at LOS D or better, and the traffic generated by the Proposed Project is not expected to exceed the threshold of significance.

**HCM LOS**
All Caltrans intersections and project driveway were evaluated using HCM methodologies. All study intersections are projected to operate at LOS D or better under Opening Year “Plus Project” conditions.

**Roadway Segment Analysis**
Roadway segment LOS analysis was completed for the ADT for opening year plus project conditions. All roadway segments are anticipated to operate at LOS D or better, and no significant impacts were identified.

**Queuing Analysis**
All Caltrans off-ramp approaches were evaluated using HCM methodologies. All Caltrans off-ramp approaches are projected to have adequate storage to accommodate opening year plus project traffic conditions.

**General Plan Build Out Year 2035 “No Project” Conditions**
Traffic analysis for General Plan Build Out Year 2035 conditions were performed based on post-processed volumes developed from the Anaheim Traffic Analysis Model (ATAM). ATAM is the traffic forecasting modeling tool for the City of Anaheim. Future model raw volumes for arterial intersection and roadway segments were post-processed on the basis of the standard post-processing methodology as defined in NCHRP Report 255. Observed existing traffic volumes were used as the basis to develop future post-processed volumes. LOS analyses were conducted to evaluate buildout year intersection operations during the weekday AM and PM peak hours. The signalized
intersections were analyzed using ICU methodology, and additional HCM analyses were completed at the Caltrans freeway ramp terminals and the there is one driveway project driveways.

ICU LOS
All of the study intersections operate at LOS D or better for General Plan Build Out without Project conditions.

HCM LOS
All Caltrans intersections (freeway ramp terminals) and project driveway were evaluated using HCM methodologies. The following two (2) intersections are forecasted to operate at a deficient LOS (LOS E or worse) during AM or PM peak hours under General Plan Build Out without Project conditions:

8. Anaheim Boulevard/I-5 Northbound On-ramp/Anaheim Way (PM LOS E)
11. I-5 Southbound Loop Off-ramp/Manchester Avenue/Katella Avenue (AM LOS E)

Roadway Segment Analysis
Roadway segment LOS analysis was completed for the ADT for existing conditions. All roadway segments are currently operating at LOS D or better.

Queueing Analysis
All Caltrans off-ramp approaches were evaluated using HCM methodologies. All Caltrans off-ramp approaches are projected to have adequate storage to accommodate General Plan Build Out Year traffic conditions.

General Plan Build Out Year 2035 “Plus Project” Conditions
Trips generated by the project were assigned to the surrounding roadway. Project trips were then added to the Build Out Year baseline volumes to represent the Build Out Year 2035 “Plus Project” conditions.

LOS analyses were conducted to evaluate the General Plan Build Out Year plus project intersection operations during the weekday AM and PM peak hours. All signalized intersections were analyzed using ICU methodology, and additional HCM analyses were completed at the Caltrans freeway ramp terminals and the project driveway.

ICU LOS
All of the study intersections operate at LOS D or better for General Plan Build Out with Project conditions and No Project-related significant impact was identified.

HCM LOS
The following two (2) intersections were forecasted to operate deficiently (LOS E or worse) during AM and PM peak hours under General Plan Build Out with Project conditions:

8. Anaheim Boulevard/I-5 Northbound On-ramp/Anaheim way (PM LOS E)
11. I-5 Southbound Loop Off-ramp/Manchester Avenue/Katella Avenue (AM LOS E)

The CMP establishes a threshold of Level of Service E or better for CMP roadways and intersections. Roadways with an increase in V/C ratio greater than 0.10 over the base condition, and intersections that operate or are forecast to operate at LOS F, are not in compliance with CMP LOS objectives and require a mitigation or a deficiency plan. The results of the traffic analysis indicate the Proposed Project would not create any project-level significant impact to the surrounding roadway system during the existing, Opening Year (2019), or General Plan Build Out Year (2035) conditions, with the exception of the arterial segment at Anaheim Boulevard between Cerritos Avenue and Anaheim Way. The arterial segment is projected to operate deficiently under both Year 2035 “No Project” and “Plus Project” conditions. However, no Project-related significant impact was identified for the arterial segment, as it is projected to perform deficiently under the “No Project” condition.

