LINK OC – ANAHEIM, CA
INITIAL STUDY

Applicant:
Pacific Center Acquisitions Partners LLC
Pacific Center Acquisitions Partners II LLC

Prepared By:
environmental advisors
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Anaheim, CA 92806

FEBRUARY 2018
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CITY OF ANAHEIM
ENVIRONMENTAL CHECKLIST FORM

CASE NOS.: Development Project No. 2017-00031 (DEV2017-00031)
Conditional Use Permit No. 2017-05911 (CUP2017-05911)

SITE ADDRESS: 1041 and 1065 North Pacific Center Drive and 1071 and 1081 North Tustin Avenue


GENERAL PLAN DESIGNATION: Mixed-Use

ZONING: Transit Oriented Area (DA-3) of the Anaheim Canyon Specific Plan No. 2015-1 (ACSP)

PROJECT NAME: Link OC

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

CONTACT PERSON AND PHONE NUMBER: Scott Koehm, 714-765-5395

APPLICANTS: Pacific Center Acquisitions Partners LLC, 4000 MacArthur Boulevard, Suite 110, Newport, CA 92660 and Pacific Center Acquisitions Partners LLC II, 4000 MacArthur Boulevard, Suite 110, Newport, CA 92660

PROJECT DESCRIPTION: Pac Center Acquisitions Partners, LLC and Pac Center Acquisitions Partners II, LLC (the Applicant) propose to demolish 26,000 square feet of office space, and remove approximately 6,750 cubic yards of asphalt within surface parking lots, and 9,250 cubic yards of landscaping; in order to construct 406 apartment units and 5,000 square feet of new retail space (the Proposed Project). The overall residential density is approximately 27.7 units/acre.

LOCATION: The Proposed Project is located in the Anaheim Canyon, in the northern portion of Anaheim, approximately 25 miles southeast of downtown Los Angeles. The Anaheim Canyon encompasses approximately 2,600 acres. The boundaries for Anaheim Canyon are Orangethorpe Avenue, on the north; the Santa Ana River, on the south; Imperial Highway (State Route 90), on the east; and Orange Freeway (State Route 57) on the west. The Santa Ana River traverses Anaheim Canyon. The Santa Ana River is the major means of drainage for the San Bernardino Mountains and a major water source for four counties.

The boundaries for the Project Site are East La Palma Avenue and commercial/industrial uses to the north, North Tustin Avenue and commercial uses to the east, State Route 91 to the south, and the Metrolink Anaheim Canyon Station and multi-family residential uses to the west. Figure 1, Project Location and Boundary Map, shows the Project Site and its boundaries.

The Proposed Project would occur within 14.68-acres of the Anaheim Pacificenter on Assessor Parcel Numbers (APNs) 345-181-03, 345-181-05, 345-181-08, 345-181-09, 345-181-12, and 345-181-18 (the Project Site). The existing Project Site includes a mix of office and retail uses, with surface parking, landscaped areas, and a private street, Pacificenter Drive. The Applicant is requesting a lot line adjustment to correspond with the configuration of the parcels once developed (see Figure 2, Before and After Lot Line Adjustments). The Applicant has identified several sites within the Project Site to describe the various components of the Proposed Project. Figure 3, Site Plan, identifies these sites. Below is a description of each of the sites:
Figure 1: Project Location and Boundary Map
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NOTES

1. A LOT LINE ADJUSTMENT OVER PARCEL 2 OF PM 90-387, PARCELS 6 & 7 OF PM 87-446 AND PARCEL 1 OF PM 99-129 WILL BE FILED. SEE "EXISTING LOT CONFIGURATION" DIAGRAM AT UPPER LEFT.

THE RESULTING LOTS AFTER RECONSTRUCTION OF THE LOT LINE ADJUSTMENT WILL BE AS SHOWN ON THE "LOT CONFIGURATION POST LOT" DIAGRAM AT LOWER RIGHT.

Figure 2: Before and After Lot Line Adjustments
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Lot ‘1’ (APN 345-181-08) is 2.5 acres in the northwest corner of Anaheim Pacificcenter, bordering La Palma Avenue to the north, Pacificcenter Drive to the east, and the railroad to the west. Improvements to Lot ‘1’ would include demolition of 570 cubic yards (CY) of asphalt concrete (AC) and 3,600 CY of landscaping. As shown in Figure 3, Site Plan. Lot ‘1’ would be developed with up to 192 apartment units in a five-story, 71' high building wrapped around a proposed seven-level, 85' high parking structure with an amenity deck above. A total of 359 parking spaces would be provided. A parking structure with 354 parking spaces would accommodate all 318 required resident parking spaces. An additional 5 surface parking spaces and 41 spaces in the parking structure would be available to guests. The remaining 7 required guest spaces (48 guest spaces in total) would be available in the existing office building parking lot (Lot ‘3’) during off-peak hours as described in the Link OC Shared Parking Analysis (Appendix A, Link OC Shared Parking Analysis, LSA, February 7, 2018).

Lot ‘2’ (APN 345-181-12) is 2.7 acres on the southwestern portion of Anaheim Pacificcenter, east of the railroad and north of State Route (SR) 91. Improvements to Lot ‘2’ would include demolition of 2,790 CY of AC, 1,158 CY of landscaping, and 1,158 gross square feet of building area. As shown in Figure 3, Site Plan, Lot ‘2’ would be developed with up to 214 apartment units in a five-story, 72-foot high building wrapped around a proposed six-level 74’ high parking structure. A total of 387 parking spaces would be provided. A parking structure with 377 parking spaces would accommodate all 367 required residential parking spaces. An additional 20 guest parking spaces would be available on-site before 5:00 p.m. Another 34 required guest spaces (54 required guest spaces in total) would be available in the existing office building parking lot (Lot ‘3’) during off-peak hours as described in the Link OC Shared Parking Analysis.

Lot ‘3’ (APN 345-181-09) is 4.0 acres at the center of the Project Site and contains an existing 94,518-square foot, four-story office building that will remain in place, as shown in Figure 3, Site Plan. Improvements to Lot ‘3’ would include demolition of 1,410 CY of AC, 165 surface parking spaces and 5,650 CY of landscaping; and include construction of 294 reconfigured surface parking spaces to serve the existing office building, including 70 surface parking spaces of dedicated parking for Metrolink rail users. Although Metrolink’s existing parking easement is for 70 spaces, on occasional high demand days, such as the one survey day identified in the Link OC Shared Parking Analysis, transit riders utilize up to 87 parking spaces on the campus. For additional office parking demand that occurs during working hours, the overflow would be located on the retail sites (Lot ‘4’ and Lot ‘5’), detailed below. The retail site parking is self-contained; however, retail parking is also available in the general office parking lot after 5:00 p.m. The Proposed Project also includes two bus bays for Anaheim Resort Transit and Orange County Transportation Authority (OCTA) buses and shuttles, on the northern edge of Lot ‘3’, along Pacificenter Drive. In addition, the Proposed Project would provide temporary moving truck loading and unloading spaces, at the southern and northern edges of Lot ‘3’ to serve Sites ‘A’ and ‘B’, respectively. These spaces would be separate from the proposed bus bays.

Lot ‘4’ (APN 345-181-18) is 1.7-acres and contains the private drive, Pacificcenter Drive, as shown in Figure 3, Site Plan. According to Figures 4a and 4b, Conceptual Grading Plan, the Proposed Project would restripe portions of Pacificcenter Drive, in order to convert the existing dual right turn lanes, onto La Palma Avenue, to one right-turn-only lane and one left-turn-only lane. Additional improvements would include landscaping, pedestrian pathways and crosswalks, and a shared use bicycle and pedestrian path serving the Project Site and the Metrolink station.

Lot ‘5’ (APN 345-181-03) is 2.5-acres and located at the northeast corner of the Project Site. Improvements to Lot ‘5’ would include demolition of 1,980 CY of AC. As shown in Figure 3, Site Plan, this parcel is currently vacant and would include a 5,000-square foot retail pad, parking lot reconfiguration and landscaping improvements within the existing retail center adjacent to the intersection of La Palma Avenue and Tustin Avenue. The retail site parking is self-contained; however, in the evening, when office parking demand is low, excess parking demand would be available in the general office parking lot after 5:00 p.m.
Lot ‘6’ (APN 345-181-05) is 1.2 acres and contains an existing 23,762 square foot retail center that will remain in place, as shown in Figure 3, *Site Plan*. There are no changes occurring to this parcel as part of the Proposed...
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Project; however, this parcel is owned by the Applicant and is included toward the overall area of the Project Site. The retail site parking is self-contained; however, in the evening, when office parking demand is low, excess parking demand would be available in the general office parking lot after 5:00 p.m.

**PROJECT DESIGN:** As shown in Figures 5 through 9, *Project Elevations*, the proposed residential buildings utilize a variety of high quality building materials in a contemporary architectural style, including a light sand finish stucco; brick and stone veneers; and vinyl, aluminum and metal finishes on windows, storefronts and railings. The varying colors and textures, as well as the varying roof line, add dimension and interest, and all facades are treated to the same standard of quality. The proposed commercial building is in a more modern architectural style, with clean horizontal lines and modern materials consisting of glass, wood, metal and aluminum.

Site amenities for the residential apartment units would include both active and passive open space areas, including pools, spas, fitness areas, clubhouses, courtyards, plazas, private patios and balconies, dog parks, and landscaped areas. The Proposed Project includes landscaping in parkways and medians along Pacificenter Drive, in parking areas, and in the plaza near the northeastern entrance to the existing office building. Rooftop containerized trees would also be provided on the amenity roof decks in Sites ‘A’ and ‘B’. New landscaping would complement the existing palette with a variety of drought tolerant, flowering tree and shrub species. The Proposed Project also includes enhanced paving for pedestrian pathways, at vehicular entrances and within recreational areas. Tubular steel fencing would surround the proposed dog park and pool areas.

The Applicant will take the following security measures, including filing an Emergency Listing Card, Form APD-281 with the Police Department, providing a comprehensive security alarm system, completing a Burglary/Robbery Alarm Permit application, providing an electronic access system to the Police Department for any gates, adding rooftop address numbers, adding “No Trespassing” signs to the entrances to the parking structures, ensuring monument signs are well lit, and ensuring adequate lighting of parking lots, parking structures, circulation areas, aisles, passageways, recesses, and grounds contiguous to buildings.

**ACCESS AND CIRCULATION:** The Proposed Project provides vehicular and pedestrian access via La Palma Avenue and Pacificenter Drive from the north, and Tustin Avenue and Pacificenter Drive from the east. The Proposed Project would provide truck access to the Project Site from La Palma Avenue and Tustin Avenue onto Pacificenter Drive.

Pedestrians can access the site from the Metrolink platform via an existing lighted path. As part of the Proposed Project, the Applicant would implement components of the City’s Bicycle Master Plan through the installation of bike lanes. The Applicant would construct a lighted, shared, multi-purpose path for both pedestrians and cyclists from the Metrolink platform, north to La Palma Avenue (portion of Bike ID 20), and east to Tustin Avenue (portion of Bike ID 12). The Proposed Project would include a right-of-way (ROW) dedication along the south side of La Palma Avenue that ranges from 10 feet to 17 feet to incorporate a street widening adjacent to the railroad ROW and a multi-use bike/pedestrian (Bike ID 19).

**OFFSITE IMPROVEMENTS:** The Applicant would implement, or fund implementation of, the following off-site improvements:

- Removal of a portion of the existing median on Tustin Avenue at the intersection with Pacificenter Drive, to permit northbound left-turns from Pacificenter Drive. The Proposed Project would remove the existing 15-foot-wide median adjacent to the existing left-turn pocket and replace it with a second 11-foot-wide left-turn lane and a 4-foot median according to engineering plans prepared by the City of Anaheim at the time of Tustin Avenue widening.
- Addition of a crosswalk on the west side of the intersection of La Palma Avenue and Pacificenter Drive; the crosswalk would include an ADA-accessible ramp on the northerly side of the street.
• Modification of sidewalks and landscape buffers on the south side of La Palma Avenue to provide ADA compliant connections to the crosswalk on the west side of the intersection of La Palma Avenue and Pacificenter Drive, including crosswalk striping and pedestrian crossing hardware.
• Addition of a left-turn traffic signal to allow northbound left turns from Pacificenter Drive onto westbound La Palma Avenue. The improvement would include modifying the existing median and traffic signal.
• Reprogramming of signal timing to account for new northbound left-turn and pedestrian crossing phases at the intersection of Pacificenter Drive and La Palma Avenue.
• Reconfiguring access to the existing hotel parking lot south of Lot ‘2’, including the removal of two parking spaces at the northeast corner of Lot ‘2’ in order to create a connection with the extension of Pacificenter Drive; the addition of two parking spaces at the eastern connection with the east-west alley between office and hotel parcels; and the addition of two parking spaces at the western connection with the east-west alley.

The Applicant would coordinate the timing of offsite improvements, including utility work in the public right-of-way, with the respective City departments (i.e., Public Works, Utilities).

**CONSTRUCTION ACTIVITIES:** Construction activities would consist of site preparation and demolition, grading, building construction, utility improvements and paving. The Applicant anticipates that demolition and grading would begin mid-2018 with construction commencing in late 2018. The Applicant is expecting buildout to be complete by 2022. The Proposed Project’s Phasing Plan Figure 3, Site Plan, identifies the following phases for Project construction:

- Phase 1: Surface parking reconfiguration on Lot ‘3’;
- Phase 2: Construction of Lot ‘1’;
- Phase 3: Demolition of existing building on Lot ‘2’;
- Phase 4: Construction of Lot ‘2’; and
- Phase 5: Construction of the retail pad on Lot ‘5’.

**OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED:** N/A

**ENVIRONMENTAL REVIEW:** In January 2016, the Anaheim City Council certified Environmental Impact Report (EIR) No. 348, concurrent with the adoption of the Anaheim Canyon Specific Plan (ACSP). EIR No. 348 evaluated the environmental impacts associated with the implementation of the ACSP and created Mitigation Monitoring Reporting Plan No. 312 (MMRP No. 312). EIR No. 348 serves as the environmental document for Projects implemented in accordance with the ACSP. At buildout, the ACSP would allow for the redevelopment of existing uses resulting in approximately 47 million square feet of non-residential and 2,919 dwelling units.

