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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Savanna Townhomes.

PROJECT ADDRESS: 3534-3538 Savanna Street.

APPLICANT: Mr. Chris Segesman, Bonanni Development. 5500 Bolsa Avenue, Suite 120, Huntington Beach, California 92649.

CITY AND COUNTY: Anaheim, Orange County.

DESCRIPTION: The City of Anaheim Planning and Building Department, in its capacity as the Lead Agency, is reviewing a request by Bonanni Development to subdivide an existing 33,841 square-foot (0.78-acre) site located at 3534-3538 Savanna Street. The subdivision will allow for the construction of 19 three-story townhome units totaling 24,204 square feet of building floor area. A total of 5,931 square feet of common open space and 10,584 square feet of landscaping (31%) will be provided. The project will provide 45 total parking spaces. Each unit will be equipped with a two-car garage for a total of 38 enclosed parking spaces. Seven additional parking spaces will be reserved for guests. Access to the site will be provided by a 24-foot wide driveway located along the south side of Savanna Street.

FINDINGS: The environmental analysis provided in the attached Initial Study indicates that the proposed project will not result in any potentially significant environmental impacts. For this reason, the City of Anaheim determined that a Mitigated Negative Declaration is the appropriate CEQA document for the proposed project. The following findings may also be made based on the analysis contained in the attached Initial Study:

- The proposed project will not have the potential to degrade the quality of the environment.

- The proposed project will not have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.

- The proposed project will not have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the City.

- The proposed project will not have environmental effects that will adversely affect humans, either directly or indirectly.

____________________________________  __________________________
Nicholas Taylor, Associate Planner       Date
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<td>5.2 References</td>
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Appendix: Provided under a separate cover
SECTION 1 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

The City of Anaheim Planning and Building Department, in its capacity as the Lead Agency, is reviewing a request by Bonanni Development to subdivide an existing 33,841 square-foot (0.78-acre) site located at 3534-3538 Savanna Street. This project site currently consists of two parcels (APNs: 134-252-16 and 134-252-17). The subdivision will allow for the construction of 19 three-story townhome units totaling 24,204 square feet of building floor area. A total of 5,931 square feet of common open space and 10,584 square feet (31%) of landscaping will be provided. The project will provide a total of 45 parking spaces. Each unit will include a garage that will contain two enclosed spaces. Guest parking will consist of seven parking spaces. Access to the site will be provided by a 24-foot wide driveway located along the south side of Savanna Street. The project Applicant is Mr. Chris Segesman, Bonanni Development, 5500 Bolsa Avenue, Suite 120, Huntington Beach, California 92649.

The City of Anaheim is the designated Lead Agency for the proposed project and will be responsible for the project’s environmental review. The construction of the proposed project will require the approval of a Tentative Tract Map (TTM No. 18152), a General Plan Amendment (GPA), a Zoning Reclassification (RCL), and Conditional Use Permit (CUP). The aforementioned discretionary actions, together with the proposed development, are considered to be a project pursuant to the California Environmental Quality Act (CEQA). As part of the proposed project’s environmental review, the City of Anaheim authorized the preparation of this Initial Study. Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and analysis of the City of Anaheim, in its capacity as the Lead Agency. The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental impacts of the proposed project and that decision-makers have considered such impacts before making a decision on the project. Pursuant to the CEQA Guidelines, purposes of this Initial Study include the following:

- To provide the City information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration;

- To facilitate the project’s environmental assessment early in the design and development of the project;

- To eliminate unnecessary EIRs;

- To determine the nature and extent of any impacts associated with the proposed project; and,

- To enable modification of the project to mitigate adverse impacts of the project.

---


4 California, State of. California Environmental Quality Act (CEQA) Guidelines § 15050. As Amended.
Based on the results of this Initial Study, the City has determined, that a Mitigated Negative Declaration is the appropriate environmental document for the project's environmental review pursuant to CEQA. This Initial Study and the Notice of Intent to Adopt a Mitigated Negative Declaration will be forwarded to responsible agencies, trustee agencies, and the public for review and comment.

1.2 INITIAL STUDY’S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- **Section 1 Introduction**, provides the procedural context surrounding this Initial Study's preparation and insight into its composition.

- **Section 2 Project Description**, provides an overview of the existing environment as it relates to the project area and describes the proposed project’s physical and operational characteristics.

- **Section 3 Environmental Analysis**, includes an analysis of potential impacts associated with the proposed project’s construction and the subsequent operation.

- **Section 4 Findings**, indicates the conclusions of the environmental analysis and the Mandatory Findings of Significance. In addition, this section also includes the Mitigation Monitoring and Reporting Program (MMRP).

- **Section 5 References**, identifies the sources used in the preparation of this Initial Study.
2.1 PROJECT OVERVIEW

The City of Anaheim Planning and Building Department, in its capacity as the Lead Agency, is reviewing a request by Bonanni Development to subdivide an existing 33,841 square-foot (0.78-acre) site located at 3534-3538 Savanna Street. This project site currently consists of two parcels (APNs: 134-252-16 and 134-252-17) and is occupied by two older single-family units. The subdivision will allow for the construction of 19 three-story townhome units totaling 24,204 square feet (71.5% of the site) of building floor area. A total of 5,931 (17.5% of the site) square feet of common open space and 10,584 square feet (31% of the site) of landscaping will be provided. The project will provide a total of 45 parking spaces that will include 38 enclosed spaces (two spaces in each garage) and seven guest parking spaces. Access to the site will be provided by a 24-foot wide driveway that will connect with the south side of Savanna Street. The project is described in greater detail in Section 2.4.

2.2 PROJECT LOCATION

The project site is located in the southwestern portion of the City of Anaheim. The City of Anaheim is located approximately 21 miles southeast of downtown Los Angeles and 6.3 miles northwest of Santa Ana. Anaheim is bounded by the cities of Buena Park, Fullerton, Placentia, and Yorba Linda to the north; the cities of Orange, Garden Grove, Stanton, Cypress, and unincorporated Orange County to the south; the Santa Ana Mountains to the east; and the City of Buena Park to the west. Major physiographic features in the area include the Puente-Chino Hills, located approximately two miles to the north of the City, and the Santa Ana Mountains, which extend along the City’s eastern boundary. Regional access to the City is provided by the Riverside Freeway (SR-91), the Orange Freeway (SR-57), the Santa Ana Freeway (I-5), and the Costa Mesa Freeway (SR-55).

The project site is located along the south side of Savanna Street. The site's legal addresses are 3534-3538 Savanna Street. Major streets located in the vicinity of the project site include Knott Avenue, located 534 feet to the east; Ball Road, located 1,000 feet to the south; Orange Avenue, located 0.32 mile to the north; and Valley View Street, located 0.86 mile to the west of the site. The location of the City of Anaheim in a regional context is shown in Exhibit 2-1. An area wide map is shown in Exhibit 2-2. Finally, a vicinity map is shown in Exhibit 2-3.

---

6 Quantum GIS. Southern California Cities Shapefile.
7 Google Earth. Site accessed on April 18, 2018
EXHIBIT 2-3
VICINITY MAP
SOURCE: QUANTUM GIS
2.3 ENVIRONMENTAL SETTING

The project area is located in the midst of a residential neighborhood located in the southwestern portion of the City. The following land uses and development are located near the project site:

- **North of the project site.** Savanna Street extends along the north side of the project site. Apartment complexes and other high density residential development occupy the frontage along the north side of Savanna Street.

- **South of the project site.** Apartments are located adjacent to the project site to the south. Single-family residential units are located southwest of the project site along Marian Way.

- **East of the project site.** Townhouses are located adjacent to the project site to the east. Knott Avenue is located 534 feet further east of the site.

- **West of the project site.** Apartments are located west of the project site. Marian Way is located 190 feet further west of the site.8

The site is currently occupied by two single-family units. An aerial photograph is provided in Exhibit 2-4.

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS

The proposed project involves the construction of 19 new, three-story townhome units within a 0.78-acre (33,841 square feet) site. The project’s implementation will require the demolition of the existing structural improvements that occupy the site. These two units total approximately 4,000 square feet. The project elements are described below:

- **Project Site.** The 0.78-acre project site currently consists of two parcels (APNs: 134-252-16 and 134-252-17). The project site has a maximum lot depth (north to south) of 213 feet and a maximum lot width (east to west) of 158 feet. The proposed project will have a density of 24.35 dwelling units per acre (du/acre) and a lot coverage of 35 percent. The project’s overall lot coverage was calculated by taking the total building footprint (11,821 square feet) and dividing that number by the project site’s total land area. The site’s southern, eastern, and western boundaries will be enclosed by a new six-foot high concrete block wall.9

- **Townhome Units.** The project will include the construction of 19 three-story townhome units with a total floor area of 24,204 square feet. These 19 townhome units will be distributed through five separate buildings (referred to herein as Buildings A-E).

---

8 Blodgett Baylosis Environmental Planning. Site Survey. The site visit was conducted on April 5, 2018.

9 Google Earth. Site accessed on April 18, 2018.

EXHIBIT 2-4
AERIAL PHOTOGRAPH
SOURCE: GOOGLE EARTH
Building A will consist of five units; Building B will total six units; Building C will contain two units; Building D will consist of three units; and Building E will total three units. The townhome units will have a maximum height of 36 feet and 7 inches. A total of two floor plan options will be offered: Plan 1A and Plan 1B. Of the total number of units that will be provided, 14 will consist of Plan 1A units and five will consist of Plan 2B units. Each floor plan will feature two bedrooms, though Plan 1A units will have a total floor area of 1,276 square feet while Plan 1B units will have a floor area of 1,268 square feet. These units will be equipped with double-paned windows, central air conditioning, and solid core doors.11

- **Open Space and Landscaping.** A total of 5,931 square feet of common open space will be provided. Various amenities, such as a barbeque area and a tot lot, will be provided. In addition, approximately 10,584 square feet of landscaping will be installed translating into approximately 31 percent of the total site area.12

- **Parking and Access.** A total of 45 parking spaces will be provided. Each unit will include a two-car garage for a total of 38 enclosed parking spaces. In addition, a total of seven guest parking spaces will be provided. Access to the project site will be provided by a 24-foot wide driveway located on the south side of Savanna Street. An internal drive aisle ranging in width from 20 to 30 feet will facilitate internal circulation.13

The proposed project is summarized in Table 2-1, which is shown below. The proposed site plan is provided in Exhibit 2-5 and the building elevations are provided in Exhibits 2-6 through 2-10.

<table>
<thead>
<tr>
<th>Project Element</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Area</td>
<td>33,841 sq. ft. (0.78 acres)</td>
</tr>
<tr>
<td>Total Number of Units</td>
<td>19</td>
</tr>
<tr>
<td>Total Building Floor Area</td>
<td>24,204 sq. ft.</td>
</tr>
<tr>
<td>Maximum Building Height</td>
<td>36 ft. and 7 in.; three stories maximum</td>
</tr>
<tr>
<td>Project Density</td>
<td>24.35 du/acre</td>
</tr>
<tr>
<td>Lot Coverage</td>
<td>35 percent</td>
</tr>
<tr>
<td>Number of Floor Plan 1A Units</td>
<td>15</td>
</tr>
<tr>
<td>Number of Floor Plan 1B Units</td>
<td>4</td>
</tr>
<tr>
<td>Floor Plan 1A Floor Area</td>
<td>1,276 sq. ft.</td>
</tr>
<tr>
<td>Floor Plan 1B Floor Area</td>
<td>1,268 sq. ft.</td>
</tr>
<tr>
<td>Common Open Space</td>
<td>5,931 sq. ft.</td>
</tr>
<tr>
<td>Landscaping</td>
<td>10,584 sq. ft. (31.2% of site)</td>
</tr>
<tr>
<td>Parking</td>
<td>45 parking spaces: 38 garage spaces and 7 guest spaces</td>
</tr>
</tbody>
</table>


---


12 Ibid.

13 Ibid.
EXHIBIT 2-5
CONCEPTUAL SITE PLAN
SOURCE: BEGOVICH ARCHITECTS
EXHIBIT 2-6
CONCEPTUAL ELEVATIONS
SOURCE: BEGOVICH ARCHITECTS
EXHIBIT 2-7
CONCEPTUAL ELEVATIONS
SOURCE: BEGOVICH ARCHITECTS
EXHIBIT 2-8
CONCEPTUAL ELEVATIONS
SOURCE: BEGOVICH ARCHITECTS
EXHIBIT 2-9
CONCEPTUAL ELEVATIONS
SOURCE: BEGOVICH ARCHITECTS
EXHIBIT 2-10
CONCEPTUAL ELEVATIONS
SOURCE: BEGOVICH ARCHITECTS
2.4.2 CONSTRUCTION CHARACTERISTICS

The construction of the phase for the proposed project would take approximately 11 months to complete. The key construction phases are outlined below:

- **Demolition.** The existing on-site improvements and buildings will be demolished and removed during this phase. This phase will take one month to complete.

- **Site Preparation.** The project site will be readied for the construction of the proposed project. This phase will take approximately one month to complete and will involve the removal of trees, pavement, a clearing/grubbing of the site.

- **Grading.** The project site will be graded and trenched during this phase. This phase will take one month to complete. The site will be over excavated approximately three feet and these soils will be re-compacted.

- **Construction.** The 19 townhome units will erected during this phase. This phase will take approximately five months to complete.

- **Paving.** This phase will involve the paving of the site. This phase will take approximately one month to complete.

- **Landscaping and Finishing.** This phase will involve the planting of landscaping and the completion of the on-site improvements. This phase will take approximately two months to complete.

2.5 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Anaheim) that calls for an exercise of judgment in deciding whether to approve a project. The proposed project will require the approval of the following discretionary actions:

- The approval of a General Plan Amendment (GPA) to change the site’s land use designation from Low-Medium Density to Mid Density;

- The approval of a Zoning Reclassification from RM-4 (Multiple-Family Residential) to RM-3.5 (Multiple-Family Residential);

- The approval of a Tentative Tract Map (TTM No. 18152) for a one lot subdivision for 19 units;

- The approval of a Conditional Use Permit (CUP) to allow residential development within the RM-3.5 Zone. The CUP will also allow for a modification of the required interior, side, and building to building setback standards;
The approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).
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CASE NO.: Development Project No. 2017-00094.

SITE ADDRESS: 3534-3538 Savanna Street.

PROJECT NAME: Savanna Townhomes.

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

CONTACT PERSON AND PHONE NUMBER: Nicholas Taylor, Associate Planner. Email: NJTaylor@anaheim.net. Phone: (714) 765-4323.

PROJECT LOCATION:

PROJECT SPONSOR’S NAME AND ADDRESS: The project Applicant is Mr. Chris Segesman, Bonanni Development, 5500 Bolsa Avenue, Suite 120, Huntington Beach, California 92649.

GENERAL PLAN DESIGNATION: The project site’s General Plan land use designation is Low-Medium Density.
ZONING: The project site is zoned RM-4 (*Multiple-family residential*).

**PROJECT DESCRIPTION:** The City of Anaheim Planning and Building Department, in its capacity as the Lead Agency, is reviewing a request by Bonanni Development to subdivide an existing 33,841 square-foot (0.78-acre) site located at 3534-3538 Savanna Street. This project site currently consists of two parcels (APNs: 134-252-16 and 134-252-17). The subdivision will allow for the construction of 19 three-story townhome units totaling 24,204 square feet of building floor area. A total of 5,931 square feet of common open space and 10,584 square feet (31%) of landscaping will be provided. The project will provide a total of 45 parking spaces. Each unit will include a garage that will contain two enclosed spaces. Guest parking will consist of seven parking spaces. Access to the site will be provided by a 24-foot wide driveway located along the south side of Savanna Street.

**PROJECT SETTING AND SURROUNDING LAND USES:** The project area is located in the midst of a residential neighborhood located in the southwestern portion of the City. The following land uses and development are located near the project site:

- **North of the project site.** Savanna Street extends along the north side of the project site. Apartment complexes and other high density residential development occupy the frontage along the north side of Savanna Street.

- **South of the project site.** Apartments are located adjacent to the project site to the south. Single-family residential units are located southwest of the project site along Marian Way.

- **East of the project site.** Townhouses are located adjacent to the project site to the east. Knott Avenue is located 534 feet further east of the site.

- **West of the project site.** Apartments are located west of the project site. Marian Way is located 190 feet further west of the site.

The site is currently occupied by two single-family units totaling approximately 4,000 square feet.

**OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED:**

The project would require various ministerial approvals such as building permits, grading permits, occupancy permits, and a permit to connect to the City’s water and sewer lines. The project would also be required to submit a Notice of Intent to comply with the General Construction Activity NPDES Permit to the State Water Resources Control Board.

---

14 Blodgett Baylosis Environmental Planning. *Site Survey.* The site visit was conducted on April 5, 2018.

15 Google Earth. Site accessed on April 18, 2018.
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

____________________________________ _________________
Signature of City of Anaheim Representative  Date

____________________________________                         _________________
Printed Name/Title                              Phone No.
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 EIR is required.

   B). Potentially Significant Unless Mitigation Incorporated applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact”. The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.

   C). Less Than Significant Impact applies where the project creates no significant impacts, only Less Than Significant impacts.

   D). No Impact applies where a project does not create an impact in that category. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one proposed (e.g., the project falls outside of a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

4) Earlier analyses may be used where, pursuant to a tiering, program EIR, Master EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15062(c)(3)(D)). In this case, a brief discussion should identify the following:

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

   b) Impacts Adequately Addressed. Identify which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
c) **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated”, describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

6) The explanation of each issue should identify:

a) The significance criteria or threshold, if any, used to evaluate each question; and,

b) The mitigation measure identified, if any, to reduce the impact to less than significant.
3.1 AESTHETICS

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1.A.</td>
<td>Have a substantial adverse effect on a scenic vista?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.1.B.</td>
<td>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>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.1.C.</td>
<td>Substantially degrade the existing visual character or quality of the site and its surroundings?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.1.D.</td>
<td>Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

3.1.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

**No Impact.** The project’s implementation will not result in a loss of scenic views. Major physiographic features in the area include the Puente-Chino Hills, located approximately two miles to the north of the City, and the Santa Ana Mountains, which extend along the City’s eastern boundary. There are no available views of the Puente-Chino Hills or the Santa Ana Mountains available from the project site, Savanna Street, or Marian Way. Views of these scenic vistas are restricted since the existing streetscape and development obstructs the line-of-sight between the project site, Savanna Street, Marian Way, and the aforementioned mountains. The field survey that was conducted as part of this Initial Study confirmed the absence of views of the Puente-Chino Hills and the Santa Ana Mountains from the project area. Since the project’s implementation will not result in any loss of scenic vistas, no impacts will occur. Therefore, no mitigation measures are required.

B. Would the project 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?

**No Impact.** According to the California Department of Transportation (Caltrans), the closest scenic highway is a four-mile segment of SR-91 from SR-55 to just east of the City of Anaheim’s corporate boundaries. The project site is located approximately 11 miles southwest of the scenic portion of SR-91. The project site is not located within the City’s Scenic Corridor Overlay Zone and will not be subject to the development standards outlined for new development proposed within the area.

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18 Google Earth. Site accessed on April 19, 2018.
Furthermore, the project’s construction will be restricted to the designated project site. As a result, no impacts to trees, rock outcroppings, and/or historic buildings located along the designated portion of SR-91 will occur and no mitigation is required.

C. Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

No Impact. The project site is underutilized and is presently occupied by older single-family units. The site’s General Plan land use designation is Low-Medium Density. This land use designation 0.78-acre site can support up to 14 dwelling units (based on a ratio of 18 du/0.78 acres). The first single-family unit is a Craftsman style home while the second is a typical California Bungalow. Neither of these two units are of historic value (refer to Section 3.5). Both residential units are in a poor state of repair and the site’s parkway along the Savanna Street frontage is also poorly maintained.

Once complete, the 19 townhome units will improve the visual appearance of the site and the surrounding areas by introducing newer architecture, articulated facades, neutral exterior colors, and drought tolerant landscaping. The project’s density of 24.35 du/acre is below the maximum permitted density of 28 du/acre allowed within the RM-4 zone. In addition, the project will have a lot coverage of 35 percent, which is less than the 55 percent allowed under the underlying zone. The project’s overall lot coverage was calculated by taking the total building footprint (11,821 square feet) and dividing that number by the project site’s total land area. Thus, the project’s size and density will be consistent with the requirements established for the RM-4 zone. Furthermore, the proposed project will be consistent with the size and massing of the surrounding land uses. The project site is located within a multiple-family residential neighborhood. The surrounding multiple-family units generally consist of two stories and have various heights ranging from 17 feet to 31 feet. Since the project’s implementation will improve the visual character and quality of the area, no impacts will result and no mitigation is required.

D. Would the project create a new source of substantial light or glare that would adversely affect day- or night-time views in the area?

Less than Significant Impact. Exterior lighting can be a nuisance to adjacent land uses that are sensitive to this lighting. This nuisance lighting is referred to as light trespass which is typically defined as the presence of unwanted light on properties located adjacent to the source of lighting. There are light sensitive residential uses located north, south, east, and west of the project site. Future sources of light emanating from the project site include vehicular headlights, interior lighting, and exterior lighting including street lamps and wall packs. The proposed project will be required to adhere to Section 18.42.090.030 of the City’s municipal code, which states the following:

● Lighting of Parking Areas Adjoining Residential Premises. Any lights provided to illuminate such parking areas shall be so arranged and directed as to reflect the light away from adjoining residential premises and shall not exceed a height of 12 feet. The City may require adjustments to the light fixture shielding at the time of final inspection to satisfy this requirement.

The proposed project, like all new developments in the City, would be subject to the aforementioned regulations. Glare is related to light trespass and is defined as visual discomfort resulting from high contrast in brightness levels. Glare-related impacts can adversely affect day or nighttime views. As with lighting trespass, glare is of most concern if it would adversely affect sensitive land use or driver’s vision. The exterior façade surfaces will consist of non-reflective materials, such as stucco. However, the individual units will be equipped with energy efficient windows. The energy-efficient window and glazing systems that will be used for the project will dramatically reduce energy consumption because of lower heat loss, less air leakage, and warmer window surfaces. These windows feature double or triple glazing and specialized transparent coatings that will reduce or eliminate reflective glare. As a result, no significant glare-related impacts are anticipated.

Nighttime glare and illumination has the potential to result in potentially significant impacts to sensitive receptors. The project site is located along a residential street and is located in close proximity to light sensitive uses. Many sources of light contribute to the ambient nighttime lighting conditions. These sources of nighttime light include street lights, security lighting, wall packs, vehicular headlights, and interior lighting. The proposed project will not introduce nighttime lighting that could potentially impact nearby sensitive receptors. As indicated previously, the closest sensitive receptors are the residential units abutting the property to the east, west, and south. These residential units will not be exposed to spillover lighting during the evening hours because the project will be in compliance with Section 18.42.090.030 of the City’s Municipal Code. As a result, the project’s potential impacts would be less than significant and no mitigation is required.

3.1.2 Cumulative Impacts

Typically, aesthetic impacts are site-specific. As indicated in the previous sections, the proposed project will not restrict scenic views along the adjacent roadways, damage or interfere with any scenic resources or highways, degrade the visual character of the project sites and surrounding areas, or result in significant light and glare impacts; therefore, no cumulative impacts will occur as part of the proposed project’s implementation and no mitigation is required of the proposed project.
### 3.2 Agriculture & Forestry Resources

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.2.A</td>
<td>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>X</td>
</tr>
<tr>
<td>3.2.B</td>
<td>Conflict with existing zoning for agricultural use, or a Williamson Act Contract?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.2.C</td>
<td>Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.2.D</td>
<td>Result in the loss of forest land or conversion of forest land to non-forest use?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.2.E</td>
<td>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>X</td>
</tr>
</tbody>
</table>

### 3.2.1 Analysis of Environmental Impacts

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

**No Impact.** According to the California Department of Conservation, the project site does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is located within a largely developed area of the City and there are no areas in close proximity to the project site that are classified as “Prime Farmland.” The project site is occupied by two single-family homes. In addition, the project site is located in the midst of a residential neighborhood. Since the implementation of the proposed project will not involve the conversion of prime farmland, unique farmland, or farmland of statewide importance to urban uses, no impacts will occur and no mitigation is required.

