

TOM DODSON & ASSOCIATES

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MEMORANDUM

September 19, 2019

From: Tom Dodson

To: Mr. Joseph Lambert, Director of Development Services

Subj: Completion of the Final Environmental Impact Report for the Rich Heritage, Bright Future: Placentia General Plan (General Plan Update), SCH# 2018101031

The City of Placentia (City) distributed the Draft Environmental Impact Report (DEIR) for the Rich Heritage, Bright Future: Placentia General Plan (General Plan Update), SCH# 2018101031 for public review with the review starting on July 12, 2019 and ending on August 26, 2019. The City received seven (7) comment letters on this project and these letters are attached along with responses to each of the comments raised. The contents of a Final EIR are defined in Section 15132 of the State California Environmental Quality Act (CEQA) Guidelines and include the following requirements: the Draft EIR; comments and recommendations received on the Draft; a list of parties commenting of the Draft EIR; responses to comments by the CEQA Lead Agency (City); a mitigation monitoring and reporting program; and any other environmental information added by the Lead Agency as part of its decision-making process for a project. Because this DEIR did not identify any unavoidable significant adverse impacts that could not be mitigated, a Statement of Overriding Considerations will not be required as part of the decision-making package before the Final PEIR can be certified. This memorandum and the attached responses to comments contained herein constitute a portion of the Final EIR for the City on this proposed project.

The following agencies and parties submitted written comments, which are addressed in the attached responses to comments attachment.

1. Governor's Office of Planning and Research, State Clearinghouse and Planning Unit
2. Orange County Fire Authority
3. South Coast Air Quality Management District
4. Department of Transportation, District 12 (Caltrans)
5. Metrolink
6. Orange County Transportation Authority (OCTA, 8/26/19)
7. Orange County Transportation Authority (OCTA, 8/28/19)

This memorandum, combined with the Draft EIR, the above list of commenters, the attached comment letters and responses, the Mitigation Monitoring and Reporting Program, and other staff materials in the final administrative record constitute the Final EIR for the City of Placentia. The City Council will hold a meeting on October 1, 2019 to consider a recommendation to certify the Final EIR (SCH# 2018101031) and approval of the Rich Heritage, Bright Future: Placentia General Plan (General Plan Update). The meeting will be held at the City Administrative Center located at 401 E. Chapman Avenue, Placentia, California in the Council Chambers.

After review and response to all of the comments, the Final EIR identifies the same potential less than significant adverse impacts as were forecast in the Draft EIR. After taking into consideration the comments submitted by the above parties, the data and analysis continue to indicate that no significant impacts to the environment, will result from implementing the proposed General Plan Update. The data in the Final EIR support a finding that all potential adverse environmental impacts are either less than significant without mitigation (primarily due to specific goals and policies contained in the General Plan Update), or are less than significant with implementation of the identified mitigation measures. This finding is consistent with that identified in the Draft EIR. No recirculation of the Draft EIR will be necessary. The Final EIR package is now ready for consideration and certification by the Placentia City Council.

Do not hesitate to contact me a call if you have any questions regarding the enclosed material.

Sincerely,

A handwritten signature in black ink that reads "Tom Dodson". The signature is written in a cursive style with a large initial "T" and a stylized "D".

Tom Dodson

TD/cmc

Attachments



Gavin Newsom
Governor

COMMENT LETTER #1

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

August 27, 2019

Joe Lambert
Placentia, City of
401 E. Chapman Avenue
2018101031
Placentia, CA 92870

Subject: Rich Heritage, Bright Future: Placentia General Plan (General Plan Update)
SCH#: 2018101031

Dear Joe Lambert

1-1

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 8/26/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, <https://ceqanet.opr.ca.gov/2018101031/2>.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RESPONSES TO COMMENTS
LETTER #1
GOVERNORS OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

- 1-1 This is an acknowledgment letter verifying that the State Clearinghouse submitted the Draft EIR to selected state agencies for review, and that no state agency submitted comments through the Clearinghouse by the close of the review period, which occurred on August 26, 2019. The State assigned this project the following tracking number, SCH#2018101031. The Clearinghouse letter is for information only and does not require additional formal response.