The Proposed Project is exempt from environmental review pursuant to Public Resources Code section 21155.4 because the Proposed Project:

- Is a mixed-use development Project proposed within a transit priority area, as defined in subdivision (a) of Public Resources Code section 21099;
- Would be undertaken to implement and is consistent with the ACSP, for which EIR No. 348 was prepared; and
- Is consistent with the general plan land use designation, density, building intensity, and applicable policies specified for the Project Site in the Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS or Plan).

Accordingly, no further environmental review of the Proposed Project is required under Public Resources Code section 21166.
1. NORTH ELEVATION

2. EAST ELEVATION

**LINK OC - ANAHEIM, CA**

**SITE "A" - CONCEPTUAL ELEVATIONS**

**ARCHITECTS ORANGE**

Environmental Advisors, LLC

Figure 5: Elevations - Site A(1)
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Figure 6: Elevations - Site A(2)
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1. NORTH ELEVATION

2. EAST ELEVATION

Figure 7: Elevations - Site B(1)
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Figure 9: Retail Elevations
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This Initial Study was prepared to summarize the analysis that was included in the EIR No. 348 and compare the impacts of the Proposed Project with those analyzed and anticipated by EIR No. 348. The Initial Study addresses the potential impacts of the Proposed Project with the applicable mitigation measures set forth in MMRP No. 312, as described in the technical studies prepared specifically for the Proposed Project. The City, as Lead Agency, would implement the applicable mitigation measures, as conditions of approval, which the City would apply to the Proposed Project, as part of its discretionary approval of the Proposed Project. The Initial Study indicates modifications to the mitigation measures from MMRP No. 312 as strike-through for deleted text and bold for new, inserted text. Clarification on Project-specific implementation of a mitigation measure is underlined. With implementation of the mitigation measures identified in the Initial Study, the Proposed Project would not result in any environmental impacts beyond those identified in the previously certified EIR No. 348.

This Initial Study was also prepared to satisfy the requirements of PRC Section 21099(b)(3), which requires a public agency to analyze a Project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation. This Initial Study analyzes these impacts.

The Initial Study concludes the following:

- The Proposed Project will not cause significant effects on the environment that were not examined in EIR No. 348.
- All potentially significant impacts of the Proposed Project are mitigated and avoided pursuant to paragraph (1) of subdivision (a) of Section 21081 of the Public Resources Code, as a result of the EIR No. 348.
- EIR No. 348 examined at a sufficient level of detail the Proposed Project’s effects on the environment to enable those effects to be mitigated or avoided by site-specific revisions, the imposition of conditions, or by other means in connection with the approval of the Proposed Project.
- The Proposed Project is consistent with the ACSP, the applicable local land use plans and zoning of the City of Anaheim.
- No substantial changes are proposed to the implementation of the ACSP through the Proposed Project which will require major revisions of EIR No. 348.
- No substantial changes have occurred with respect to the circumstances under which the Proposed Project is being undertaken, which will require major revisions in EIR No. 348.
- Lastly, no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified as complete that is relevant to the conclusions and findings of EIR No. 348.
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the City)

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 1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and 2) 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

______________________________
Christine Saunders, Associate Planner
Printed Name, Title

Date
(714) 765-5238
Phone Number
EVALUATION OF ENVIRONMENTAL IMPACTS:

1) All answers must take account of the whole action involved, including offsite as well as onsite, 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 Environmental Impact Report (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 California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or negative declaration (§ 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.
## I. AESTHETICS
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>Impacts analyzed in EIR No. 348 No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Have a substantial adverse effect on a scenic vista?</td>
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<td>b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway or local scenic expressway, scenic highway, or eligible scenic highway?</td>
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<td>c) Substantially degrade the existing visual character or quality of the site and its surroundings?</td>
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<td>d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</td>
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Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts. EIR No. 348 analyzed the aesthetic impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.1. All impacts were identified as less than significant in EIR No 348.

EIR No. 348 analyzed the impact of the ACSP on the existing land form and existing aesthetic characteristics of the site and surroundings, including scenic vistas, scenic resources, and the visual quality of the site and surroundings. EIR No. 348 also analyzed impacts of the ACSP related to light and glare adjacent to sensitive uses. EIR No. 348 concluded that implementation of the ACSP would not adversely impact any scenic vista or damage scenic resources within a state scenic highway (Impact 5.1-1). State Route (SR) 91 runs along the southern edge of the Santa Ana River and is officially designated as a state scenic highway from SR-55 to east of Anaheim city limit. The Proposed Project is located to the west of the SR-91/SR-55 interchange, and is not within the limits of the state scenic highway. Therefore, impacts related to scenic vistas and scenic resources within a state scenic highway would be less than significant.

EIR No. 348 concluded that implementation of the ACSP would not degrade the visual quality of the Project area (Impact 5.1-2). The Proposed Project would enhance the visual character of the site and complement the existing adjacent buildings and landscaping. The proposed residential buildings utilize a variety of high quality building materials in a contemporary architectural style, including a light sand finish stucco; brick and stone veneers; and vinyl, aluminum and metal finishes on windows, storefronts and railings. The varying colors and textures, as well as the varying roof line, add dimension and interest, and all facades are treated to the same standard of quality. The proposed commercial building is in a more modern architectural style, with clean horizontal lines and modern materials consisting of glass, wood, metal and aluminum. The proposed residential buildings would be taller than existing uses on site, but would comply with the height limitation of 100 feet within DA-3. The Applicant has requested modification of structural setbacks to the southern interior property line of Lot ‘1’ and the northern interior property line of Lot ‘2’ as part of the Conditional Use Permit request from the required 10′-0″ to the proposed 5′-0″ structural setback. The tallest building on the Project Site would be the 84-foot, four-inch residential building/parking structure on Lot ‘1’.

EIR No. 348 concluded that implementation of the ACSP would not have adverse light and glare impacts adjacent to sensitive uses (Impact 5.1-3). The Proposed Project would add nighttime lighting, such as structural lighting, overhead street lighting, parking lot lighting, sign/building illumination, vehicle headlights security lighting common area lighting and pathway lighting. All path lighting and common area lighting will meet Anaheim Municipal Code requirements. However, the Proposed Project would comply with the applicable provisions of ACSP Development Standards (Section 18.120.040.0701), which state that “all uses within the ACSP shall be maintained in such a manner that they are not obnoxious, offensive, or objectionable by reason of excessive lighting (glare), or other similar cause detrimental to the public health, safety, or general welfare.” Proposed lighting would satisfy this requirement with proper installation of shielded light fixtures—including hoods, filtering louvers, and glare shields. As noted above, the Proposed Project involves various mobility, open space, and infrastructure improvements within the Project Site. However, lighting associated with these improvements would be shielded in accordance with the ACSP Development Standards so as not to impact adjacent sensitive land uses. Furthermore, proposed building materials as listed above avoid reflective surfaces that could cause glare and impact adjacent uses, particularly those driving on the freeway near the Proposed Project.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
II. AGRICULTURE RESOURCES

In determining whether Impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation (DOC) as an optional model to use in assessing impacts on agriculture and farmland. 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</th>
<th>Impacts analyzed in EIR No. 348</th>
<th>No Impact</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>
<td>☑</td>
</tr>
<tr>
<td>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Code § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<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>
<td>☑</td>
</tr>
<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>
<td>☑</td>
</tr>
</tbody>
</table>

**Narrative Summary: No Impact (a – e).** During preparation of the EIR No. 348, agriculture resources were identified as not being significantly affected by, or affecting the ACSP. The ACSP area is urbanized and has been disturbed by human activity and development. Implementation of the Proposed Project as anticipated by the ACSP would not result in the rezoning, conversion or loss of agricultural resources. Therefore, they were not addressed in the EIR.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
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:

<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>Impacts analyzed in EIR No. 348 No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>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)?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>d) Expose sensitive receptors to substantial pollutant concentrations?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☑</td>
</tr>
<tr>
<td>e) Create objectionable odors affecting a substantial number of people?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☑</td>
</tr>
</tbody>
</table>

Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts. EIR No. 348 addressed the air quality impacts associated with implementation of the ACSP. Refer to EIR No. 348, Section 5.2.

EIR No. 348 analyzed criteria pollutant emissions from both construction and operational activities of the proposed 19.6 million square feet of additional industrial and commercial uses and 2,607 additional residential units that could be developed within the ACSP. EIR No. 348 concluded that after mitigation, significant and unavoidable impacts would still occur with respect to short-term construction emissions, long-term operational emissions, exposing sensitive receptors to substantial construction and operational pollutants, and violating air quality standards (Issues A, B, C and D). After mitigation, EIR No. 348 concluded that implementation of the ACSP would have less than significant impacts with respect to creating objectionable odors that affect a substantial number of people (Issue E).

EIR No. 348 concluded that significant air quality impacts would occur from both construction and operation of all foreseeable development as detailed in the ACSP. Construction activities associated with the ACSP would exceed the South Coast Air Quality Management District’s (SCAQMD) regional thresholds for volatile organic compounds (VOC) and nitrogen oxides (NOX). Operation of the Project at buildout would generate air pollutant emissions that exceed SCAQMD’s regional significance thresholds for VOC, NOX, carbon monoxide (CO), PM10, and PM2.5. The Proposed Project represents 406 residential units and 5,000 square feet of commercial uses, which equates to approximately 16 percent and less than one percent of the total development potential of residential and non-residential uses in the ACSP, respectively. The Proposed Project could expose sensitive receptors to elevated pollutant concentrations during construction and operational activities if it would cause or contribute significantly to elevating those levels. Concentrations of criteria air pollutants generated by a Project depend on the emissions generated onsite and the distance to the nearest sensitive receptor. Therefore, a Localized Significance Threshold (LST) Analysis was conducted at the Project-level to evaluate whether the Proposed Project would cause significant air quality impacts (Appendix B, City of Anaheim – Hines OC Link Apartments Project Air Quality Technical Memorandum, Vista Environmental, February 2, 2018).
LST ANALYSIS
The LST Analysis identified that the nearest sensitive receptors to the Project site consist of workers and guests at the existing Extended Stay America hotel located as near as 60 feet south of the Lot ‘2’ portion of the project site. There are also residential apartment units located as near as 100 feet west of both Lot ‘1’ and Lot ‘2’. The nearest school to the project site is El Camino Real High School, located as near as 0.9 mile north of the project site.

Regional Air Quality
To estimate if the Proposed Project may adversely affect the air quality in the region, the SCAQMD has prepared the CEQA Air Quality Handbook (SCAQMD 1993) to provide guidance to those who analyze the air quality impacts of proposed projects. The SCAQMD CEQA Handbook states that any project in the Air Basin with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. For the purposes of this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in Table A.

Table A – SCAQMD Regional Criteria Pollutant Emission Thresholds of Significance

<table>
<thead>
<tr>
<th>Pollutant Emissions (pounds/day)</th>
<th>VOC</th>
<th>NOx</th>
<th>CO</th>
<th>SOx</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>75</td>
<td>100</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
<tr>
<td>Operation</td>
<td>55</td>
<td>55</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
</tbody>
</table>


Local Air Quality
Project-related construction and operational air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. SCAQMD has also provided Final Localized Significance Threshold Methodology (LST Methodology, July 2008), which details the methodology to analyze local air emission impacts. The LST Methodology found that the primary emissions of concern are NO\textsubscript{2}, CO, PM10, and PM2.5.

The LST Methodology provides Look-Up Tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. The area that would be disturbed during construction of the Proposed Project is approximately 11.75 acres. However, because the Project applicant has stated that no more than 5 acres would be disturbed in any day during construction activities associated with the Proposed Project, the 5-acre Project site shown in the Look-Up Tables was utilized for this analysis.

The Project site is located in Air Monitoring Area 17, which covers the Central Orange County. As stated above, the nearest sensitive receptors are workers and guests at the nearby Extended Stay America Hotel located approximately 60 feet (18 meters) south of the Lot ‘2’ portion of the project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25 meter thresholds. Table B below shows the NO\textsubscript{x}, CO, PM\textsubscript{10}, and PM\textsubscript{2.5} for both construction and operational activities.

Table B – SCAQMD Local Air Quality Thresholds of Significance

<table>
<thead>
<tr>
<th>Activity</th>
<th>Allowable Emissions (pounds/day)(^1)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NO\textsubscript{x}</td>
</tr>
<tr>
<td>Construction</td>
<td>183</td>
</tr>
<tr>
<td>Operation</td>
<td>183</td>
</tr>
</tbody>
</table>

Notes:
\(^1\) The nearest offsite sensitive receptors are workers and guests located as near as 60 feet (17 meters) from the project site at the Extended Stay America Hotel. According to LST Methodology, any receptor located closer than 25 meters shall be based on the 25 meter thresholds.

Source: Calculated from SCAQMD’s Mass Rate Look-up Tables for five acres in Air Monitoring Area 17, Central Orange County.

Criteria Pollutant Emissions Modeling Results
The Proposed Project would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. The following section calculates the potential air emissions associated with the construction and operations...
of the Proposed Project and compares the emissions to the SCAQMD standards.

Construction-Related Regional Impacts

The CalEEMod model has been utilized to calculate the construction-related regional emissions from the Proposed Project. The worst-case summer or winter daily construction-related criteria pollutant emissions from the Proposed Project for each phase of construction activities are shown below in Error! Reference source not found. and the CalEEMod daily printouts are included in Appendix B.