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B. Would the project conflict with existing zoning for agricultural use or a Williamson Act Contract?

No Impact. The project site is currently zoned as RM-4 (Multiple-family Residential).21 As indicated in the City’s Zoning Code, agricultural uses consisting of the growing of field crops, trees, vegetables, fruits, berries, and nursery stock are permitted within the RM-4 zone. However, the raising of animals for commercial purposes is not permitted within the RM-4 zone.22 The project’s implementation will require a Zoning Reclassification from RM-4 to RM-3.5 for consistency with the proposed General Plan designation of Mid Density Residential. The site is presently occupied by two single-family units and there are no ongoing agricultural activities located within either property. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.23 Thus, no impacts on existing Williamson Act Contracts or land zoned for agricultural use will result from the proposed project’s implementation and no mitigation is required.

C. Would the project conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code section §12220(g)), timberland (as defined by Public Resources Code section §4526), or timberland zoned Timberland Production (as defined by Government Code section §51104(g))?  

No Impact. The western portion of the City of Anaheim and the project site are located in the midst of an urban area and no forest lands are located within the City. However, the eastern portion of the City is located adjacent to Chino Hills State Park as well as the Cleveland National Forest. The project’s construction will be restricted to the designated project site and will not extend into or otherwise affect the Chino Hills State Park or the Cleveland National Forest. Moreover, the project site is currently occupied by two single-family units and no timberland resources are located on-site. Therefore, no impacts on forest land or timber resources will result and no mitigation is required.

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

No Impact. No forest lands are located within the vicinity of the project site, which is in the western portion of the City. The eastern portion of the City is located adjacent to Chino Hills State Park and the Cleveland National Forest. The project’s construction will be restricted to the project site and will not extend into or otherwise affect the Chino Hills State Park or the Cleveland National Forest. As a result, no loss or conversion of forest lands will result from the proposed project’s implementation and no impacts will occur and no mitigation is required.

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21 City of Anaheim Zoning Map. Site accessed on April 19, 2018
E. Would the project involve other changes in the existing environment that, due to their location or nature, may result in conversion of Farmland to non-agricultural use or the conversion of forest land to a non-forest use?

No Impact. The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to non-agricultural use or conversion of forest land to non-forest use because the project site is not located in close proximity to forest land or farmland. As a result, no impacts will result from the implementation of the proposed project and no mitigation is required.

3.2.2 Cumulative Impacts

Typically, agriculture and forestry impacts are site-specific. The analysis determined that there are no agricultural or forestry resources in the project area and that the implementation of the proposed project would not result in any impacts on these resources. As a result, no cumulative impacts on agriculture or forestry resources will occur and no mitigation is required of the proposed project.
## 3.3 Air Quality

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3.A.</td>
<td>Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.3.B.</td>
<td>Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.3.C.</td>
<td>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>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.3.D.</td>
<td>Expose sensitive receptors to substantial pollutant concentrations?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.3.E.</td>
<td>Create objectionable odors affecting a substantial number of people?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 3.3.1 Analysis of Environmental Impacts

The South Coast Air Quality Management District (SCAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the following criteria pollutants:

- **Ozone** ($O_3$) is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).

- **Carbon monoxide** (CO) is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust.

- **Nitrogen oxides** (NOx) are a yellowish-brown gas, which at high levels can cause breathing difficulties. NOx is formed when nitric oxide (a pollutant from internal combustion processes) combines with oxygen.

- **Sulfur dioxide** ($SO_2$) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms and difficulty in breathing for children.

- **PM$_{10}$ and PM$_{2.5}$** refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation.
Projects in the South Coast Air Basin (SCAB) generating construction-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA:

- 75 pounds per day of reactive organic compounds;
- 100 pounds per day of nitrogen oxides;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM$_{10}$;
- 55 pounds per day of PM$_{2.5}$; or,
- 150 pounds per day of sulfur oxides.

A project would have a significant effect on air quality if any of the following operational emissions thresholds for criteria pollutants are exceeded:

- 55 pounds per day of reactive organic compounds;
- 55 pounds per day of nitrogen oxides;
- 550 pounds per day of carbon monoxide;
- 150 pounds per day of PM$_{10}$;
- 55 pounds per day of PM$_{2.5}$; or,
- 150 pounds per day of sulfur oxides.

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

Less than Significant Impact. The City of Anaheim is located within the South Coast Air Basin (SCAB), which includes a 6,600 square-mile area within Orange County and the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. Air quality in the SCAB is monitored by the South Coast Air Quality Management District (SCAQMD) at various monitoring stations located throughout the area.\(^\text{24}\) Measures to improve regional air quality are outlined in the SCAQMD’s Air Quality Management Plan (AQMP).\(^\text{25}\) The most recent 2016 AQMP was adopted in 2017 and was jointly prepared with the California Air Resources Board (CARB) and the Southern California Association of Governments (SCAG).\(^\text{26}\) The AQMP will help the SCAQMD maintain focus on the air quality impacts of major projects associated with goods movement, land use, energy efficiency, and other key areas of growth. Key elements of the 2016 AQMP include enhancements to existing programs to meet the 24-hour PM$_{2.5}$ Federal health standard and a proposed plan of action to reduce ground-level ozone. The primary criteria pollutants that remain non-attainment in the local area include PM$_{2.5}$ and Ozone. Specific criteria for determining a project’s conformity with the AQMP is defined in Section 12.3 of the SCAQMD’s CEQA Air Quality Handbook. The Air Quality Handbook refers to the following criteria as a means to determine a project’s conformity with the AQMP:\(^\text{27}\)

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\(^{24}\) South Coast Air Quality Management District, Final 2016 Air Quality Plan, Adopted March 10, 2017.

\(^{25}\) Ibid

\(^{26}\) Ibid.

\(^{27}\) South Coast Air Quality Management District. CEQA Air Quality Handbook. April 1993.
• **Consistency Criteria 1** refers to a proposed project’s potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation.

• **Consistency Criteria 2** refers to a proposed project’s potential for exceeding the assumptions included in the AQMP or other regional growth projections relevant to the AQMP’s implementation.28

In terms of Criteria 1, the proposed project’s long-term (operational) airborne emissions will be below levels that the SCAQMD considers to be a significant impact (refer to the analysis included in the next section where the long-term stationary and mobile emissions for the proposed project are summarized in Table 3-2). The project would also conform to Consistency Criteria 2 since the project’s construction emissions would be below the thresholds of significance established by the SCAQMD (the project’s construction emissions are summarized in Table 3-1).

The proposed project would also conform to Consistency Criteria 2 since it would not exceed the housing, population, and employment assumptions presented in the 2016 AQMP. According to the AQMP, the SCAG region is projected to see a 12 percent growth in population, 16 percent growth in housing units, 23 percent growth in employment, and eight percent growth in vehicle miles traveled between 2012 and 2031. The SCAG region is expected to add two million new residents through the year 2031. Furthermore, the proposed project will not conflict with the regional population forecast presented in the 2016-2040 RTP/SCS prepared by SCAG. According to the RTP/SCS Demographics and Growth Forecast Appendix, the City of Anaheim is expected to add approximately 58,100 new residents through the year 2040.29 As indicated previously, the project site’s land use designation permits up to 18 du/acre. Therefore, if the site were developed according to the maximum allowable density, the site would be occupied by 14 units. These 14 units could support an estimated 47 residents. The build-out of the site was contemplated in the Land Use Element of the General Plan. However, the increase in density for this site has not been accounted for in the 2016 RTP since the City had originally designated the Craftsman unit located at 3534 West Savanna Street (the eastern portion of the project site) as a structure of historical interest.30 Nevertheless, the project site is located within the West Anaheim redevelopment project area. The City has identified this area for revitalization and additional infill opportunities in the Land Use Element of the General Plan. In addition, the project complies with the following general plan goals and policies calling for redevelopment of underutilized parcels:

• Facilitate new residential development on vacant or underutilized infill parcels.

• Promote the assembly of parcels to allow for more efficient development patterns wherever adjacent neighborhoods are not adversely impacted.

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Preserve single-family neighborhoods and encourage residential development that promotes home ownership.

The proposed project could add approximately 64 new residents based on the average household size of 3.38 persons per household identified in the 2010 census. The potential increase in population has not been accounted for by SCAG. However, the implementation of the proposed project is consistent with the goals and policies outlined in the Land Use Element and Housing Element. Furthermore, the approval of the project will assist the City in meeting their RHNA goal.

In addition, the project’s operational emissions are well within the emissions projections identified in the 2016 AQMP. As shown in Table 3-5 of the Final 2016 AQMP, the future 2031 daily operational emissions with the estimated population, employment, and VMT growth projections are estimated to be: 345 tons per day of VOCs; 214 tons per day of NOx; 1,188 tons per day of CO; 18 tons per day of Sox; and 65 tons per day of PM$_{2.5}$. The project’s operational emissions would be well within the emissions projections estimated in the AQMP. Since the proposed project would not be in violation of either Consistency Criteria, the project’s potential impacts are considered to be less than significant and no mitigation is required.

**B. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

*Less than Significant Impact. Construction Emissions.* The entire construction period for the proposed project is expected to last for approximately 11 months to complete (refer to Section 2.4.3) and would include demolition, grading, site preparation, construction of the 19 new townhome units, and the finishing of the project (pavement areas, painting, and planting of landscaping). The analysis of daily construction and operational emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod V.2016.3.2). The assumptions regarding the construction phases and the length of construction followed those identified herein in Section 2.4.3. As shown in Table 3-1, daily construction emissions are not anticipated to exceed the SCAQMD’s significance thresholds.

<table>
<thead>
<tr>
<th>Table 3-1 Estimated Daily Construction Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Phase</td>
</tr>
<tr>
<td>--------------------</td>
</tr>
<tr>
<td>Demolition (on-site)</td>
</tr>
<tr>
<td>Demolition (off-site)</td>
</tr>
<tr>
<td><strong>Total Demolition</strong></td>
</tr>
<tr>
<td>Site Preparation (on-site)</td>
</tr>
<tr>
<td>Site Preparation (off-site)</td>
</tr>
<tr>
<td><strong>Total Site Preparation</strong></td>
</tr>
<tr>
<td>Grading (on-site)</td>
</tr>
<tr>
<td>Grading (off-site)</td>
</tr>
<tr>
<td><strong>Total Grading</strong></td>
</tr>
<tr>
<td>Building Construction (on-site)</td>
</tr>
<tr>
<td>Building Construction (off-site)</td>
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<tr>
<td><strong>Total Building Construction</strong></td>
</tr>
</tbody>
</table>
Table 3-1
Estimated Daily Construction Emissions

<table>
<thead>
<tr>
<th>Construction Phase</th>
<th>ROG</th>
<th>NO₂</th>
<th>CO</th>
<th>SO₂</th>
<th>PM₁₀</th>
<th>PM₂.₅</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paving</td>
<td>0.91</td>
<td>9.17</td>
<td>8.90</td>
<td>0.01</td>
<td>0.52</td>
<td>0.48</td>
</tr>
<tr>
<td>Paving</td>
<td>0.06</td>
<td>0.04</td>
<td>0.58</td>
<td>--</td>
<td>0.14</td>
<td>0.03</td>
</tr>
<tr>
<td>Total Paving</td>
<td>0.97</td>
<td>9.22</td>
<td>9.48</td>
<td>0.01</td>
<td>0.66</td>
<td>0.51</td>
</tr>
<tr>
<td>Architectural Coatings (on-site)</td>
<td>2.98</td>
<td>1.83</td>
<td>1.84</td>
<td>--</td>
<td>0.12</td>
<td>0.12</td>
</tr>
<tr>
<td>Architectural Coatings (off-site)</td>
<td>0.01</td>
<td>0.01</td>
<td>0.13</td>
<td>--</td>
<td>0.03</td>
<td>--</td>
</tr>
<tr>
<td>Total Architectural Coatings</td>
<td>2.99</td>
<td>1.84</td>
<td>1.97</td>
<td>--</td>
<td>0.15</td>
<td>0.12</td>
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<tr>
<td>Maximum Daily Emissions</td>
<td>3.00</td>
<td>22.92</td>
<td>15.51</td>
<td>0.02</td>
<td>3.04</td>
<td>1.96</td>
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<tr>
<td>Daily Thresholds</td>
<td>75</td>
<td>100</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
</tbody>
</table>

Significant Impact? No No No No No No

Source: CalEEMod V.2016.3.2. (the worksheet are included herein in Appendix A)

As indicated previously, the project site is located in a non-attainment area for ozone and particulates, the project will be required to adhere to all SCAQMD regulations related to fugitive dust generation and other construction-related emissions. According to SCAQMD Regulation 403, all unpaved demolition and construction areas shall be regularly watered up to three times per day during excavation, grading, and construction as required (depending on temperature, soil moisture, wind, etc.). Watering could reduce fugitive dust by as much as 55 percent. Rule 403 also requires that temporary dust covers be used on any piles of excavated or imported earth to reduce wind-blown dust. In addition, all clearing, earthmoving, or excavation activities must be discontinued during periods of high winds (i.e. greater than 15 mph), so as to prevent excessive amounts of fugitive dust. Finally, the contractors must comply with other SCAQMD regulations governing construction equipment idling and emissions controls. The aforementioned SCAQMD regulations are standard conditions required for every construction project undertaken in the City as well as in the cities and counties governed by the SCAQMD.

Operational Emissions. The long-term air quality impacts associated with the proposed project include mobile emissions from vehicular traffic; area emissions from cleaning products and the operation of landscaping equipment; and off-site stationary emissions associated with the off-site energy generation and consumption (natural gas). The analysis of long-term operational impacts summarized in Table 3-2, also used the CalEEMod computer model developed for the SCAQMD. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the SCAQMD’s daily emissions thresholds.

Table 3-2
Estimated Operational Emissions in lbs/day

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>ROG</th>
<th>NO₂</th>
<th>CO</th>
<th>SO₂</th>
<th>PM₁₀</th>
<th>PM₂.₅</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area-wide (lbs/day)</td>
<td>0.45</td>
<td>0.01</td>
<td>1.57</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Energy (lbs/day)</td>
<td>--</td>
<td>0.08</td>
<td>0.03</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Mobile (lbs/day)</td>
<td>0.11</td>
<td>0.14</td>
<td>1.46</td>
<td>--</td>
<td>0.51</td>
<td>0.13</td>
</tr>
<tr>
<td>Total (lbs/day)</td>
<td>0.58</td>
<td>0.24</td>
<td>3.07</td>
<td>--</td>
<td>0.52</td>
<td>0.15</td>
</tr>
<tr>
<td>Daily Thresholds</td>
<td>55</td>
<td>55</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
</tbody>
</table>

Significant Impact? No No No No No No

Source: CalEEMod V.2016.3.2. (the worksheet is included herein in Appendix A)
Since the cumulative air quality emissions are under the thresholds of significance established by the SCAQMD, the potential air quality impacts are considered to be less than significant and no mitigation is required.

C. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less than Significant Impact. **Cumulative Emissions.** According to the SCAQMD, a cumulative air pollution impact is an adverse health effect, risk, or nuisance from exposure to pollutants released into the air from multiple air pollution sources. The proposed project is residential in nature and no heavy trucks will be travelling to and from the site once the project is occupied. These trucks operate using diesel fuel, which produces diesel particulate matter (DPM).

Future truck drivers visiting the site during the project’s construction must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel powered vehicles to less than five minutes. Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. In addition, the project’s construction contractors must adhere to SCAQMD Rule 403 regulations, which significantly reduce the generation of fugitive dust. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant and no mitigation is required.

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

Less than Significant Impact. Most vehicles generate carbon monoxide (CO) as part of the tail-pipe emissions and high concentrations of CO along busy roadways and congested intersections are a concern. The areas surrounding the most congested intersections are often found to contain high levels of CO that exceed applicable standards and are referred to as hot-spots. Three variables influence the creation of a CO hot-spot: traffic volumes, traffic congestion, and the background CO concentrations for the source receptor area.

Typically, a CO hot-spot may occur near a street intersection that is experiencing severe congestion (a LOS E or LOS F) where idling vehicles result in ground level concentrations of carbon monoxide. However, within the last decade, decreasing background levels of pollutant concentrations and more effective vehicle emission controls have significantly reduced the potential for the creation of hot-spots. The SCAQMD stated in its CEQA Handbook that a CO hot-spot would not likely develop at an intersection operating at LOS C or better. Since the Handbook was written, there have been new CO emissions controls added to vehicles and reformulated fuels are now sold in the SCAB. These new automobile emissions controls, along with the reformulated fuels, have resulted in a lowering of both ambient CO concentrations and vehicle emissions.

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A Traffic Impact Study dated May 10, 2018 was prepared for the project by K2 Traffic Engineering, Inc. (this report is provided in Appendix G). According to the study, it is estimated that the project would generate approximately 86 net new daily trips, with six net new trips during the morning (AM) peak hour and six net new trips during the evening (PM) peak hour.\textsuperscript{32} As noted in Section 3.16.2.A, the intersection of Savanna Street and Knott Avenue will continue to operate at a LOS A with the inclusion of the project’s traffic.\textsuperscript{33} Since the intersection of Savanna Street and Knott Avenue will continue to operate at a LOS A with the inclusion of the project, the likelihood of a CO hot-spot developing at this intersection is considered remote. Therefore, no impacts with respect to the creation of CO hot-spots will occur.

Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality and typically include homes, schools, playgrounds, hospitals, convalescent homes, and other facilities where children or the elderly may congregate.\textsuperscript{34} These population groups are generally more sensitive to poor air quality. Sensitive receptors abut the project site to the east, west, and south and include both residential and non-residential sensitive receptors such as John Beat Park, located 600 feet to the northwest and the Park Anaheim Health Care Center, located 675 feet to the southeast. These nearby sensitive residential receptors are shown in Exhibit 3-1.

The SCAQMD requires that CEQA air quality analyses indicate whether a proposed project will result in an exceedance of localized emissions thresholds or LSTs. LSTs only apply to short-term (construction) emissions at a fixed location and do not include off-site or area-wide emissions. The pollutants that are the focus of the LST analysis include the conversion of NO\textsubscript{x} to NO\textsubscript{2}; carbon monoxide (CO) emissions from construction; PM\textsubscript{10} emissions from construction; and PM\textsubscript{2.5} emissions from construction. For purposes of the LST analysis, the receptor distance used was 25 meters. Based on the analysis of LST impacts summarized above in Table 3-3, the potential impacts will be less than significant and no mitigation is required.

### Table 3-3
Local Significance Thresholds Exceedance SRA 17 for 1-Acre Sites (the site is 0.78 acres)

<table>
<thead>
<tr>
<th>Emissions</th>
<th>Project Emissions (lbs/day)</th>
<th>Type</th>
<th>Allowable Emissions Threshold (lbs/day) and a Specified Distance from Receptor (in meters)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{2}</td>
<td>22.92</td>
<td>Construction</td>
<td>81</td>
</tr>
<tr>
<td>CO</td>
<td>15.51</td>
<td>Construction</td>
<td>485</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>3.04</td>
<td>Construction</td>
<td>4</td>
</tr>
<tr>
<td>PM\textsubscript{2.5}</td>
<td>1.96</td>
<td>Construction</td>
<td>3</td>
</tr>
</tbody>
</table>

\textsuperscript{32} Refer to Table 3-12 in the Traffic Impact Analysis presented in Section 3.16.

\textsuperscript{33} Ibid.

\textsuperscript{34} South Coast Air Quality Management District. \textit{CEQA Air Quality Handbook, Appendix 9}. As amended 2017.
EXHIBIT 3-1
SENSITIVE RECEPTORS MAP
SOURCE: QUANTUM GIS
E. Would the project create objectionable odors affecting a substantial number of people?

Less than Significant Impact. The SCAQMD has identified those land uses that are typically associated with odor complaints. These uses include activities involving livestock, rendering facilities, food processing plants, chemical plants, composting activities, refineries, landfills, and businesses involved in fiberglass molding. The project is a proposal to construct 19 townhome units. As designed, the proposed project will not be involved in any of the aforementioned odor-generating activities. Given the nature of the intended use (19 residential townhome units), no operational impacts related to odors are anticipated with the proposed project.

Potential truck drivers visiting the site (construction and deliveries) must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel powered vehicles to less than five minutes. Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. In addition, the project’s construction contractors must adhere to SCAQMD Rule 403 regulations, which significantly reduce the generation of fugitive dust. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant and no mitigation is required.

3.3.2 CUMULATIVE IMPACTS

Other developments approved by the City of Anaheim were also taken into consideration. Based on information published by the City’s Planning Department, there are three other development projects located within a five-mile radius affecting the study intersections. These three related projects are as follows: a 5,270 square feet medical office building specializing in outpatient care located at 3350 West Ball Road; a 2,558 square feet Taco Bell with Drive-Through located at 3270 West Lincoln Avenue; and a 22-unit single-family residential development located at 3319-3321 West Lincoln Avenue. The combined operational emissions from the proposed project and the three related projects will still be below the thresholds of significance established by the SCAQMD (the CalEEMod worksheets for the cumulative emissions are provided in the Appendix). The four projects’ cumulative operational emissions are listed below. These emissions are compared to the thresholds of significance established by the SCAQMD for the designated criteria pollutants.

- **Reactive Organic Gasses (ROG).** Estimated operational emissions: 4.53 pounds per day; threshold of significance: 55 pounds per day.

- **Nitric Oxide (NO₂).** Estimated operational emissions: 13.58 pounds per day; threshold of significance: 55 pounds per day.

- **Carbon Monoxide (CO).** Estimated operational emissions: 27.10 pounds per day; threshold of significance: 550 pounds per day.

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- **Sulfur Dioxide (SO₂).** Estimated operational emissions: 0.07 pounds per day; threshold of significance: 150 pounds per day.

- **Particulate Matter (PM₁₀).** Estimated operational emissions: 5.33 pounds per day; threshold of significance: 150 pounds per day.

- **Particulate Matter (PM₂.₅).** Estimated operational emissions: 1.56 pounds per day; threshold of significance: 55 pounds per day.

As stated above, the cumulative emissions from the four related projects (including the proposed project) will be below the thresholds of significance established by the SCAQMD. As a result, less than significant cumulative air quality impacts will occur and no mitigation is required of the proposed project.
### 3.4 Biological Resources

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.4-A.</td>
<td>Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, or U. S. Fish and Wildlife Service?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.4-B.</td>
<td>Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.4-C.</td>
<td>Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.4-D.</td>
<td>Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.4-E.</td>
<td>Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.4-F.</td>
<td>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>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

#### 3.4.1 Analysis of Environmental Impacts

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

*No Impact.* A review of the California Department of Fish and Wildlife California Natural Biodiversity Database (CNDDB) Bios Viewer for the Anaheim Quadrangle indicated that out of a total of 25 native plant and animal species, six are either threatened or endangered. These species include the western yellow-billed cuckoo; the coastal California gnatcatcher; quino checkerspot butterfly; Gambel's watercress; California black rail; and the Swainson's hawk.\(^{37}\) The proposed project will not have an

\(^{37}\) California Department of Fish and Wildlife. *Bios Viewer.* [https://map.dfg.ca.gov/bios/?tool=cnddbQuick](https://map.dfg.ca.gov/bios/?tool=cnddbQuick). Site accessed on April 19, 2018
impact on the aforementioned species since there is no suitable riparian or native habitat located within, or in the vicinity of, the project site. These species typically require wetland or riparian habitat with native vegetation and access to bodies of water.

An additional search was conducted using the California Native Plant Society’s Inventory of Rare and Endangered Plants to ascertain any rare or endangered plant species which may occur in the Anaheim Quadrangle. The search yielded five results. The following five plants have been identified in the Anaheim Quadrangle: southern tarplant, chaparral sand-verbena, Parish’s brittlescale, Coulter’s goldfields, and the San Bernardino aster.38 None of these plants were encountered during the site survey. As indicated previously, the only vegetation that is present on-site consists of non-native introduced species typically used as ornamental landscaping. As a result, no impacts on any candidate, sensitive, or special status species will result from development of the proposed project, and no mitigation is required.

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

No Impact. The field survey indicated that there are no wetlands or riparian habitat present on-site or in the surrounding areas. This conclusion is also supported by a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper.39 In addition, there are no designated “blue line streams” located within the project area. As a result, no impacts on natural or riparian habitat will result from the proposed project’s implementation. Therefore, no mitigation measures are required.