ORANGE COUNTY FIRE AUTHORITY

P. O. Box 57115, Irvine, CA 92619-7115 • 1 Fire Authority Road, Irvine, CA 92602-0125

Brian Fennessy, Fire Chief

(714) 573-6000

www.ocfa.org

August 15, 2019

City of Placentia
Attn: Joe Lambert
401 E. Chapman Avenue
Placentia, CA 92870

Ref: Notice of Availability of Draft Environmental Report – Rich Heritage, Bright Future:
Placentia General Plan

2-1

Thank you for the opportunity to review the subject document. The Orange County Fire Authority (OCFA) currently provides fire protection and emergency medical services response to the project area. Services include: structural fire protection, emergency medical and rescue services, education, fire code hazardous material inspections and hazardous material response. OCFA also participates in disaster planning as it relates to emergency operations, which includes high occupant areas and schools sites and may participate in community disaster drills planned by others. Resources are deployed based upon a regional service delivery system, assigning personnel and equipment to emergency incidents without regard to jurisdictional boundaries. The equipment used by the department has the versatility to respond to both urban and wildland emergency conditions. The following are our comments:

2-2

Page 1-3 Document Statement:

Hazards & Hazardous Waste: Orange County Fire Authority and Department of Toxic Substances Control (DTSC) may be involved should for future projects that would store hazardous materials or that would be located on a site contaminated by hazardous materials.

OCFA COMMENTS: This is currently the responsibility of the County of Orange Health Care Agency

2-3

Page 3.9 Document Statement:

LU-2.15 Work with Orange County Fire Authority (OCFA) to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.

OCFA COMMENTS: This is currently the responsibility of the County of Orange Health Care Agency

**RESPONSES TO COMMENTS
LETTER #2
ORANGE COUNTY FIRE AUTHORITY**

- 2-1 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. The City appreciates the effort expended by the OCFA to make the edits to this DEIR to ensure accuracy.
- 2-2 The referenced text has been modified to incorporate this change in Chapter 1.
- 2-3 The referenced text has been modified to incorporate this change in Chapter 3.

Page 3-39 Document Statement:

2-4 SAF-4.1 Follow the response procedures outlined within the Orange County Fire Authority's Hazardous Materials Area Plan in the event of a hazardous materials emergency.

OCFA COMMENTS: This is currently the responsibility of the County of Orange Health Care Agency

Page 3-68 Document Statement:

The following companies and agencies will continue to provide utilities and services to the City when the new General Plan is adopted.

Utilities

Electricity Southern California Edison

Natural Gas Southern California Gas

Water Golden State, Yorba Linda Water Districts

Sewer/WWTP Orange County

City of Placentia

2-5 Solid Waste Orange County

Drainage Orange County Flood Control District

Telephone Varies according to cell and land line providers

Internet Varies from 15 providers

Services

Law Enforcement Placentia Police Department

Fire Protection Orange County Fire Department

Schools Placentia-Yorba Linda Unified School District

OCFA COMMENTS: Orange County Fire Authority is currently the service provider, this document states that the city will not be renewing its contract with OCFA, this area could reflect current and future fire protection services and the service timelines.

Page 4.10-6 Document Statement:

■ Fire Regulations

2-6 Fire codes are important to all building construction. The Orange County Fire Authority (OCFA) provides services to the City of Placentia under a joint powers agreement (JPA) to provide fire prevention, suppression and emergency services to 22 jurisdictions within Orange County. OCFA monitors the storage of hazardous materials in the County for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the OCFA. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations.

OCFA COMMENTS:

As of August 16, 2019, OCFA serves

- 25 jurisdictions, this includes 24 cities and the County of Orange Unincorporated.
- OCFA does not monitor the storage of hazardous material in the County, this is done by the County of Orange Environmental Health Care Agency.
- The correct agency to file an Accidental Risk Prevention Program with would be the County of Orange Environmental Health Care Agency.

- 2-4 The referenced text has been modified to incorporate this change in Chapter 3.
- 2-5 The referenced text has been modified to incorporate this change in Chapter 3.
- 2-6 The referenced text has been modified to incorporate these changes in Chapter 4.10.