Table C – Construction-Related Regional Criteria Pollutant Emissions

<table>
<thead>
<tr>
<th>Activity</th>
<th>Pollutant Emissions (pounds/day)</th>
<th>VOC</th>
<th>NOx</th>
<th>CO</th>
<th>SO₂</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition¹</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Onsite</td>
<td></td>
<td>3.72</td>
<td>38.32</td>
<td>22.30</td>
<td>0.04</td>
<td>3.75</td>
<td>2.08</td>
</tr>
<tr>
<td>Offsite</td>
<td></td>
<td>0.29</td>
<td>7.57</td>
<td>2.38</td>
<td>0.02</td>
<td>0.61</td>
<td>0.19</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>4.01</td>
<td>45.89</td>
<td>24.68</td>
<td>0.06</td>
<td>4.36</td>
<td>2.27</td>
</tr>
<tr>
<td>Site Preparation¹</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Onsite</td>
<td></td>
<td>4.56</td>
<td>48.20</td>
<td>22.48</td>
<td>0.04</td>
<td>9.62</td>
<td>6.24</td>
</tr>
<tr>
<td>Offsite</td>
<td></td>
<td>0.12</td>
<td>0.78</td>
<td>0.90</td>
<td>0.00</td>
<td>0.25</td>
<td>0.07</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>4.68</td>
<td>48.98</td>
<td>23.38</td>
<td>0.04</td>
<td>9.87</td>
<td>6.31</td>
</tr>
<tr>
<td>Grading³</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Onsite</td>
<td></td>
<td>5.09</td>
<td>59.52</td>
<td>35.09</td>
<td>0.06</td>
<td>6.02</td>
<td>3.83</td>
</tr>
<tr>
<td>Offsite</td>
<td></td>
<td>0.13</td>
<td>0.78</td>
<td>0.98</td>
<td>0.00</td>
<td>0.27</td>
<td>0.08</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>5.22</td>
<td>60.30</td>
<td>36.07</td>
<td>0.06</td>
<td>6.29</td>
<td>3.91</td>
</tr>
<tr>
<td>Building Construction</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Onsite</td>
<td></td>
<td>2.68</td>
<td>23.39</td>
<td>17.58</td>
<td>0.03</td>
<td>1.50</td>
<td>1.41</td>
</tr>
<tr>
<td>Offsite</td>
<td></td>
<td>2.94</td>
<td>15.72</td>
<td>22.75</td>
<td>0.09</td>
<td>6.29</td>
<td>0.78</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>5.62</td>
<td>39.11</td>
<td>40.33</td>
<td>0.12</td>
<td>7.79</td>
<td>2.19</td>
</tr>
<tr>
<td>Paving</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Onsite</td>
<td></td>
<td>1.62</td>
<td>14.07</td>
<td>14.65</td>
<td>0.02</td>
<td>0.75</td>
<td>0.69</td>
</tr>
<tr>
<td>Offsite</td>
<td></td>
<td>0.07</td>
<td>0.04</td>
<td>0.49</td>
<td>0.00</td>
<td>0.17</td>
<td>0.05</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>1.69</td>
<td>14.11</td>
<td>15.14</td>
<td>0.02</td>
<td>0.92</td>
<td>0.74</td>
</tr>
<tr>
<td>Architectural Coatings</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Onsite</td>
<td></td>
<td>28.90</td>
<td>1.68</td>
<td>1.83</td>
<td>0.00</td>
<td>0.11</td>
<td>0.11</td>
</tr>
<tr>
<td>Offsite</td>
<td></td>
<td>0.42</td>
<td>0.26</td>
<td>3.18</td>
<td>0.01</td>
<td>1.09</td>
<td>0.29</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>29.32</td>
<td>1.94</td>
<td>5.01</td>
<td>0.01</td>
<td>1.20</td>
<td>0.40</td>
</tr>
<tr>
<td>Combined Building Construction, Paving, &amp; Architectural Coatings</td>
<td></td>
<td>36.63</td>
<td>55.16</td>
<td>60.48</td>
<td>0.15</td>
<td>9.91</td>
<td>3.33</td>
</tr>
<tr>
<td>SCQAMD Thresholds</td>
<td></td>
<td>75</td>
<td>100</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
<tr>
<td>Exceeds Threshold?</td>
<td></td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:
¹ Demolition, Site Preparation, and Grading based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.
² Onsite emissions from equipment not operated on public roads.
³ Offsite emissions from vehicles operating on public roads.
Source: CalEEMod Version 2016.3.2.

Table C shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from construction of the proposed project.

Construction-Related Local Impacts

Construction-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.
The local air quality emissions from construction were analyzed through utilizing the methodology described in *Localized Significance Threshold Methodology* (LST Methodology), prepared by SCAQMD, revised October 2009. The LST Methodology found the primary criteria pollutant emissions of concern are NOx, CO, PM10, and PM2.5. In order to determine if any of these pollutants require a detailed analysis of the local air quality impacts, each phase of construction was screened using the SCAQMD’s Mass Rate LST Look-up Tables. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily onsite emissions of CO, NOx, PM10, and PM2.5 from the Proposed Project could result in a significant impact to the local air quality. Table D shows the onsite emissions from the CalEEMod model for the different construction phases and the calculated emissions thresholds that have been detailed above.

<table>
<thead>
<tr>
<th>Phase</th>
<th>Pollutant Emissions (pounds/day)</th>
<th>NOx</th>
<th>CO</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition¹</td>
<td>38.32</td>
<td>22.30</td>
<td>3.75</td>
<td>2.08</td>
<td></td>
</tr>
<tr>
<td>Site Preparation¹</td>
<td>48.20</td>
<td>22.48</td>
<td>9.62</td>
<td>6.24</td>
<td></td>
</tr>
<tr>
<td>Grading¹</td>
<td>59.52</td>
<td>35.09</td>
<td>6.02</td>
<td>3.83</td>
<td></td>
</tr>
<tr>
<td>Combined Building Construction, Paving, and Architectural Coatings</td>
<td>39.14</td>
<td>34.06</td>
<td>2.36</td>
<td>2.21</td>
<td></td>
</tr>
<tr>
<td>- Building Construction</td>
<td>23.39</td>
<td>17.58</td>
<td>1.50</td>
<td>1.41</td>
<td></td>
</tr>
<tr>
<td>- Paving</td>
<td>14.07</td>
<td>14.65</td>
<td>0.75</td>
<td>0.69</td>
<td></td>
</tr>
<tr>
<td>- Architectural Coatings</td>
<td>1.68</td>
<td>1.83</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
</tr>
<tr>
<td>SCAQMD Thresholds for 25 meters (82 feet)²</td>
<td>183</td>
<td>1,253</td>
<td>13</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>Exceeds Threshold?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

Notes:

¹ Demolition, Site Preparation, and Grading based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

² The nearest offsite sensitive receptors are workers and guests located as near as 60 feet (17 meters) from the project site. According to LST Methodology, any receptor located closer than 25 meters shall be based on the 25 meter thresholds.

Source: Calculated from CalEEMod and SCAQMD’s Mass Rate Look-up Tables for two acres in Air Monitoring Area 17, Central Orange County.

The data provided in Table D shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds for any phase of construction or the combined building construction, paving, and architectural coatings phases. In addition, construction emissions would be short-term, limited only to the period when construction activity is taking place. As such, construction related local air concentrations would be less than significant for the Proposed Project. Additionally, construction activities would be required to follow SCAQMD regulations that limit fugitive dust emissions, including SCAQMD Rules 401 and 403. These rules require that contractors working on the Proposed Project implement measures to reduce fugitive dust emissions that include the following:

- Limit speed of vehicles on dirt areas of the project site to 15 miles per hour or less.
- Apply water and/or other dust suppressants as necessary to prevent or alleviate erosion by the forces of wind.
- Limit all stockpiles that can be blown by wind to 8 feet in height or apply a soil stabilizer.
- Cover all trucks hauling soil or other loose material.
- Sweep daily all paved access roads and any trackout onto public road with water sweepers.
- When winds exceed 25 mph, cease all grading operations other than dust suppression activities.

**Operations-Related Criteria Pollutant Analysis**

The on-going operation of the Proposed Project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the Project-generated vehicle trips and through operational emissions from the on-going use of the Proposed Project. The following provides an analysis of the potential long-term air quality impacts due to regional air quality and local air quality impacts with the on-going operations of the Proposed Project.

The operations-related criteria air quality impacts created by the proposed project have been analyzed through use of the CalEEMod model. The worst-case summer or winter VOC, NOx, CO, SO2, PM10, and PM2.5 daily emissions created from the proposed project’s long-term operations have been calculated and are summarized below in Table E and the CalEEMod daily emissions printouts are included in Appendix B.
### Table E – Operational Regional Criteria Pollutant Emissions

<table>
<thead>
<tr>
<th>Activity</th>
<th>Pollutant Emissions (pounds/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>VOC</td>
</tr>
<tr>
<td>Area Sources¹</td>
<td>8.63</td>
</tr>
<tr>
<td>Energy Usage²</td>
<td>0.14</td>
</tr>
<tr>
<td>Mobile Sources³</td>
<td>4.29</td>
</tr>
<tr>
<td>Total Emissions</td>
<td>13.06</td>
</tr>
<tr>
<td>SCQAMD Operational Thresholds</td>
<td>55</td>
</tr>
<tr>
<td>Exceeds Threshold?</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:

¹ Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
² Energy usage consist of emissions from natural gas usage (excluding hearths).
³ Mobile sources consist of emissions from vehicles and road dust.

Source: Calculated from CalEEMod Version 2016.3.2.

The data provided in Table E above shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the Proposed Project.

### Operations-Related Local Air Quality Impacts

Project-related air emissions from onsite sources such as architectural coatings, landscaping equipment, and onsite usage of natural gas appliances may have the potential to create emissions areas that exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

The local air quality emissions from onsite operations were analyzed using the SCAQMD’s Mass Rate LST Look-up Tables and the methodology described in LST Methodology. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOₓ, PM10, and PM2.5 from the Proposed Project could result in a significant impact to the local air quality. Table F shows the on-site emissions from the CalEEMod model that includes area sources, energy usage, and vehicles operating in the immediate vicinity of the Project site and the calculated emissions thresholds.

### Table F – Operations-Related Local Criteria Pollutant Emissions

<table>
<thead>
<tr>
<th>Onsite Emission Source</th>
<th>Pollutant Emissions (pounds/day)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NOx</td>
</tr>
<tr>
<td>Area Sources</td>
<td>0.39</td>
</tr>
<tr>
<td>Energy Usage</td>
<td>1.18</td>
</tr>
<tr>
<td>Onsite Vehicle Emissions¹</td>
<td>2.20</td>
</tr>
<tr>
<td>Total Emissions</td>
<td>3.77</td>
</tr>
<tr>
<td>SCAQMD Thresholds for 25 meters (82 feet)²</td>
<td>183</td>
</tr>
<tr>
<td>Exceeds Threshold?</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:

¹ Onsite vehicle emissions based on 1/8 of the gross vehicular emissions, which is the estimated portion of vehicle emissions occurring within a quarter mile of the project site.
² The nearest offsite sensitive receptors are workers and guests located as near as 60 feet (17 meters) from the project site. According to LST Methodology, any receptor located closer than 25 meters shall be based on the 25 meter thresholds.

Source: Calculated from CalEEMod and SCAQMD’s Mass Rate Look-up Tables for five acres in Air Monitoring Area 17, Central Orange County.

The data provided in Table F shows that the on-going operations of the Proposed Project would not exceed the local NOₓ, CO, PM10 and PM2.5 thresholds of significance discussed above. Therefore, the on-going operations of the Proposed Project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.
HEALTH RISK ASSESSMENT

Pursuant to ACSP Mitigation Monitoring and Reporting Program (MMRP) No. 312 Mitigation Measure AQ-10, a Health Risk Assessment (HRA) & Odor Analysis (Appendix C, Health Risk Assessment & Odor Analysis OC Link Project, Vista Environmental, January 5, 2018) was prepared for the Proposed Project to identify if the Proposed Project has the potential to expose sensitive receptors to substantial pollutant concentrations during operational activities.

The HRA found that operation of new land uses associated with the Proposed Project and consistent with the ACSP, would generate new sources of criteria air pollutants and toxic air contaminants (TACs) in the plan area from area/stationary sources and mobile sources. The HRA found that through implementation of MM AQ-1 related to the heating, ventilation, and air conditioning (HVAC) system, all cancer and non-cancer risks from TACs and from odor impacts to the proposed residential apartment units would be reduced to less than significant levels. Further, many aspects of the ACSP serve to directly and indirectly reduce the air quality and odor impacts by and to development projects. Development of the Proposed Project would be consistent with the land use designations provided in the ACSP and would promote the goals and policies of the ACSP by providing multi-family residential uses in close proximity to the existing Metrolink Station, employment and commercial opportunities that will promote a walkable community.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.

With the implementation of MMs AQ1, AQ2, AQ3, AQ4, AQ5, AQ6, AQ7, AQ10 and AQ11, the Proposed Project would not result in any construction or operational air quality impacts beyond those identified in the previously certified EIR No. 348.

**Applicable Mitigation Measures from EIR No. 348/MMRP No. 312**

Modifications to the mitigation measures from MMRP No. 312 are shown as *strikethrough* for deleted text and **bold** for new, inserted text. Clarification on Project-specific implementation of a mitigation measure is *underlined*.

### AQ-1:

Prior to issuance of grading, demolition or building plans, whichever occurs first, the property owner/developer shall provide a note on plans indicating that ongoing during grading and construction, contractors will use equipment that meets the following United States Environmental Protection Agency (EPA)-Certified emissions standards:

- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 Final emission standards. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations.

### AQ-2:

Prior to issuance of grading, demolition or building plans, whichever occurs first, the property owner/developer shall provide a list of all construction equipment proposed to be used on the Project Site. This list may be provided on the building plans. The construction equipment list shall state the makes, models, and numbers of the equipment; that the equipment shall be properly serviced and maintained in accordance with the manufacturer’s recommendations; and, that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with California Air Resources Board’s Rule 2449.

### AQ-3:

Prior to issuance of grading, demolition or building plans, whichever occurs first, the property owner/developer shall submit a dust control plan that implements the following measures during ground-disturbing activities, in addition to the existing requirements for fugitive dust control under South Coast Air Quality Management District Rule 403, to further reduce PM10 and PM2.5 emissions:

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering.
b) During all construction activities, the construction contractor shall sweep streets with Rule 1186-compliant, PM10-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.

c) During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and tarp materials with a fabric cover or other cover that achieves the same amount of protection.

d) During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of three times per day.

e) During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

The Building Division shall verify compliance during normal construction site inspections.

AQ-4:

Prior to issuance of a building permit, the property owner/developer shall provide a note on plans indicating that:

a) All coatings and solvents will have a volatile organic compound (VOC) content lower than required under Rule 1113 (i.e., super compliant paints).

b) All architectural coatings shall be applied either by (1) using a high-volume, low pressure spray method operated at an air pressure between 0.1 and 10 pounds per square inch gauge to achieve a 65 percent application efficiency; or (2) manual application using a paintbrush, hand-roller, trowel, spatula, dauber, rag, or sponge, to achieve a 100 percent applicant efficiency.

c) The construction contractor shall also use precoated/natural colored building materials, where feasible.