C. Would the project have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. As indicated in the previous subsection, the project site and the adjacent developed properties do not contain any natural wetland and/or riparian habitat.40 As a result, the proposed project will not impact any protected wetland area or designated blue-line stream and no impacts will occur and no mitigation is required.

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38 California Native Plant Society, Rare Plant Program. 2018. Inventory of Rare and Endangered Plants of California. http://www.rareplants.cnps.org. Site accessed on April 19, 2018


40 Ibid.
D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact with Mitigation. The site is surrounded by development and lacks suitable riparian habitat. Furthermore, the site contains no natural hydrological features. Constant disturbance (noise and vibration) from vehicles travelling on the adjacent roadways limit the site’s utility as a migration corridor. However, the project will require the removal of all of the existing trees located on-site. Although the trees that will be removed would be replaced as part of the project’s landscaping plan, a mitigation measure is required to protect any potential nesting avian species that may be in the site’s trees that would be subject to removal:

*Mitigation Measure No. 1 (Biological Resources).* Prior to issuance of any demolition or building permits, if clearing and/or construction activities would occur during the raptor or migratory bird nesting season (February 15 to August 15), the Applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before construction activities. The qualified biologist shall survey the construction zone and a 500-foot buffer surrounding the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are identified during the preconstruction survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist. Details of compliance shall be provided in conjunction with or on plans submitted for permits.

The above mitigation would reduce the impact to levels that are less than significant by ensuring there are no nesting birds present on-site should construction commence between the months of February and August.

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

Less than Significant Impact. Chapter 13.12 –Street Trees serves as the City’s tree preservation ordinance. Trees located within the public right-of-way are considered property of the City. There is one street tree located along the south side of Savanna Street. This tree will likely be removed to accommodate the new driveway apron. Section 13.12.060 states that any street tree removed shall be replaced if a replacement is deemed possible. The replacement species shall be selected in accordance with the Official Tree Species List and Tree Master Plan. In addition, Section 13.12.080.020 will also apply. According to the aforementioned section, no person shall cut, trim, prune, plant, remove, spray, or in any other manner interfere with any street tree within the City of Anaheim without first having secured written permission from the Director of Community Services or his or her designee. Therefore, the project Applicant will also be required to obtain written permission from the Director of Community Services.

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41 Blodgett Baylosis Environmental Planning. *Site Survey.* The site visit was conducted on April 5, 2018.
Services prior to the removal of the street tree. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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

*No Impact.* The proposed project will not impact an adopted or approved local, regional, or State habitat conservation plan because the proposed project is located in the midst of an urban area. The construction and operation of the proposed project will not affect any designated Orange County Significant Ecological Area (SEA) since the proposed development will be restricted to the project area. Therefore, no impacts will occur and no mitigation is required. In addition, the project site is many miles west and will not affect the Chino Hills State Park or the Cleveland National Forest.

**3.4.2 Cumulative Impacts**

Typically, impacts to biological resources are site-specific. The analysis determined that the proposed project will not involve any incremental loss or degradation of protected habitat. As a result, no cumulative impacts will occur and no mitigation is required of the proposed project.
3.5 CULTURAL RESOURCES

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.5.A.</td>
<td>Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.5.B.</td>
<td>Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.5.C.</td>
<td>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.5.D.</td>
<td>Disturb any human remains, including those interred outside of formal cemeteries?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

3.5.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less than Significant Impact. Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a local general plan or historic preservation ordinance. A site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. The State, through the State Historic Preservation Office (SHPO), maintains an inventory of those sites and structures that are considered to be historically significant. Finally, the U.S. Department of Interior has established specific Federal guidelines and criteria that indicate the manner in which a site, structure, or district is to be defined as having historic significance and in the determination of its eligibility for listing on the National Register of Historic Places. To be considered eligible for the National Register, a property’s significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements.

State historic preservation regulations include the statutes and guidelines contained in the California Environmental Quality Act (CEQA) and the Public Resources Code (PRC). A historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript, that is historically or archaeologically significant. The State regulations that govern historic resources and structures include Public Resources Code Section 5024.1 and CEQA Guidelines Sections 15064.5(a) and 15064.5(b). According to Section 5024.1(c) of the State Public Resources Code:

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43 Ibid.
(c) A resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

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

In addition, California law protects Native American burials, skeletal remains, and associated grave goods regardless of the antiquity and provides for the sensitive treatment and disposition of those remains. CEQA, as codified at PRC Sections 21000 et seq., is the principal statute governing the environmental review of projects in the State. A Sacred Lands File Search was conducted for the project. The results of which came back negative (refer to the letter prepared by the NAHC which is shown in Appendix B).

The City of Anaheim adopted a comprehensive Citywide Historic Preservation Plan in 2010. This plan was prepared for the City by Architectural Resources Group and was adopted by the City Council in May of 2010. Additionally, the City maintains a list of historic districts, structures within those districts, and structures of historical interest. The Craftsman style home located at 3534 West Savanna Street (the eastern portion of the project site) is listed as a structure of historical interest. Structures of Historical Interest includes properties outside of established historic districts that have been identified by interested individuals or groups, by City staff, through windshield survey, or through any other process that identifies groups of buildings or individual buildings for further study based on their age, building type, style, etc. The list is a tool for identifying potential historic districts and Historically Significant Structures, but it may also encourage preservation as it identifies any properties that are resources for understanding the City’s historic built environment. A building, structure, or object that is over fifty (50) years old and possesses sufficient historic integrity may be added to the list of Structures of Historical Interest with the approval of the Executive Director of the Community Development Department. The list consists of buildings that are a good example of an identifiable architectural style and buildings that are associated with the residential, institutional, industrial, or commercial development of Anaheim or the region. At the department’s discretion, structures of less than 50 years old may be added as well if they are exceptionally interesting or significant and merit tracking. Updates to the list will be approved by the Executive Director of the Community Development Department.

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Structures on this list may be eligible for certain City incentive programs to assist with their rehabilitation if they have the potential to become historically significant structures.46

Since the project site is occupied by a structure that is listed as a structure of historical interest, the Applicant will be required to undergo the demolition review process. The demolition review process has been established to preserve Anaheim’s cultural and architectural history. In order to comply with the demolition review process, the Applicant must perform the following tasks prior to the issuance of a building permit:

1. File a 60-day “Notice of Intent to Demolish” application with the Anaheim Building Division. Once the application is received, it will be forwarded to the Historic Preservation program staff as well as appropriate organizations and interested individuals.

2. Post a “Notice of Intent to Demolish” on the property.

3. Offer the building to any individual or organization that would relocate and preserve it.

Interested parties have 60 days from the posting date of the “Notice of Intent to Demolish” to develop a plan to preserve the structure either on site or at an appropriate new location. If no alternative is identified as being acceptable to the property owner after the 60-day notice period expires, a demolition permit may be issued. The aforementioned craftsman style unit that occupies the site is obsolete and performing the renovations necessary to improve the unit’s appearance as well as bring the unit up to current state and local building codes may affect the integrity of the building. Adherence to the City’s historic preservation guidelines will ensure potential impacts remain at levels that are less than significant.

B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5 of the CEQA Guidelines?

Less than Significant Impact with Mitigation. The City of Anaheim (and the greater Los Angeles Basin) was previously inhabited by the Gabrielleño-Kizh people, named after the San Gabriel Mission, and the Juaneno. The Gabrielleño-Kizh tribe has lived in this region for around 7,000 years.47 Before European contact, approximately 5,000 Gabrielleño-Kizh people lived in villages throughout the Los Angeles Basin.48 Archaeological sites are often located along creek areas, ridgelines, and vistas.49 A Sacred Lands File Search was conducted for the project on June 19, 2018. The results of which came back negative (refer to the letter prepared by the NAHC which is shown in Appendix B). Formal Native American consultation was provided in accordance with AB-52. AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with


49 McCawley. The First Angelinos, the Gabrielleño Indians of Los Angeles County. 1996.
the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. AB-52 consultation letters were sent to a total of 22 individuals presenting various branches of the Gabrieleño, Juaneño, Kumeyaay, and Serrano. The specific tribal contacts are included in Appendix B, which is provided under a separate cover. The tribal representative of the Gabrielino-Kizh indicated on July 18, 2018 that the project site is situated in an area of high archaeological significance. As a result, the following mitigation is required:

**Mitigation Measure No. 2 (Cultural Resources).** Prior to issuance of any demolition or building permits, the project Applicant will be required to obtain the services of a qualified Native American Monitor and archeologist during construction-related ground disturbance activities. Ground disturbance is defined as activities that include, but are not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, and trenching, within the project area. The monitor(s) must be approved by the tribal representatives and will be present on-site during the construction phases that involve any ground disturbing activities. The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed. The archeologist will monitor grading activities and must complete monitoring logs on a daily basis. The logs completed by both the archaeologist and the tribal monitor must be submitted to the Planning Division on a weekly basis in order to determine compliance with the mitigation measure. In the unlikely event that remains are uncovered by construction crews, all excavation and grading activities shall be halted and the Anaheim Police Department would be contacted (the Department would then contact the County Coroner). This is a standard condition under California Health and Safety Code Section 7050.5(b).

Adherence to the abovementioned mitigation will reduce potential impacts to levels that are less than significant since the tribal monitor would possess a level of familiarity of tribal resources that exceeds that of a typical archaeologist.

**C. Would the project disturb any human remains, including those interred outside of formal cemeteries?**

**Less than Significant Impact.** There are no cemeteries located in the immediate area that would be affected by the proposed project. Forest Lawn Cemetery located 2.3 miles to the northwest in the City of Cypress is the closest cemetery to the project site. The proposed project is not likely to disturb any on-site burials due to the level of disturbance that has occurred in order to accommodate the former development. Notwithstanding, in the unlikely event that remains are uncovered by construction crews, all excavation and grading activities shall be halted and the Anaheim Police Department would be contacted (the Department would then contact the County Coroner). This is a standard condition under California Health and Safety Code Section 7050.5(b), which states:

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"In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission."

In addition, Title 14; Chapter 3; Article 5; Section 15064.5 of CEQA would apply in terms of the identification of significant archaeological resources and their salvage. Therefore, the potential impacts are considered to be less than significant and no mitigation is required.

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

No Impact. The project site is developed with two single-family units. As a result, there are no rock formations or other unique geological features present on-site. No paleontological resources or geologic features are anticipated to be encountered during the project’s construction phase due to the recent age (Holocene) of the soil. The soils that underlie the project area are alluvial soils. The alluvial deposits are typically quaternary-aged (from two million years ago to the present day) and span the two most recent geologic epochs, the Pleistocene and the Holocene. As a result, no impacts to paleontological resources will occur and no mitigation is required.

3.5.2 Cumulative Impacts

The potential environmental impacts related to cultural resources are site-specific. Furthermore, the analysis herein determined that the proposed project would not result in any significant impacts on cultural resources. A Sacred Lands File Search was conducted for the project. The results from the Sacred Lands File Search came back negative. The City of Anaheim adopted a comprehensive Citywide Historic Preservation Plan in 2010. This plan was prepared for the City by Architectural Resources Group and was adopted by the City Council in May of 2010. Additionally, the City maintains a list of historic districts, structures within those districts, and structures of historical interest. The Craftsman style home located at 3534 West Savanna Street (the eastern portion of the project site) is listed as a

51 United States Geological Survey. What is the Quaternary?
http://geomaps.wr.usgs.gov/sfgeo/quaternary/stories/what_is.html. Site accessed on April 19, 2018
structure of historical interest.\textsuperscript{52} Since the project site is occupied by a structure that is listed as a structure of historical interest, the Applicant will be required to undergo the demolition review process. The demolition review process has been established to preserve Anaheim’s cultural and architectural history. In order to comply with the demolition review process, the Applicant must perform the following tasks prior to the issuance of a building permit:

1. File a 60-day “Notice of Intent to Demolish” application with the Anaheim Building Division. Once the application is received, it will be forwarded to the Historic Preservation program staff as well as appropriate organizations and interested individuals.

2. Post a “Notice of Intent to Demolish” on the property.

3. Offer the building to any individual or organization that would relocate and preserve it.

Interested parties have 60 days from the posting date of the “Notice of Intent to Demolish” to develop a plan to preserve the structure either on site or at an appropriate new location. If no alternative is identified as being acceptable to the property owner after the 60-day notice period expires, a demolition permit may be issued. The aforementioned craftsman style unit that occupies the site is obsolete and performing the renovations necessary to improve the unit’s appearance as well as bring the unit up to current state and local building codes may affect the integrity of the building. As a result, no cumulative impacts will occur and no additional mitigation is required of the proposed project.

\textsuperscript{52} City of Anaheim Planning Department. \textit{List of Historic Structures}. List revised on June 14, 2016. List accessed on April 19, 2018.
### 3.6 GEOLOGY & SOILS

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>
| 3.6.A.  | Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:  
- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.  
- Strong seismic ground–shaking?  
- Seismic-related ground failure, including liquefaction?  
- Landslides? | X | | | |
| 3.6.B.  | Result in substantial soil erosion or the loss of topsoil? | | | X | |
| 3.6.C   | Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | X | | | |
| 3.6.D.  | Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2010), creating substantial risks to life or property? | | | X | |
| 3.6.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? | | | | X |

### 3.6.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

**A. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:** Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. Strong seismic ground–shaking? Seismic-related ground failure, including liquefaction? Landslides?

*Less than Significant Impact with Mitigation.* The City of Anaheim is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act’s main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A list of cities and counties subject to the Alquist-Priolo Earthquake

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S3 California Department of Conservation. *What is the Alquist-Priolo Act.*  
[http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx](http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx) Site accessed on April 19, 2018

S4 Ibid.
Fault Zones is available on the State’s Department of Conservation website. The City of Anaheim is not on the list. As a result, there are no known faults located within the City’s corporate boundaries that may be subject to a fault rupture hazard.

A preliminary geotechnical investigation dated October 8, 2017 was prepared for the project by Strata-Tech, Inc (this study is presented in Appendix C, which is provided on a separate cover). According to the report, the nearest fault is the Coyote Hills Fault, located approximately 5.1 miles to the north. The Newport-Inglewood located six miles to the southwest and the Whittier-Elsinore Fault 14 miles to the north are considered causative with regard to seismicity at the site. In addition, the Elysian Park Thrust fault is located within two miles north east from the site. The principal seismic hazard to the subject property and proposed project is strong ground shaking from earthquakes produced by local faults. It is likely that the subject property will be shaken by future earthquakes produced in Southern California. Secondary effects such as surface rupture, lurching, lateral spread or flooding are not considered probable.

Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The proposed project will be constructed in compliance with the 2016 Building Code, which contains standards for building design to minimize the impacts from fault rupture. Therefore, the potential impacts resulting from fault rupture are anticipated to be less than significant. The potential impacts in regards to ground shaking would also be considered to be less than significant. The intensity of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The proposed project will be constructed in compliance with the 2016 Building Code, which contains standards for building design to minimize the impacts from ground shaking.

Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is located in an area that is subject to liquefaction (refer to Exhibit 3-2). According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. Essentially, liquefaction is the process by which the ground soil loses strength due to an increase in water pressure following seismic activity. Even though the site is located within an area that is subject to liquefaction, the liquefaction potential for the project site is considered to be low. Nevertheless, the following recommendation was provided in the Geotechnical Report prepared by Strata-Tech, Inc:

**Mitigation Measure No. 3 (Geology & Soils).** The project must comply with all the design and construction-related actions in the site specific Geotechnical Report prepared by Strata-Tech. These design requirements will be confirmed by the City Engineer during the final plan check prior to the issuance of any building permit. In addition, the Applicant must remove and re-compact the

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57 Ibid.

58 Ibid.
underlying soils and provide additional slab and foundation support in order to address potential liquefaction risks. The removal and re-compaction of the underlying soil will be confirmed by the building inspector, the City Engineer, and a representative of Strata-Tech prior to the framing phase of the project’s construction. The recommendations and requirements of the Strata-Tech study must be implemented to the satisfaction of the City Engineer.

Implementation of the above-mentioned mitigation will reduce potential impacts to levels that are less than significant. Lastly, the project site is not subject to the risk of landslides (refer to Exhibit 3-2) because there are no hills or mountains within the vicinity of the project site.

Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction-induced or can be the result of excess moisture within the underlying soils. Liquefaction induced lateral spreading would not affect the proposed development because the project must be in compliance with Title 24 of the California Code of Regulations, which identifies building standards for seismic-related construction requirements that have been promulgated by the State of California. Therefore, lateral spreading caused by liquefaction would not affect the project.

The underlying soils are not prone to shrinking and swelling (refer to Section 3.6.2.D). As a result, the potential impacts in regards to liquefaction and landslides are less than significant and no additional mitigation is required.

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

*Less than Significant Impact.* A preliminary geotechnical investigation dated October 8, 2017 was prepared for the project by Strata-Tech, Inc. (this study is presented in Appendix C, which is provided on a separate cover). According to the report, artificial fill soils were encountered in sample borings between one to three feet below ground surface (BGS). Native soils consisted of clean to silty, fine grained sand, sandy, clayey silt, and silty, sandy clay to the maximum depth explored, 50 feet. The site is, and will continue to be level and no slope failure or landslide impacts are anticipated to occur. Once operational, the project site would be paved over and landscaped, which would minimize soil erosion. In addition, the Applicant will be required to adhere to the construction Best Management Practices (BMPs) outlined in the Construction Runoff Guidance Manual. Stormwater Runoff Program which includes the City of Anaheim. This program includes the County of Orange, the cities of Orange County, and the Orange County Flood Control District. The construction BMPs identified in the Construction Runoff Guidance Manual are applicable for all projects located within Orange County. These construction BMPs are grouped into the following categories:

- *Erosion control,* which focuses on preventing soil from being eroded by stormwater and potentially discharged from the construction site;

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60 Ibid.

EXHIBIT 3-2
SEISMIC HAZARDS MAP
SOURCE: CALIFORNIA DEPARTMENT OF CONSERVATION
• Sediment control, which focuses on preventing eroded soil from being discharged from the construction site;

• Wind erosion control, which protects the soil surface and prevents the soil particles from being detached by wind;

• Tracking control, which prevents or reduces the amount of sediment that is tracked to paved areas from unpaved areas by vehicles or construction equipment;

• Non-stormwater management, which limits or reduces potential pollutants at their source before they are exposed to stormwater; and,

• Waste management and materials pollution control, which practices that limit or reduce or prevent the contamination of stormwater by construction wastes and materials.62

The City’s National Pollutant Discharge Elimination System (NPDES) program coordinator and inspector is responsible for ensuring compliance with the County requirements. As a result, the potential impacts regarding soil erosion are considered to be less than significant and no mitigation is required.

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

Less than Significant Impact with Mitigation. As indicated previously, artificial fill soils were encountered in sample borings between one to three feet below ground surface (BGS).63 Native soils consisted of clean to silty, fine grained sand, sandy, clayey silt, and silty, sandy clay to the maximum depth explored, 50 feet.64 The underlying soils are not capable of supporting the proposed project. Therefore, the project Applicant will be required to adhere to the mitigation measure presented in subsection 3.6.2.A.

The site is, and will continue to be level and no slope failure or landslide impacts are anticipated to occur. Once operational, the project site will be paved over and landscaped, which will minimize soil erosion. Furthermore, no soil erosion will occur during the project’s construction since the project Applicant will be required to adhere to the construction Best Management Practices (BMPs) outlined in the County’s Construction Runoff Guidance Manual, which are applicable for all projects located within Orange County. Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction induced or can be the result of excess moisture within the underlying soils.

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63 Ibid.

64 Ibid.
Liquefaction induced lateral spreading will not affect the proposed residential development because the project will be constructed in compliance with all pertinent State Building Code regulations. In addition, the mitigation provided in subsection 3.6.2.A will address potential impacts related to liquefaction. As stated in the geotechnical report, the near surface soils have a low to very low expansion potential. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is unlikely and the potential impacts are considered to be less than significant.

In addition, the project’s implementation will not require significant grading and excavation (grading will extend not more than three feet below ground water (BGS) surface). Therefore, the likelihood of encountering groundwater is considered to be less than significant. Groundwater was encountered in the borings at approximately 16.5 feet. The soils that underlie the project site are not prone to subsidence. Subsidence occurs via soil shrinkage and is triggered by a significant reduction in an underlying groundwater table, thus causing the earth on top to sink. No groundwater will be drained to accommodate the construction of the proposed project. In addition, the project will not result in the direct extraction of groundwater located below ground surface (BGS). Therefore, the likelihood of on-site subsidence is considered to be remote. As a result, the potential impacts are anticipated to be less than significant with the implementation of the mitigation identified in the previous subsection and no additional mitigation is required.

D. Would the project 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?

Less than Significant Impact. The near surface soils have a low to very low expansion potential. The mitigation presented throughout this Section (3.6) will minimize potential seismic impacts. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

E. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. No septic tanks will be used as part of proposed project. However, septic tanks may be present on-site due to the age of the existing structures. Any potential septic tanks located BGS will be removed. The project will be connected to the existing sanitary sewer system. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project’s implementation and no mitigation is required.
3.6.2 **Cumulative Impacts**

Typically, impacts to geology and soils are site-specific. The analysis herein determined that the proposed project would not result in significant impacts related to ground shaking, liquefaction, landslides, soil erosion, lateral spreading, or subsidence. As a result, no cumulative impacts will occur and no mitigation is required for the proposed project.
3.7 GREENHOUSE GAS EMISSIONS

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.7.A.</td>
<td>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>X</td>
</tr>
<tr>
<td>3.7.B.</td>
<td>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>X</td>
</tr>
</tbody>
</table>

3.7.1 ENVIRONMENTAL ANALYSIS

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

Less than Significant Impact. The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions, or gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The accumulation of GHG in the atmosphere regulates the earth’s temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. The SCAQMD has established multiple draft thresholds of significance. These thresholds include 1,400 metric tons of CO₂E (MTCO₂E) per year for commercial projects, 3,000 MTCO₂E per year for residential projects. Table 3-5 summarizes annual greenhouse gas (CO₂E) emissions from the proposed project. Carbon dioxide equivalent, or CO₂E, is a term that is used for describing different greenhouse gases in a common and collective unit. As indicated in Table 3-5, the CO₂E total for the project is 171 MTCO₂E, which is below the aforementioned thresholds.

The project’s construction would result in a generation of 190 MTCO₂E per year. When amortized over a 30 year period, these emissions decrease to 6.34 MTCO₂E per year. These amortized construction emissions were added to the project’s operational emissions to calculate the project’s true GHG emissions. As shown in the table, the project’s total operational emissions would be 177 MTCO₂E per year, which is still below the threshold of 3,000 MTCO₂E per year for residential projects. The aforementioned estimate of operational GHG emissions do not take into account the two single family residences that occupy the site. When taking the existing two residences into account, the net increase in GHG emissions will be less.