The two intersections identified above would also operate at an unacceptable LOS under General Plan Build Out without Project conditions, and therefore represent an existing deficiency that would occur even without development of the project. While these intersections are forecast to operate deficiently, the projected LOS under Project conditions in 2035 are not expected to exceed “No Project” conditions LOS, and no Project-related significant impact was identified.

Roadway Segment Analysis
Roadway segment LOS analysis was completed for the ADT for the General Plan Build Out Year plus Project conditions. All roadway segments are anticipated to operate at acceptable LOS (LOS C or better for City of Anaheim and LOS E or better for CMP) with the exception of the arterial segment at Anaheim Boulevard between Cerritos Avenue and Anaheim Way, which is projected to operate deficiently under both Year 2035 “No Project” and “Plus Project” conditions.

In accordance with the City of Anaheim evaluation guidelines, a peak-hour link LOS analysis was performed to determine if significant
impacts must be addressed. The roadway segment is anticipated to operate at acceptable LOS (LOS C or better) under both AM and PM peak-hour conditions, and no Project-related significant impact was identified.

Queuing Analysis
All Caltrans off-ramp approaches were evaluated using HCM methodologies. All Caltrans off-ramp approaches are projected to have adequate storage to accommodate General Plan Build Out Year with Project traffic conditions.

ENVIRONMENTAL ANALYSIS

a) Less than significant impact. The Proposed Project would not result in a significant impact on the study area intersections under existing and future traffic conditions. As such, the Property Owner/Developer would comply with the City’s standards. Based on rates developed for Anaheim Resort hotels, the proposed hotel is forecast to generate 91 new AM peak-hour trips, 78 new PM peak-hour trips, and 1,155 new weekday daily trips. The results of the traffic analysis indicate the Proposed Project would not create any project-level significant impact to the surrounding roadway system during the existing, opening year (2019), or General Plan Build Out Year (2035) conditions, with the exception of the arterial segment at Anaheim Boulevard between Cerritos Avenue and Anaheim Way. The arterial segment is projected to operate deficiently under both Year 2035 “No Project” and “Plus Project” conditions, and therefore represents a deficiency that would exist even without development of the Proposed Project. No project-related significant impact was identified for this arterial segment, as it is projected to perform deficiently under No Project conditions.

The purpose of the CMP is to develop a coordinated approach to managing and decreasing traffic congestion by linking the various transportation, land use, and air quality planning programs throughout the County to be consistent with that of SCAG. The CMP requires review of substantial individual projects, which might on their own impact the CMP transportation system. Specifically, the CMP Traffic Impact Analysis measures impacts of a Project on the CMP Highway System.

This study includes the following three (3) roadway segments that would be analyzed in accordance with CMP criteria:

- Katella Avenue between Harbor Boulevard and Clementine Street (#3)
- Katella Avenue between Clementine Street and Haster Street/Anaheim Boulevard (#4)
- Katella Avenue between Haster Street/Anaheim Boulevard and I-5 Southbound Loop Off-ramp (#5)

The study also includes the following three (3) intersections that would be analyzed in accordance with CMP criteria:

- Harbor Boulevard and Katella Avenue (#2)
- I-5 Southbound Off-ramp/Manchester Avenue and Katella Avenue (#11)
- I-5 Northbound Off-ramp/Anaheim Way and Katella Avenue (#12)

c) No impact. The Project Site is not located near an airport, and the Proposed Project would not change air traffic patterns at the Fullerton Municipal Airport, the nearest airport located approximately 5.89 miles northwest to the Project Site. The Proposed Project would also not directly increase the amount or location of air traffic. There would be no impact.

d) Less than significant impact. Access to the site would be provided by a proposed right-in/right-out driveway along Anaheim Boulevard. As discussed in Opening Year “Plus Project” Intersection, above, while multiple intersections are forecast to operate deficiently, the traffic generated by the Proposed Project is not expected to exceed the threshold of significance and No Project-related significant impact was identified. The Project would not add incompatible uses to area roadways or increase hazards due to a design feature. The required street modification process—which includes constructing Anaheim Boulevard to its ultimate half-section width, including a planned Class II bike lane in compliance with the City’s Traffic Engineering Division—would ensure that no adverse impacts related to a design feature would occur.