The Building Division shall verify compliance during normal construction site inspections.

AQ-5:

Prior to issuance of building permits, for residential development, the property owner/developer shall provide a note on building plans that indicates that all shared community barbeques will be electric powered barbeque units. These units shall be verified on site by the Building Division prior to issuance of a Certificate of Occupancy.

AQ-6:

Prior to issuance of a building permit, the property owner/developer shall show on plans that all applicant-provided appliances be Energy Star appliances (dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances shall be verified by the Building Division prior to issuance of a Certificate of Occupancy.

AQ-7:

Prior to issuance of building permits for new construction of residential development, the property owner/developer shall indicate on plans that garage and/or car port parking are electrically wired to accommodate a Level 2 (240 volt) electric vehicle charging. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by the Building Division prior to issuance of a Certificate of Occupancy.

AQ-10:

Prior to issuance of building permits for new residential developments, the property owner/developer shall submit a health risk assessment (HRA) to the Planning Department. The Applicant has prepared a Health Risk Assessment (HRA) & Odor Analysis (Appendix C, Health Risk Assessment & Odor Analysis OC Link Project, Vista Environmental, January 5, 2018).

The HRA shall be prepared in accordance with policies and procedures of the State of California’s Office of Environmental Health Hazard Assessment (OEHHA) and the South Coast Air Quality Management District (SCAQMD).

If the HRA shows that the incremental cancer risk exceeds one in one hundred thousand (1.0E-05), PM concentrations would exceed 2.5 μg/m3, or the appropriate noncancer hazard index exceeds 1.0, the following is required prior to issuance of building permits: The HRA showed that the calculated cancer risks at all sides of the two proposed residential apartment buildings would range between 2.2 and 7.5 per 100,000 people. This would exceed the cancer risk threshold of 1.0 per 100,000 persons, and therefore, the HRA concluded that the following measures apply:

a) The HRA shall identify the level of high-efficiency Minimum Efficiency Reporting Value (MERV) filter required
to reduce indoor air concentrations of pollutants to achieve the cancer and/or noncancer threshold. The HRA identified that the HVAC system would require a MERV 16 filter for all units located on the west side of Buildings ‘A’ and ‘B’, and a MERV 13 filter for all other residential units, as shown on Figure 10. **MERV 13 and 16 Filter Locations.** With the inclusion of upgraded air filtration systems for the residential buildings, as shown in Figure 10, residents would not be exposed to emissions that exceed SCAQMD’s health risk significance thresholds for cancer or chronic or acute non-cancer hazards.

b) Installation of high efficiency MERV filters in the intake of residential ventilation systems consistent with the recommendations of the HRA, shall be shown on plans. Heating, air conditioning, and ventilation (HVAC) systems shall be installed with a fan unit designed to force air through the MERV filter. The MERV filter requirements as shown on Figure 10 will be shown on building plans.

c) To ensure long-term maintenance and replacement of the MERV filters in the individual units, the property owner/developer shall record a covenant on the property that requires ongoing implementation of the actions below. The form of the covenant shall be approved by the City Attorney’s Office prior to recordation.

1. The property owner/developer shall provide notification to all future tenants or owners of the potential health risk for affected units and the increased risk of exposure to diesel particulates when windows are open.
2. For rental units, the property owner/developer shall maintain and replace MERV filters in accordance with the manufacture’s recommendations.
3. For ownership units, the Homeowner’s Association shall incorporate requirements for long-term maintenance in the Covenant Conditions and Restrictions and inform homeowners of their responsibility to maintain the MERV filter in accordance with the manufacturer’s recommendations.

**AQ-11:**

For Projects located within 1,000 feet of an industrial facility that emits substantial odors, which includes but is not limited to:

- Wastewater treatment plants
- Composting, greenwaste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Food-processing facilities

The property owner/developer shall submit an odor assessment to the Planning Director prior to approval of any future discretionary action that verifies that the South Coast Air Quality Management District (SCAQMD) has not received three or more verified odor complaints. If the Odor Assessment identifies that the facility has received three such complaints, the applicant will be required to identify and demonstrate that Best Available Control Technologies for Toxics (T-BACTs) are capable of reducing potential odors to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers at the industrial facility, or installation of Minimum Efficiency Reporting Value (MERV) filters rated at 14 or better at all residential units.

The **Applicant has satisfied Mitigation Measure AQ-11 with the preparation of an HRA & Odor Analysis.** An Odor Analysis was prepared as part of the HRA & Odor Analysis (Appendix C), which lists all facilities located within 1,000 feet of the proposed residential apartment units that meet the above criteria of potential odor generating facilities. The analysis found that none of the potential odor generating facilities that are located within 1,000 feet of the proposed residential apartment buildings have received any verified odor complaints as recorded by SCAQMD. Therefore, the proposed residential apartment units would not be exposed to significant odor impacts and would meet the requirements of Mitigation Measure AQ-11.
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### IV. BIOLOGICAL 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>Impacts analyzed in EIR No. 348</th>
<th>No New Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>c) Have a substantial adverse effect on federally protected wetlands as defined by § 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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>

**Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts.** EIR No. 348 addressed the potential impacts to biological resources associated with implementation of the ACSP. Refer to EIR No. 348, Section 5.3.

EIR No. 348 evaluated the potential for the ACSP to impact biological resources in the local and regional context of the City of Anaheim, including sensitive species, riparian and sensitive habitats, wetlands, and migratory waterfowl. EIR No. 348 also evaluated the ACSP for consistency with local plans, policies and ordinances protecting biological resources. EIR No. 348 concluded that after mitigation, impacts would be less than significant with respect to impacts on sensitive species (Issue A), riparian or other sensitive habitats (Issue B), protected wetlands (Issue C), and migratory waterfowl (Issue D). Impacts would also be less than significant, and no mitigation measures required, with respect to conflicts with any local policies or ordinances (Issue E) and provisions of an adopted conservation plan (Issue F).

EIR No. 348 identified that the ACSP area contains wetland and aquatic habitats that are potentially suitable for a number of sensitive species. These include the Santa Ana sucker (Catostomus santaanae), a federally listed fish species, and southwestern pond turtle (Actinemys marmorata pallida), burrowing owl (Athene cunicularia), and northwestern San Diego...
pocket mouse (Chaetodipus fallax)—all of which are California Species of Concern. The potentially suitable habitat areas for these species are in areas designated Open Space under the General Plan and maintained as Open Space/Water in the proposed ACSP. However, the underlying General Plan designation for the Proposed Project area is General Commercial and was not identified in the EIR as having sensitive species. Therefore, no new impacts would occur.

EIR No. 348 identified sensitive vegetation communities in the ACSP area including areas of riparian vegetation and wetlands in the Santa Ana River and basin areas, which contain open water habitat that is used by migratory and resident waterfowl and other bird species, principally for foraging. Despite these areas being heavily disturbed, there are patches of vegetation that could support sensitive species, and thus could directly affect sensitive species. However, the Proposed Project will not affect the Santa Ana River and basin areas; therefore, the Proposed Project would not have direct or indirect impacts to the sensitive vegetation communities identified in the EIR No. 348. Nevertheless, MM BIO-2 requires that prior to issuance of demolition, grading or building permits, whichever occurs first, for construction activity that is set to occur during nesting season (typically between February 1 and July 1), the property owner/developer shall be required to conduct nesting bird surveys in accordance with the California Department of Fish and Wildlife requirements, and submit said surveys to the City of Anaheim Planning Department. Such surveys shall identify avoidance measures to protect active nests. This mitigation measure would be applied to the Proposed Project and impacts would be less than significant.

The Project Site is fully developed and does not contain areas considered to be potentially suitable habitat for sensitive species or sensitive vegetation communities, and is not identified in the EIR No. 348 as providing wildlife corridors or nurseries on or in the vicinity of the site. In addition, the EIR found the ACSP consistent with the goals and policies for protection of biological resources in the Green Element of the Anaheim General Plan. Therefore, future projects in accordance with the ACSP, including the Proposed Project, would comply with all relevant policies and ordinances relating to tree preservation, including the City of Anaheim Street Tree Ordinance. Finally, the Project Site is not located within a designated natural communities conservation plan/habitat conservation plan (NCCP/HCP) area.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.

**Applicable Mitigation Measures from EIR No. 348/MMRP No. 312**

**BIO-2:**

Prior to issuance of demolition, grading or building permits, whichever occurs first, construction activity is set to occur during nesting season (typically between February 1 and July 1), the property owner/developer shall be required to conduct nesting bird surveys in accordance with the California Department of Fish and Wildlife requirements, and submit said surveys to the City of Anaheim Planning Department. Such surveys shall identify avoidance measures to protect active nests.
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>Impacts analyzed in EIR No. 348 No New 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 CEQA Guidelines §15064.5 and/or identified on the Anaheim Citywide Historic Preservation Plan.</td>
<td>☐</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 CEQA Guidelines § 15064.5?</td>
<td>☐</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>
<td>☑</td>
</tr>
<tr>
<td>d) Disturb any human remains, including those interred outside of formal cemeteries?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>

**Narrative Summary:** Impacts analyzed in EIR No. 348/No new impacts. During preparation of the EIR No. 348, cultural resources were identified as not being significantly affected by, or affecting the ACSP. The ACSP has been previously disturbed and lacks identified historical, archaeological, and paleontological resources. Therefore, they were not addressed in the EIR.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
VI. GEOLOGY AND SOILS

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>Impacts analyzed in EIR No. 348 No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>ii) Strong seismic ground shaking?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>iii) Seismic-related ground failure, including liquefaction?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>iv) Landslides?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>b) Result in substantial soil erosion or the loss of topsoil?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts. EIR No. 348 analyzed the geotechnical and soils impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.4. All impacts were considered less than significant, with no mitigation measures required.

EIR No. 348 evaluated the potential for implementation of the ACSP to impact geological and soil resources and expose people to geologic and seismic hazards. EIR No. 348 identified that Project residences, occupants, visitors, etc., would be subjected to potential seismic related hazards, such as liquefaction, settlement, subsidence or collapse, but that appropriate measures to reduce and minimize the effects of earthquakes are included in the California Building Code (CBC), with specific provisions for seismic design. Consistent with the analysis presented in EIR No. 348, the design of structures within the Project Site in accordance with the CBC, as well as the Seismic Hazard Mapping Act (SHMA), which requires a site-specific investigation and compliance with existing regulations, would minimize impacts to less than significant levels, except for a catastrophic seismic event. In compliance with the SHMA requirement, a Preliminary Geotechnical Investigation (Appendix D, Preliminary Geotechnical Investigation, NOVA Services, Inc., July 20, 2017) was prepared to characterize subsurface conditions and provide preliminary geotechnical recommendations for foundation design and
construction in order to minimize the potential for seismic related hazards. The Preliminary Geotechnical Investigation concluded an overall low probability of liquefaction or related seismic phenomena. Site-specific mass grading and compaction that would occur as part of the Proposed Project would reduce any potential impacts from seismically induced lateral spreading, settlement and/or collapse within the Project Site. Impacts would be less than significant.

As noted in EIR No. 348, the ACSP area is located in a relatively flat area with minimal potential for landslides and ground lurching. Soils in the Project Site have already been disturbed by development. Therefore, the loss of topsoil is not a potential impact. Soils in the Project Site are particularly prone to erosion during the grading phase of development, especially during heavy rains. Reduction of the erosion potential can be accomplished through a Storm Water Pollution Prevention Plan (SWPPP), which specifies best management practices for temporary erosion controls. Such measures typically include temporary catchment basins and/or sandbagging to control runoff and contain sediment transport within the Project Site. However, during demolition and construction activities, when areas are exposed to erosion, adherence to the following would ensure that impacts would be less than significant: local and State codes and requirements for erosion control and grading; compliance with the National Pollutant Discharge Elimination System (NPDES) permit and the subsequent development of a Storm Water Pollution Prevention Plan (SWPPP).

EIR No. 348 identified the ACSP area as having a low to moderate potential for expansive soils. The Preliminary Geotechnical Investigation prepared for the Proposed Project determined that, in consideration of the largely sandy near surface soils on the Project Site, expansive soils would not be an issue. The sandy soils have the ability to undergo significant volume changes (shrinking or swelling) due to variations in moisture content. Impacts would be less than significant. Proposed Project

Future development within the Project Site would not require the installation of a septic tank or alternative wastewater disposal system as future developments would utilize the local sewer system. Therefore, no impacts would result from soil conditions in relation to septic tank or other onsite wastewater disposal systems.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
### VII. GREENHOUSE GAS EMISSIONS

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>Impacts analyzed in EIR No. 348</th>
<th>No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
<td></td>
</tr>
</tbody>
</table>

**Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts.** EIR No. 348 analyzed the potential impacts from greenhouse gas (GHGs) emissions related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.5. EIR No. 348 concluded that implementation of the ACSP would result in significant and unavoidable impacts with respect to GHG emissions (Issue A), and less than significant impacts with respect to conflicts with applicable plans, policies or regulations adopted for the purpose of reducing emissions of GHGs (Issue B).

EIR No. 348 evaluated the potential for implementation of the ACSP to generate GHGs, either indirectly or directly, that may have a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. EIR No. 348 concluded that although the Proposed Project would not conflict with applicable regulations and policies adopted for the purpose of reducing greenhouse gas (GHG) emissions and although feasible mitigation measures would be incorporated into the Proposed Project, the magnitude of the increase in GHG emissions would remain cumulatively considerable and the impact to GHG emissions would be significant and unavoidable. The Anaheim City Council adopted a Statement of Overriding Considerations with regard to these potential impacts.