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Table 3-5
Greenhouse Gas Emissions Inventory

<table>
<thead>
<tr>
<th>Source</th>
<th>CO₂</th>
<th>CH₄</th>
<th>N₂O</th>
<th>CO₂E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Long-Term – Area Emissions</td>
<td>0.32</td>
<td>--</td>
<td>--</td>
<td>0.32</td>
</tr>
<tr>
<td>Long-Term - Energy Emissions</td>
<td>84.66</td>
<td>--</td>
<td>--</td>
<td>84.87</td>
</tr>
<tr>
<td>Long-Term - Mobile Emissions</td>
<td>65.32</td>
<td>--</td>
<td>--</td>
<td>65.41</td>
</tr>
<tr>
<td>Long-Term - Waste Emissions</td>
<td>1.77</td>
<td>0.10</td>
<td>--</td>
<td>4.39</td>
</tr>
<tr>
<td>Long-Term – Water Emissions</td>
<td>15.41</td>
<td>0.03</td>
<td>--</td>
<td>16.46</td>
</tr>
<tr>
<td>Long-Term - Total Emissions</td>
<td>167.49</td>
<td>0.14</td>
<td>--</td>
<td>171.48</td>
</tr>
<tr>
<td>Total Construction Emissions</td>
<td>189.32</td>
<td>0.03</td>
<td>--</td>
<td>190.32</td>
</tr>
<tr>
<td>Construction Emissions Amortized Over 30 Years</td>
<td></td>
<td></td>
<td></td>
<td>6.34</td>
</tr>
<tr>
<td>Total Operational Emissions with Amortized Construction Emissions</td>
<td></td>
<td></td>
<td></td>
<td>177.82 MTCO₂E</td>
</tr>
<tr>
<td>Significance Threshold</td>
<td></td>
<td></td>
<td></td>
<td>3,000 MTCO₂E</td>
</tr>
</tbody>
</table>

Source: CalEEMod.V.2016.3.2 (the worksheet is included herein in Appendix A)

The GHG emissions estimates reflect what a 19-unit townhome of the same location and description would generate once fully operational. The type of activities that may be undertaken once the project is operational have been predicted and accounted for in the model for the selected land use type. It is important to note that the project is an “infill” development, which is seen as an important strategy in combating the release of GHG emissions. Infill development provides a regional benefit in terms of a reduction in Vehicle Miles Traveled (VMT) since the project is consistent with the regional and State sustainable growth objectives identified in the State’s Strategic Growth Council (SGC). Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. When development is located in a more rural setting, such as further east in the desert areas, employees, patrons, visitors, and residents may have to travel farther since rural development is often located a significant distance from employment, entertainment, and population centers. Consequently, this distance is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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

Less than Significant Impact. The SCAQMD has established multiple draft thresholds of significance. These thresholds include 1,400 metric tons of CO₂E (MTCO₂E) per year for commercial projects, 3,500

69 California Strategic Growth Council.  http://www.sgc.ca.gov/Initiatives/infill-development.html. Promoting and enabling sustainable infill development is a principal objective of the SGC because of its consistency with the State Planning Priorities and because infill furthers many of the goals of all of the Council’s member agencies. Site accessed on April 20, 2018.
MTCO₂E per year for residential projects, 3,000 MTCO₂E per year for mixed-use projects, and 7,000 MTCO₂E per year for industrial projects. In addition, an initial threshold of 10,000 MTCO₂E per year for industrial projects was established in 2008. As shown in Table 3-5, the project’s construction would result in a generation of 190 MTCO₂E per year. When amortized over a 30 year period, these emissions decrease to 6.34 MTCO₂E per year. These amortized construction emissions were added to the project’s operational emissions to calculate the project’s true GHG emissions. As shown in the table, the project’s total operational emissions would be 177 MTCO₂E per year, which is still below the threshold of 3,000 MTCO₂E per year for residential projects. The City of Anaheim Public Utilities Department prepared a Greenhouse Gas Reduction Plan dated July 2015 that identifies steps residents and business owners can take to reduce their GHG emissions. The proposed project will be consistent with the following solutions:

- **Replace older appliances, electronics and lighting with ENERGY STAR compliant devices.** The project’s implementation will be constructed in accordance with Title 24 of California Code of Regulations as well as the California Green Building Code.

- **Use energy-saver light bulbs, such as compact fluorescents or LED Bulbs.** The project’s implementation will be constructed in accordance with Title 24 of California Code of Regulations as well as the California Green Building Code.

- **Upgrade heating and cooling systems with energy efficient systems, including a programmable thermostat.** The project’s implementation will be constructed in accordance with Title 24 of California Code of Regulations as well as the California Green Building Code.

- **Plant drought tolerant trees and landscaping in the yard to shade your home and provide significant energy savings.** The project will include drought tolerant landscaping pursuant to the City’s landscaping requirements.

In addition, the Green Element of the General Plan contains numerous policies aimed at reducing GHG emissions. The proposed project will be consistent with the following policies:

- **Ensure compliance with the Federal Clean Water Act requirements for National Pollutant Discharge Elimination System (NPDES) permits, including developing and requiring the development of Water Quality Management Plans for all new development and significant redevelopment in the City.** A Preliminary Water Quality Management Plan dated May 29, 2018 and a Preliminary Hydrology & Hydraulics Study dated May 29, 2018 were prepared for the project by DMS Consultants, Inc. pursuant to Title 10 of the City’s Municipal Code (these reports are provided in Appendix D). According to the Hydrology Report and WQMP, the project will include the use of a StormTech MC-3500 stormwater chamber, catch basins, permeable pavers, and two hydrodynamic separators. These post-construction BMPs will filter out contaminants of concern, allow runoff to percolate into the ground, and will also result in the controlled discharge of excess runoff off-site.

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- **Require new development and significant redevelopment to utilize site preparation, grading and best management practices that provide erosion and sediment control to prevent construction-related contaminants from leaving the site and polluting waterways.** The discharge of contaminated runoff from construction will be minimized since the Applicant will be required to adhere to the construction Best Management Practices (BMPs) outlined in the Construction Runoff Guidance Manual. The construction BMPs identified in the Construction Runoff Guidance Manual are applicable for all projects located within Orange County. The project Applicant would also be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to General Construction Activity NPDES regulations since the project would connect to the City’s MS4. The SWPPP would contain additional construction BMPs that would be the responsibility of the project Applicant to implement. Furthermore, the Applicant would also be required to submit a Notice of Intent to comply with the General Construction Activity NPDES Permit to the State Water Resources Control Board.

- **Regulate construction practices, including grading, dust suppression, chemical management, and encourage pre-determined construction routes that minimize dust and particulate matter pollution.** The project’s contractors will be required to adhere to SCAQMD Rule 403 regulations, which govern the release and mitigation of fugitive dust.

As indicated previously, the operation of the proposed project will result in an incremental increase in GHG emissions though these operational GHG emissions will be below SCAQMD thresholds of significance. The proposed project will result in the generation of 177 MTCO₂E per year. The proposed project will not introduce any conflicts with adopted initiatives that are designed to control future GHG emissions. The project is an “infill development” and is seen as an important strategy in reducing regional GHG emissions. As a result, the impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are considered to be less than significant and no mitigation is required.

### 3.7.2 Cumulative Impacts

As indicated in the preceding analysis, the project’s GHG emissions are below thresholds considered to represent a significant impact.
### 3.8 HAZARDS & HAZARDOUS MATERIALS

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.8.A.</td>
<td>Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8.B.</td>
<td>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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8.C.</td>
<td>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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8.D.</td>
<td>Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8.E.</td>
<td>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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8.F.</td>
<td>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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8.G.</td>
<td>Impair implementation of or physically interfere with, an adopted emergency response plan or emergency evacuation plan?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8.H.</td>
<td>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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8.I.</td>
<td>Would the project include a new or retrofitted stormwater treatment control Best Management Practice (BMP), (e.g., water quality treatment basin, constructed treatment wetlands, etc.), the operation of which could result in significant environmental effects (e.g., increased vectors and noxious odors)</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 3.8.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

*Less than Significant Impact.* The project site is not located on the California Department of Toxic Substances Control’s Hazardous Waste and Substances Site List Site Cleanup (Cortese List). In

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72 CalEPA. DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List), [http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm). Site accessed on April 20, 2018
addition, the project site is not identified on any Leaking Underground Storage Tank database (LUST).73 A search through the California Department of Toxic Substances Control’s Envirostor database indicated that the project site was not included on any Federal or State clean up or Superfund lists.74 The United States Environmental Protection Agency’s multi-system search was consulted to determine whether the project site is identified on any Federal Brownfield list; Federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List; Federal Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) Facilities List; and/or Federal RCRA Generators List. The project site was not identified on any of the aforementioned lists.75 The project’s construction will require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. No other hazardous materials would be used during the project’s construction phase. Due to the nature of the proposed project (a 19-unit townhome development), no hazardous materials beyond what is typically used in a household setting for routine cleaning and maintenance would be used once the project is occupied. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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

Less than Significant Impact with Mitigation. In order to accommodate the construction of the project, the Applicant must demolish the existing buildings that occupy the site. Lead based paint and asbestos containing materials may be present in the flooring, walls, roof materials, dry wall, etc. due to the age of the buildings present on-site. In addition, septic tanks may be present on-site due to the age of the existing single-family units. Any septic tanks encountered on-site may have the potential to leak if not properly handled. As a result, the project’s contractors must be familiar with SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) and SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). Furthermore, the following mitigation is required:

**Mitigation Measure No. 4 (Hazards & Hazardous Materials).** The Applicant, and the contractors, must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials, lead paint, underground septic tanks, and other hazardous substances and materials that may be encountered during demolition and land clearance activities. The City’s Inspector will ensure compliance by inspecting the site during the demolition phase. Any contamination encountered during the demolition, grading, and/or site preparation activities must also be removed and disposed of in accordance with applicable laws prior to the issuance of any building permit.

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73 California State Water Resources Control Board. GeoTracker. [https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=anaheim.ca](https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=anaheim.ca). Site accessed on April 20, 2018


Due to the nature of the proposed project (a 19-unit townhome development), no hazardous materials will be used on-site beyond those which are used for routine cleaning and maintenance. The project's construction will require the use of diesel fuel to power the construction equipment. The diesel fuel will be properly sealed in tanks and will be transported to the site by truck. No other hazardous materials will be used during the project's construction phase. Therefore, the project's implementation will result in less than significant impact with mitigation.

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

*Less than Significant Impact with Mitigation.* There is one school located within one-quarter of a mile from the project site. Ronda Rae Preschool is located approximately 600 feet southeast of the project site. The Applicant will remove all of the buildings located within the project site. During these activities, lead and/or asbestos containing materials may be encountered. The handling, removal, and disposal of the aforementioned items are governed by State and Federal regulations. In addition, the project's contractors must be familiar with SCAQMD Rule 1166 and Rule 1403. Due to the nature of the proposed project (a 19-unit townhome development), no hazardous materials beyond what is typically used in a household setting for cleaning and maintenance would be used once the project is occupied. The project will not require the use of chemicals or materials that require oversight of Department of Toxic Substances Control, Environmental Protection Agency, Fire Department, SCAQMD, or Regional Water Quality Control Board.

The existing single-family units that occupy the site likely contain lead based paint or asbestos containing materials. Since the implementation of the proposed project will require the demolition of these existing units, asbestos and lead may be encountered during demolition. Therefore, SCAQMD Rule 1403-Asbestos Emissions from Demolition/Renovation Activities will also apply. In addition, the mitigation presented in the previous subsection will also be required. Adherence to the mitigation identified in the previous subsection will ensure impacts remain at levels that are less than significant. Therefore, the project's implementation will result in less than significant impact with mitigation.

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

*No Impact.* The “Cortese List,” also referred to as the Hazardous Waste and Substances Sites List or the California Superfund List, is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. California Government Code section 65962.5 requires the California Environmental Protection Agency to develop and update the Cortese List on annually basis. The list is maintained as part of the DTSC’s Brownfields and Environmental Restoration Program referred to as EnviroStor. A search of the EnviroStor Hazardous Waste and Substances Site List website was completed to identify whether the project site is listed in the database as a Cortese site.
The site was not identified on the list. Therefore, no impacts will result with the implementation of the proposed project and no mitigation is required.

**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?**

*Less than Significant Impact.* The project site is located within two miles of the Joint Forces Joint Forces Training Base in Los Alamitos. The project site is located within the Runway Protection Zone (RPZ), the FAR Part 77 zone, and height restriction zone for the Joint Forces Training Base. The proposed townhome units will have a maximum height of less than 37 feet. Therefore, the proposed project will not penetrate the airport’s 100:1 slope. Essentially, the proposed project will not introduce a building that will interfere with the approach and take off of airplanes utilizing the aforementioned airport. Furthermore, the project site is not located within the aforementioned airport’s 60 Community Noise Equivalent Level (CNEL) boundaries. The proposed project will be 36 feet in height and will be exempt from Federal Aviation Administration (FAA) lighting requirements per FAA AC 70/7460-1L – Obstruction Marking and Lighting with Change. According to Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) tower lighting requirements, all structures exceeding 200 feet above ground level (AGL) must be appropriately marked with tower lights or tower paint. In addition, the Federal Communications Commission governs monitoring requirements. As a result, the proposed project will not present a safety or noise hazard related to aircraft or airport operations at a public use airport to people residing or working in the project area. Therefore, the potential impacts are considered to be less than significant and no mitigation is required.

**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?**

*No Impact.* The project site is not located within two miles of a private use airport or helipad. Therefore, no impacts will result with the implementation of the proposed project and no mitigation is required.

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

*No Impact.* At no time will Savanna Street be completely closed to traffic. All construction staging must occur within the project area. As a result, no impacts are associated with the proposed project’s implementation and no mitigation is required.

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76 CalEPA. DTSC’s Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). [http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm](http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm). Site accessed on April 20, 2018


H. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wild lands fire, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?

No Impact. As indicated previously, the project site and the adjacent properties are urbanized and there are no areas of native or natural vegetation found within the vicinity of the project area. The project site is located outside of the City’s WildFire Protection Area, or any areas where there is natural vegetation that may represent a significant wildfire risk. As a result, no risk from wildfire is anticipated with the approval and subsequent implementation of the proposed project and no impacts will occur.

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

Less than Significant Impact. A Preliminary Water Quality Management Plan dated May 29, 2018 and a Preliminary Hydrology & Hydraulics Study dated May 29, 2018 were prepared for the project by DMS Consultants, Inc. pursuant to Title 10 of the City’s Municipal Code (these reports are provided in Appendix D). According to the Hydrology Report and WQMP, the project will include the use of a StormTech MC-3500 stormwater chamber, catch basins, permeable pavers, and two hydrodynamic separators. The Stormtech MC-3500 stormwater chamber will be installed below-ground surface (BGS). This chamber consists of a polypropylene corrugated chamber (resembling a tube-like structure), impermeable liners, and a stone bottom. Other BMPs include Eco-Stone Permeable Pavers and hydrodynamic separators. The Eco-Stone Permeable Pavers allow surface runoff to percolate through small openings, where surface runoff will be filtered via a crushed gravel base. Lastly, excess surface runoff that accumulates within the landscaped areas will drain into yard drain inlets. From there, runoff will be conveyed to the hydrodynamic separators via new six-inch storm drains. Runoff processed by the hydrodynamic separators will pass through filter screens which will remove trash and debris. This filter screen will also allow sediment to be removed and sink to the bottom of the separators in special sediment chambers. Filtered runoff will then be expelled from the separators through an outlet pipe.

The operation of the aforementioned BMPs will not result in significant environmental effects such as increased vectors or odors since the WQMP includes maintenance guidelines for every BMP recommended in the Plan. Adherence to the maintenance instructions outlined in the WQMP will ensure that no impacts regarding vectors or odors will occur. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

79 City of Anaheim General Plan. Figure S-5:Fire Protection Areas Map. Plan adopted May 2004. Site accessed on April 20, 2018
81 Ibid.
3.8.2 CUMULATIVE IMPACTS

The potential impacts related to hazardous materials are site specific. Furthermore, the analysis herein also determined that the implementation of the proposed project will not result in any significant impacts related to hazards and/or hazardous materials. As a result, no significant cumulative impacts related to hazards or hazardous materials will result from the proposed project’s implementation and no additional mitigation is required relative to cumulative hazards.
### 3.9 HYDROLOGY & WATER QUALITY

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.9.A.</td>
<td>Violate any water quality standards or waste discharge requirements?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.9.B.</td>
<td>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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.9.C.</td>
<td>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>X</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>3.9.D.</td>
<td>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>X</td>
<td></td>
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<td></td>
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<tr>
<td>3.9.E.</td>
<td>Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?</td>
<td>X</td>
<td></td>
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<tr>
<td>3.9.F.</td>
<td>Otherwise substantially degrade water quality?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.9.G.</td>
<td>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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.9.H.</td>
<td>Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</td>
<td>X</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>3.9.I.</td>
<td>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>X</td>
<td></td>
<td></td>
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<tr>
<td>3.9.J.</td>
<td>Inundation by seiche, tsunami, or mudflow?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.9.K.</td>
<td>Substantially degrade water quality by contributing pollutants from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling, or storage, delivery areas, loading docks or other outdoor work areas?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.9.L.</td>
<td>Substantially degrade water quality by discharge which affects the beneficial uses (i.e., swimming, fishing, etc.) of the receiving or downstream waters?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### 3.9.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

#### A. Would the project violate any water quality standards or waste discharge requirements?

**Less than Significant Impact.** The project’s construction and subsequent occupation will not violate any water quality standards, waste discharge requirements, or otherwise degrade surface or groundwater quality. Construction activities such as site preparation and grading may have the potential to result in the discharge of sediment, oils, residual diesel fuel, rubbish, or other contaminants of concern into the local streets and/or stormwater infrastructure. The discharge of contaminated runoff from construction will be minimized since the Applicant will be required to adhere to the construction Best Management Practices (BMPs) outlined in the Construction Runoff Guidance Manual.

The construction BMPs identified in the Construction Runoff Guidance Manual are applicable for all projects located within Orange County.\(^\text{83}\) These construction BMPs are grouped into the following categories:

- *Erosion control*, which focuses on preventing soil from being eroded by stormwater and potentially discharged from the construction site;

- *Sediment control*, which focuses on preventing eroded soil from being discharged from the construction site;

- *Wind erosion control*, which protects the soil surface and prevents the soil particles from being detached by wind;

- *Tracking control*, which prevents or reduces the amount of sediment that is tracked to paved areas from unpaved areas by vehicles or construction equipment;

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• **Non-stormwater management**, which limits or reduces potential pollutants at their source before they are exposed to stormwater; and,

• **Waste management and materials pollution control**, which practices that limit or reduce or prevent the contamination of stormwater by construction wastes and materials.\(^8^4\)

The City’s NPDES program coordinator and inspector is responsible for ensuring compliance with the County requirements. As a result, the potential construction impacts are considered to be less than significant and no separate mitigation is required.

The project Applicant would also be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to General Construction Activity NPDES regulations since the project would connect to the City’s MS4. The SWPPP would contain additional construction BMPs that would be the responsibility of the project Applicant to implement. Furthermore, the applicant would also be required to submit a Notice of Intent to comply with the General Construction Activity NPDES Permit to the State Water Resources Control Board.

Title 10—Public Services and Utilities, Chapter 10.09—National Pollution Discharge Elimination System of the City of Anaheim Municipal Code regulates the discharge of stormwater within the City. This code regulates facility operations of development and redevelopment projects to comply with the current “Municipal NPDES” permit requirements. According to the aforementioned code section, an Applicant is required to prepare a Water Quality Management Plan (WQMP) prior to the issuance of a grading permit, building permit and/or conditional use permit for any new development or significant redevelopment. The mandatory WQMP must include Site Design Best Management Practices (BMPs) and Treatment Control BMPs. Inclusion of the post-construction BMPs identified in the mandatory WQMP will filter out contaminants of concern (oil, grease, debris, leaves, etc).

Once constructed, the project will not introduce polluted runoff into the existing storm drain system. In addition, the project will not create excess runoff that will exceed the capacity of the existing storm water drainage system. The project site in its current state is dominated by pervious surfaces. Following construction, the percentage of pervious surfaces on-site will be 31 percent.

A Preliminary Water Quality Management Plan dated May 29, 2018 and a Preliminary Hydrology & Hydraulics Study dated May 29, 2018 were prepared for the project by DMS Consultants, Inc. pursuant to Title 10 of the City’s Municipal Code (these reports are provided in Appendix D). According to the Hydrology Report and WQMP, the project will include the use of a StormTech MC-3500 stormwater chamber, catch basins, permeable pavers, and two hydrodynamic separators.\(^8^5\) The Stormtech MC-3500 stormwater chamber will be installed below-ground surface (BGS). This chamber consists of a polypropylene corrugated chamber (resembling a tube-like structure), impermeable liners, and a stone bottom.\(^8^6\) The Stormtech MC-3500 chamber will have a storage capacity of 1,780 cubic feet of runoff.

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\(^8^5\) Ibid.

\(^8^6\) Ibid.
These chambers are used for storage and no infiltration will occur since the underground detention will utilize an impermeable liner to store the required detention volume.

Other BMPs include Eco-Stone Permeable Pavers and hydrodynamic separators. The Eco-Stone Permeable Pavers allow surface runoff to percolate through small openings, where surface runoff will be filtered via a crushed gravel base. Lastly, excess surface runoff that accumulates within the landscaped areas will drain into yard drain inlets. From there, runoff will be conveyed to the hydrodynamic separators via new six-inch storm drains. Runoff processed by the hydrodynamic separators will pass through filter screens which will remove trash and debris. This filter screen will also allow sediment to be removed and sink to the bottom of the separators in special sediment chambers. Filtered runoff will then be expelled from the separators through an outlet pipe.

Even though the project’s implementation will result in a reduction of pervious surfaces, the post-construction BMPs will allow excess runoff to be filtered and percolate into the ground. As a result, the potential operational impacts are considered to be less than significant and no mitigation is required.

B. Would the project 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)?

Less than Significant Impact. The grading that will occur will not extend to the depths where groundwater may be encountered. As indicated in the geotechnical report summarized in Section 3.6, groundwater was encountered in borings at a depth of 16.5 feet. Grading and excavation will not extend greater than three feet BGS. As a result, no dewatering will occur as part of the proposed project’s construction. Therefore no direct construction related impacts to groundwater supplies or groundwater recharge activities will occur. The project will continue to be connected to the City’s water lines and will not result in a direct decrease in underlying groundwater supplies. Furthermore, the project’s contractors will be required to adhere to the applicable Best Management Practices (BMPs) for the construction site. Adherence to the required BMPs will restrict the discharge of contaminated runoff into the local storm drain system. As a result, the impacts are anticipated to be less than significant and no mitigation is required.

C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

No Impact. The project’s construction will be restricted to the designated project site and the project will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The Carbon Creek is the closest body of water to the project site. This creek is located 420 feet to the north of the project site and is channelized at this location for flood control. Once implemented, the

The proposed project will change the site’s drainage characteristics. A majority of the project site is covered over in pervious surfaces. Currently, stormwater runoff either percolates into the ground, or is discharged off-site into local storm drains. Following construction, 31 percent of the site will consist of pervious surfaces. Nevertheless, the project will not lead to an increased amount of runoff that would exceed the capacity of the local stormwater infrastructure.

A Preliminary Water Quality Management Plan dated May 29, 2018 and a Preliminary Hydrology & Hydraulics Study dated May 29, 2018 were prepared for the project by DMS Consultants, Inc. pursuant to Title 10 of the City’s Municipal Code (these reports are provided in Appendix D). According to the Hydrology Report and WQMP, the project will include the use of a StormTech MC-3500 stormwater chamber, catch basins, permeable pavers, and two hydrodynamic separators. These post-construction BMPs will filter out contaminants of concern, allow runoff to percolate into the ground, and will also result in the controlled discharge of excess runoff off-site. As a result, no impacts related to off-site erosion or siltation will occur. In addition, the Applicant will be required to adhere to the construction Best Management Practices (BMPs) outlined in the Construction Runoff Guidance Manual. Stormwater Runoff Program which includes the City of Anaheim. This program includes the County of Orange, the cities of Orange County, and the Orange County Flood Control District. Since runoff will be contained on-site during the project’s construction and occupation, no off-site erosion will occur and no mitigation measures are required.

D. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. The project’s construction will be restricted to the designated project site and the project will not alter the course of any stream or river that would lead to on- or off-site flooding. The Carbon Creek is the closest body of water to the project site. This creek is located 420 feet to the north of the project site and is channelized at this location for flood control. Once implemented, the proposed project will change the site’s drainage characteristics. A majority of the project site is covered over in pervious surfaces. Currently, stormwater runoff either percolates into the ground, or is discharged off-site into local storm drains. Following construction, 31 percent of the site will consist of pervious surfaces. Nevertheless, the project will not lead to an increased amount of runoff that would exceed the capacity of the local stormwater infrastructure. Since runoff will be contained on-site during the project’s construction and occupation, no off-site erosion or flooding will occur and no mitigation measures are required.