e) Less than significant impact. Access to the site would be provided by a proposed right-in/right-out driveway along Anaheim Boulevard. An emergency turn-around feature is included to provide internal circulation for emergency vehicles. The internal circulation would be reviewed and implemented according to Anaheim Fire Authority and City of Anaheim standards. In addition, access driveways would not result in congestion on roadways. The Project would not impede emergency access to the Project Site or to the surrounding community during operations. Preparation of a construction traffic control plan would be required for a right-of-way construction permit. As such, less than significant impacts are anticipated to occur with regard to emergency access during Project construction.

f) Less than significant impact with mitigation incorporated. As shown on Exhibit 12—Transit Routes, OCTA, Los Angeles Transit...
Environmental Issues

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

Authority (Metro), and Anaheim Resort Transportation (ART) all operate bus lines within the area of the Project Site. Descriptions of the transit services follow.

**Metro Lines**
- Line 460—This line operates between downtown Los Angeles and Disneyland. The line travels north-south along Harbor Boulevard, and along Disney Way, near the study area. Service is provided at 20-minute headways during peak periods on weekdays. Weekends and holiday service is also provided.

**OCTA Lines**
- Line 46—This line operates between Los Alamitos and Orange County. Within the study area, the line travels east-west along Ball Road. Service is provided at 30-minute headways solely during weekday peak periods and 50-minute headways during the weekends.
- Line 47—This line operates between Fullerton to Balboa. Within the study area, the line travels north-south along Anaheim Boulevard. Service is provided at 20-minute headways during the weekdays. Weekends and holiday service is also provided.
- Line 50—This line operates between Long Beach and Orange County. Within the study area, the line travels east-west on Katella Avenue. Service is provided at 15-minute headways during the weekdays and 50-minute headways during the weekends and holidays.
- Line 83—This line operates between Anaheim and Laguna Hills. The line travels north-south along Harbor Boulevard, northwest-southeast along Manchester Avenue, and east-west along Disney Way, near the study area. Service is provided at 20-minute headways during the weekdays.
- Line 430—This line operates between the Anaheim Regional Transportation Intermodal Center (ARTIC) and the Anaheim Resort Area. Within the study area, the line travels east-west on Katella Avenue. Service is provided at 30-minute headways solely during weekday peak periods.
- Line 543—This line operates between the Fullerton Transportation Center and Santa Ana. The line travels north-south along Harbor Boulevard, near the study area. Service is provided at 20-minute headways during peak periods on weekdays. Weekdays and holiday service is also provided.

**ART Lines**
- Lines 6, 7, 8—These lines operate between the Disneyland Transportation Center and the hotels along the GardenWalk. Within the study area, these lines travel from Anaheim Boulevard to Katella Avenue, looping around Disney Way back to Anaheim Boulevard. Service is provided at 20-minute headways during weekdays and weekends.
- Line 12—This line operates between the Disneyland Transportation Center and the Holiday Inn Anaheim on Manchester Avenue. Within the study area, the line travels east-west along Katella Avenue between Harbor Boulevard and Manchester Avenue. Service is provided at 20-minute headways during weekdays and weekends.
- Lines 14, 15—These lines operate between the Disneyland Transportation Center and GardenWalk at Cheesecake Factory. Within the study area, these lines travel east-west on Katella Avenue, and northwest-southeast on Manchester Avenue between I-5 SB Off-ramp and Anaheim Boulevard. Service is provided at 20-minute headways during weekdays and weekends.

The Property Owner/Developer will include rideshare and vanpooling opportunities for employees and patrons. ART will provide service at 20-minute headways for the Project (SC TRANS-1).

**Bikeway Configurations**
The City of Anaheim existing and proposed configurations of the bike route within the study area are described below:

- Class I Bike Path—Class I bikeways provide an exclusive route for bicycles and pedestrians. There are 14.78 miles of existing Class I bikeway within City of Anaheim. Within the study area, a Class I bike path is proposed along Disney Way, going east-west from Harbor Boulevard to Anaheim Boulevard.
- Class II Bike Lane—Class II bikeways provide a restricted right-of-way for use of bicycles alongside motor vehicles. There are 43.8 miles of existing Class II bikeways within City of Anaheim. Within the study area, a Class II bike path exists along Anaheim Boulevard traveling north-south from Ball Road to Cerritos Avenue, and is proposed to be extended past Ball Road to the north and south of Cerritos Avenue.