Page 4.10-17 Document Statement:

2-7 Chemical storage of any kind over specific quantities (such as 55 gallons of petroleum product) must be publicly reported in accordance with California Proposition 65. Emergency response plans are in place with the City in the event a hazardous or toxic materials event occurs. In addition, the Orange County Fire Authority provides emergency response to incidents involving hazardous materials. The Orange County Fire Authority Hazardous Materials Response Team (HMRT) directly responds to hazardous materials incidents. **The Orange County Fire Authority Hazardous Materials Disclosure Office** also identifies facilities that contain or handle hazardous materials.

The **OCFA** provides services to the City of Placentia and monitors the storage of hazardous materials in the County for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the **OCFA**.

OCFA COMMENTS:

OCFA does not monitor the storage of hazardous material in the County, this is done by the County of Orange Environmental Health Care Agency. The correct agency to file an Accidental Risk Prevention Program with would be the County of Orange Environmental Health Care Agency.

Page 4.10-18 Document Statement:

2-8 LU-2.15 Work with **Orange County Fire Authority (OCFA)** to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.

SAF-4.1 Follow the response procedures outlined within the **Orange County Fire Authority's** Hazardous Materials Area Plan in the event of a hazardous materials emergency.

OCFA COMMENTS:

Monitoring and procedures maintained by the County of Orange Health Care Agency should be followed

Page 4.10-19 Document Statement:

Mitigation Measures:

2-9 HAZ-1 The City shall collaborate with Orange County Community Development, the Orange County Health Care Agency, and the **Orange County Fire Authority** to create an informational pamphlet with existing hazardous material substitutions and retailers that sell the materials. Offer the information to applicable business owners who are required to file as a hazardous waste handler in the City.

HAZ-2 The City shall collaborate with Orange County Community Development, the Orange County Health Care Agency, and the **Orange County Fire Authority** and the provide information on viable alternatives to household hazardous materials on the City's website so households may use alternatives. Information will also educate the public to the health, safety, and environmental benefits of using non-hazardous substitutions.

OCFA COMMENTS:

OCFA would not be included in this Mitigation Measure

- 2-7 The referenced text has been modified to incorporate these changes in Chapter 4.10.
- 2-8 The referenced text has been modified to incorporate these changes in Chapter 4.10.
- 2-9 The referenced text has been modified to incorporate these changes in Chapter 4.10.

- 2-10 **Page 4.12-15 Document Statement:**
LU-2.15 Work with Orange County Fire Authority (OCFA) to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.
OCFA COMMENTS:
This would be the responsibility of the County of Orange Environmental Health Care Agency
- 2-11 **Page 4.16-1 Document Statement:**
Orange County Fire Authority (OCFA) is a premier public safety agency providing superior services that result in no lives or property lost. OCFA protects and supports the needs of the service area, which includes the City of Placentia, to the fullest extent possible. The OCFA is a regional fire service agency that serves 23 cities in Orange County and all unincorporated areas. The OCFA protects over 1,680,000 residents from its 71 fire stations located throughout Orange County. OCFA Reserve Firefighters work 10 stations throughout Orange County.
OCFA COMMENTS:
As of 8/16/2019 OCFA serves 24 cities in Orange County and all unincorporated areas. The OCFA protects over 1,980,000 residents from its 79 fire stations located throughout Orange County.
- 2-12 **Page 4.16-1 Document Statement:**
Besides fire suppression, the OCFA services also include fire investigation, public safety education, fire protection engineering, building inspections for code compliance, weed abatement, hazardous materials inspections, and emergency preparedness planning and training.
OCFA COMMENTS:
hazardous materials inspections should read fire code hazardous materials inspections
- 2-13 **Page 4.16-4 Document Statement:**
FUNDING
The most significant local economic factor impacting OCFA is Orange County's housing market, including fluctuations in new construction activities and housing prices. Property taxes derived from these activities comprised 61.2% of the OCFA's total governmental funds revenues in Fiscal Year 2017/18.5. The OCFA is also partially funded through individual City's Development Impact Fees (DIF). The City of Placentia collects the following DIFs for Public Safety, a portion of which is dedicated to fire protection services:
 - Single Family Detached Housing: \$1,049 per dwelling unit
 - Single Family Attached Housing: \$851 per dwelling unit
 - Multi-Family Housing: \$966 per dwelling unit
 - Mobile Homes: \$768 per dwelling unit
 - Retail/Commercial: \$0.71 per building square footage
 - Office: \$1.02 per building square footage
 - Industrial: \$0.51 per building square footage**OCFA COMMENTS:**
The City of Placentia is a Contract City with Orange County Fire Authority, which means the City pays for OCFA services through the General Fund.