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E. Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. A Preliminary Water Quality Management Plan dated May 29, 2018 and a Preliminary Hydrology & Hydraulics Study dated May 29, 2018 were prepared for the project by DMS Consultants, Inc. pursuant to Title 10 of the City’s Municipal Code (these reports are provided in Appendix D). According to the Hydrology Report and WQMP, the project will include the use of a StormTech MC-3500 stormwater chamber, catch basins, permeable pavers, and two hydrodynamic separators.91 Other BMPs include Eco-Stone Permeable Pavers, hydrodynamic separators, and yard drain inlets. Therefore, the project’s implementation will not substantially increase the rate or amount of surface runoff; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; or provide additional sources of polluted runoff. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

F. Would the project otherwise substantially degrade water quality?

No Impact. The proposed project will be constructed in compliance with Chapter 10.09 of the City’s Municipal Code. Chapter 10.09 is responsible for implementing the NPDES and MS4 stormwater runoff requirements. Furthermore, the project’s contractors will be required to implement the construction BMPs identified in the Orange County Construction Runoff Guidance Manual. As a result, no other impacts are anticipated and no mitigation is required.

G. Would the project 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?

No Impact. According the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Anaheim, the proposed project site is located in Flood Zone X.92 This flood zone has an annual probability of flooding of less than 0.2 percent and represents areas outside the 500-year flood plain. Thus, properties located in Zone X are not located within a 100-year flood plain.93 As a result, no impacts will occur and no mitigation is required.

H. Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. According the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Anaheim, the proposed project site is located in Flood Zone X.94 This flood zone has an annual probability of flooding of less than 0.2 percent and represents areas outside the 500-year flood plain.

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flood plain. Thus, properties located in Zone X are not located within a 100-year flood plain. As a result, no impacts will occur and no mitigation is required.

I. Would the project 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?

Less than Significant Impact. As indicated in the Hazard Mitigation Plan that was prepared for the City, the project site is located within the dam inundation area of the Prado Dam. The potential impacts regarding dam inundation are no greater for the project site than for the surrounding areas. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

J. Would the project expose people or structures to inundation by seiche, tsunami, or mudflow?

No Impact. A seiche in the Carbon Creek is not likely to happen due to the current level of channelization and volume of water present. In addition, the project site is located inland approximately eight miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami. As a result, no impacts will occur and no mitigation is required.

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

Less than Significant Impact. The proposed project consists of 19 townhome units. No hazardous materials other than those that are widely available and used in a household or commercial setting will be used on-site. The project does not include any outdoor work areas, loading areas, or delivery areas. In addition, vehicular maintenance will be prohibited. Nevertheless, the vehicles that will travel to and from the site may release fluids and other contaminants of concern that could have a detrimental effect on the surrounding environment. These contaminants of concern will be intercepted by the post-construction BMPs and the potential impacts are considered to be less than significant. Therefore, no mitigation is required.

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

Less than Significant Impact. As indicated previously, the project will include the use of a StormTech MC-3500 stormwater chamber, catch basins, permeable pavers, and two hydrodynamic separators. These post-construction BMPs will filter out contaminants of concern, allow runoff to percolate into the ground, and will also result in the controlled discharge of excess runoff off-site. Therefore, no

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Contaminated runoff will be discharged off-site once the project is occupied. In addition, the Applicant will be required to adhere to the construction Best Management Practices (BMPs) outlined in the Construction Runoff Guidance Manual. Stormwater Runoff Program which includes the City of Anaheim. This program includes the County of Orange, the cities of Orange County, and the Orange County Flood Control District. Since runoff will be contained on-site during the project’s construction and occupation, no discharge of polluted runoff will occur and no mitigation measures are required. Lastly, the Carbon Creek is the closest body of water to the project site. This creek is located 420 feet to the north of the project site and is channelized at this location for flood control.  

M. Potentially impact stormwater runoff from construction activities?

*Less than Significant.* Construction activities such as site preparation and grading may have the potential to result in the discharge of sediment, oils, residual diesel fuel, rubbish, or other contaminants of concern into the local streets and/or stormwater infrastructure. The discharge of contaminated runoff from construction will be minimized since the Applicant will be required to adhere to the construction Best Management Practices (BMPs) outlined in the Construction Runoff Guidance Manual.

The construction BMPs identified in the Construction Runoff Guidance Manual are applicable for all projects located within Orange County. These construction BMPs are grouped into the following categories:

- *Erosion control,* which focuses on preventing soil from being eroded by stormwater and potentially discharged from the construction site;

- *Sediment control,* which focuses on preventing eroded soil from being discharged from the construction site;

- *Wind erosion control,* which protects the soil surface and prevents the soil particles from being detached by wind;

- *Tracking control,* which prevents or reduces the amount of sediment that is tracked to paved areas from unpaved areas by vehicles or construction equipment;

- *Non-stormwater management,* which limits or reduces potential pollutants at their source before they are exposed to stormwater; and,

- *Waste management and materials pollution control,* which practices that limit or reduce or prevent the contamination of stormwater by construction wastes and materials.

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The City’s NPDES program coordinator and inspector is responsible for ensuring compliance with the County requirements. As a result, the potential construction impacts are considered to be less than significant and no separate mitigation is required.

The project Applicant would also be required to prepare a Stormwater Pollution Prevention Program (SWPPP) pursuant to General Construction Activity NPDES regulations since the project would connect to the City’s MS4. The SWPPP would contain additional construction BMPs that would be the responsibility of the project Applicant to implement. Furthermore, the Applicant would also be required to submit a Notice of Intent to comply with the General Construction Activity NPDES Permit to the State Water Resources Control Board. Implementation of the BMPs outlined in the SWPPP and the County’s Construction Runoff Guidance Manual will prevent the discharge of sediment and other contaminants of concern off-site during the project’s construction phase. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

N. Potentially impact stormwater runoff from post-construction activities?

Less than Significant Impact. As indicated previously, the project will include the use of a StormTech MC-3500 stormwater chamber, catch basins, permeable pavers, and two hydrodynamic separators. These post-construction BMPs will filter out contaminants of concern, allow runoff to percolate into the ground, and will also result in the controlled discharge of excess runoff off-site. Therefore, no contaminated runoff will be discharged off-site once the project is occupied. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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

Less than Significant Impact. The post-construction BMPs that are included in the WQMP will facilitate the percolation of runoff into the ground. In addition, these BMPs will also result in the detention and controlled discharge of runoff off-site into the local storm drains. As a result, the project will not produce volumes of runoff that will lead to any environmental impacts and the potential impacts are considered to be less than significant. Thus, no mitigation is required.

P. Create significant increases in erosion of the project site or surrounding areas?

No Impact. As stated throughout the section, runoff will either percolate into the ground, or will be discharged in a controlled manner into the local stormwater infrastructure. As a result, no erosion will occur and no mitigation is necessary.

3.9.2 CUMULATIVE IMPACTS

Impacts related to hydrology and water quality are typically site-specific. The analysis determined that the implementation of the proposed project would not result in any impacts related to water and hydrology impacts. As a result, no cumulative impacts are anticipated and no mitigation is required.

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3.10 LAND USE & PLANNING

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.10.A.</td>
<td>Physically divide an established community?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3.10.B.</td>
<td>Conflict with an 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.10.C</td>
<td>Conflict with any applicable habitat conservation plan or natural community conservation plan?</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

3.10.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project physically divide an established community?

No Impact. The project area is located in the midst of a residential neighborhood located in the southwestern portion of the City. The following land uses and development are located near the project site:

- **North of the project site.** Savanna Street extends along the north side of the project site. Apartment complexes and other high density residential development occupies frontage along the north side of Savanna Street.

- **South of the project site.** Apartments are located adjacent to the project site on the south side. Single-family residential units are located southwest of the project site along Marian Way.

- **East of the project site.** Townhouses are located adjacent to the project site on the east. Knott Avenue is located 534 feet further east of the site.

- **West of the project site.** Apartments are located west of the project site. Marian Way is located 190 feet further west of the site.

The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood and no impacts will occur and no mitigation is required.

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102 Blodgett Bayliss Environmental Planning. *Site Survey.* The site visit was conducted on April 5, 2018.

103 Google Earth. Website accessed on April 18, 2018.
B. Would the project 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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

*Less than Significant Impact.* The project site is zoned RM-4 (*Multiple-family residential*). In addition, the project site’s General Plan land use designation is *Low-Medium Density*. The project site’s zoning and general plan land use designations are shown in Exhibit 3-3 and Exhibit 3-4, respectively. The project’s implementation will require the approval of a General Plan Amendment (GPA) from *Low-Medium Density* to *Mid Density*; the approval of a Zone Reclassification from RM-4 (*Multiple-Family Residential*) to RM-3.5 (*Multiple-Family Residential*); the approval of a Conditional Use Permit (CUP) to permit residential development within the RM-3.5 zone and to allow for modified development; and, the approval of a Tentative Tract Map (TTM No. 18152) for a one lot subdivision for 19 units. Table 3-6 depicts the proposed project’s conformity with the City’s RM-4 zoning standards.

<table>
<thead>
<tr>
<th>Description</th>
<th>City Requirements</th>
<th>Project Element</th>
<th>Conforms?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimum Lot Width</td>
<td>70 feet</td>
<td>158 feet</td>
<td>Yes</td>
</tr>
<tr>
<td>Maximum Building Height</td>
<td>40 feet or 3 stories</td>
<td>36 ft. 7 in., 3 stories max</td>
<td>Yes</td>
</tr>
<tr>
<td>Minimum Floor Area</td>
<td>825 sq. ft. (2-bedroom)</td>
<td>1,268-1,276 sq. ft</td>
<td>Yes</td>
</tr>
<tr>
<td>Maximum Lot Coverage</td>
<td>55%</td>
<td>35%</td>
<td>Yes</td>
</tr>
<tr>
<td>Minimum Required Setbacks</td>
<td>15 street, 15 interior, 40 between buildings</td>
<td>Up to 15 feet 2 inches for street, up to 15 feet for interior setback, and up to 16 feet 1 inch for setbacks between buildings</td>
<td>Yes*</td>
</tr>
<tr>
<td>Minimum Recreation-Leisure Space</td>
<td>3,800 sq. ft</td>
<td>5,931 sq. ft</td>
<td>Yes</td>
</tr>
<tr>
<td>Parking Required</td>
<td>43 spaces</td>
<td>45 spaces</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Source: City of Anaheim Municipal Code. Site accessed on April 20, 2018

*This project element conforms to the City’s requirements with the approval of the CUP to modify the setback standards.*

The proposed project would change the General Plan Land Use designation to the Mid Density Residential designation, which provides for a wide range of residential uses, including detached, small-lot single-family homes, attached single-family homes, patio homes, zero lot line homes, duplexes, and townhouses. This category is implemented by the RM-1, RM-2, RM-3, and RM-3.5 zones. The permitted density range is from zero up to 27 dwelling units per gross acre. The proposed project would reclassify the property to RM-3.5 Multiple-Family Residential Zone. The intent of the "RM-3.5" Zone is to provide an attractive, safe, and healthy environment with multiple-family units with a minimum building site area per dwelling unit of one thousand six hundred (1,600) square feet.
EXHIBIT 3-3
ZONING MAP
SOURCE: CITY OF ANAHEIM
As indicated in the Table, the project will comply with the City’s development standards with the exception of the minimum interior, side, and building to building setbacks, which are allowed with the approval of a Conditional Use Permit. The approval of the aforementioned discretionary actions will ensure that potential land use impacts remain at levels that are considered to be less than significant. Therefore, less than significant impacts will occur upon implementation of the proposed project and no mitigation is required.

C. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The proposed project will not impact an adopted or approved local, regional, or State habitat conservation plan because the proposed project is located in the midst of an urban area. The construction and operation of the proposed project will not affect any designated Orange County Significant Ecological Area (SEA) since the proposed development will be restricted to the project area. In addition, the project site is many miles west of and will not affect the Chino Hills State Park or the Cleveland National Forest. Therefore, no impacts will occur and no mitigation is required.

3.10.2 Cumulative Impacts

Typically, land use and planning impacts are considered to be site-specific. The analysis determined that the proposed project will not result in any significant land use impacts. As a result, no cumulative land use impacts will occur as part of the proposed project’s implementation and no mitigation is required for cumulative land use or planning impacts.
3.11 MINERAL RESOURCES

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.11.A.</td>
<td>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>X</td>
</tr>
<tr>
<td>3.11.B.</td>
<td>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>X</td>
</tr>
</tbody>
</table>

3.11.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

No Impact. The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.\(^\text{104}\) In addition, according to SMARA, study area maps prepared by the California Geological Survey, the project site is located within Mineral Resources Zone (MRZ) 4.\(^\text{105}\) Areas located within MRZ 4 are classified as areas where available information is inadequate for assignment to any other MRZ zone.\(^\text{106}\) As indicated previously, the site is occupied by two single-family units. There are no active mineral extraction activities occurring on-site or in the adjacent properties. As a result, no impacts to mineral resources will occur and no mitigation is required.

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

No Impact. As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project area. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project and no mitigation is required.

\(^{104}\) California, State of. Department of Conservation. California Oil, Gas, and Geothermal Resources Well Finder. [https://maps.conservation.ca.gov/doggr/wellfinder/#close](https://maps.conservation.ca.gov/doggr/wellfinder/#close). Site accessed on April 20, 2018


\(^{106}\) Ibid.
3.11.2 **CUMULATIVE IMPACTS**

The potential impacts on mineral resources are site-specific. Furthermore, the analysis determined that the proposed project would not result in any impacts on mineral resources. As a result, no cumulative impacts will occur and no project mitigation is required relative to cumulative impacts on mineral resources.
3.12 NOISE

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.12.A.</td>
<td>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>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.12.B.</td>
<td>Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.12.C.</td>
<td>A substantial permanent increase in ambient noise levels in the project vicinity above noise levels existing without the project?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.12.D.</td>
<td>A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.12.E.</td>
<td>For a project located with an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>3.12.F.</td>
<td>For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

3.12.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project result in the 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?

Less than Significant Impact. Noise levels may be described using a number of methods designed to evaluate the "loudness" of a particular noise. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. Noise levels may also be expressed as dBA where an “A” weighting has been incorporated into the measurement metric to account for increased human sensitivity to noise. The A-weighted measurements correlate well with the perceived noise levels at lower frequencies. Noise may be generated from a point source, such as a piece of construction equipment, or from a line source, such as a road containing moving vehicles. Noise may be generated from a point source, such as a piece of construction equipment, or from a line source, such as a road containing moving vehicles. The ambient noise environment within the project area is dominated by traffic noise emanating from Savanna Street.
A Westward Digital Sound Level Meter Model: 5URG5 (Type 2 meter) was used to conduct the noise measurements. The meter was performed using a slow response setting, with an “A” weighting. The meter’s height above the ground surface was five feet. A series of 100 discrete noise measurements were recorded along the project site’s northern property line. The duration of each measurement period was 15 minutes. The results of the survey are summarized in Table 3-7. The measurements were taken on a Thursday morning at 10:30. The median ambient exterior noise level \(L_{50}\) was 50.5 dBA at the measurement location. \(L_{50}\) represents the noise level that is exceeded 50 percent of the time (half the time the noise level exceeds this level and half the time the noise level is less than this level). As shown in Table 3-7, the average ambient noise level was 54.4 dBA.

<table>
<thead>
<tr>
<th>Noise Metric</th>
<th>Noise Level (dBA)</th>
<th>Location 1 - Northern End of the Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>(L_{10}) (Noise levels &lt;50% of time)</td>
<td>50.5 dBA</td>
<td></td>
</tr>
<tr>
<td>(L_{20}) (Noise levels &lt;75% of time)</td>
<td>61.8 dBA</td>
<td></td>
</tr>
<tr>
<td>(L_{90}) (Noise levels &lt;90% of time)</td>
<td>67.1 dBA</td>
<td></td>
</tr>
<tr>
<td>(L_{99}) (Noise levels &lt;99% of time)</td>
<td>68.5 dBA</td>
<td></td>
</tr>
<tr>
<td>(L_{min}) (Minimum Noise Level)</td>
<td>43.3 dBA</td>
<td></td>
</tr>
<tr>
<td>(L_{max}) (Maximum Noise Level)</td>
<td>73.1 dBA</td>
<td></td>
</tr>
<tr>
<td>Average Noise Level</td>
<td>54.4 dBA</td>
<td></td>
</tr>
</tbody>
</table>

Source: Blodgett Baylosis Environmental Planning.

The existing ambient noise environment is conducive for residential development. The average ambient noise level of 54.4 dBA is within the “Normally Acceptable” range established for multiple-family residential developments (refer to Exhibit 3-5). Therefore, no post-construction mitigation is required. Section 18.40.090 – Sound Attenuation for Residential Developments of the City of Anaheim Municipal Code establishes an exterior noise level of 65 dBA for single and multiple-family development. The section requires mitigation to attenuate exterior noise levels for residential developments involving the construction of two or more dwelling units, or residential subdivisions resulting in two (2) or more parcels, and located within six hundred (600) feet of any railroad, freeway, expressway, major arterial, primary arterial or secondary arterial. According to the Circulation Element of the City’s General Plan, Knott Avenue is classified as a primary arterial. The project site is located within 600 feet of Knott Avenue. Despite the site’s proximity to a major arterial, the average ambient noise level along the site’s northern property line was 54.4 dBA at the time of the recording.

A traffic noise prediction model was operated for the nearest segment of Savanna Street to determine the projected noise exposure levels from traffic noise. The noise prediction model utilizes a number of independent variables to predict LDN (the average 24-hour day and nighttime noise level), including existing traffic volumes, nature of the ground surface (defined as hardscape or softscape), roadway grade, and the receptor distance from the roadway centerline. The traffic noise levels are depicted using noise “contours” that define the traffic noise levels within the contour.

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### Exhibit 3-5

**Land Use Compatibility for Community Noise Exposure**

Source: City of Anaheim General Plan

<table>
<thead>
<tr>
<th>Land Use Category</th>
<th>Community Noise Exposure Level Ldn or CNEL, dB.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential-Low Density</td>
<td></td>
</tr>
<tr>
<td>Single Family, Duplex, Mobile Homes</td>
<td></td>
</tr>
<tr>
<td>Residential-Multiple Family</td>
<td></td>
</tr>
<tr>
<td>Transient Lodging-Motels, Hotels</td>
<td></td>
</tr>
<tr>
<td>Schools, Libraries, Churches, Hospitals, Nursing Homes</td>
<td></td>
</tr>
<tr>
<td>Auditoriums, Concert Halls, Amphitheaters</td>
<td></td>
</tr>
<tr>
<td>Sports Arena, Outdoor Spectator Sports</td>
<td></td>
</tr>
<tr>
<td>Playgrounds, Neighborhood Parks</td>
<td></td>
</tr>
<tr>
<td>Golf Courses, Riding Stables, Water Recreation, Cemeteries</td>
<td></td>
</tr>
<tr>
<td>Office Buildings, Businesses, Commercial, and Professional</td>
<td></td>
</tr>
<tr>
<td>Industrial, Manufacturing, Utilities, Agriculture</td>
<td></td>
</tr>
</tbody>
</table>

- **Normally Acceptable:** Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
- **Conditionally Acceptable:** New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice. Outdoor environment will seem noisy.
- **Normally Unacceptable:** New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made with needed noise insulation features included in the design. Outdoor areas must be shielded.
- **Clearly Unacceptable:** New construction or development should generally not be undertaken. Construction costs to make the indoor environment acceptable would be prohibitive and the outdoor environment would not be usable.

*Source: California Office of Noise Control*
The noise prediction model indicated that the project would be located within the 66 Community Noise Equivalent Level (CNEL) dBA noise contour. Therefore, the project site would be within the “Conditionally Acceptable” range established for multiple-family residential developments. However, this noise would be reduced by the building’s shell, the inclusion of double-paned windows, and central air conditioning.

The existing ambient noise environment can support the proposed project. In addition, the proposed project will conform to the following policies outlined in the Noise Element of the City’s General Plan:

- **Consider the compatibility of proposed land uses with the noise environment when preparing, revising or reviewing development proposals.** The existing average noise levels adjacent to the site are 54.4 dBA. As shown in Exhibit 3-5, the project site is within the “Normally Acceptable” range established for multiple-family residential developments. In addition, the neighborhood consists of residential units and no noise generating activities took place at the time of the site survey.

- **Discourage the siting of sensitive uses in areas in excess of 65 dBA CNEL without appropriate mitigation.** The existing ambient noise levels average 54.4 dBA along the project site’s northern property line.

- **Enforce standards to regulate noise from construction activities.** Particular emphasis shall be placed on the restriction of the hours in which work other than emergency work may occur. Discourage construction on weekends or holidays except in the case of construction proximate to schools where these operations could disturb the classroom environment. Mitigation has been provided in subsection 3.12.2.D that will ensure the project’s compliance with this policy.

- **Require that construction equipment operate with mufflers and intake silencers no less effective than originally equipped.** Mitigation has been provided in subsection 3.12.2.D that will ensure the project’s compliance with this policy.

Future sources of noise will include noise from vehicles travelling to and from the project site; interior noise; and noise emanating from the parking lot and common open space area. Noise generated within the parking lot and common open space areas would include people shouting/laughing, which averages 64.5 dBA; car door slamming, which averages 62.5 dBA; car idling, which averages 61 dBA; car starting, which averages 59.5 dBA; and people talking, which averages 41 dBA. All of these averages were taken at a distance of 50 feet from the source. This information is based on actual parking lot noise measurements taken by Blodgett Baylosis Environmental Planning. Noise from the aforementioned sources will be attenuated by the six-foot tall concrete wall that will be installed along the site’s eastern, southern, and western property lines. An additional six-foot tall wall is located east of the project site along the adjacent property’s western property line. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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B. Would the project result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. The nearest land uses that may potentially be impacted from groundborne vibration and noise (primarily from the use of heavy construction equipment) are the residential units that abut the site to the east, south, and west. The noisiest phases of construction are anticipated to be 89 dBA at a distance of 50 feet as measured from the noise source (i.e. the location of the construction equipment). The construction activities will be concentrated in the interior of the site where the building demolition and the erection of the new housing units will occur. The construction noise levels will decline as one moves away from the noise source. This effect is known as spreading loss. In general, the noise level adjustment that takes the spreading loss into account calls for a 6.0 dBA reduction for every doubling of the distance beginning with the initial 50-foot distance. Mitigation has been provided in Subsection 3.12.2.D to alleviate potential noise impacts generated during the project’s construction phase. The background vibration velocity level in residential areas is usually around 50 vibration velocity level (VdB). A vibration velocity of 75 VdB is the approximately dividing line between barely perceptible and distinctly perceptible levels for many people. Sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors causes most perceptible indoor vibration. Construction activities may result in varying degrees of ground vibration, depending on the types of equipment, the characteristics of the soil, and the age and construction of nearby buildings. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance.

Buildings located in the vicinity of the construction site respond to these vibrations with varying results ranging from no perceptible effects, low rumbling sounds and discernible vibrations at moderate levels, and actual building damage at the highest levels. Ground vibrations associated with construction activities using modern construction methods and equipment rarely reach the levels that result in damage to nearby buildings though vibration related to construction activities may be discernible in areas located near the construction site. A possible exception is in older buildings where special care must be taken to avoid damage. Table 3-8 summarizes the levels of vibration and the usual effect on people and buildings. The U.S. Department of Transportation (U.S. DOT) has guidelines for vibration levels from construction related to their activities, and recommends that the maximum peak-particle-velocity (PPV) levels remain below 0.05 inches per second at the nearest structures. PPV refers to the movement within the ground of molecular particles and not surface movement. Vibration levels above 0.5 inches per second have the potential to cause architectural damage to normal dwellings. The U.S. DOT also states that vibration levels above 0.015 inches per second (in/sec) are sometimes perceptible to people, and the level at which vibration becomes an irritation to people is 0.64 inches per second.
Table 3-8
Common Effects of Construction Vibration

<table>
<thead>
<tr>
<th>Peak Particle Velocity (in/sec)</th>
<th>Vibration Effects on Humans</th>
<th>Vibration Effects on Buildings</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;0.005</td>
<td>Imperceptible</td>
<td>No effect on buildings</td>
</tr>
<tr>
<td>0.005 to 0.015</td>
<td>Barely perceptible</td>
<td>No effect on buildings</td>
</tr>
<tr>
<td>0.02 to 0.05</td>
<td>Level at which continuous vibrations begin to annoy occupants of nearby buildings</td>
<td>No effect on buildings</td>
</tr>
<tr>
<td>0.1 to 0.5</td>
<td>Vibrations considered unacceptable for persons exposed to continuous or long-term vibration.</td>
<td>Minimal potential for damage to weak or sensitive structures</td>
</tr>
<tr>
<td>0.5 to 1.0</td>
<td>Vibrations considered bothersome by most people, however tolerable if short-term in length</td>
<td>Threshold at which there is a risk of architectural damage to buildings with plastered ceilings and walls. Some risk to ancient monuments and ruins.</td>
</tr>
<tr>
<td>1.0 to 2.0</td>
<td>Vibrations considered unpleasant by most people.</td>
<td>U.S. Bureau of Mines data indicates that blasting vibration in this range will not harm most buildings. Most construction vibration limits are in this range.</td>
</tr>
<tr>
<td>&gt;3.0</td>
<td>Vibration is unpleasant</td>
<td>Potential for architectural damage and possible minor structural damage</td>
</tr>
</tbody>
</table>

Source: U.S. Department of Transportation

Typical levels from vibration generally do not have the potential for any structural damage. Some construction activities, such as pile driving and blasting, can produce vibration levels that may have the potential to damage some vibration sensitive structures if performed within 50 to 100 feet of the structure. The reason that normal construction vibration does not result in structural damage has to do with several issues, including the frequency vibration and magnitude of construction related vibration. Unlike earthquakes, which produce vibration at very low frequencies and have a high potential for structural damage, most construction vibration is in the mid- to upper-frequency range, and therefore has a lower potential for structural damage.