In summary, the Property Owner/Developer will widen the southbound curb to the ultimate right-of-way of 63 feet from the centerline of Anaheim Boulevard, which is the cross section for a Primary Arterial with a Class II Bike lane. At the recommendation of Caltrans Traffic Operations and Design groups, the implementation of MM TRANS-1 would reduce impacts to alternative modes of transportation and public transit facilities to less than significant levels.

**Standard Conditions**
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>SC TRANS-1</td>
<td>The Property Owner/Developer shall include rideshare and vanpooling opportunities for employees and patrons in conjunction with Anaheim Resort Transit.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Mitigation Measure**

**MM TRANS-1**  
Prior to a certificate of occupancy, the Property Owner/Developer shall provide a Class II bicycle lane running along Anaheim Boulevard adjacent to the Proposed Project, consistent with the City of Anaheim Bicycle Master Plan. The Class II bicycle lane shall be designed as on-road facilities, with recommended painted bicycle lanes. The Class II bicycle lane shall be immediately adjacent to the sidewalk until the start of the exclusive right-turn lane from southbound Anaheim Boulevard to northbound I-5. The bicycle lane shall continue southbound between the free right-turn lane and the right-most through lane.
Exhibit 12
Transit Routes

Legend

- Project Site
- OCTA Lines
  - ART Lines
    - Line 12
    - Lines 14, 15
    - Lines 6, 7, 8
  - Metro Line

Source: ESRI World Street Map, OCTA GIS Data
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>XVII. TRIBAL CULTURAL RESOURCES—Would the project:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>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:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section §5020.1(k), or</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section §5024.1. In applying criterial set forth in subdivision (c) of Public Resources Code Section §5021.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

Narrative Summary:

a, b) Less than significant impact with mitigation. Effective July 1, 2015, Assembly Bill (AB) 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in §21074. A tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed projects within its traditionally and culturally affiliated area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete, or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code §21082.3(c).

The City of Anaheim has received requests from three California Native American Tribes to be notified of projects in which the City of Anaheim is the Lead Agency under CEQA. The Gabrieleño Band of Mission Indians—Kizh Nation, the Soboba Band of Luiseño Indians, and the Juaneño Band of Mission Indians—Acjachemen Nation were notified of the Proposed Project on November 14, 2017, and the 30-day notification period lapsed on December 14, 2017. The City received one response from the Gabrieleno Band of Mission Indians—Kizh Nation, requesting consultation on the Proposed Project.

On December 28, 2018, the City of Anaheim held telephone consultations with the Kizh Gabrieleño Band of Mission Indians. Chairman Andrew Salas spoke on behalf of the tribe. Chairman Salas identified the Project Site as located within the ancestral territory of the Gabrieleno Tribe. In order to maintain the Tribal Cultural Resources within the area, Chairman Salas requested that Native American monitors be present during all ground-disturbing activities on the Project Site, as provided in MM TRI-1.

Mitigation Measure

MM TCR-1 Prior to issuance of a grading permit, the Property Owner/Developer shall provide the Planning and Building Department, Planning Services Division with an executed contract with Tribal Representatives from the Gabrieleño Band of Mission Indians-Kizh Nation for the services of a qualified Native American Monitor(s) to provide oversight during construction-related ground disturbance activities. Ground disturbance is defined by the Tribal Representatives from the Gabrieleño Band of Mission Indians-Kizh Nation as activities that include but are not limited to pavement removal, pot-holing or auguring, grubbing, weed abatement, boring, grading, excavation, drilling, and trenching, within the Project Site. The monitor(s) must be approved by the Tribal Representatives and shall be present on-site during the construction phases that involve any ground-disturbing activities. The Native American Monitor(s) shall complete monitoring logs on a daily basis. The logs shall provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. The monitor(s) shall possess Hazardous Waste Operations and Emergency Response (HAZWOPER) certification. In addition, the monitor(s) shall be required to provide insurance certificates, including liability insurance, for any archaeological resource(s) encountered during grading and excavation activities pertinent to the provisions outlined in the California Environmental Quality Act, California Public Resources Code Division 13, Section 21083.2 (a) through (k). The on-site monitoring shall end when the grading and excavation activities on the Project Site are completed, or when the Tribal Representatives and monitor have indicated that the Project Site has a low potential for Tribal Cultural Resources.
Environmental Issues | Potentially Significant Impact | Less Than Significant with Mitigation | Less Than Significant Impact | No Impact
--- | --- | --- | --- | ---