The ACSP allows for up to 2,919 dwelling units and 6.4 million square feet of non-residential uses in the DA-3 (Transit Oriented) development area at buildout. Therefore, the air quality analysis in EIR No. 348 analyzed the operational impacts of the buildout potential. The Applicant proposes to construct up to 406 apartment units on two sites and 5,000 square feet of new retail within the larger Anaheim Pacificenter development, which is presently developed with a mix of office, retail and hotel uses. As a result, the Proposed Project is within the maximum amount of development analyzed in EIR No. 348.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. Potential impacts would be reduced by implementation of MMs AQ-5, AQ-6, and AQ-7. The Anaheim City Council has adopted a Statement of Overriding Considerations for impacts that remain significant, unavoidable and adverse after mitigation measures are applied.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
### VIII. HAZARDS AND HAZARDOUS MATERIALS

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>Impacts analyzed in EIR No. 348</th>
<th>No New Impact</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>
<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>
<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>
<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 § 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>
<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>
<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>
<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>
<td>☐</td>
</tr>
<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>
<td>☐</td>
</tr>
</tbody>
</table>

**Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts.** EIR No. 348 analyzed the hazards and hazardous materials impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.6. All impacts were determined to be less than significant, with no mitigation measures required.

EIR No. 348 evaluated the potential impacts of the Proposed Project on human health and the environment due to exposure to hazardous materials or conditions associated with the Project Area, construction, and operations. The ACSP area contains various industrial uses that handle, store, and dispose various hazardous materials. With emphasis on green technology and sustainable development, ACSP is not anticipated to substantially increase the use, transport, or disposal of hazardous materials. The ACSP allows for additional residential units in DA-3 Transit Oriented Development Area, in the vicinity of Anaheim Canyon Metrolink. The Proposed Project is located within DA-3. Development of proposed residential uses in the...
A non-residential area may increase the potential for safety impacts from hazardous materials. However, adhering to the existing review and permitting process would ensure that hazardous materials do not pose significant safety threats to the residences.

A Phase 0 Site Assessment (Appendix D of the DEIR No. 348, Phase 0 Site Assessment, The Planning Center[DC&E, January 2014]) was prepared for the ACSP area, which identified uses and properties that could potentially pose a variety of environmental hazards within the boundaries of the ACSP. The ACSP area includes a number of facilities that are listed on the hazardous materials sites list compiled by various government agencies. The listed facilities would be required to conduct site-specific evaluation in accordance with the State of California Hazardous Substances Control Law (Health and Safety Code, Division 20, Chapter 6.5) and the requirements of the California Administrative Code, Title 30, Chapter 22. The Project Site was not identified as a property that could potentially pose environmental hazard.

A Phase I Environmental Site Assessment (ESA) was prepared for the Proposed Project (Appendix E, Phase I Environmental Site Assessment, Gabion Real Estate Advisors, September 8, 2016). A review of standard state and federal environmental agency records for the Project Site and surrounding properties did not identify any evidence of existing, controlled, or historical recognized environmental conditions, environmental concerns, or de minimis conditions. Owing to current use, there are no tenants conducting environmentally sensitive activity that would reasonably be expected to present an environmental issue of concern. Therefore, impacts with regards to the release or disposal of hazardous materials are less than significant. Furthermore, the proposed residential and retail uses will not create a significant hazard to the public through the routine transport, use or disposal of hazardous materials; release hazardous materials into the environment; or emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

The Project Site is not in the vicinity of an airport or within the jurisdiction of an Airport Land Use Plan. The ACSP area, including the Project Site, is already developed and no significant roadway changes would occur that would adversely affect any emergency response or evacuation plans. The Proposed Project would be reviewed by the Anaheim Fire Department, including adequate access for emergency vehicles. The Project Site and its surrounding area are in an urbanized setting, and no undeveloped wildland areas are adjacent to the Project Site. The Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No significant impact would occur.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
### IX. HYDROLOGY AND WATER QUALITY

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>Impacts analyzed in EIR No. 348</th>
<th>No New Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Violate any water quality standards or waste discharge requirements?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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)?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>f) Otherwise substantially degrade water quality?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>j) Expose persons or structures to risk of inundation by seiche or mudflow?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts. EIR No. 348 analyzed the hydrology and water quality impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.7. All impacts were determined to be less than significant, with no mitigation measures required.

EIR No. 348 evaluated the potential for implementation of the ACSP to impact hydrology and water quality conditions, including impacts to groundwater, drainage patterns, and runoff. EIR No. 348 also analyzed the potential for flooding, seiche, tsunami or mudflow onsite. According to EIR No. 348, development in the ACSP area and the change in land uses could result in an increase in impervious surfaces. This could result in an increase in storm water runoff, higher peak discharges to drainage channels, the potential to cause erosion or sedimentation in drainage swales and streams, and reduce groundwater recharge. The County of Orange and City of Anaheim require as a standard condition of approval that all new development or significant redevelopment Projects complete drainage and hydrology analyses to ensure that on-site and off-site drainage facilities can accommodate increased storm water flows.

The Applicant prepared a Post-Development Hydrology Report (Appendix F, Hydrology Report, Fuscoe Engineering, August 2017), and a Preliminary Water Quality Management Plan (WQMP) (Appendix G, Preliminary Water Quality Management Plan, Fuscoe Engineering, August 3, 2017). The City’s review of the Preliminary WQMP was focused on the Pretreatment and Low Impact Design (LID) components and therefore, additional comments should be anticipated at the Final WQMP. Nevertheless, both the Hydrology Report and the Preliminary WQMP concluded that the Project Site would include similar drainage patterns as existing conditions Under proposed conditions, runoff from the northern portion of Lot 1 would flow in a northerly direction towards its respective proposed bioretention planter without underdrain where low flows will receive infiltration treatment.

Table G below (from Table 6.2 of the Hydrology Report) provides the total area of the watershed and quantifies the run-off for both existing and proposed development. The total increase in runoff with the Proposed Project is 8.0 cubic feet per second (cfs).

<table>
<thead>
<tr>
<th>Item</th>
<th>Existing</th>
<th>Proposed</th>
<th>Difference</th>
<th>Mitigated Flowrates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area Flowing to La Palma Ave</td>
<td>3.9 Ac.</td>
<td>3.7 Ac.</td>
<td>-0.2 Ac.</td>
<td></td>
</tr>
<tr>
<td>Area Flowing to Tustin Ave</td>
<td>1.9 Ac</td>
<td>0.3 Ac</td>
<td>-1.6 Ac</td>
<td></td>
</tr>
<tr>
<td>Area Flowing to S.W. Corner</td>
<td>21.3 Ac</td>
<td>20.2 Ac</td>
<td>-1.1 Ac</td>
<td></td>
</tr>
<tr>
<td>Area Flowing to Infiltration</td>
<td>0.0 Ac</td>
<td>3.1 Ac</td>
<td>+2.0 Ac</td>
<td></td>
</tr>
<tr>
<td>Total Area of</td>
<td>27.1 Ac</td>
<td>27.3 Ac</td>
<td>+0.2 Ac</td>
<td></td>
</tr>
</tbody>
</table>
The WQMP divided the Project Site into Drainage Management Areas (DMAs) to be utilized for defining drainage areas based on the proposed site grading patterns, drainage patterns, storm drain and catch basin locations (Refer to WQMP Exhibit in Section VI for locations of DMA). There are three DMAs on the Project Site. Runoff from DMA 2A would flow in a northerly direction where low flows would be treated via proposed pervious pavements, DMA 2B would flow towards the center island for low flow treatment via proposed bioretention planter, and DMA 2C would flow towards the center parking aisle for low flow treatment via proposed pervious pavement. All high flows would overflow and connect to the existing public storm drain line along La Palma Avenue. Runoff from the remaining southern half of Lot ‘1’ and the entire Lot ‘2’ would comingle with off-site drainage and continue to flow in a southerly direction towards the existing flood control basin that would be retrofitted into an infiltration basin as part of the Proposed Project. A forebay will receive the comingled runoff flows and will spill over into the infiltration basin for treatment of low flows. High flows will overflow and continue to drain towards the Santa Ana River.

The WQMP describes the best management practices (BMPs) and site design measures that would be implemented to retain onsite stormwater runoff up to 80 percent average annual capture efficiency, or if not feasible, to provide on-site or offsite treatment control BMPs prior to discharge to waters of the US. Sizing of treatment control BMP(s) shall be based on the unmet volume after claiming applicable water quality credits, if appropriate. Proposed BMPs include minimizing impervious surfaces through landscaping; maximizing natural infiltration capacity through infiltration basins, pervious pavements and bioretention planters without underdrains; preserving existing drainage patterns and time of concentration; and incorporating native and/or drought tolerant landscaping. Low Impact Design (LID) BMPs are also proposed to reduce pollutants in storm water discharges. LID BMPs include hydrologic source controls (to be determined at final Project design), infiltration BMPs (i.e., infiltration trenches, bioretention without underdrains, drywells, permeable pavement, and underground infiltration galleries). Therefore, the design of the Proposed Project would result in less than significant impacts on drainage patterns, runoff volume and water quality.

The Applicant would also be required to submit a SWPPP, which includes an erosion control plan that prescribes measures, such as phasing of grading, limiting areas of disturbance, designation of restricted-entry zones, diversion of runoff away from disturbed areas, protective measures for sensitive areas, outlet protection, and provisions for revegetation or mulching. The erosion control plan would also include treatment measures to trap sediment once it has been mobilized, including inlet protection, straw bale barriers, straw mulching, straw wattles, silt fencing, check dams, terracing, and siltation or sediment ponds. With implementation of these measures during construction, any erosion or siltation impacts would be less than significant.

The Property Owner/Developer would construct an adequately sized storm drainage system to convey on-site storm water runoff to existing storm drain facilities and prove that runoff for the site could be fully conveyed by the existing storm drainage system for a minimum 10-year storm event, with drainage basins tributary to the Santa Ana River sized to convey water from a 25-year storm event (City of Anaheim 2004). A preliminary basin capacity analysis performed as part of the Hydrology Report determined that the current basin is adequately sized for the proposed development. A conservative value for the change in surface elevation during the peak 25-year storm event calculates at less than 6” using only the bottom area of the basin and disregarding the side slopes and extended “fingers” of the basin. The basin has a storage capacity of approximately 80,000 cubic feet before fully cresting at the culvert inlet. The basin appears to be sized for back to back storms, which is typical for control structures.
EIR No. 348 identified that water demand from maximum build out in the ACSP area would not deplete groundwater resources. Implementation of the ACSP Project would result in short-term construction-related and long-term operational water quality impacts. However, implementation of mitigation measures and compliance with the standard requirements, including obtaining a National Pollutant Discharge Elimination System (NPDES) permit and preparing a SWPPP reduces these impacts.

As identified in EIR No. 348, implementation of the ACSP would not increase the potential flooding compared to the existing conditions. Implementation of the ACSP would not expose people or structures to a significant risk of loss, injury, or death in the case of dam failure, or result in inundation by seiche, tsunami, or mudflow.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
### X. LAND USE AND PLANNING

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>Impacts analyzed in EIR No. 348 No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Physically divide an established community?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>c) Conflict with any applicable habitat conservation plan or natural community conservation plan?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>

**Narrative Summary:** Impacts analyzed in EIR No. 338/No impacts. EIR No. 348 analyzed the land use impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.8. All impacts were determined to be less than significant, with no mitigation measures required.

EIR No. 348 evaluated the potential for implementation of the ACSP to physically divide an established community; conflict with any applicable land use plan, policy or regulation with jurisdiction over the Project; or conflict with any habitat conservation plan or natural community conservation plan. EIR No. 348 identified that no established community would be divided as a result of implementation of the ACSP, and no significant impact is anticipated. The EIR concluded that Project implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. EIR No. 348 provided a consistency analysis with all relevant goals and policies identified in the City of Anaheim General Plan, Southern California Association of Governments (SCAG’s) 2008 Regional Comprehensive Plan and SCAG’s 2012 Regional Transportation Plan/Sustainable Communities Strategy. The Proposed Project is also consistent with the general use designation, density, building intensity, and applicable policies of SCAG’s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.

Public Resources Code (PRC) Section 21099 defines “transit priority area” to mean an area within one-half mile of an existing or planned major transit stop. A major transit stop is defined by Public Resources Code section 21064.3 to include a site containing an existing rail transit station. The Proposed Project is located within a transit priority area. Pursuant to PRC Section 21099(b)(3), this Initial Study is required to analyze a Project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associated with transportation. This Initial Study meets the requirement of this Code as it addresses all topics associated with transportation; See Section III, Air Quality, Section VII, Greenhouse Gas Emissions; Section VIII, Hazards and Hazardous Materials; Section XII, Noise; Section XIV, Public Services; and Section XVI, Transportation/Traffic). For each topic, this Initial Study concluded that the Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Anaheim Canyon is developed with urban uses and is not part of any habitat conservation plan; no natural habitat exists within the Project limits. Implementation of the Proposed Project would not conflict with any habitat conservation plans.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
## XI. MINERAL 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>Impacts analyzed in EIR No. 348 No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>

**Narrative Summary: Impacts analyzed in EIR No. 348/No impacts.** EIR No. 348 analyzed the mineral resources impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.9. Impacts were determined to be less than significant with no mitigation measures required.

EIR No. 348 evaluated the potential for the ACSP to impact the mineral resources in a local and regional context. EIR No. 348 identified that almost the entire ACSP area, including the Project Site, is within Mineral Resource Zone (MRZ)-2, where current information indicates that significant mineral deposits are present or there is a high likelihood of their presence. Additionally, the ACSP area contains Richfield Oil Field; Olive Oil Field; and a number of quarry, sand, gravel, or clay pit and oil and gas wells. However, the regionally significant sectors are already developed with urban uses such as industrial, commercial, and office. These areas are also surrounded by urban development. Therefore, as stated in the Green Element of the General Plan (*General Plan for the City of Anaheim, Green Element*, City of Anaheim, May 2004), the practical value of mineral resources in the City is already limited, and no substantial environmental changes are anticipated with Project implementation. The General Plan does not identify any specific goal or policy related to mineral resources.

The review of historical aerial photographs and database search results indicated that the ACSP area, including the Project Site, was not utilized for mining operations other than for aggregate materials in the former quarries. As shown in Figure 5.9-1 of EIR No. 348, Mineral Resource Map, the ACSP has three sectors identified as containing mineral resources of regional significance:

- Sector D: aggregate-sand and gravel deposits between Orangethorpe Avenue and La Palma Avenue.
- Sector E: aggregate-sand and gravel deposits at the southwest corner of the intersection of Miraloma Avenue and North Lakeview Avenue.
- Sector F: aggregate-sand and gravel deposits in the Warner Basin near the intersection of La Palma Avenue and Tustin Avenue.