Various types of construction equipment have been measured under a wide variety of construction activities with an average of source levels reported in terms of velocity levels as shown in Table 3-9. Although the table gives one level for each piece of equipment, it should be noted that there is a considerable variation in reported ground vibration levels from construction activities. The data in Table 3-9 does provide a reasonable estimate for a wide range of soil conditions. Based on Transit Noise and Vibration Impact Assessment (FTA, May 2006), a vibration level of 102 VdB (vibration decibels, or 0.5 inches per second [in/sec]) (FTA, May 2006) is considered safe and would not result in any construction vibration damage. In general, the townhome units will be located between 30 and 39 feet from the adjacent sensitive receptors. Thus, construction of the townhome units would take place a minimum of 30 feet from the nearby residential uses. No pile driving equipment would be used during the project’s construction and no significant grading would be required to accommodate the project. Therefore, the proposed project will not generate any significant vibration impacts. The project’s construction will require the use of a jackhammer to break up the concrete driveway that extends along the east side of the project site. The presence of the existing concrete wall located along within the
adjacent property will help attenuate the noise and vibration emanating from the jackhammer. In addition, the peak particle velocity will be below the 0.5 inches per second threshold discussed above.

### Table 3-9
Vibration Source Levels for Typical Construction Equipment

<table>
<thead>
<tr>
<th>Construction Equipment</th>
<th>PPV @ 25 ft. (inches/sec.)</th>
<th>Vibration (VdB) @ 25 ft.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pile Driver (impact)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Upper range</td>
<td>1.58</td>
<td>112</td>
</tr>
<tr>
<td>Typical</td>
<td>0.644</td>
<td>104</td>
</tr>
<tr>
<td>Pile Drive (Sonic)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Upper range</td>
<td>0.734</td>
<td>105</td>
</tr>
<tr>
<td>Typical</td>
<td>0.170</td>
<td>93</td>
</tr>
<tr>
<td>Clam Shovel Drop</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.202</td>
<td></td>
<td>94</td>
</tr>
<tr>
<td>Large Bulldozer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.089</td>
<td></td>
<td>87</td>
</tr>
<tr>
<td>Caisson Drilling</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.089</td>
<td></td>
<td>87</td>
</tr>
<tr>
<td>Loaded Trucks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.076</td>
<td></td>
<td>86</td>
</tr>
<tr>
<td>Jackhammer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.035</td>
<td></td>
<td>79</td>
</tr>
</tbody>
</table>

Source: Noise and Vibration During Construction

Once operational, the proposed project will not generate excessive ground-borne noise because the project will not require the use of equipment capable of creating ground-borne noise. The project will be required to adhere to all pertinent City noise control regulations. In addition, the cumulative traffic associated with the proposed project will not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). Adherence to the construction and post-construction mitigation provided in the previous subsection will reduce potential impacts to levels that are less than significant.

C. **Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less than Significant Impact.** A traffic noise prediction model was operated for the nearest segment of Savanna Street to determine the projected noise exposure levels from traffic noise. The noise prediction model utilizes a number of independent variables to predict LDN (the average 24-hour day and nighttime noise level), including existing traffic volumes, nature of the ground surface (defined as hardscape or softscape), roadway grade, and the receptor distance from the roadway centerline. The traffic noise levels are depicted using noise “contours” that define the traffic noise levels within the contour. The noise prediction model indicated that the project would be located within the 66 Community Noise Equivalent Level (CNEL) dBA noise contour. Therefore, the project site would be within the “Conditionally Acceptable” range established for multiple-family residential developments.109 However, this noise would be reduced by the building’s shell, the inclusion of double-paned windows,

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109 City of Anaheim General Plan. Noise Element Figure N-2—Land Use Compatibility for Community Noise Exposure. Plan dated May 2004. Site accessed on April 20, 2018
and central air conditioning. When adding the additional peak hour traffic from the proposed project (six PM peak hour trips), the LDN for Savanna Street will remain unchanged (66 dBA). The overall increase in ambient noise level would not be readily apparent to an individual with normal hearing. This typically requires a doubling of traffic volumes to generate a change in ambient noise volumes of between 3.0 and 5.0 dBA. Therefore, the traffic noise impacts resulting from the proposed project’s occupancy are deemed to be less than significant. In addition, the project will not result in the exposure of nearby residents to the generation of excessive ground-borne noise due to the nature of the proposed use (no heavy machinery or equipment are anticipated to be in operation once the project is complete). The proposed project’s future residents will be required to adhere to all pertinent City noise regulations. 

Future sources of noise will include noise from vehicles travelling to and from the project site; interior noise; and noise emanating from the parking lot and common open space area. Noise generated within the parking lot and common open space areas would include people shouting/laughing, which averages 64.5 dBA; car door slamming, which averages 62.5 dBA; car idling, which averages 61 dBA; car starting, which averages 59.5 dBA; and people talking, which averages 41 dBA. All of these averages were taken at a distance of 50 feet from the source. This information is based on actual parking lot noise measurements taken by Blodgett Baylosis Environmental Planning. Noise from the aforementioned sources will be attenuated by the six-foot tall concrete wall that will be installed along the site’s eastern, southern, and western property lines. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

D. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact with Mitigation. As indicated previously, the nearest noise sensitive receptors are the residential units that abut the project site to the east, west, and south. Noise levels associated with various types of construction equipment are summarized in Exhibit 3-6. The noise levels are those that would be expected at a distance of 50 feet from the noise source. Composite construction noise is best characterized in a study prepared by Bolt, Beranek, and Newman. The noisiest phases of construction are anticipated to be 89 dBA at a distance of 50 feet as measured from the noise source (i.e. the location of the construction equipment). The construction activities will be concentrated in the interior of the site where the building demolition and the erection of the new housing units will occur. The homes located along the project site’s eastern property line lie within a 50-foot distance of the construction activity. The demolition of the existing residence and the removal of the concrete driveway will be the predominant source of noise during the demolition phases. The construction of the new units in the eastern portion of the site will also be within 50 feet of the existing homes to the east. Therefore, the highest noise level to reach these sensitive receptors is approximately 89 dBA. Since the project’s construction will likely result in excessive noise levels, the following mitigation is required:

**Mitigation Measure No. 5 (Noise).** The City Inspector shall ensure that the contractors use construction equipment that includes working mufflers and other sound suppression mechanisms as a means to reduce machinery noise. The Inspector must inspect the equipment prior to the start of the demolition phase.
### Exhibit 3-6

**Typical Construction Noise Levels**

*Source: Blodgett Bayliss Environmental Planning*

<table>
<thead>
<tr>
<th><strong>Equipment</strong></th>
<th>70 dBA</th>
<th>80 dBA</th>
<th>90 dBA</th>
<th>100 dBA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Earth Moving Equipment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compactors (Rollers)</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Front Loaders</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Backhoes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tractors</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scrapers, Graders</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Pavers</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Trucks</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Materials Handling Equipment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Concrete Mixers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Concrete Pumps</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Cranes (Movable)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Cranes (Derrick)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Stationary Equipment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pumps</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Generators</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compressors</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Impact Equipment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pneumatic Wrenches</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jack Hammers</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Pile Drivers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Other Equipment</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vibrators</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Saws</td>
<td></td>
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</tbody>
</table>
Mitigation Measure No. 6 (Noise). The Applicant must notify residents in the area regarding construction times and local contact information. This notice must be placed along the north side of the project site approximately 10 days prior to the start of demolition and shall include the name and phone number of the local contact person residents may call to complain about noise. The City Inspector will verify that the notice has been placed along the north side of the site prior to the start of demolition. Upon receipt of a complaint, the contractor must respond immediately by reducing noise via available reasonable means, and to the satisfaction of the Planning Director. In addition, all complaints and subsequent communication between the affected residents and contractors must be forwarded to the City’s Planning and Building Department.

Mitigation Measure No. 7 (Noise). The Applicant shall ensure that the contractors conduct demolition and construction activities between the hours of 7:00 AM and 7:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no construction permitted on Sundays or Federal holidays.

Mitigation Measure No. 5 calls for the use of sound suppressing equipment. For example, a typical excavator will produce noise levels of around 80.5 dBA at a distance of 50 feet. In the quietest configuration, with improved exhaust and intake muffling, fan disengaged, and three sound panels around the engine, the overall level was reduced to 71.5 dBA at a distance of 50 feet. Furthermore, regular maintenance of construction equipment will ensure noise levels do not increase over time. The proposed on-site improvements will not require extensive excavation and therefore will not cause extensive noise. Adherence to the mitigation outlined above will reduce potential impacts to levels that are less than significant. Furthermore, the construction noise impacts will cease once construction is complete. The existing six foot wall that separates the project site and the units to the east will further reduce anticipated noise levels. According to Caltrans, an eight inch thick concrete block wall will attenuate noise levels by as much as 34 dBA as long as the line of sight between the noise source and the receptor is blocked by the aforementioned wall.

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

No Impact. The project site is located within two miles of the Joint Forces Joint Forces Training Base in Los Alamitos. The site is not located within the airport’s 60 CNEL boundaries. As a result, the proposed project’s implementation would not expose future visitors and residents to excess aircraft noise and no impacts will occur. Therefore, no mitigation is required.

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https://www.lhsfna.org/LHSFNA/assets/File/bpguide%202014.pdf


112 Toll-Free Airline. *Orange County Public and Private Airports, California.*
http://www.tollfreeairline.com/california/losangeles.htm. Site accessed on April 20, 2018

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

No Impact. The project site is not located within two miles of a private use airport or helipad. Therefore, no impacts will result with the implementation of the proposed project and no mitigation is required.

3.12.2 CUMULATIVE IMPACTS

According to the City, there are three related projects located within the vicinity of the project site. The number of trips that will be added to the adjacent roadways by the proposed project as well as by the related projects will not result in a doubling of traffic volumes. In addition, the related projects are not located in the immediate vicinity of the proposed project. The separation of the four projects (including the proposed project) will eliminate the concentration of noise generating activities that would result in an increase in cumulative noise levels and no additional mitigation is required.
### 3.13 Population & Housing

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.13.A</td>
<td>Induce substantial 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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.13.B</td>
<td>Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.13.C</td>
<td>Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 3.13.1 Analysis of Environmental Impacts

#### A. Would the project 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)?

**No Impact.** Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts are described below:

- **New development in an area presently undeveloped and economic factors which may influence development.** The site is currently occupied by two single-family units. In addition, the site is located in the midst of an urban area.

- **Extension of roadways and other transportation facilities.** The project will utilize the existing roadways and sidewalks. The new driveway that will be provided will only serve the project and its future residents.

- **Extension of infrastructure and other improvements.** The project will utilize the existing infrastructure, though new utility lines will be installed. The installation of these new utility lines will not lead to subsequent development.

- **Major off-site public projects (treatment plants, etc.).** The project is a proposal to construct 19 townhome units on a 0.78-acre lot. The project’s increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants.

- **The removal of housing requiring replacement housing elsewhere.** The site is occupied by two market rate housing units that will be replaced by 19 new residential units.
Additional population growth leading to increased demand for goods and services. The project will result in a potential population increase of up to 68 new persons. This incremental increase in the City’s population will lead to an increase in demand for municipal services, though the payment of all required development impact fees will help alleviate the marginal increase in demand.

Short-term growth-inducing impacts related to the project’s construction. The project will result in temporary employment during the construction phase.

The proposed project is an infill development that will utilize existing roadways and infrastructure. The new utility lines that will be provided will not extend into undeveloped areas and will not result in unplanned growth. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), the City of Anaheim is projected to add a total of 58,100 new residents through the year 2040. The potential population increase that is attributable to the proposed project is approximately 68 persons based on the average ratio of 3.38 persons per household identified in the 2010 U.S. Census. Therefore, the proposed project will not result in substantial unplanned population growth. As a result, no impacts will occur and no mitigation is required.

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

Less than Significant Impact. The project site is currently occupied by two market rate housing units. These existing units will be demolished in order to accommodate the construction of the 19 new townhome units. The project will involve the construction of 19 new market-rate housing units that will replace the existing two market rate units that will be demolished. As a result, no mitigation is required.

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

Less than Significant Impact. The project site is currently occupied by two market rate housing units. These existing units will be demolished in order to accommodate the construction of the 19 new townhome units. The proposed project will displace an estimated seven individuals based on the ratio of 3.38 persons per household identified in the 2010 U.S. Census. The project Applicant will not be required to provide replacement housing since the units that occupy the site are market rate units. As a result, less than significant impacts will occur and no mitigation is required.

3.13.2 CUMULATIVE IMPACTS

The analysis of potential population and housing impacts indicated that no significant impacts would result upon the proposed project’s implementation. The potential population and employment growth that would result with the implementation of the four cumulative projects (including the proposed

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project) is not a significant factor in relation to population and employment projections calculated for the City in the SCAG 2016 RTP/SCS. Moreover, these projects will utilize existing infrastructure including sewer and water lines, roadways, and storm drains. In addition, there will be no citywide net loss in housing. As a result, no cumulative impacts will occur and no mitigation is required.
### 3.14 Public Services

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.14.A.</td>
<td>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in fire protection services?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.14.B.</td>
<td>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in police protection services?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.14.C.</td>
<td>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in school services?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.14.D.</td>
<td>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in parks?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.14.E.</td>
<td>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in other public facilities?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 3.14.1 Analysis of Environmental Impacts

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

**Less than Significant Impact.** The City of Anaheim Department of Fire and Rescue provides fire protection services in Anaheim. The Operations Division is the largest division in the Anaheim Fire and Rescue. Under the direction of the Operations Deputy Chief, the Division employs seven Battalion Chiefs, approximately 200 Suppression Personnel, an Emergency Medical Services (EMS) Coordinator,
a registered nurse EMS Educator, and a senior secretary. Field Operations handles approximately 30,000 emergency incidents a year including fire suppression, rescue, medical aid, and other calls for service. Operation Division manages all major emergency responses and staffs ten engine and six truck companies in 11 Fire Stations. In addition, the Operations Division is responsible for insuring that all personnel are Hazardous Material's First Responder trained, and for maintaining one of Orange County’s Type 1 Hazmat Units and a Type I Urban Search & Rescue Team. The training and safety section is also managed by the Operations Division as well as the Type 3 Wildland Interface engines.115

The closest first response station to the project site is the Twila Reid Station No. 11, located 0.92 mile northeast of the site along Orange Avenue. The Department of Fire and Rescue will review the development plans to ascertain the nature and extent of any additional measures that may be required to meet any Fire Code requirements. As stated in Section 3.13.2.C, an estimated seven individuals currently reside on-site based on the average ratio of 3.38 persons per household identified in the 2010 U.S. Census. The project is anticipated to result in a net increase of 61 persons over the existing conditions (68 new residents overall). The proposed project would not place additional demands on fire services since the project is designed with more modern structures. In addition, the project Applicant will be required to pay all pertinent development impact fees. The proposed project will involve the removal of two existing older units that will be replaced by newer units that are in conformance with current building and safety code requirements. In addition, the proposed project is located on an infill property and it will not involve any obstructions or changes to the surrounding public street system. As a result, the proposed project will not affect the response times of the Twila Reid Station No. 11.116 Finally, AFD representatives indicated that the project will not impact response times or capacity. As a result, the potential project’s impacts are less than significant and no mitigation is required.

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

Less than Significant Impact. Law enforcement services are provided by the Anaheim Police Department (APD). The APD employs sworn officers, support staff, and a Reserve Officer Detail. Officers operate out of four stations and the City is divided into four service districts (West, Central, South, and East).117 The project site is located in the western district and is served by the APD’s West Station, which is located 1.27 miles to the northeast along the east side of Beach Boulevard. As stated in Section 3.13.2.C, an estimated seven individuals currently reside on-site based on the ratio of 3.38 persons per household identified in the 2010 U.S. Census. The project is anticipated to result in an increase of 61 persons over the existing conditions.


116 Telephone communication with Mr. Todd Rudaitis, Inspector with the Anaheim Fire Department. Phone call took place on August 8, 2018.

The proposed project will place an incremental demand on the Department’s services. The APD has reviewed the site plan and has made a number of requirements that have been incorporated directly onto the development plan specifications. These include pre-wiring all of the units for alarm systems, clearing identifying unit addresses both from ground level and from the air, secure doors with deadbolt locks, wide angled peep-holes mounted on or near the doors, adequate security lighting, and ensuring that landscaping and design measures promote defensible space. These requirements are identified directly on the site plan and are recommended conditions of approval for the proposed project. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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

Less than Significant Impact. The City of Anaheim is served by eleven school districts that oversee 49 elementary schools, 10 junior high schools, and 14 high schools within City’s boundaries. These public schools currently educate well over 100,000 students and offer additional educational opportunities and facilities to the community at large. The project site is located within the attendance boundaries of the Savanna Elementary School District and the Anaheim Union High School District (AUHSD). The closest elementary school to the project site is Hansen Elementary School, located 0.28 mile to the southeast along the east side of Knott Avenue; the closest middle school to the project site is Orangeview Junior High School, located 0.33 mile to the north along the north side of Orange Avenue; lastly, the closest high school is Western High School, located one-half mile to the northeast of the project site along the north side of Orange Avenue.

To determine the number of students that would be created by the proposed project, a generation rate derived from the Final Anaheim General Plan and Zoning Code Update Environmental Impact Report (EIR) No. 330 SCH #2003041105 prepared by the Planning Center was used. The EIR was adopted on May 25, 2004. The student generation rates for single-family units are 0.406 for elementary schools, 0.144 for middle schools, and 0.240 for high schools. Using these rates, the project has the potential to result in eight elementary school students, three middle school students, and five high school students. The rates for single-family were chosen since they were the most conservative and represented a worst-case scenario. According to the 2010 U.S. Census, approximately 22 percent of the City’s population is aged 5 to 19. Assuming 22 percent of the 68 new residents are school-aged, the project may result in up to 15 new students. The project Applicant will be required to pay all applicable school development fees. Mandatory payment of school impact fees will reduce the potential impacts to levels that are less than significant and no mitigation is required.


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

Less than Significant Impact. The proposed project will include 5,931 square feet of common open space. Various amenities will be provided such as a tot lot and a barbeque area. The inclusion of these amenities and common open space will alleviate the increase in demand for parks and recreational services. In addition, the City of Anaheim requires residential developers to pay an in-lieu park development fee. The payment of this fee will allow the City to conduct regular maintenance or construct/expand new or existing facilities. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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

Less than Significant Impact. The proposed project has the potential to add an estimated 68 new residents to the City. This increase alone will not require the expansion or construction of new governmental facilities such as libraries and parks since the Applicant is required to pay development impact fees to offset a potential increase in demand for City services that is within the growth boundaries identified in the General Plan and based on zoning designations. The payment of all mandatory development fees will reduce potential governmental service impacts to levels that are less than significant and no mitigation is required.

3.14.2 CUMULATIVE IMPACTS

The four cumulative projects (including the proposed project) will lead to an increase in demand for police and fire services. This increase in demand may significantly impact both departments; however, the payment of development fees will ensure both departments have adequate resources to accommodate the additional demand. The payment of all school impact fees will allow the designated school districts to use the fees to alleviate any potential burdens related to an increase in school enrollments. As a result, no cumulative public service impacts are anticipated and no project-related mitigation is required.
### 3.15 Recreation

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.15.A.</td>
<td>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>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.15.B.</td>
<td>Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 3.15.1 Analysis of Environmental Impacts

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

*Less than Significant Impact.* The Parks Division of the Community Services Department is responsible for the maintenance and upkeep of 57 parks in Anaheim. These 57 parks encompass 800 acres of parkland. The closest park to the project site is Hansen Park, located 0.40 mile to the southeast of the project site. As indicated in Section 3.14.2.D, the proposed project will include 5,931 square feet of common open space. Various amenities will be provided such as a tot lot and a barbeque area. The inclusion of these amenities and common open space will alleviate the increase in demand for parks and recreational services. In addition, the City of Anaheim requires residential developers to pay an in-lieu park development fee pursuant to Government Code Section 66477(a), which states:

“The legislative body of a city or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative map or parcel map”

The payment of this fee will allow the City to conduct regular maintenance or construct/expand new or existing facilities. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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

*Less than Significant Impact.* The project will include recreational facilities consisting of 5,931 square feet of common open space, a tot lot, and a barbeque area. These amenities will be restricted for

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residents and their guests. In addition, these project features will be restricted to the designated project site and no outside areas will be disturbed to accommodate the installation of the aforementioned amenities. Furthermore, the subsequent increase in usage of City parks and recreational services will not be enough to result in a deterioration of park and recreational services since the developer will be required to pay park development fees. The payment of the in-lieu park fee will allow the City to construct/expand new or existing facilities. Therefore, less than significant impacts will result and no mitigation is required.

3.15.2 CUMULATIVE IMPACTS

A total of two of the four cumulative projects will not have an impact on parks and recreational services. These two projects are commercial in nature (Taco Bell and medical office) and will not result in direct population growth. However, the remaining two projects: the proposed project and the 22-unit Lincoln Cottages will result in an incremental demand on local parks and recreational facilities. Despite the addition of the two residential projects, the payment of all pertinent park development fees will reduce potential cumulative recreation impacts to levels that are less than significant and no mitigation is required of the project.
### 3.16 TRANSPORTATION

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.16.A.</td>
<td>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>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.16.B.</td>
<td>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>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.16.C.</td>
<td>Result in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks?</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.16.D.</td>
<td>Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.16.E.</td>
<td>Conflict in inadequate emergency access?</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.16.F.</td>
<td>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>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 3.16.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

According to the "Criteria for Preparation of Traffic Impact Studies" of the City of Anaheim, Intersection Capacity Calculations is based on the Intersection Capacity Utilization (ICU) method. Per City's Growth Management Element requirements, a volume/capacity ratio of 0.90 (Level of Service D) shall be the lowest acceptable Service Level at intersections following implementation of mitigation measures. Mitigation measures sufficient to bring intersections and roadway segments to the acceptable service levels must be identified.

A. Would the project 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?

*Less than Significant Impact.* A Traffic Impact Study dated May 10, 2018 was prepared for the project by K2 Traffic Engineering, Inc. (this report is provided in Appendix F). In compliance with the scoping agreement approved by the City of Anaheim, this study includes the following scenarios:
• Existing Conditions;
• Existing Conditions plus Project;
• Opening Year (2020);
• Opening Year plus Project (2020);
• General Plan Build-out (2035); and,
• General Plan Build-out plus Project (2035).

The project site is situated at 3534 and 3538 West Savanna Street. Savanna Street is an east-west residential collector with one lane in each direction. The posted speed limit is 25 mph. The nearest intersection at Savanna Street and Knott Avenue is controlled by traffic signals. Based on the approved scoping agreement, AM and PM peak hour turning movement counts were performed at the intersection of Savanna Street and Knott Avenue on January 25, 2018. Existing traffic volumes and lane configuration are illustrated in Exhibit 3-7. Traffic data can be found in Appendix B of the traffic study. This Traffic Study has been approved by the City of Anaheim.