**XVIII. UTILITIES AND SERVICE SYSTEMS—Would the project:**

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? ☑

b) Require or result in the construction of new water or wastewater treatment facilities (including sewer (waste water) collection facilities) or expansion of existing facilities, the construction of which could cause significant environmental effects? ☑

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? ☑

d) Have sufficient water supplies available to serve the project (including large-scale developments as defined by Public Resources Code Section 21151.9 and described in Question No. 20 of the Environmental Information Form) from existing entitlements and resources, or are new or expanded entitlements needed? ☑

e) 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? ☑

f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs? ☑

g) Comply with Federal, State, and local statutes and regulations related to solid waste? ☑

h) Result in a need for new systems or supplies, or substantial alterations related to electricity? ☑

i) Result in a need for new systems or supplies, or substantial alterations related to natural gas? ☑

j) Result in a need for new systems or supplies, or substantial alterations related to telephone service? ☑

k) Result in a need for new systems or supplies, or substantial alterations related to television service/reception? ☑

**Narrative Summary:**

Information and analysis for Utility and Service Systems impacts are based on the Preliminary Water Quality Management Plan (KPFF Consulting Engineers 2017), Drainage Plan (KPFF Consulting Engineers 2017), and Sewer Study (Psomas 2017) prepared for the Proposed Project. The reports are included in Appendix E. The Proposed Project would connect to all existing utilities. All utilities and service systems would sufficiently serve the Project Site. Existing powerline and power easements are located at the southwest edge of the Project Site and outside of the proposed sound wall. In addition, two gas line easements running east to west exist on the northern portion of the Site. The gas lines are dated from 1929 and are presumably inactive and will be abandoned prior to construction as a condition of approval of the Proposed Project.

a) **Less than significant impact.** Implementation of the Proposed Project would result in the generation of wastewater. According to the City of Anaheim General Plan, sewage is collected by City collector facilities and conveyed to trunk sewers owned and maintained by the Orange County Sanitation District (OCSD). Wastewater generated on the Project Site would be transported by trunk sewers to the OCSD Reclamation Plant No. 1, located in the City of Fountain Valley, and Reclamation Plant No. 2, located in the City of Huntington Beach. The effluent discharged to the ocean is a blend of advanced primary and secondary treated wastewater, as specified in the OCSD’s NPDES permit. Both of these reclamation plants are required to comply with the treatment requirements specified in the NPDES permits issued by the RWQCB.

Reclamation Plant No. 1 currently has a design capacity of 144 million gallons per day (mgd), and Reclamation Plant No. 2 has a design capacity of 108 mgd. As stated in the General Plan, these treatment capacities would expand in the future. For the 2015–2016 fiscal year, average wastewater flows at Reclamation Plant No. 1 were 117 mgd, and flows at Reclamation Plant No. 2 were 67 mgd, totaling
The Project Applicant, estimates that the water demand for the Proposed Project is 14,604.76 gallons per day, or 5,330,737.4 gallons per year (16.36 acre-feet). The Proposed Project would be required to connect to an existing 12-inch ductile iron pipe water line in Anaheim Boulevard.

According to the City’s 2015 Urban Water Management Plan (UWMP), the City depends on a combination of imported water, local groundwater, and recycled water to meet its water needs. The City works with two primary agencies, MWD and OCWD, to ensure a safe and reliable water supply that will continue to serve the community in periods of drought and shortage.

The City’s main source of water supply is groundwater from the Groundwater Basin. Currently, the City relies on approximately 70 percent groundwater from OCWD, and 30 percent imported water from MWD. The City anticipates the same water supply mix to be available through 2040. With the projects and programs implemented by MWD, OCWD, and the City, water supplies are projected to meet full-service demands of the City’s UWMP determined that it would be able to meet the City’s projected 2040 water demand, which would be 71,172 acre-foot/year. The water demand of the Proposed Project would account for approximately 0.02 percent of the City’s projected 2040 water demand. In addition, MWD’s 2015 UWMP found that it would be able to meet full-service demands of its member agencies from 2020 through 2040 during normal, single dry, and multiple dry years.