The existing quarry, sand, gravel, or clay pits in the ACSP area do not exist on the Project Site and would be allowed to continue operation under the Proposed Project, and displacement of these uses would not be required.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
### XII. NOISE

Would the Project result in:

<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>Impacts analyzed in EIR No. 348</th>
<th>No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>✓</td>
<td></td>
<td>□</td>
</tr>
<tr>
<td>b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>✓</td>
<td></td>
<td>□</td>
</tr>
<tr>
<td>c) A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>✓</td>
<td></td>
<td>□</td>
</tr>
<tr>
<td>d) A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?</td>
<td>□</td>
<td>□</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 expose people residing or working in the Project Site to excessive noise levels?</td>
<td>□</td>
<td>□</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 expose people residing or working in the Project Site to excessive noise levels?</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td>□</td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

**Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts.** EIR No. 348 analyzed the noise impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.10. EIR No. 348 concluded that after mitigation, impacts would still be significant and unavoidable with respect to temporary construction noise increases (Issue A). After mitigation, impacts would be less than significant with respect to exposing sensitive receptors to strong levels of groundborne vibration and transportation-related noise sources (Issues B and D). Impacts would be less than significant, with no mitigation measures required, with respect to all other issue areas (Issues C, E and F).

EIR No. 348 evaluated the potential noise and vibration impacts associated with buildout of the ACSP. EIR No. 348 determined that construction activities associated with the ACSP would result in temporary noise increases in the vicinity of the ACSP Area, including the Project Site, and have the potential to significantly impact noise-sensitive receptors. Vibration impacts associated with the ACSP may also occur from construction equipment associated with development.

The EIR also concluded that buildout of the individual land uses and Projects for implementation of the ACSP, including the Proposed Project, would expose sensitive uses to strong levels of groundborne vibration in areas adjacent to the railroad line, including additional residential units in the vicinity of the Anaheim Canyon Metrolink Station. Future residential uses within the ACSP area would also be exposed to potential noise impacts from traffic and rail activity.

Although compliance with Policies 3 to 7 from Goal 1.1 of the General Plan Noise Element would encourage proper site planning to reduce potential noise impacts from transportation sources to noise-sensitive receptors, it cannot be guaranteed that all receptors would comply with the applicable exterior and interior noise standards and mitigation measures were
identifying to reduce these potential impacts.

EIR No. 348 concluded that noise-sensitive uses could be exposed to elevated noise levels from stationary sources. However, noise generated by residential or commercial uses as part of the Proposed Project is generally short and intermittent, and these uses are not a substantial source of noise. Through compliance with the City’s Noise Ordinance, stationary-source noise from these types of proposed land uses would not substantially increase the noise environment.

EIR No. 348 identified that the closest airport from the edges of the ACSP boundaries is the Fullerton Municipal Airport, approximately 5.5 miles to the northwest. The Kaiser Permanente Anaheim Medical Center Heliport is located within the ACSP boundaries. However, operation of this heliport is sporadic and would not generate substantial amounts of noise to users in the ACSP area. Impacts would be less than significant and no mitigation would be required.

MMs N-1, N-3, and N-5 apply to the Proposed Project. MM N-1 requires measures to limit construction-related noise. MM N-3 requires a vibration analysis to demonstrate that the vibration levels from passing trains are below 72 Vibration Decibels (VdB) at the proposed residential apartment units. MM N-5 requires that any new residential use within the ACSP prepare an acoustical analysis to show the development will be sound-attenuated against roadway, aircraft, helicopter, stationary (i.e., nearby industrial, commercial, etc.), and railroad noise sources.

In compliance with MMs N-3 and N-5, a Project-specific noise and vibration study (Appendix H, Noise & Vibration Impact Analysis, Vista Environmental, October 7, 2017) was prepared to quantify the construction and operational noise and vibration impacts to sensitive receptors on the Project Site. **Proposed Project Construction-Related Vibration Impacts**

The nearest sensitive receptors to the proposed construction activities consist of workers and guests at the existing Extended Stay America hotel located as near as 60 feet south of the Lot ‘2’ portion of the Project site. There are also residential apartment units located as near as 100 feet west of both Lot ‘1’ and Lot ‘2’.

Neither the Municipal Code nor the General Plan provide a quantifiable vibration threshold for construction activities. However, the General Plan EIR utilized a vibration threshold of 0.2 inch per second peak particle velocity (PPV) threshold to determine vibration impacts associated with implementation of the General Plan. The 0.2 inch per second PPV threshold was derived from research performed by Caltrans. Since the 0.2 inch per second PPV threshold is a substantiated threshold that has been utilized by the City, it was also utilized in the analysis of construction vibration impacts for the Proposed Project.

The primary source of vibration during construction would be from the operation of a bulldozer. A large bulldozer would create a vibration level of 0.089 inch per second PPV at 25 feet (FTA, 2006). Based on typical propagation rates, the vibration level at the nearest offsite receptor (Extended Stay America) would be 0.03 inch per second PPV. The vibration level at the nearest offsite receptor is within the 0.2 inch per second PPV threshold. Therefore, construction-related vibration impacts would be less than significant.

**Proposed Project Operations-Related Vibration Impacts**

The Proposed Project would consist of the operation of 406 apartment units and 5,000 square feet of new retail. The ongoing operation of the Proposed Project would not include the operation of any known vibration sources that may affect nearby properties. However, the proposed residential apartment building at Lot ‘1’ is located as near as 65 feet from a railroad line and the proposed residential building at Lot ‘2’ is located as near as 80 feet from a railroad line. The ACSP MMRP No. 312 Mitigation Measure N-3 provides a vibration level threshold of 72 VdB to analyze vibration impacts from railroad lines to affected residential uses.

Vibration measurements were taken at the nearest portion of both Lot ‘1’ and Lot ‘2’ to the railroad during train pass-bys and found that the vibration levels produced by a train pass-by at Lot ‘1’ is 39.1 VdB and at Lot ‘2’ is 45.1 VdB. Both Lot ‘1’ and Lot ‘2’ would be within the 72 VdB vibration impact threshold detailed in Mitigation Measure N-3 from the ACSP. Impacts would be less than significant.

With the implementation of MMs N-1, N-3, and N-5, impacts would be less than significant.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.

**Applicable Mitigation Measures from EIR No. 348/MMRP No. 312**

Modifications to the mitigation measures from MMRP No. 312 are shown as strikethrough for deleted text and **bold** for added text.
new, inserted text. Clarification on Project-specific implementation of a mitigation measure is underlined.

N-1:
Ongoing during grading, demolition, and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise:

- Construction activity is limited to the daytime hours between 7 AM to 7 PM, as prescribed in the City’s Municipal Code.
- All internal combustion engines on construction equipment and trucks are fitted with properly maintained mufflers.
- Stationary equipment such as generators, air compressors shall be located as far as feasible from nearby noisesensitive uses.
- Stockpiling is located as far as feasible from nearby noise-sensitive receptors.
- Construction traffic shall be limited to the haul routes established by the City of Anaheim.

N-3:
Prior to issuance of building permits, if new vibration-sensitive land uses are located within 200 feet of any railroad line, the property owner/developer shall retain an acoustical engineer to conduct an acoustic analysis that includes a vibration analysis for potential impacts from vibration generated by operation of the rail line. Mixed use buildings shall be designed to eliminate vibration amplifications due to resonances of floors, walls, and ceilings. The detailed analysis shall be submitted to the Planning Department prior to issuance of building permits and shall show that the vibration levels would be below 72 VdB, which is Federal Transit Administration’s nighttime criteria to regulate vibration impacts to affected residential uses.

The Applicant has satisfied Mitigation Measure N-3 with the preparation of a Noise & Vibration Impact Analysis, which concluded that the vibration levels produced by a train pass-by at Lot ‘1’ is 39.1 VdB and at Lot ‘2’ is 45.1 VdB. Both Lot ‘1’ and Lot ‘2’ would be within the 72 VdB vibration impact threshold detailed in MM N-3, impacts would be less than significant, and no further mitigation is required.

N-5:
Prior to issuance of a building permit, the property owner/developers shall submit a final acoustical report prepared to the satisfaction of the Planning Director. The report shall show that the development would be sound-attenuated against present and projected noise levels, including roadway, aircraft, helicopter, stationary sources (e.g., industrial, commercial, etc.), and railroad, to meet City interior standards as follows:

a) The report shall demonstrate that the proposed residential design will result in compliance with the 45 dBA CNEL interior noise levels, as required by the California Building Code and California Noise Insulation Standards (Title 24 and 25 of the California Code of Regulations).

b) The report shall demonstrate that the Proposed Project residential design shall minimize nighttime awakening from train horns such that interior single-event noise levels are below 81 dBA Lmax.

The property owner/developer shall submit the noise mitigation report to the Planning Director for review and approval. Upon approval by the City, the project acoustical design features shall be incorporated into construction of the Proposed Project.

The Applicant has satisfied Mitigation Measure N-5 with the preparation of the Noise & Vibration Impact Analysis, which identified Project Design Features (PDFs) NOI-1 and NOI-2 that would sound-attenuate the Proposed Project to City interior standards as required in MM N-5.

Project Design Features

PDF NOI-1:
To address the criteria in MM N-5 a) to reduce the average interior noise levels to a level below the 45dBA CNEL interior noise standard, the property owner/developer will upgrade windows and exterior doors with a minimum Sound Transmission Class (STC) rating of 29 for all units shown in Figure 11. Residential Units with STC 29 and 30 Ratings, and include a note on the plans showing this PDF and Figure 11. With the inclusion of upgraded windows and exterior doors with an STC rating of 29, as shown in Figure 11, future residents would not be exposed to interior noise levels above 45dBA.

PDF NOI-2:
To address the criteria in MM N-5 b) to reduce the single event interior train horn noise level to below 81 dBA Lmax, the property owner/developer will upgrade windows and exterior doors with a minimum Sound Transmission Class (STC) rating of 30 STC for all floors located on the west side of the residential apartment buildings on both Lot ‘1’ and Lot ‘2’, as shown in Figure 11 and include a note on the plans showing this PDF and Figure 11. With the inclusion of upgraded windows and exterior doors with an STC rating of 30, as shown in Figure 11, future residents would not be exposed to significant single event interior train horn noise levels.
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### XIII. POPULATION AND HOUSING

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>Impacts analyzed in EIR No. 348</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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)?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

**Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts.** EIR No. 348 analyzed the population and housing impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.11. All impacts were determined to be less than significant with no mitigation measures required.

EIR No. 348 evaluated the socioeconomic effects of implementation of the ACSP to determine if implementation of the ACSP would induce substantial population growth and/or displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. EIR No. 348 concluded that the ACSP, including the Proposed Project, would directly result in population growth in the ACSP area. Under buildout of the ACSP, the number of housing units in the ACSP area would increase from 312 to 2,919 dwelling units, an increase of 2,607 units, or more than 835 percent increase from the existing housing stock. Based on the existing 312 residential units in the ACSP area and assuming an average of 3 residents per unit, the population in ACSP would also increase by 835 percent from 936 to 7,821 residents. With the increase of over 19 million square feet of non-residential space in the ACSP area, the ACSP would add approximately 38,720 jobs, which represents an increase of approximately 69 percent from the existing conditions. The Applicant proposes to construct up to 406 apartment units on two sites and 5,000 square feet of new retail within the larger Anaheim Pacificenter development. As a result, the Proposed Project is within the maximum amount of housing and population growth analyzed in EIR No. 348. The Proposed Project would directly induce population growth through allowing additional residential development and indirectly by allowing additional non-residential development in Anaheim Canyon.

Although jobs/housing goals and ratios are advisory only, the American Planning Association (APA) recognizes a balance within the range of 1.3 to 1.7, which EIR No. 348 uses as a guideline. At buildout, the ACSP area would have a ratio of 32.4, representing a significant improvement over the existing jobs/housing ratio of 178.9. However, although the ACSP is higher than recommended by the APA, the ACSP area is not intended as a jobs/housing balanced area, but as a competitive and vital center for research, industry, and commerce that serves not only the City but also the region. Anaheim Canyon is envisioned as a regional job center with available infrastructure for growth and would facilitate future job growth at strategic points along the commuter rail, transit systems, and freeway corridors. EIR No. 348 concluded that these regional growth implications are consistent with 2012 SCAG RTP/SCS strategies in compliance with SB 375. SCAG has since adopted the 2016 RTP/SCS; therefore, an assessment of the Proposed Project’s consistency with the pertinent 2016 SCAG RTP/SCS goals is presented below in Table H. This analysis demonstrates the Proposed Project would be consistent with the applicable RTP/SCS goals. The Project is also consistent with the general use designation, density, and building intensity assumptions for the Project Site as detailed in the 2016 RTP/SCS. The Transportation Analysis Zone level data in the 2016 RTP/SCS assumes a High Quality Transit Area (“HQTA”) at the Project Site (2016 RTP/SCS, SCS Background...
Table H – Consistency with SCAG’s 2016 Regional Transportation Plan / Sustainable Communities Strategy Goals

<table>
<thead>
<tr>
<th>RTP Goals</th>
<th>Project Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Align the plan investments and policies with improving regional economic development and competitiveness.</td>
<td><strong>Consistent:</strong> Fostering economic growth and development is the overarching objective of the ACSP. The ACSP intends to create and update its unique economic identity and become the leading innovation center for Southern California. The Proposed Project would provide housing opportunities within the ACSP area, which is crucial to achieving this goal.</td>
</tr>
<tr>
<td>2. Maximize mobility and accessibility for all people and goods in the region.</td>
<td><strong>Consistent:</strong> The Proposed Project is located within the DA-3 Transit-Oriented Area of the ACSP. The Transit-Oriented Area provides a location for the development of a high quality, pedestrian- and bicycle friendly mixed-use district, which will take full advantage of the Metrolink Station and convenient access to the regional freeway network.</td>
</tr>
<tr>
<td>3. Ensure travel safety and reliability for all people and goods in the region.</td>
<td><strong>Consistent:</strong> The Proposed Project will allow more residential units near jobs to reduce vehicle miles traveled. The Proposed Project would also create pedestrian-friendly walking environment through improvements that include landscaping, pedestrian pathways and crosswalks, and a shared use bicycle and pedestrian path serving the Project Site and the Metrolink station.</td>
</tr>
<tr>
<td>4. Preserve and ensure a sustainable regional transportation system.</td>
<td><strong>Consistent:</strong> All applicant-provided appliances for the Proposed Project would be Energy Star appliances (dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances shall be verified by the Building Division prior to issuance of a Certificate of Occupancy.</td>
</tr>
<tr>
<td>5. Maximize the productivity of our transportation system.</td>
<td><strong>Consistent:</strong> See Response to Goal 6 above.</td>
</tr>
<tr>
<td>6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</td>
<td></td>
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<tr>
<td>7. Actively encourage and create incentives for energy efficiency, where possible.</td>
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<tr>
<td>8. Encourage land use and growth patterns that facilitate transit and active transportation.</td>
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</tr>
</tbody>
</table>

In addition, the County’s jobs/housing ratio is balanced with and without the ACSP with a ratio of 1.54 at buildout with Project implementation. Therefore, although the Proposed Project would result in direct and indirect growth in the area, this growth would be consistent with what was analyzed in EIR No 348 for the ACSP. Additionally, the ACSP would be consistent with SCAG’s growth management policies that aim to better coordinate infrastructure development with projected population, housing, and employment growth. Therefore, no significant impact is anticipated.