Complying with the guidelines, the intersection analysis is performed using SYNCHRO software and the Intersection Capacity Utilization (ICU) method. Table 3-10 shows existing traffic conditions of studied intersections. All studied intersections are currently operated at level of service “A.” The analysis worksheets can be found in Appendix C of the traffic study.

<table>
<thead>
<tr>
<th>Intersection</th>
<th>AM Peak ICU</th>
<th>AM Peak LOS</th>
<th>PM Peak ICU</th>
<th>PM Peak LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Savanna St at Knott Ave</td>
<td>0.556</td>
<td>A</td>
<td>0.538</td>
<td>A</td>
</tr>
</tbody>
</table>

Trip generation represents the amount of traffic attracted and produced by the project development. Based upon the recommendations from “Trip Generation” 10th edition, published by the Institute of Transportation Engineers (ITE), project related trip generation rates are shown in Table 3-11.

<table>
<thead>
<tr>
<th>LAND USE</th>
<th>UNIT</th>
<th>Daily</th>
<th>AM Peak</th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total</td>
<td>Total</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>IN</td>
<td>OUT</td>
</tr>
<tr>
<td>Multi-family Housing (Mid-Rise)</td>
<td>Dwelling Unit</td>
<td>5.44</td>
<td>0.36</td>
<td>21%</td>
</tr>
<tr>
<td>(221)</td>
<td></td>
<td></td>
<td>21%</td>
<td>79%</td>
</tr>
<tr>
<td>Single-Family Detached Housing</td>
<td>Dwelling Unit</td>
<td>9.44</td>
<td>0.19</td>
<td>25%</td>
</tr>
<tr>
<td>(210)</td>
<td></td>
<td></td>
<td>25%</td>
<td>75%</td>
</tr>
</tbody>
</table>

124 Ibid.
EXHIBIT 3-7
EXISTING TRAFFIC VOLUME & LANE CONFIGURATION
SOURCE: K2 TRAFFIC ENGINEERING
The proposed developments are expected to have a NET increase of two inbound and four outbound trips in the AM peak hour, four inbound and two outbound trips in the PM peak hour, and 86 daily trips. The projected trips associated with the project are provided in Table 3-12.

<table>
<thead>
<tr>
<th>LAND USE</th>
<th>UNIT</th>
<th>Quantity</th>
<th>AM Peak</th>
<th>PM Peak</th>
<th>Daily</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>IN</td>
<td>OUT</td>
<td>IN</td>
</tr>
<tr>
<td>Multi-family Housing (Mid-Rise) (221)</td>
<td>Dwelling Unit</td>
<td>19</td>
<td>7</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>Single-Family Detached Housing (210)</td>
<td>Dwelling Unit</td>
<td>-2</td>
<td>-1</td>
<td>0</td>
<td>-1</td>
</tr>
</tbody>
</table>

**NET TRIPS**

6 2 4 6 4 2 86

Trip distribution represents the directional orientation of traffic to and from the proposed project. Directional orientation is largely influenced by the geographical location of the site, among many other factors. The trip distribution pattern for the project is illustrated on Exhibit 3-8. The traffic assignment to and from the project site has been based upon the results of trip generation, trip distribution, and access layouts. Exhibit 3-9 illustrates the traffic assignment of the proposed project for the AM and PM peak hours.

Traffic volumes of the existing condition plus project traffic are shown in Exhibit 3-10. The project's level of significance of traffic impact under existing conditions for the AM and PM peak hour are shown in Table 3-13. All studied intersections will maintain level of service "A" for the existing conditions plus project.

<table>
<thead>
<tr>
<th>Intersection</th>
<th>AM Peak ICU</th>
<th>AM Peak LOS</th>
<th>PM Peak ICU</th>
<th>PM Peak LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Savanna St. at Knott Ave.</td>
<td>0.559</td>
<td>A</td>
<td>0.539</td>
<td>A</td>
</tr>
<tr>
<td>2. Project Driveway</td>
<td>9.5 seconds</td>
<td>A</td>
<td>8.9 seconds</td>
<td>A</td>
</tr>
</tbody>
</table>

Traffic conditions prior to completion of the proposed development is estimated by applying an annual growth rate of one percent over existing traffic counts for year 2020 conditions plus traffic generated by other developments. Traffic volumes for the pre-project completion are illustrated in Exhibit 3-11.

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126 Ibid.
127 Ibid.
EXHIBIT 3-9
TRAFFIC ASSIGNMENT
SOURCE: K2 TRAFFIC ENGINEERING
EXHIBIT 3-10
EXISTING CONDITIONS PLUS PROJECT
SOURCE: K2 TRAFFIC ENGINEERING
EXHIBIT 3-11
OPENING YEAR PLUS OTHER DEVELOPMENTS TRAFFIC VOLUME
SOURCE: K2 TRAFFIC ENGINEERING
EXHIBIT 3-12
OPENING YEAR PLUS OTHER DEVELOPMENTS
PLUS PROJECT TRAFFIC VOLUME
SOURCE: K2 TRAFFIC ENGINEERING
Table 3-15  
Opening Year Conditions Plus Project

<table>
<thead>
<tr>
<th>Intersection</th>
<th>AM Peak ICU</th>
<th>AM Peak LOS</th>
<th>PM Peak ICU</th>
<th>PM Peak LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Savanna St. at Knott Ave.</td>
<td>0.569</td>
<td>A</td>
<td>0.550</td>
<td>A</td>
</tr>
<tr>
<td>2. Project Driveway</td>
<td>9.5 seconds</td>
<td>A</td>
<td>8.9 seconds</td>
<td>A</td>
</tr>
</tbody>
</table>

Based on the projection data furnished by the Planning Department, General Plan build-out conditions are illustrated in Exhibit 3-13. The level of services for AM and PM peak hours are shown in Table 3-16.

Table 3-16  
General Plan Build-out Level of Service

<table>
<thead>
<tr>
<th>Intersection</th>
<th>AM Peak ICU</th>
<th>AM Peak LOS</th>
<th>PM Peak ICU</th>
<th>PM Peak LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Savanna St. at Knott Ave.</td>
<td>0.728</td>
<td>C</td>
<td>0.538</td>
<td>A</td>
</tr>
</tbody>
</table>

Traffic volumes for General Plan Build-out conditions plus project are illustrated in Exhibit 3-14. The level of services for AM and PM peak hours are shown in Table 3-17.

Table 3-17  
General Plan Build-out Plus Project Level of Service

<table>
<thead>
<tr>
<th>Intersection</th>
<th>AM Peak ICU</th>
<th>AM Peak LOS</th>
<th>PM Peak ICU</th>
<th>PM Peak LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Savanna St. at Knott Ave.</td>
<td>0.732</td>
<td>C</td>
<td>0.539</td>
<td>A</td>
</tr>
<tr>
<td>2. Project Driveway</td>
<td>9.6 seconds</td>
<td>A</td>
<td>8.8 seconds</td>
<td>A</td>
</tr>
</tbody>
</table>

In accordance with the City's guidelines, the threshold of significant traffic impact on an intersection is shown in Table 3-18.

Table 3-18  
Threshold of Significant Impact

<table>
<thead>
<tr>
<th>LOS</th>
<th>Final V/C Ratio</th>
<th>Project-Related Increase In V/C</th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
<td>&gt; 0.700 - 0.800</td>
<td>≥ 0.050</td>
</tr>
<tr>
<td>D</td>
<td>&gt; 0.800 - 0.900</td>
<td>≥ 0.030</td>
</tr>
<tr>
<td>E, F</td>
<td>&gt; 0.900</td>
<td>≥ 0.010</td>
</tr>
</tbody>
</table>
EXHIBIT 3-13
GENERAL PLAN BUILD-OUT TRAFFIC VOLUME
SOURCE: K2 TRAFFIC ENGINEERING
EXHIBIT 3-14
GENERAL PLAN BUILD-OUT PLUS PROJECT TRAFFIC VOLUME
SOURCE: K2 TRAFFIC ENGINEERING
The traffic impacts of the project at the study intersection of Savanna Street and Knott Avenue under various scenarios are shown in Table 3-19. The project will not result in a significant impact for any of the study scenario.\(^\text{128}\) Therefore, no mitigation measures are required and the potential impacts are considered to be less than significant.

### Table 3-19

**Project Impact Analysis**

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Pre-Project Conditions</th>
<th>Post Project Conditions</th>
<th>Project-Related Increase in V/C</th>
<th>Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>LOS</td>
<td>ICU</td>
<td>LOS</td>
<td>ICU</td>
</tr>
<tr>
<td><strong>AM PEAK</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing + Project</td>
<td>0.556</td>
<td>A</td>
<td>0.559</td>
<td>A</td>
</tr>
<tr>
<td>Opening + Project</td>
<td>0.567</td>
<td>A</td>
<td>0.569</td>
<td>A</td>
</tr>
<tr>
<td>GP Build-out + Project</td>
<td>0.728</td>
<td>C</td>
<td>0.732</td>
<td>C</td>
</tr>
<tr>
<td><strong>PM PEAK</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing + Project</td>
<td>0.538</td>
<td>A</td>
<td>0.539</td>
<td>A</td>
</tr>
<tr>
<td>Opening + Project</td>
<td>0.549</td>
<td>A</td>
<td>0.550</td>
<td>A</td>
</tr>
<tr>
<td>GP Build-out + Project</td>
<td>0.538</td>
<td>A</td>
<td>0.539</td>
<td>A</td>
</tr>
</tbody>
</table>

**B. Would the project 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?**

*No Impact.* The proposed project is consistent with the requirements and procedures outlined in the current Orange County Congestion Management Program (CMP). The CMP requires that a traffic impact analysis be conducted for any project generating 2,400 or more daily trips, or 1,600 or more daily trips for projects that directly access the CMP Highway System (HS). It should be noted that the two thresholds described above are intended for establishing the CMP based study scope, and are not the CMP’s criteria for determining significant traffic impacts of a development project. Per the CMP, a significant impact is identified if the project causes the CMP facility to operate worse than a LOS E, and increases the ICU value by more than 0.10 if the CMP facility operates at LOS F with the project. The traffic resulting from the project’s occupation will not generate more than 1,600 trips, decrease any intersection’s LOS to an LOS E or worse, or increase an ICU value by more than 0.10. As a result, no impacts will occur and no mitigation is required.

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C. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in the location that results in substantial safety risks?

*No Impact.* The project site is not located within an approach or take-off aircraft safety zone for the Joint Forces Training Base (refer to Section 3.12.2.E). As a result, no impacts are anticipated and no mitigation is required.

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

*Less than Significant Impact.* A Traffic Impact Study dated May 10, 2018 was prepared for the project by K2 Traffic Engineering, Inc. (this report is provided in Appendix F). Street parking is allowed on Savanna Street and at project frontage. Site access appears safe and corner sight distance is adequate. The site consists of alleyways at least 24 feet wide connecting all buildings. Adequate setbacks are provided to ensure parking maneuvers be contained on site without affecting traffic on the public street. On-site circulation appears efficient and safe without bottleneck. The intersection of Knott Avenue and Savanna Street is signalized. Therefore, the project will not introduce future residents and guests to a dangerous intersection. Furthermore, the project will not introduce equipment or vehicles (such as trucks, etc.) that are incompatible with the surrounding roadways since the project will be residential in nature. As a result, the potential impacts are considered to be less than significant.

E. Would the project result in inadequate emergency access?

*No Impact.* The project would not affect emergency access to any adjacent parcels. At no time will any local streets or parcels be closed to traffic. As a result, the proposed project’s implementation will not result in any impacts and no mitigation is required.

F. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

*No Impact.* The project site is in close proximity to the Knott Avenue/Savanna Street stop. This stop is utilized by Orange County Transportation Authority (OCTA) Line 25. This bus stop will not be impacted by the proposed project. Furthermore, the proposed project will not significantly affect patrons. There are no bicycle lanes located along Knott Avenue or Savanna Street. In addition, the project will not impact pedestrian facilities since the project will not remove the existing sidewalks. As a result, no impacts will result from the proposed project’s implementation and no mitigation is required.

### 3.16.2 Cumulative Impacts

Other developments approved by the City of Anaheim within a five-mile radius of the project site were also taken into consideration. According to the City, there are three related projects located within the vicinity of the project site. The number of trips that will be added to the adjacent roadways by the proposed project as well as by the related projects will not result in a deterioration of any study.

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intersection’s level of service. In addition, the related projects are not located in the immediate vicinity of the proposed project. The number of trips that will be generated by the three related projects is shown in Table 3-20. Exhibit 3-15 illustrates traffic volumes generated by other development projects for study intersections.

Table 3-20
Cumulative Projects

<table>
<thead>
<tr>
<th>Project Information</th>
<th>Location</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
<th>Daily</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
</tr>
<tr>
<td>Proposed 5,270 sq.ft. single story medical office</td>
<td>3350 W Ball Road</td>
<td>11</td>
<td>3</td>
<td>15</td>
</tr>
<tr>
<td>Taco Bell with Drive-Through (2,558 sf)</td>
<td>3270 W Lincoln Avenue</td>
<td>52</td>
<td>50</td>
<td>103</td>
</tr>
<tr>
<td>Lincoln Cottages (22-unit single-family residences)</td>
<td>3319-3321 W Lincoln Avenue</td>
<td>2</td>
<td>6</td>
<td>8</td>
</tr>
</tbody>
</table>

The proposed project is expected to have a net increase of two inbound and four outbound trips in the AM peak hour, four inbound and two outbound trips in the PM peak hour, and 86 net daily trips. The addition of the project’s trips with the trips produced by the related projects listed above will not result in a degradation of any of the study intersection’s level of service. As a result, the cumulative impacts are considered to be less than significant and no mitigation is required.
EXHIBIT 3-15
OTHER DEVELOPMENTS TRAFFIC VOLUME
SOURCE: K2 TRAFFIC ENGINEERING
### 3.17 TRIBAL CULTURAL RESOURCES

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.17.A.</td>
<td>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?</td>
<td>X</td>
<td></td>
<td></td>
<td>No Impact</td>
</tr>
<tr>
<td>3.17.B.</td>
<td>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section §5024.1. In applying criterial set forth in subdivision (c) of Public Resources Code Section §5021.1, the lead agency shall consider the significance of the resource to a California Native American tribe?</td>
<td>X</td>
<td></td>
<td></td>
<td>No Impact</td>
</tr>
</tbody>
</table>

### 3.17.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

**A. Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

**Less than Significant Impact.** A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this
paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

A Sacred Lands File Search was conducted for the project. The results of which came back negative (refer to the letter prepared by the NAHC which is shown in Appendix B). Formal Native American consultation was provided in accordance with AB-52. AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. AB-52 consultation letters were sent to a total of 22 individuals presenting various branches of the Gabrieleño, Juaneño, Kumeyaay, and Serrano. The specific tribal contacts are included in Appendix B, which is provided under a separate cover. The tribal representative of the Gabrieleño-Kizh indicated that the project site is situated in an area of high archaeological significance. As a result, Mitigation Measure Number 2 was included in Section 3.5 to address potential impacts to cultural resources. This mitigation calls for the use of monitors during ground disturbance activities, which are defined as activities that include, but are not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, and trenching, within the project area. The monitor(s) will complete monitoring logs on a daily basis that will provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed. In the unlikely event that remains are uncovered by construction crews, all excavation and grading activities shall be halted and the Anaheim Police Department would be contacted (the Department would then contact the County Coroner). This is a standard condition under California Health and Safety Code Section 7050.5(b). With the implementation of this mitigation measure, tribal cultural impacts will be reduced to levels that are considered to be less than significant and no additional mitigation is required.
B. Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section §5024.1. In applying criterial set forth in subdivision (c) of Public Resources Code Section §5021.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact. A Sacred Lands File Search was conducted for the project. The results of which came back negative (refer to the letter prepared by the NAHC which is shown in Appendix B). Formal Native American consultation was provided in accordance with AB-52. AB-52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. AB-52 consultation letters were sent to a total of 22 individuals presenting various branches of the Gabrieleño, Juaneño, Kumeyaay, and Serrano. The specific tribal contacts are included in Appendix B, which is provided under a separate cover. The tribal representative of the Gabrieleño-Kizh indicated that the project site is situated in an area of high archaeological significance. As a result, Mitigation Measure Number 2 was included in Section 3.5 to address potential impacts to cultural resources. This mitigation calls for the use of monitors during ground disturbance activities, which are defined as activities that include, but are not limited to, pavement removal, pot-holing, or auguring, boring, grading, excavation, and trenching, within the project area. The monitor(s) will complete monitoring logs on a daily basis that will provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed. In the unlikely event that remains are uncovered by construction crews, all excavation and grading activities shall be halted and the Anaheim Police Department would be contacted (the Department would then contact the County Coroner). This is a standard condition under California Health and Safety Code Section 7050.5(b). With the implementation of this mitigation measure, tribal cultural impacts will be reduced to levels that are considered to be less than significant and no additional mitigation is required.

3.17.2 Cumulative Impacts

The analysis determined that there would not be any impacts related to tribal cultural resources. As a result, no significant cumulative impacts will occur as part of the implementation of the proposed project and no additional project-related mitigation is required.
## 3.18 Utilities

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.18.A.</td>
<td>Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>3.18.B.</td>
<td>Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>3.18.C.</td>
<td>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>
<td></td>
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<td></td>
</tr>
<tr>
<td>3.18.D.</td>
<td>Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>3.18.E.</td>
<td>Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>3.18.F.</td>
<td>Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>3.18.G.</td>
<td>Comply with Federal, State, and local statutes and regulations related to solid waste?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>3.18.H.</td>
<td>Result in a need for new systems or supplies, or substantial alterations related to electricity?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>3.18.I.</td>
<td>Result in a need for new systems or supplies, or substantial alterations related to natural gas?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>3.18.J.</td>
<td>Result in a need for new systems or supplies, or substantial alterations related to telephone service?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
<tr>
<td>3.18.K.</td>
<td>Result in a need for new systems or supplies, or substantial alterations related to television service/reception?</td>
<td></td>
<td></td>
<td>❌</td>
<td></td>
</tr>
</tbody>
</table>

### 3.18.1 Analysis of Environmental Impacts

**A. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

*Less than Significant Impact.* Sewage is collected by City collector facilities and conveyed to trunk sewers owned and maintained by the Orange County Sanitation District, which then treats the sewage at regional facilities. The Orange County Sanitation District (OCSD) is responsible for safely collecting, treating, and disposing the wastewater generated by 2.5 million people living in a 479 square-mile area of central and northwest Orange County. The OCSD’s system includes approximately 580 miles of

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sewer lines and two treatment plants located in the Cities of Fountain Valley and Huntington Beach. Through these facilities, OCSD collects, conveys, treats, and/or reclaims approximately 23o-million gallons of wastewater generated daily in its service area.

Wastewater from the City’s local conveyance system is then conveyed to the OCSD trunk sewers and treated at the OCSD Plant No. 2 located in Huntington Beach. The OCSD Revenue Area 3 serves the City of Buena Park, La Habra, Garden Grove, Anaheim, Cypress, La Palma, Stanton, Los Alamitos, Westminster, and Fountain Valley. All sewage flow from Revenue Area 3 is collected and treated at Treatment Plant No. 2, which is located at 22212 Brookhurst Street, Huntington Beach. The estimated average daily effluent received at Plant No. 2 is 127 million gallons (mgd). This facility currently has a total primary treatment capacity of 168 mgd, with an average daily treatment of approximately 127 mgd. Therefore, there is approximately 41 mgd of excess primary treatment capacity at OCSD Plant No. 2. Plant No. 2 also has 90 mgd of secondary treatment capacity. Table 3-22 indicates the future wastewater generation in gallons per day. According to Table 3-22, the proposed project is expected to generate approximately 4,940 gallons of sewage per day, well within the daily average totals for the Huntington Beach treatment plant.

<table>
<thead>
<tr>
<th>Use</th>
<th>Unit</th>
<th>Factor</th>
<th>Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed Project</td>
<td>19 dwelling units</td>
<td>260 gals/dwelling unit</td>
<td>4,940 gals/day</td>
</tr>
</tbody>
</table>

Source: Los Angeles County Sanitation Districts

The project Applicant will install a new six-inch sewer line to accommodate the increase in effluent. From there, the new sewer lines will connect to an existing eight-inch sewer line located within Savanna Street. This sewer line will ultimately discharge effluent into the districts’ trunk sewer located within Knott Avenue. Therefore, the existing sewer line has sufficient capacity to accommodate the projected flows. Adequate sewage collection and treatment are currently available at the Huntington Beach treatment plant. Therefore, project implementation will not exceed wastewater treatment requirements and the impacts are considered to be less than significant and no mitigation is required.

B. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. The City of Anaheim will continue to provide water for the project site. The City receives untreated surface water from the Metropolitan Water District (MWD). This water is conveyed to the Lenain Water Treatment Plant, which has a treatment capacity of 15 million gallons per day. The City is presently taking steps to increase the capacity of the aforementioned plant. A Facilities Master Plan was prepared for the City in 2016. This plan contains recommended improvements that will increase the plant’s capacity to 22 million gallons per day.131 The plan to expand the plant’s capacity was not created as a response to the project, but rather a response to a citywide need.

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As indicated previously, wastewater from the City’s local conveyance system is then conveyed to the OCSD trunk sewers and treated at the OCSD Plant No. 2 located in Huntington Beach. The estimated average daily effluent received at Plant No. 2 is 127 million gallons (mgd). This facility currently has a total primary treatment capacity of 168 mgd, with an average daily treatment of approximately 127 mgd. Therefore, there is approximately 41 mgd of excess primary treatment capacity at OCSD Plant No. 2. Plant No. 2 also has 90 mgd of secondary treatment capacity. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

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?

Less than Significant Impact. Once constructed, the project will not introduce polluted runoff into the existing storm drain system. In addition, the project will not create excess runoff that will exceed the capacity of the existing storm water drainage system. The project site in its current state is dominated by pervious surfaces. Following construction, the percentage of pervious surfaces on-site will be 31 percent. A Preliminary Water Quality Management Plan dated May 29, 2018 and a Preliminary Hydrology & Hydraulics Study dated May 29, 2018 were prepared for the project by DMS Consultants, Inc. pursuant to Title 10 of the City’s Municipal Code (these reports are provided in Appendix D). According to the Hydrology Report and WQMP, the project will include the use of a StormTech MC-3500 stormwater chamber, catch basins, permeable pavers, and two hydrodynamic separators. Even though the project’s implementation will result in a reduction of pervious surfaces, the post-construction BMPs will allow excess runoff to be filtered and percolate into the ground. As a result, the potential operational impacts are considered to be less than significant and no mitigation is required.

D. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact. A Final Urban Water Management Plan dated June 2016 was prepared for the City by Arcadis U.S., Inc. The City currently serves water to an area of approximately 49.3 square miles (31,560 acres). The City’s service area includes approximately 1.4 square miles (three percent of the total service area) of water bodies. The City’s service area excludes several small areas inside City limits serviced by other water purveyors and includes areas outside of City limits (between Brookhurst and Gilbert Streets). The City’s current major water system facilities consist of eight import connections to Metropolitan (one untreated water and seven treated water connections), 18 active wells, one 920-million gallon (MG) reservoir for untreated water, one 15-million gallons per day (MGD) water treatment plant, 13 treated water reservoirs with 38.75 MG of total storage capacity, permanent chlorination facilities at various sites, nine booster pump stations, approximately 752 miles of water mains and approximately 7,800 fire hydrants.

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As indicated in the City’s 2015 Urban Water Management Plan, the City will have adequate supply to accommodate demand for the years 2020, 2025, and beyond.\textsuperscript{134} The City will also have enough supplies to accommodate demand through multiple dry years as well.\textsuperscript{135} Table 3-21 shows the amount of water that will be consumed by the proposed project. According to Table 3-21, the proposed project is projected to consume 9,063 gallons of water on a daily basis.