The Proposed Project would use a relatively nominal percentage of the projected water supply available to the City in future year scenarios. The City can meet its water demand under multiple dry years with diversified supply and conservation measures. Therefore, impacts associated with water facilities and supplies would be less than significant.

**Wastewater—Less than significant impact.** There is no sewage flow from the existing vacant site. Sewage from the Proposed Project would be discharged to the existing 10-inch VCP sewer running along northbound side of Anaheim. The Proposed Project would increase the total average daily flow to the sewer collection system by 47,190 gpd. As determined in the Sewer Study (Psomas 2017), no additional sewer system improvements are required for the Proposed Project. There are three existing deficiencies in Katella Avenue sewer lines existed prior to Project buildout. These deficiencies are included in the recommended Capital Improvement Program of the Central Anaheim Area Master Plan of Sanitary Sewers.

The Proposed Project would generate the same types of municipal wastewater that are currently generated throughout the City. The Proposed Project would not include industrial uses or activities that would require unique wastewater treatment processes. Reclamation Plants Nos. 1 and 2 would adhere to the treatment requirements specified in the NPDES permits issued by the RWQCB. The Proposed Project’s wastewater generation would represent only a nominal fraction (0.06 percent, discussed above) of the present surplus treatment capacity. Therefore, impacts associated with wastewater treatment facilities and capacities would be less than significant.

c) **Less than significant impact.** As stated in the WQMP, the Project Site is located within the Anaheim Bay-Huntington Harbor Los Alamitos/East Garden Grove/Bolsa Chica Watershed.

The site infrastructure will include piping, multiple drain inlets, detention basins, an underground storage system, and a concrete connector pipe serving as the site’s main stormwater outlet. The stormwater would be treated by various methods outlined in the Preliminary Water Quality Management Plan (KPFF Consulting Engineers 2017). Treatment of on-site runoff will include 12- to 18-inch-deep aboveground detention basins and an underground detention system to capture the difference between the proposed and existing 10-year runoff volume. Flow would be diverted to the public storm drain system through an outlet pipe engineered to deliver stormwater to the public system at a rate not to exceed the existing 10-year rate. Since the Project will retain the volume equivalent to the difference between existing and proposed 10-year volume on-site, the proposed volume leaving the site will not exceed the existing condition.

Furthermore, the Property Owner/Developer would comply with the NPDES Construction General Permit to control construction-related pollutants and would implement structural and non-structural BMPs throughout the Project Site to achieve long-term water quality. Therefore, impacts would be less than significant.

d) **Less than significant impact.** According to the City’s General Plan, the City utilizes two primary sources of water supply: groundwater produced from City-owned wells and imported water from the MWD. The City of Anaheim’s 2015 UWMP indicates that the City’s