EIR No. 348 also concluded that ACSP implementation would not result in displacement of housing or people. As part of the Proposed Project, no existing housing or people would be displaced, necessitating the construction of replacement housing elsewhere. Therefore, no impacts would occur.

As the Proposed Project is within projected buildout numbers for residential and non-residential square footage for the ACSP, the Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348.
The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
XIV. PUBLIC SERVICES

Would the Project result in substantial adverse physical Impacts associated with the provision of 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>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>Impacts analyzed in EIR No. 348 No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire protection?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>Police protection?</td>
<td>☐</td>
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<tr>
<td>Schools?</td>
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<td>Parks?</td>
<td>☐</td>
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<tr>
<td>Other public facilities?</td>
<td>☐</td>
<td>☐</td>
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</tr>
</tbody>
</table>

Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts. EIR No. 348 analyzed the impacts on public services related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.12. All impacts were determined to be less than significant with no mitigation measures required.

EIR No. 348 evaluated whether implementation of the ACSP would result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, park or other public facilities servicing the ACSP area.

EIR No. 348 concluded that development of the Project Site would result in additional structures and population in the Anaheim Fire and Rescue service boundaries, thereby increasing the demands for fire protection facilities and personnel. However, compliance with the applicable fire and building codes and the increase tax revenues from the ACSP would ensure that implementation of ACSP would not result in significant impact to fire protection services. The Proposed Project is within the maximum amount of development analyzed in EIR No. 348, therefore, the Proposed Project would not result in significant impacts to fire protection services.

EIR No. 348 determined that implementation of the ACSP would introduce new structures and population into the Anaheim Police Department service boundaries, thereby increasing the requirement for police protection facilities. However, impacts to police services are anticipated to be adequately funded by an increase in tax revenues, over an extended period of time, relative to the increase in development intensity. Moreover, the Proposed Project would be developed applying the principles of Crime Prevention Through Environmental Design (CPTED), utilizing site design, building design, lighting, landscaping and line of sight/natural surveillance techniques to deter crime. Implementation of CPTED concepts in conjunction with additional facilities and personnel funded by an increase in tax revenue would reduce impacts related to police services to a less than significant level. The Applicant shall file Emergency Listing Card, Form APD-281 with the Police Department, provide a comprehensive security alarm system, complete a Burglary/Robbery Alarm Permit application, provide an electronic access system to the Police Department for any gates, add rooftop address numbers, add “No Trespassing” signs to the entrances to the parking structures, ensure monument signs are well lighted, and ensure there is adequate lighting of parking lots, parking structures, circulation areas, aisles, passageways, recesses, and grounds contiguous to buildings.

EIR No. 348 determined that implementation of the ACSP would generate new students and create additional school facilities demands. The existing school facilities are not adequate to serve the new residential development associated with the Proposed Project. However, the increased demands for additional school facilities would be accommodated through the payment of development fees and impacts would be less than significant.

EIR No. 348 determined that implementation of the ACSP, including the Proposed Project, would further exacerbate
impacts to library services. However, these impacts are anticipated to be adequately funded by an increase in tax revenue, over an extended period of time, relative to the increase in development intensity. Implementation of the ACSP, including the Proposed Project, would also increase the service needs for local day care facilities; however, these facilities are considered private non-residential uses and are a permitted primary use in the DA-4 and DA-5 and conditionally permitted in DA-1, DA-2, and DA-3. Implementation of the Proposed Project would not result in any adverse impact to local day care facilities, nor long-lasting, adverse physical impacts associated with providing adequate day care services.

The Proposed Project is within the maximum amount of development analyzed in EIR No. 348 and would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
XV. RECREATION

Would the Project:

<table>
<thead>
<tr>
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<th>Less Than Significant Impact</th>
<th>Impacts analyzed in EIR No. 348 No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☑</td>
<td>☐</td>
</tr>
<tr>
<td>b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</td>
<td>☐</td>
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<td>☑</td>
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</tbody>
</table>

Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts. EIR No. 348 analyzed the impacts on parks and recreational services related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.13. Impacts were determined to be less than significant with no mitigation measures required.

EIR No. 348 evaluated whether implementation of the ACSP would result in the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. EIR No. 348 also evaluated whether implementation of the ACSP would result in the provision of recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. EIR No. 348 determined that implementation of the ACSP, including the Proposed Project, would increase demands on existing parks and recreational facilities but would not result in adverse physical environmental impacts. The additional residents and employees in the City would create the need for additional passive and active recreational amenities and accelerate the normal wear and tear on existing park facilities. Although the ACSP area does not contain any city or regional parks, there are a number of groundwater recharge basins owned by Orange County Water District (OCWD), which are designated as DA-6 Open Space/Water Area in the ACSP. In addition to the groundwater recharge activities, implementation of the ACSP would encourage the creation of bicycle and pedestrian trails that link Anaheim Canyon to surrounding neighborhoods and the Santa Ana River Trail system. The ACSP has also identified other potential open space improvements. Provision of open space in the ACSP would not result in adverse physical impact to the environment and with on-going coordination with OCWD to provide more open space and improve connectivity with the trail system; impacts related to recreation would be reduced to a less than significant level.

The Proposed Project will result in the construction of up to 406 apartment units on two sites. Site amenities feature both active and passive open space areas including pools, spas, fitness areas, clubhouses, courtyards, plazas, private patios and balconies, a dog park, and landscaped areas. Residential development in the DA-3 Transit-Oriented Area is required to provide recreational-leisure areas pursuant to Municipal Code Section 18.32.090 Recreational-Leisure Areas, and pay park impact fees pursuant to the Quimby Act. As part of the Proposed Project, the Applicant would construct a lighted, shared, multi-purpose path for both pedestrians and cyclists from the Metrolink platform, north to La Palma Avenue (portion of Bike ID 20), and east to Tustin Avenue (portion of Bike ID 12). The Proposed Project would include a right-of-way (ROW) dedication along the south side of La Palma Avenue that ranges from 17 feet to 10 feet to incorporate a street widening adjacent to the railroad ROW and a proposed multi-use bike/pedestrian path (Bike ID 19). Connectivity to the Metrolink Platform would facilitate access to a proposed Metrolink Side Trail that would lead south to the Santa Ana River Trail and north to a proposed Class I bike facility on La Palma Avenue and Class II bike facility on Tustin Avenue.

As the Proposed Project is within projected buildout numbers for residential and non-residential square footage for the ACSP, the Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
## XVI. TRANSPORTATION/TRAFFIC

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>Impacts analyzed in EIR No. 348 No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
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<tr>
<td>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?</td>
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<tr>
<td>c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location those results in substantial safety risks?</td>
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<td>d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?</td>
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<tr>
<td>e) Result in inadequate emergency access?</td>
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<tr>
<td>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?</td>
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<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

**Narrative Summary:** Impacts analyzed in EIR No. 348/No new impacts. EIR No. 348 analyzed the transportation and traffic impacts related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.14. EIR No. 348 concluded that after mitigation, significant and unavoidable impacts would still occur with respect to freeway facilities as well as intersection peak hour impacts and roadway segment impacts under Existing 2013 Plus Project and Forecast Year 2040 General Plan Buildout Plus Project (Issues A and B). All other impacts would be less than significant with no mitigation measures required.

EIR No. 348 concluded that implementation of the ACSP would result in significant impacts to intersections in the peak hour and roadway segments under the Existing 2013 Plus Project scenario. Due to right-of-way constraints, many identified improvements are not feasible. EIR No. 348 proposed mitigation to improve intersection #42 Tustin Ave/Pacificenter Drive with the addition of a second northbound lane and a second eastbound right-turn lane. Due to right-of-way constraints, this capacity improvement is not feasible. Therefore, impacts would remain significant and unavoidable. The Anaheim City Council adopted a Statement of Overriding Considerations with regard to these potential impacts.

EIR No. 348 determined that implementation of the ACSP would result in potentially significant traffic impacts to freeway facilities for Existing 2013 Plus Project scenario AM and PM peak hour levels of service. Out of the 11 study locations, only one location is projected to have a worse LOS than the existing condition; however, the off-ramp is under the jurisdiction of...
Caltrans. Therefore, the City of Anaheim cannot guarantee the implementation of this improvement and it may not be feasible. Therefore, impacts would remain significant and unavoidable. The Anaheim City Council adopted a Statement of Overriding Considerations with regard to this potential impact.

MMRP No. 312 MM T-5 requires all projects forecast to generate 100 or more peak-hour trips to prepare a traffic improvement phasing analysis to identify when the improvements identified in the EIR No. 348 Traffic Impact Study shall be designed and constructed (Appendix G of EIR No. 348). Therefore, a Traffic Impact Analysis (TIA) (Appendix I, Traffic Impact Analysis, LSA, October 2017) was prepared for the Proposed Project to identify potential traffic and circulation impacts associated with the Proposed Project and address the timeline for phasing planned circulation improvements. The Proposed Project is expected to generate 2,839 new daily trips, 195 a.m. peak-hour trips (22 inbound and 173 outbound), and 246 p.m. peak-hour trips (175 inbound and 71 outbound). The following describes impacts for the Existing ‘Plus Project’ scenarios as they relate to implementation of the Proposed Project.

Existing 2013 Plus Project

The TIA prepared for the Proposed Project found that all study area intersections are anticipated to operate at an acceptable Level of Service (LOS) (i.e., LOS D or better) in the a.m. and p.m. peak hours with implementation of the Proposed Project (with legal turn movements at the unsignalized intersection of Tustin Avenue/Jefferson Street). The TIA also found that all study area roadway segments would operate at an acceptable LOS (i.e., LOS C or better) for daily traffic volumes, with the exception of Tustin Avenue between La Palma Avenue and SR-91. This roadway segment operates at an LOS D when considering daily traffic volumes in the existing condition and would operate with an LOS E when considering daily traffic volumes in the Existing Plus Project condition. According to the City’s standards, roadway segments that exceed daily traffic thresholds are also analyzed during the peak commute hours. The TIA analyzed the peak-hour link volumes and found that this roadway segment operates with an acceptable LOS during the critical peak hours.

Future (2022) Plus Project

Traffic generated by the Proposed Project was added to the future (2022) traffic volumes at each study area intersection and roadway segment. The TIA determined that all study area intersections are anticipated to operate at an acceptable LOS (i.e., LOS D or better) in the a.m. and p.m. peak hours with implementation of the Proposed Project (with legal turn movements at the unsignalized intersection of Tustin Avenue/Jefferson Street). The TIA also found that all study area roadway segments would operate at an acceptable LOS (i.e., LOS C or better) for daily traffic volumes, with the exception of Tustin Avenue between La Palma Avenue and SR-91. This roadway segment would operate at an LOS E when considering daily traffic volumes under both Future (2022) and Future (2022) Plus Project conditions. However, the TIA analyzed the peak-hour link volumes and found that this roadway segment operates with an acceptable LOS during the critical peak hours.

The TIA analyzed impacts on two Congestion Management Program (CMP) intersections: the eastbound and westbound ramps of Tustin Avenue and SR-91. The Orange County CMP stipulates the requirements for maintaining LOS E at CMP intersections. The TIA found that LOS E or better is anticipated at the CMP intersections.

The TIA considered the operation of each intersection in isolation from all other intersections in the roadway network. The roadway segment of Tustin Avenue between La Palma Avenue and SR-91 is the highest volume roadway in the City and has four signalized intersections within 1,985 feet (0.37 mile). In analyzing each intersection, the TIA found that localized congestion can occur due to interaction between adjacent traffic signals and queueing. Because the Tustin Avenue/Pacificenter Drive intersection is in the middle of this segment, congestion here affects progression along the corridor.

The traffic analysis for the ACSP stated that the buildout of the Specific Plan would have a significant impact at the intersection of Tustin Avenue/Pacificenter Drive and recommended two improvements at that location (i.e., adding a second northbound left-turn lane and a second eastbound right-turn lane). Analysis of this intersection for the Proposed Project in the TIA did not indicate a significant impact on the intersection. However, operational analysis of queuing at this intersection and progression along Tustin Avenue indicated that a second northbound left-turn lane would be beneficial at the time of Project opening.

In order to improve the operation of Tustin Avenue/La Palma Avenue and progression along Tustin Avenue, the TIA recommended two improvements: to provide northbound left turns out of the Site onto La Palma Avenue from Pacificcenter Drive, and to add second northbound left-turn lane and altering signal phasing on Tustin Avenue at Pacificcenter Drive to provide a lagging northbound left-turn phase. The Property Owner/Developer will implement these operational improvements as part of the Proposed Project to improve the flow of vehicles into and around the Project Site.
The TIA found that the Proposed Project would not impact Orange County CMP intersections, would not degrade Caltrans facilities from the baseline conditions, and that existing turn pockets along Pacificenter Drive are sufficient to accommodate anticipated queueing with the Project.

**Hazards to air traffic patterns.** The EIR No. 348 determined that implementation of the ACSP, including the Proposed Project, would not result in hazardous condition to air traffic patterns.