<table>
<thead>
<tr>
<th>Use</th>
<th>Unit</th>
<th>Factor</th>
<th>Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed Project</td>
<td>19 dwelling units</td>
<td>477 gals/dwelling unit</td>
<td>9,063 gals/day</td>
</tr>
</tbody>
</table>

Source: California Home Building Foundation

The project will connect to an existing eight-inch water line located along Savanna Street. The existing water supply facilities and infrastructure will be able accommodate this additional demand. In addition, the proposed project will be constructed in compliance with the 2016 California Green Building Code (Part 11 of Title 24 of the California Code of Regulations). More specifically, the project must comply with Division 5.3, Water Efficiency, and Conservation, which mandates the inclusion of water efficient fixtures such as faucets, toilets, showers, and water efficient landscaping. As a result, the impacts are considered to be less than significant and no mitigation is required.

\textbf{E. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?}

\textit{Less than Significant Impact.} As indicated previously, wastewater from the City’s local conveyance system is then conveyed to the OCSD trunk sewers and treated at the OCSD Plant No. 2 located in Huntington Beach. The estimated average daily effluent received at Plant No. 2 is 127 million gallons (mgd). This facility currently has a total primary treatment capacity of 168 mgd, with an average daily treatment of approximately 127 mgd. Therefore, there is approximately 41 mgd of excess primary treatment capacity at OCSD Plant No. 2. Plant No. 2 also has 90 mgd of secondary treatment capacity. Thus, the project’s implementation would not require the expansion of existing wastewater treatment facilities or the construction of new wastewater treatment facilities. A Sewer Study was prepared for the project by DMS Consultants, Inc. According to the study, the project will have a total peak flow of 0.032 cubic feet per second.\textsuperscript{136} The existing eight inch sewer line can accommodate the project’s flows. As a result, less than significant impacts will occur and no mitigation is required.


\textsuperscript{135} Ibid.

F. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?

*Less than Significant Impact.* The City contracts with Republic Services for waste collection. Solid waste generated by the project will be transferred to the Olinda Alpha Landfill near Brea or to the Puente Hills Transfer Station/Materials Recovery Facility (MRF). The Olinda Landfill has a maximum permitted daily refuse of 8,000 tons and is expected to be closed by the year 2030. An estimated 7,200 to 7,300 tons of solid waste is disposed at the Olinda landfill on a daily basis. The remaining daily capacity is approximately 700 tons (1,400,000 pounds). The Puente Hills Transfer Station/MRF is able to accept 4,440 tons per day of solid waste. As shown in Table 3-23, the proposed project is anticipated to generate approximately 228 pounds of waste per day.

![Table 3-23](image.png)

As shown in Table 3-23, the amount of solid waste produced by the project will total an estimated 228 pounds per day. The amount of solid waste produced by the project is not significant and will be accommodated by the aforementioned landfills and transfer stations. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

G. Comply with federal, state, and local statutes and regulations related to solid waste?

*No Impact.* The proposed use, like all other development in the City, would be required to adhere to all pertinent ordinances related to waste reduction and recycling. As a result, no impacts on the existing regulations pertaining to solid waste generation would result from the proposed project’s implementation and no mitigation is required.

H. Result in a need for new systems or supplies, or substantial alterations related to electricity?

*Less than Significant Impact.* Table 3-24 below provides an estimate of electrical consumption for the proposed project. As indicated in the table, the project is estimated to consume approximately 123,849 kilowatt (kWh) per year (or 10,317 kWh per month) of electricity.

![Table 3-24](image.png)

As shown in Table 3-24, the proposed project is anticipated to generate approximately 228 pounds of waste per day.
It is important to note that the project will include energy efficient fixtures. In addition, the energy consumption rates do not reflect the more stringent 2016 California Building and Green Building Code requirements. The proposed project will be in accordance with the City's Building Code and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The 2016 version of the standards became effective as of January 1, 2017. The 2016 version addressed additional items such as clean air vehicles, increased requirements for electric vehicles charging infrastructure, organic waste, and water efficiency and conservation. The California Green Building Standards Code do not prevent a local jurisdiction from adopting a more stringent code as state law provides methods for local enhancements. The proposed project will conform to all pertinent energy conservation requirements. All of the light fixtures and appliance will be EnergyStar® rated. As a result, the impacts are considered to be less than significant and no mitigation is required.

I. Result in a need for new systems or supplies, or substantial alterations related to natural gas?

*Less than Significant Impact.* Table 3-25 below provides an estimate of natural gas consumption for the proposed project. As indicated in the table, the project is estimated to consume approximately 6,137 therms per year of natural gas.

<table>
<thead>
<tr>
<th>Project</th>
<th>Consumption Rate</th>
<th>Total Project Consumption</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed Project (assumes 19-units)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas Consumption</td>
<td>323 therms/unit/year</td>
<td>6,137 therms/year total</td>
</tr>
</tbody>
</table>

Source: Southern California Gas Company.

It is important to note that the project will include energy efficient fixtures. In addition, the energy consumption rates do not reflect the more stringent 2016 California Building and Green Building Code requirements. The proposed project will be in accordance with the City's Building Code and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. As a result, the impacts are considered to be less than significant and no mitigation is required.

J. Result in a need for new systems or supplies, or substantial alterations related to telephone service?

*Less than Significant Impact.* The proposed project will require continued telephone service from AT&T and/or other telecommunication providers. The existing telephone lines on Savannah Street will be utilized to provide service to the proposed project. Thus, impacts on communication systems are anticipated to be less than significant.
K. Result in a need for new systems or supplies, or substantial alterations related to television service/reception?

*Less than Significant Impact.* Multiple providers including Directv, AT&T U-verse, Dish, Spectrum, and Cox offer television service throughout the City. These providers will be able to accommodate any increase in customers. As a result, the potential impacts are considered to be less than significant and no mitigation is required.

### 3.18.2 Cumulative Impacts

The potential impacts related to utility capacities are site-specific. Furthermore, the analysis herein also determined that the proposed project would not result in any significant impacts on local utilities. The ability of the existing sewer lines, water lines, and other utilities to accommodate the projected demand from future related projects will require evaluation on a case-by-case basis. As a result, no cumulative impacts on utilities will occur and no mitigation is required.
### 3.19 Mandatory Findings of Significance

<table>
<thead>
<tr>
<th>Section</th>
<th>Description of Issue</th>
<th>Potentially Significant Impact</th>
<th>Less than Significant Impact with Mitigation</th>
<th>Less Than Significant Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b)</td>
<td>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>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>c)</td>
<td>Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 3.19.1 Analysis of Environmental Impacts

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

**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?**

**Less than Significant Impact with Mitigation.** The proposed project would not have the potential to degrade the quality of the environment since the project’s air quality emissions would be below the thresholds of significance outlined by the SCAQMD. In addition, no hazardous waste or materials would be used on-site beyond those chemicals that would be used for routine cleaning and maintenance. The project’s implementation will require the removal of two existing single-family units. Asbestos containing materials and/or lead based paint (ACM/LBP) may be present within the two structures due to their age. As a result, mitigation (Mitigation Measure No.4) was provided that will preclude the exposure of nearby residents to ACM/LBP. No impacts to protected species or habitat would result with the implementation of the proposed project. Mitigation (Mitigation Measure No. 1) was provided that would minimize potential construction impacts to nesting avian species. A Sacred Lands File Search was conducted and the results came back negative. Furthermore, tribal consultation was provided in accordance with AB-52. The tribal representative from the Gabrieleño-Kizh indicated
that the project site is situated in an area of high archaeological significance. Therefore, mitigation (Mitigation Measure No.2) was provided in Section 3.5.2.B herein to address the risk of encountering tribal resources. Furthermore, the best management practices identified in the preliminary WQMP will filter out contaminants of concern present in stormwater runoff. The addition of project trips will not negatively impact any local intersection. Lastly, the project will include energy and water efficient appliances and fixtures. The implementation of the required mitigation measures for biological (Mitigation Measure No. 1) and cultural resources (Mitigation Measure No. 2), geology/soils (Mitigation Measure No. 3), hazards and hazardous materials (Mitigation Measure No. 4), and noise (Mitigation Measure No. 5 and No. 6) would reduce potential impacts to levels that are considered to be less than significant.

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

Less than Significant Impact. According to the City, there are three related projects located within the vicinity of the project site. Typically, aesthetic impacts are site-specific. As indicated previously, the proposed project will not restrict scenic views along the adjacent roadways, damage or interfere with any scenic resources or highways, degrade the visual character of the project sites and surrounding areas, or result in significant light and glare impacts; therefore, no cumulative impacts will occur with respect to aesthetics as part of the proposed project’s implementation and no mitigation is required of the proposed project. The analysis of agriculture and forestry impacts determined that there are no agricultural or forestry resources in the project area and that the implementation of the proposed project would not result in any impacts on these resources. As a result, no cumulative impacts on agriculture or forestry resources will occur and no mitigation is required of the proposed project.

The combined operational emissions from the proposed project and the three related projects (a 5,270 square feet medical office building specializing in outpatient care located at 3350 West Ball Road; a 2,558 square feet Taco Bell with Drive-Through located at 3270 West Lincoln Avenue; and a 22-unit single-family residential development located at 3319-3321 West Lincoln Avenue) will still be below the thresholds of significance established by the SCAQMD (the CalEEMod worksheets for the cumulative emissions are provided in the Appendix). The four projects’ cumulative operational emissions are listed below. These emissions are compared to the thresholds of significance established by the SCAQMD for the designated criteria pollutants.

- **Reactive Organic Gasses (ROG).** Estimated operational emissions: 4.53 pounds per day; threshold of significance: 55 pounds per day.

- **Nitric Oxide (NOx).** Estimated operational emissions: 13.58 pounds per day; threshold of significance: 55 pounds per day.
- **Carbon Monoxide (CO).** Estimated operational emissions: 27.10 pounds per day; threshold of significance: 550 pounds per day.

- **Sulfur Dioxide (SO₂).** Estimated operational emissions: 0.07 pounds per day; threshold of significance: 150 pounds per day.

- **Particulate Matter (PM₁₀).** Estimated operational emissions: 5.33 pounds per day; threshold of significance: 150 pounds per day.

- **Particulate Matter (PM₂.₅).** Estimated operational emissions: 1.56 pounds per day; threshold of significance: 55 pounds per day.

As stated above, the cumulative emissions from the four related projects (including the proposed project) will be below the thresholds of significance established by the SCAQMD. As a result, less than significant cumulative air quality impacts will occur and no mitigation is required of the proposed project.

The potential impacts in regards to biological and cultural resources and geology and soils are site specific. In addition, the project’s GHG emissions are below thresholds considered to represent a significant impact. The potential impacts related to hazardous materials, land use and planning, and mineral resources are site specific. Furthermore, the three related projects as well as the proposed project would be required to adhere to the City’s low impact development requirements and must take steps to eliminate the discharge of contaminated runoff.

The number of trips that will be added to the adjacent roadways by the proposed project as well as by the related projects will not result in a doubling of traffic volumes. In addition, the related projects are not located in the immediate vicinity of the proposed project. The separation of the four projects (including the proposed project) will eliminate the concentration of noise generating activities that would result in an increase in cumulative noise levels and no additional mitigation is required.

The analysis of potential population and housing impacts indicated that no significant impacts would result upon the proposed project’s implementation. The potential population and employment growth that would result with the implementation of the four cumulative projects (including the proposed project) is within the population and employment projections calculated for the City by SCAG. Moreover, these projects will utilize existing infrastructure including sewer and water lines, roadways, and storm drains. In addition, there will be no citywide net loss in housing. As a result, no cumulative impacts will occur and no mitigation is required.

The four cumulative projects (including the proposed project) will lead to an increase in demand for police and fire services. This increase in demand may significantly impact both departments; however, the payment of development fees will ensure both departments have adequate resources to accommodate the additional demand. The payment of all school impact fees will allow the designated school districts to use the fees to alleviate any potential burdens related to an increase in school
enrollments. As a result, no cumulative public service impacts are anticipated and no project-related mitigation is required.

A total of two of the four cumulative projects will not have an impact on parks and recreational services. These two projects are commercial in nature (Taco Bell and medical office) and will not result in direct population growth. However, the remaining two projects: the proposed project and the 22-unit Lincoln Cottages will result in an incremental demand on local parks and recreational facilities. Despite the addition of the two residential projects, the payment of all pertinent park development fees will reduce potential cumulative recreation impacts to levels that are less than significant and no mitigation is required of the project.

Other developments approved by the City of Anaheim were also taken into consideration. Based on information available through the Planning Department, other development projects within a five-mile radius affecting the study intersections are listed in Table 3-20. The location map of these other development projects are illustrated on Exhibit 3-15. Exhibit 3-17 illustrates traffic volumes generated by other development projects for study intersections.

The proposed project is expected to have a net increase of two inbound and four outbound trips in the AM peak hour, four inbound and two outbound trips in the PM peak hour, and 86 net daily trips. The addition of the project’s trips with the trips produced by the related projects listed above will not result in a degradation of any of the study intersection’s level of service. As a result, the cumulative impacts are considered to be less than significant and no mitigation is required.

The analysis determined that there would not be any impacts related to tribal cultural resources. As a result, no significant cumulative impacts will occur as part of the implementation of the proposed project and no additional project-related mitigation is required. Finally, the analysis herein also determined that the proposed project would not result in any significant impacts on local utilities. The ability of the existing sewer lines, water lines, and other utilities to accommodate the projected demand from future related projects will require evaluation on a case-by-case basis. In conclusion, the project’s impacts have been mitigated and the project’s impacts would be limited and not cumulatively considerable.

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

Less than Significant Impact with Mitigation. Daytime and nighttime light and glare from both the proposed project would not contribute any significant impacts since the project must comply with Section 18.42.090.030 of the City’s municipal code. The project’s operational air quality impacts would be less than significant. However, the project’s construction would have the potential to result in particulate matter emissions which may affect the adjacent sensitive receptors. Therefore, project contractors would be responsible for maintaining compliance with SCAQMD’s mandatory Rule 403 regulations, which significantly reduce the generation of fugitive dust. In addition, future truck drivers must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel powered vehicles to less than five minutes. Adherence to the aforementioned standard condition will
minimize odor impacts from diesel trucks. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant. No hazardous waste or materials will be used on-site. The project’s contracts will be required to adhere to all applicable regulations governing the removal, handling, transport, and disposal of lead based paint and/or asbestos containing materials. The analysis contains a specific mitigation measure (Mitigation Measure No.4) dealing with the removal of ACM/LBP. Adherence to the construction noise mitigation provided in the preceding analysis would prevent the exposure of sensitive receptors to excess noise. Lastly, the addition of the project’s traffic would not result in a deterioration of any intersection’s level of service or the creation of a CO hot-spot. As a result, the potential impacts are considered to be less than significant with adherence to the required mitigation measures.
SECTION 4 CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project will not have a significant effect on the environment.
- The proposed project will not have the potential to achieve short-term goals to the disadvantage of long-term environmental goals.
- The proposed project will not have impacts that are individually limited, but cumulatively considerable, when considering planned or proposed development in the immediate vicinity.
- The proposed project will not have environmental effects that will adversely affect humans, either directly or indirectly.
- A Mitigation Reporting and Monitoring Program will be required.

4.2 MITIGATION MONITORING & REPORTING PROGRAM

Section 21081(a) of the Public Resources Code states that findings must be adopted by the decision-makers coincidental to the approval of a Mitigated Negative Declaration. These findings shall be incorporated as part of the decision-maker’s findings of fact, in response to AB-3180. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the following additional findings may be made:

- A mitigation reporting or monitoring program will be required;
- Site plans and/or building plans, submitted for approval by the responsible monitoring agency, shall include the required standard conditions; and,
- An accountable enforcement agency or monitoring agency shall be identified for the mitigations adopted as part of the decision-maker’s final determination.

Project Description – The City of Anaheim Planning and Building Department, in its capacity as the Lead Agency, is reviewing a request by Bonanni Development to subdivide an existing 33,841 square-foot (0.78-acre) site located at 3534-3538 Savanna Street. The subdivision will allow for the construction of 19 three-story townhome units totaling 24,204 square feet of building floor area. A total of 5,931 square feet of common open space and 10,584 square feet of landscaping (31%) will be provided. The project will provide 45 total parking spaces. Each unit will be equipped with a two-car garage for a total of 38 enclosed parking spaces. Seven additional parking spaces will be reserved for
guests. Access to the site will be provided by a 24-foot wide driveway located along the south side of Savanna Street. The project also includes the following approvals:

1. **Applicant** – The project Applicant is Mr. Chris Segesman, Bonanni Development, 5500 Bolsa Avenue, Suite 120, Huntington Beach, California 92649.

2. **Environmental Equivalent/Timing** – Any Mitigation Measure and timing thereof, subject to the approval of the City, which will have the same or superior result and will have the same or superior effect on the environment. The Planning Department, in conjunction with any appropriate agencies or City departments, shall determine the adequacy of any proposed “environmental equivalent/timing” and, if determined necessary, may refer said determination to the Planning Commission. Any costs associated with information required in order to make a determination of environmental equivalency/timing shall be borne by the Applicant. Staff time for reviews will be charged on a time and materials basis at the rate in the City’s adopted fee schedule.

3. **Timing** – This is the point where a mitigation measure must be monitored for compliance. In the case where multiple action items are indicated, it is the first point where compliance associated with the mitigation measure must be monitored. Once the initial action item has been complied with, no additional monitoring pursuant to the Mitigation Monitoring Plan will occur because routine City practices and procedures will ensure that the intent of the measure has been complied with. For example, if the timing is “to be shown on approved building plans” subsequent to issuance of the building permit consistent with the approved plans will be final building and zoning inspections pursuant to the building permit to ensure compliance.

4. **Responsibility for Monitoring** – Shall mean that compliance with the subject mitigation measure(s) shall be reviewed and determined adequate by all departments listed for each mitigation measure.

5. **Ongoing Mitigation Measures** – The mitigation measures that are designated to occur on an ongoing basis as part of this mitigation monitoring program will be monitored in the form of an annual letter from the Applicant in January of each year stating how compliance with the subject measure(s) has been achieved. When compliance with a measure has been demonstrated for a period of one year, monitoring of the measure will be deemed to be satisfied and no further monitoring will occur. For measures that are to be monitored “Ongoing During Construction,” the annual letter will review those measures only while construction is occurring. Monitoring will be discontinued after construction is completed.

6. **Building Permit** – For purposes of this mitigation monitoring program, a building permit shall be defined as any permit issued for construction of a new building or structural expansion or modification of any existing building but shall not include any permits required for interior tenant improvements or minor additions to an existing structure or building.

The monitoring and reporting on the implementation of these measures is identified in Table 4-1 provided on the following pages.
**TABLE 4-1**  
**MITIGATION-MONITORING PROGRAM**

<table>
<thead>
<tr>
<th>Measure &amp; No.</th>
<th>Timing</th>
<th>Responsible for Monitoring</th>
<th>Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Biological Resources</strong></td>
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<tr>
<td>Mitigation Measure No. 1 (Biological Resources). Prior to issuance of any demolition or building permits, if clearing and/or construction activities would occur during the raptor or migratory bird nesting season (February 15 to August 15), the Applicant and/or its contractor shall retain a qualified biologist to conduct preconstruction surveys for nesting birds up to 14 days before construction activities. The qualified biologist shall survey the construction zone and a 500-foot buffer surrounding the construction zone to determine whether the activities taking place have the potential to disturb or otherwise harm nesting birds. Surveys shall be repeated if project activities are suspended or delayed for more than 15 days during nesting season. If active nest(s) are identified during the preconstruction survey, a qualified biologist shall establish a 100-foot no-activity setback for migratory bird nests and a 250-foot setback for raptor nests. No ground disturbance should occur within the no-activity setback until the nest is deemed inactive by the qualified biologist. Details of compliance shall be provided in conjunction with or on plans submitted for permits.</td>
<td>Prior to the issuance of any demolition or building permits.</td>
<td>Planning &amp; Building Department</td>
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<tr>
<td><strong>Cultural Resources</strong></td>
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<td>Mitigation Measure No. 2 (Cultural Resources). Prior to issuance of any demolition or building permits, the project Applicant will be required to obtain the services of a qualified Native American Monitor and archeologist during construction-related ground disturbance activities. Ground disturbance is defined as activities that include, but are not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, and trenching, within the project area. The monitor(s) must be approved by the tribal representatives and will be present on-site during the construction phases that involve any ground disturbing activities. The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed. The archeologist will monitor grading activities and must complete monitoring logs on a daily basis. The logs completed by both the archaeologist and the tribal monitor must be submitted to the Planning Division on a weekly basis in order to determine compliance with the mitigation measure. In the unlikely event that remains are uncovered by construction crews, all excavation and grading activities shall be halted and the Anaheim Police Department would be contacted (the Department would then contact the County Coroner). This is a standard condition under California Health and Safety Code Section 7050.5(b).</td>
<td>Prior to the issuance of any demolition or building permits.</td>
<td>Planning &amp; Building Department</td>
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<tr>
<td>Measure &amp; No.</td>
<td>Timing</td>
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<td>Completion</td>
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<tr>
<td><strong>Geology &amp; Soils</strong></td>
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<tr>
<td>Mitigation Measure No. 3 (Geology &amp; Soils).</td>
<td>During final plan check prior to the issuance of any building or grading permit.</td>
<td>Chief Building Official and the City Engineer</td>
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<td></td>
<td>The project must comply with all the design and construction-related actions in the site specific Geotechnical Report prepared by Strata-Tech. These design requirements will be confirmed by the City Engineer during the final plan check prior to the issuance of any building permit. In addition, the Applicant must remove and re-compact the underlying soils and provide additional slab and foundation support in order to address potential liquefaction risks. The removal and re-compaction of the underlying soil will be confirmed by the building inspector, the City Engineer, and a representative of Strata-Tech prior to the framing phase of the project’s construction. The recommendations and requirements of the Strata-Tech study must be implemented to the satisfaction of the City Engineer.</td>
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<tr>
<td><strong>Hazards &amp; Hazardous Materials</strong></td>
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<tr>
<td>Mitigation Measure No. 4 (Hazards &amp; Hazardous Materials).</td>
<td>During the demolition phase.</td>
<td>Chief Building Official</td>
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<td></td>
<td>The Applicant, and the contractors, must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials, lead paint, underground septic tanks, and other hazardous substances and materials that may be encountered during demolition and land clearance activities. The City’s Inspector will ensure compliance by inspecting the site during the demolition phase. Any contamination encountered during the demolition, grading, and/or site preparation activities must also be removed and disposed of in accordance with applicable laws prior to the issuance of any building permit.</td>
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<tr>
<td><strong>Noise</strong></td>
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<tr>
<td>Mitigation Measure No. 5 (Noise).</td>
<td>10 days prior to the start of the demolition phase.</td>
<td>Chief Building Official</td>
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</tbody>
</table>
### TABLE 4.1
**MITIGATION-MONITORING PROGRAM**

<table>
<thead>
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<th>Completion</th>
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</thead>
<tbody>
<tr>
<td><strong>Mitigation Measure No. 6 (Noise)</strong></td>
<td>10 days prior to the start of the demolition phase.</td>
<td>Chief Building Official and Planning Department</td>
<td></td>
</tr>
<tr>
<td><strong>Mitigation Measure No. 7 (Noise)</strong></td>
<td>Throughout the construction period.</td>
<td>Chief Building Official &amp; Planning Department</td>
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</tbody>
</table>

**Mitigation Measure No. 6 (Noise).** The Applicant must notify residents in the area regarding construction times and local contact information. This notice must be placed along the north side of the project site approximately 10 days prior to the start of demolition and shall include the name and phone number of the local contact person residents may call to complain about noise. The City Inspector will verify that the notice has been placed along the north side of the site prior to the start of demolition. Upon receipt of a complaint, the contractor must respond immediately by reducing noise via available reasonable means, and to the satisfaction of the Planning Director. In addition, all complaints and subsequent communication between the affected residents and contractors must be forwarded to the City’s Planning and Building Department.

**Mitigation Measure No. 7 (Noise).** The Applicant shall ensure that the contractors conduct demolition and construction activities between the hours of 7:00 AM and 7:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no construction permitted on Sundays or Federal holidays.
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SECTION 5 REFERENCES

5.1 PREPARERS

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(626) 336-0033

Marc Blodgett, Project Manager
Bryan Hamilton, Project Planner
Liesl Sullano, Project Planner

5.2 REFERENCES

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APPENDICES

PROVIDED UNDER A SEparate COVER