---

4 https://www.ocsd.com/services/regional-sewer-service
<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>current water supply is sufficient. As defined in CEQA Guidelines Section 15155, the Proposed Project is not a hotel development of more than 500 rooms and would not be considered a water-demand project. As discussed in Impact XVIII.b, the Proposed Project would have less than significant impact on water supplies.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>e) Less than significant impact.</strong> As previously discussed, both OCSD wastewater treatment facilities that would serve the Proposed Project have design capacities that exceed their current utilization, with Plant 1 in the City of Fountain Valley presently having a 27-mgd surplus capacity and Plant 2 in the City of Huntington Beach having a 41-mgd surplus capacity. Combined, both Plant 1 and Plant 2 currently have surplus capacity of 68 mgd. The Proposed Project would generate the same types of municipal wastewater that are currently generated throughout the City. The Proposed Project would not include industrial uses or activities that would require unique wastewater treatment processes. The Proposed Project’s wastewater generation would represent only a nominal fraction of this present surplus treatment capacity, wastewater produced by the Proposed Project and required treatment would comply with the treatment requirements of the RWQCB. Therefore, impacts associated with wastewater treatment capacity would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>f) Less than significant impact.</strong> Orange County Waste and Recycling owns and operates three active landfills. These are Olinda Alpha Landfill near Brea, the Frank R. Bowerman Landfill near Irvine, and the Prima Deschecha Landfill in San Juan Capistrano. The Olinda Alpha Landfill is the closest facility to the Project Site and would most likely receive waste from the Proposed Project. According to the County of Orange Waste and Recycling website, this landfill has a daily maximum of 8,000 tons per day. As provided by the Applicant, the Project is expected to generate 24.01 cubic yards, or 33.61 tons of solid waste per day. The 33.61 tons per day of solid waste generated by this Project is nominal compared with Olinda Alpha Landfill’s permitted capacity of 8,000 tons per day. Therefore, impacts would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>g) Less than significant impact.</strong> As stated above, solid waste generated by the Project would be disposed of at one of the three landfills in Orange County. Disposal of solid waste would be required to comply with all federal state, and local statutes and regulations related to solid waste. This would include providing receptacles for green waste, recyclables and garbage. Impacts would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>h) Less than significant impact.</strong> The Anaheim Public Utilities (APU) Electrical Division would provide electricity for the Proposed Project. APU’s distribution system consists of approximately 3,400 circuit miles of transmission and distribution lines, over 1,600 miles of which are underground. In order to facilitate the safe and efficient transfer of electricity to residences and businesses, 13 distribution substations are located throughout the City. APU has an annual historic system peak demand of 593 megawatts and provides more than 2.9 million megawatt-hours annually to its customers. The Project Site is already within the APU service area. It is anticipated that APUD would have the capabilities to meet future demands. Impacts would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>i) Less than significant impact.</strong> Southern California Gas Company provides gas service in the City of Anaheim and has facilities throughout the City. The availability of natural gas service is based upon current gas supply and regulatory policies. As a public utility, the Gas Company is under the jurisdiction of the Public Utilities Commission and federal regulatory agencies. Should these agencies take any action that affects gas supply, or the conditions under which service is available, gas service would be provided in accordance with revised conditions. Development on the Project Site would be required to comply with standard regulatory requirements related to natural gas. As such, impacts would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>j) Less than significant impact.</strong> The Project Site is in a highly urbanized setting and already served by local telephone service such as AT&amp;T. The Project would require reconfiguration and improvements to the existing telephone facilities to accommodate the proposed hotel development. However, no major alterations to existing telephone system to supplies would be necessary to provide adequate service to the Proposed Project. Impacts would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>k) Less than significant impact.</strong> The Project Site is in a highly urbanized setting and already served by television service/reception. No major alterations to existing system or supplies would be necessary to accommodate the proposed hotel development. Impacts would be less than significant.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

5 Solid Waste Management Plan of the Site Plan Package
6 https://www.anaheim.net/1067/About-the-Utilities
## XIX. MANDATORY FINDINGS OF SIGNIFICANCE

<table>
<thead>
<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant with Mitigation</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?</td>
<td>☐</td>
<td>✓</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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)?</td>
<td>☐</td>
<td>✓</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</td>
<td>☐</td>
<td>✓</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

**Narrative Summary:**

a) **Less than significant impact with mitigation.** With the incorporation of the identified mitigation measures, the Proposed Project would not degrade the quality of the environment; substantially reduce the habitats of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animals; or eliminate important examples of major periods of California history or prehistory.

b) **Less than significant impact with mitigation.** The Proposed Project would result in potentially significant project-specific impacts to biological resources, cultural resources and geology/soils, and could result in hazards and noise impacts. However, all mitigation measures have been identified that would reduce these impacts to less than significant levels. Furthermore, the Air Quality and Transportation/Traffic analyses presented in Impact III and Impact XVI, respectively, of this document considered cumulative impacts and determined that cumulative air quality and traffic impacts would less than significant. No additional mitigation measures would be required to reduce cumulative impacts to less than significant levels.

c) **Less than significant impact with mitigation.** Impacts related to biological resources, cultural resources, geology, hazards, noise, traffic, and tribal resources were identified. With implementation of mitigation measures, all identified impacts would be reduced to less than significant levels; therefore, the Proposed Project would not cause substantial adverse effects on human beings.
References