**Hazards due to design feature or conflicting use.** The EIR No. 348 determined that implementation of the ACSP, including the Proposed Project, would not substantially increase hazards due to a design feature (sharp curves, etc.) or conflicting uses. The Proposed Project incorporates a multi-modal Complete Street design into the circulation plan for the Project. Complete Streets are streets that are designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities. Therefore, no significant impacts are anticipated.

**Inadequate emergency access.** The EIR No. 348 determined that implementation of the ACSP would not result in inadequate emergency access. Development would occur incrementally over a 20-year period and each individual development Project, including the Proposed Project, would be required to provide appropriate fire and emergency access, approved by the Anaheim Fire and Rescue (AF&R). All vehicle access within the Project Site would be designed and improved in accordance with the requirements of the City Engineer and Caltrans, including temporary construction related access, prior to the issuance of building permits. Therefore, less than significant impacts to emergency access are anticipated.

**Adopted policies, plans, and programs for alternative transportation.** EIR No. 348 determined that implementation of the ACSP would comply with adopted policies, plans, and programs for alternative transportation, including Orange County Transportation Authority’s (OCTA)’s Congestion Management Plan and the RTP/SCS. The Proposed Project would create a pedestrian-friendly walking environment through a complete sidewalk network and enhance bicycle facilities. Through such complete streets strategies and allowing additional residential units near transit center, the Proposed Project would address regional mobility to reduce vehicle miles traveled (VMT), consistent with RTP/SCS policies.

**Conclusion**

With implementation of applicable mitigation measures from the MMRP No. 312, Project impacts would be less than significant. The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.

**Applicable Mitigation Measures from EIR No. 348/MMRP No. 312**

Modifications to the mitigation measures from MMRP No. 312 are shown as *strike-through* for deleted text and **bold** for new, inserted text. Clarification on Project-specific implementation of a mitigation measure is *underlined*.

**T-4**

Prior to issuance of the first building permit for each building, the property owner/developer shall pay all applicable transportation impact fees to the City of Anaheim in amounts determined by the City Council Resolution in effect at the time of issuance of the building permit with credit given for City-authorized improvements provided by the property owner/developer; and participate in all applicable reimbursement or benefit districts which have been established.

**T-5:**

Prior to issuance of building permits for any Project forecast to generate 100 or more peak hour trips, as determined by the City Traffic and Transportation Manager utilizing Anaheim Traffic Analysis Model Trip Generation Rates, the property owner/developer shall submit to the City Traffic and Transportation Manager traffic improvement phasing analyses to identify when the improvements identified in the Anaheim Canyon Specific Plan EIR Traffic Impact Study, Iteris, September 2014 (Appendix G of the EIR No. 348) shall be designed and constructed.

a) The traffic improvement phasing analyses will specify the timing, funding, construction and fair-share responsibilities for all traffic improvements necessary to maintain satisfactory levels of service within the City of Anaheim and surrounding jurisdictions, as defined by the City’s General Plan, based on thresholds of significance, performance standards and methodologies utilized in EIR No. 348, Orange County Congestion Management Program and established in City of Anaheim Traffic Study Guidelines.

b) The property owner/developer shall construct, bond for or enter into a funding agreement for necessary circulation system improvements, as determined by the City Traffic and Transportation Manager. At minimum, fair-share
calculations shall include intersection improvements, rights-of-way, and construction costs, unless alternative funding sources have been identified to help pay for the improvement.

The Applicant has prepared a Traffic Impact Analysis satisfying the requirement of Mitigation Measure T-5 to submit a traffic improvement phasing analysis. Intersections analyzed in the Anaheim Canyon Specific Plan EIR Traffic Impact Study, Iteris, September 2014 (Appendix G of the EIR No. 348) within the study area for the Proposed Project included: Miller Street/La Palma Avenue (#33), Grove Street/La Palma Avenue (#36), Tustin Avenue/Miraloma Avenue (#39), Tustin Avenue/Jefferson Street (#40), Tustin Avenue/La Palma Avenue (#41), Tustin Avenue/Pacificenter Drive (#42), Tustin Avenue/SR-91 westbound ramps (#43), Tustin Avenue/SR-91 eastbound ramps (#44), and Pacificenter Drive/La Palma Avenue (#46). The Traffic Impact Analysis analyzed these intersections without planned or recommended traffic improvements and determined that the Proposed Project would not result in a significant traffic impact at any of the studied intersections based on thresholds of significance, performance standards and methodologies utilized in EIR No. 348, Orange County Congestion Management Program and established in City of Anaheim Traffic Study Guidelines. Furthermore, the Traffic Impact Analysis determined that the studied intersections would maintain satisfactory levels of service, as defined by the City’s General Plan, in the Proposed Project’s opening year with implementation of the Proposed Project. Therefore, planned and recommended traffic improvements would not need to be constructed prior to construction of the Proposed Project and the Proposed Project does not have a fair-share responsibility for any planned or recommended traffic improvements.

However, the Traffic Impact Analysis recommended operational improvements at the Proposed Project access intersections that will be constructed as part of the Proposed Project. One of these operational improvements is the addition of a second northbound left-turn lane at Tustin Avenue/Pacificenter Drive (#42), which was a traffic improvement recommended by the Anaheim Canyon Specific Plan EIR Traffic Impact Study, Iteris, September 2014 (Appendix G of the EIR No. 348).
**XVII. UTILITIES AND SERVICE SYSTEMS**

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>Impacts analyzed in EIR No. 348</th>
<th>No New Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
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<td>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?</td>
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<td>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?</td>
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<tr>
<td>d) Have sufficient water supplies available to serve the Project (including large-scale developments as defined by Public Resources Code § 21151.9 and described in Question No. 20 of the City’s Environmental Information Form) from existing entitlements and resources, or are new or expanded entitlements needed?</td>
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<tr>
<td>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?</td>
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<tr>
<td>f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?</td>
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<td>g) Comply with Federal, State, and local statutes and regulations related to solid waste?</td>
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<tr>
<td>h) Result in a need for new systems or supplies, or substantial alterations related to electricity?</td>
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<tr>
<td>i) Result in a need for new systems or supplies, or substantial alterations related to natural gas?</td>
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<td>j) Result in a need for new systems or supplies, or substantial alterations related to telephone service?</td>
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<td>k) Result in a need for new systems or supplies, or substantial alterations related to television service/reception?</td>
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Narrative Summary: Impacts analyzed in EIR No. 348/No new impacts. SEIR No. 348 analyzed the impacts to utilities and service systems related to the implementation of the ACSP. Refer to EIR No. 348, Section 5.15. EIR No. 348 concluded that all impacts would be less than significant, with no mitigation measures required, with the exception of impacts on existing sewer facilities (Issue B). However, with implementation of mitigation measures, impacts to sewer facilities would be reduced to less than significant.

EIR No. 348 analyzed the following: potential for implementation of the ACSP to exceed wastewater treatment requirements; need for construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; and/or result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the ACSP’s projected demand in addition to the provider's existing commitments. EIR No. 348 concluded that implementation of the ACSP would not result in exceedance of the treatment capacity at Orange County Sanitation treatment plant, requiring construction of new or expanded wastewater treatment facilities. However, some of the City’s existing sewer collection facilities are projected to be inadequate to handle the projected increase in flow from implementation of the ACSP. As required by MM USS-1, individual projects require Project-specific analysis during final design to evaluate sewer capacities. The Sewer Study prepared for the Proposed Project (Appendix J, Sewer Study, Psomas, February 6, 2018) determined that the existing condition plus the Proposed Project produced no deficiencies in the downstream sewer collection system. The Sewer Study determined that future condition plus the Proposed Project would create deficiencies in the downstream La Palma Avenue sewer as well as a few in Kraemer Boulevard. However, all of the deficiencies are already present in the buildout of the ACSP Sewer Study, and the Proposed Project would not create any additional downstream sewer deficiencies that were not already identified in the Buildout Condition in the ACSP Sewer Study. As the project, by itself, would not contribute to sewer deficiencies when added to existing flows in the downstream collection system, no additional sewer system improvements would be required for the Proposed Project. However, while the impact of the Proposed Project does not result in an offsite sewer improvement, sewer impact fees would be assessed for the incremental impact of the additional flow contributed from the Proposed Project to cover the Project’s fair share of Buildout Condition sewer improvements.

For regional impacts to Orange County Sanitation District (OCSD) facilities, the Proposed Project would pay capital Facilities fee charges to the OCSD. Costs for installing and upgrading City of Anaheim sewers are paid from sewer service fees, and onsite improvements would be implemented incrementally. Thus, payment of OCSD and City sewer fees would reduce cumulative impacts to sewers to a less than significant level.

MM USS-2 requires that prior to approval of sanitary sewer connections, the Applicant shall install the sanitary sewer facilities, as required by the City Engineer, to prevent the sewer surcharge in the public system from back-flowing into below-grade structures of the Proposed Project based upon the latest updated sewer study for the ACSP. As determined by the Sewer Study, no additional sewer system improvements would be required for the Proposed Project. Sewer facilities are included as part of the Proposed Project as shown Figure 12a and 12b, Conceptual Utility Plan.

MM USS-3 requires that prior to the approval of any street improvement plans that encompass area(s) where OCSD would be upsizing trunk lines and/or are making other improvements, the Applicant shall coordinate with OCSD to ensure that backflow prevention devices are installed at the lateral connections to prevent surcharge flow from entering private properties. As determined by the Sewer Study, no additional sewer system improvements would be required for the Proposed Project, and therefore, this mitigation measure would not apply to the Proposed Project.

With the implementation of mitigation measures identified in the EIR No. 348, impacts associated with sewer capacity would be less than significant.

EIR No. 348 determined that adequate water facilities are provided within the ACSP area and that the ACSP area would be served by sufficient water supplies without procurement of additional water entitlements. The Water Supply Assessment for the ACSP evaluated the additional water demands based on buildout of the ACSP, and determined that a sufficient and reliable water supply for the ACSP Project would be provided. As the Proposed Project represents approximately 16 percent of the residential buildout of the ACSP and less than one percent of the non-residential buildout, the Proposed Project is within the maximum amount of development analyzed in EIR No. 348, and therefore, would also be served by sufficient water supplies.

EIR No. 348 determined that existing solid waste facilities would be able to accommodate ACSP-generated solid waste and comply with related solid waste regulations. The Proposed Project is within the maximum amount of development analyzed in EIR No. 348, and therefore, would also be accommodated by existing solid waste facilities.

EIR No. 348 also determined that the ACSP area, including the Proposed Project, would be served by adequate gas and electrical service.
With implementation of MMs USS-1, USS-2, and USS-3, the Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.

**Applicable Mitigation Measures from EIR No. 348/MMRP No. 312**

**USS-1:**

Prior to issuance of demolition, grading, or building permits, whichever occurs first, the property owner/developer shall submit plans to the City Engineer for review. The City Engineer shall review the location of each project to determine if it is an area served by potentially deficient sewer facilities, as identified in the latest updated sewer study for the ACSP. If the project will increase sewer flows beyond those programmed in the appropriate master plan sewer study for the area or if the project currently discharges to an existing deficient sewer system or will create a deficiency in an existing sewer line, the property owner/developer shall perform additional sewer analysis using flow, wet-weather data, and other information specific for the project to determine the surcharge levels for final design. The property owner/developer shall be required to guarantee mitigation of the impact to adequately serve the area to the satisfaction of the City Engineer and City Attorney’s Office, which could include additional related fees, construction, or a combination thereof.

The Applicant has satisfied MM USS-1 with the completion of the Sewer Study, Appendix J, Psomas, February 6, 2018. The Sewer Study concluded that Proposed Project would not create any additional downstream sewer deficiencies that were not already identified in the Buildout Condition in the ACSP Sewer Study.

**USS-2:**

Prior to approval of sanitary sewer connections for each development Project, the property owner/developer shall be required to install the sanitary sewer facilities, as required by the City Engineer, to prevent the sewer surcharge in the public system from back-flowing into below-grade structures of the proposed development based upon the latest updated sewer study for the ACSP. Where requested by the City Engineer, sewer improvements shall be constructed with larger than recommended diameter to maintain the surcharge levels within the pipe, and the invert elevation of sewer laterals shall be located above the hydraulic grade line elevation of the surcharge levels when the invert elevation of sewer laterals are above the pipe crown.

The Applicant has satisfied MM USS-2. As determined by the Sewer Study, no additional sewer system improvements would be required for the Proposed Project.

**USS-3:**

Prior to the approval of any street improvement plans within the ACSP that encompass area(s) where Orange County Sanitation District (OCSD) would be upsizing trunk lines and/or are making other improvements, the property owner/developer shall coordinate with OCSD to ensure that backflow prevention devices are installed at the lateral connections to prevent surcharge flow from entering private properties. Proof of such coordination, such as a letter from OCSD affirming review of proposed plans, shall be provided by the property owner/developer to the City prior to approval of the street improvement plans.

The Applicant has satisfied MM USS-3. As determined by the Sewer Study, no additional sewer system improvements would be required for the Proposed Project.
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### XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

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<tr>
<th>Environmental Issues</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>Impacts analyzed in EIR No. 348</th>
<th>No New 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>
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<td>b) Does the project have Impacts that are individually limited, but cumulatively considerable? (&quot;Cumulatively considerable&quot; 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>
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<td>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</td>
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</table>

**Narrative Summary:** Impacts analyzed in EIR No. 348/No new impacts. EIR No. 348 analyzed the Project’s impacts related to the implementation of the ACSP.

The Proposed Project would not result in any impacts beyond those identified in the previously certified EIR No. 348. Impacts are addressed by mitigation measures set forth in MMRP No. 312, and applicable mitigation measures are included in this Initial Study. For impacts that remain significant, unavoidable and adverse after mitigation measures are applied, the Anaheim City Council has adopted a Statement of Overriding Considerations with regard to these potential impacts. The Proposed Project contains no substantial changes to the implementation of the ACSP, there have been no substantial changes in circumstances, and no new information has become available, which was not known and could not have been known, at the time that EIR No. 348 was certified, that would require major revisions to EIR No. 348.
References

LSA. Traffic Impact Analysis: Link OC. October 2017
The Planning Center | DC&E. Phase 0 Site Assessment. January 2014.