<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>AF&amp;R</td>
<td>Anaheim Fire and Rescue</td>
</tr>
<tr>
<td>APUD</td>
<td>Anaheim Public Utilities District</td>
</tr>
<tr>
<td>ART</td>
<td>Anaheim Resort Transportation</td>
</tr>
<tr>
<td>ARSP</td>
<td>Anaheim Resort Specific Plan</td>
</tr>
<tr>
<td>ATAM</td>
<td>Anaheim Traffic Analysis Model</td>
</tr>
<tr>
<td>bgs</td>
<td>below ground surface</td>
</tr>
<tr>
<td>BIOS</td>
<td>Biogeographic and Information Observation System</td>
</tr>
<tr>
<td>BMPs</td>
<td>best management practices</td>
</tr>
<tr>
<td>BSA</td>
<td>Biological Study Area</td>
</tr>
<tr>
<td>CBC</td>
<td>California Building Code</td>
</tr>
<tr>
<td>CDFW</td>
<td>California Department of Fish and Wildlife</td>
</tr>
<tr>
<td>CMP</td>
<td>Congestion Management Plan</td>
</tr>
<tr>
<td>CNDDDB</td>
<td>California Natural Diversity Database</td>
</tr>
<tr>
<td>CNPS</td>
<td>California Native Plant Society</td>
</tr>
<tr>
<td>CUP</td>
<td>Conditional Use Permit</td>
</tr>
<tr>
<td>CWA</td>
<td>federal Clean Water Act</td>
</tr>
<tr>
<td>FAR</td>
<td>floor-area-ratio</td>
</tr>
<tr>
<td>FMMP</td>
<td>Farmland Mapping and Monitoring Program</td>
</tr>
<tr>
<td>GPD</td>
<td>Gallon per day</td>
</tr>
<tr>
<td>HCM</td>
<td>Highway Capacity Manual</td>
</tr>
<tr>
<td>HCP</td>
<td>Habitat Conservation Plan</td>
</tr>
<tr>
<td>ICU</td>
<td>Intersection Capacity Utilization</td>
</tr>
<tr>
<td>IPaC</td>
<td>Information, Planning, and Conservation System</td>
</tr>
<tr>
<td>LBP</td>
<td>lead based paint</td>
</tr>
<tr>
<td>LOS</td>
<td>level of service</td>
</tr>
<tr>
<td>MBTA</td>
<td>Migratory Bird Treaty Act</td>
</tr>
<tr>
<td>Mgd</td>
<td>million gallons per day</td>
</tr>
<tr>
<td>MRZ</td>
<td>mineral resource zone</td>
</tr>
<tr>
<td>NCCP</td>
<td>Natural Community Conservation Plan</td>
</tr>
<tr>
<td>NPDES</td>
<td>National Pollutant Discharge Elimination System</td>
</tr>
<tr>
<td>NWI</td>
<td>National Wetlands Inventory</td>
</tr>
<tr>
<td>OCSD</td>
<td>Orange County Sanitation District</td>
</tr>
<tr>
<td>OCTA</td>
<td>Orange County Transit Authority</td>
</tr>
<tr>
<td>OCWD</td>
<td>Orange County Water District</td>
</tr>
<tr>
<td>OHWM</td>
<td>ordinary high water mark</td>
</tr>
<tr>
<td>PCBs</td>
<td>polychlorinated biphenyls</td>
</tr>
<tr>
<td>RWQCB</td>
<td>Regional Water Quality Control Board</td>
</tr>
<tr>
<td>SARWQCB</td>
<td>Santa Ana Regional Water Quality Control Board</td>
</tr>
<tr>
<td>SCAG</td>
<td>Southern California Association of Governments</td>
</tr>
<tr>
<td>SWPPP</td>
<td>Storm Water Pollution Prevention Plan</td>
</tr>
<tr>
<td>USACE</td>
<td>United States Army Corps of Engineers</td>
</tr>
<tr>
<td>USFWS</td>
<td>United States Fish and Wildlife Service</td>
</tr>
<tr>
<td>V/C</td>
<td>volume-to-capacity</td>
</tr>
<tr>
<td>VCP</td>
<td>vitrified clay pipe</td>
</tr>
<tr>
<td>WQMP</td>
<td>Water Quality Management Plan</td>
</tr>
</tbody>
</table>
THIS PAGE INTENTIONALLY LEFT BLANK