- 2-10 The referenced text has been modified to incorporate this change in Chapter 4.12.
- 2-11 The referenced text has been modified to incorporate these changes in Chapter 4.16.
- 2-12 The referenced text has been modified to incorporate this change in Chapter 4.16.
- 2-13 The referenced text has been modified to incorporate this change in Chapter 4.16.

Page 4.16—5&6 Document Statement

2-14

Impact Analysis: Development associated with implementation of the proposed General Plan would result in additional demands on existing fire services and equipment. New development and redevelopment of existing parcels associated with the proposed General Plan would be required to comply with all applicable fire code and ordinance requirements for construction, access, water mains, fire flows, and hydrants Individual projects would be reviewed by the OCFA or other fire service provider should the City develop one in the future to determine the specific fire requirements applicable to a specific development and to ensure compliance with these requirements. The General Plan includes goals and policies that would enforce requirements that the City continue to refine procedures and processes to minimize the risk of fire hazards, requiring new development, where appropriate, to utilize fire-resistant building materials; incorporate fire retardant landscaping; incorporate fire sprinklers as appropriate; and, provide fire protection plans. Additionally, the General Plan would ensure adequate fire-fighting resources are available to meet the demands of new development, especially with increases in the construction of mid to high-rise structures, by ensuring that: fire flow engine requirements are consistent with ISO recommendations; and the height of truck ladders and other equipment and apparatus are sufficient to protect multiple types of structures. The City would need to consider impacts to fire services and facilities as part of the long-term planning process, and has done that with the proposed General Plan, which serves as a long-term planning document and anticipates future growth. Funding for expanded fire protection services is assessed as development within the City occurs. Funding for these services is assessed through DIFs on new developments within the City and through OCFA collection of property taxes. Collection of these funds would ensure that new development would not reduce the staffing, response times, or existing service levels within the City. Therefore, implementation of the proposed General Plan would result in less than less than significant impacts to fire protection and emergency services. As such, implementation of the proposed General Plan would not result in cumulatively considerable fire protection impacts

OCFA COMMENTS:

- This may be an appropriate section of the document to add the transition dates from OCFA fire services to the City's new model and the services that OCFA will no longer be responsible to perform. Each item that names OCFA should include a date of transition and the responsible agency after the transition to ensure the Safety Element is current.
- The City of Placentia is a Contract City with Orange County Fire Authority, which means the City pays for OCFA services through the General Fund

Page 4.16-6 Document Statement:

2-15

Work with Orange County Fire Authority (OCFA) to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.

OCFA COMMENTS:

This responsibility would be for County of Orange Environmental Health Care Agency not OCFA

2-14 The referenced text has been modified to incorporate this change in Chapter 4.16.

2-15 The referenced text has been modified to incorporate this change in Chapter 4.16.

Page 4.16-7 Document Statement:

SAF-4.1 Follow the response procedures outlined within the Orange County Fire Authority's Hazardous Materials Area Plan in the event of a hazardous materials emergency.

2-16

OCFA COMMENTS:

SAF-4.1 Follow the response procedures outlined within the Health Care Agency's Hazardous Materials Area Plan in the event of a hazardous materials emergency.

Page 4.21-2 Document Statement

Orange County Fire Authority (OCFA) is a premier public safety agency providing superior services that result in no lives or property lost. OCFA protects and supports the needs of the service area, which includes the City of Placentia, to the fullest extent possible. The OCFA is a regional fire service agency that serves 23 cities in Orange County and all unincorporated areas. The OCFA protects over 1,680,000 residents from its 71 fire stations located throughout Orange County. OCFA Reserve Firefighters work 10 stations throughout Orange County.5 OCFA contributes to wildfire protection as well as urban fire projection.

2-17

OCFA COMMENTS:

As of 8/16/2019 OCFA serves 24 cities in Orange County and all unincorporated areas. The OCFA protects over 1,980,000 residents from its 79 fire stations located throughout Orange County.

Thank you for providing us with this information. Please contact me at 714-573-6199 if you have any questions.

Sincerely,



Tamera Rivers

Management Analyst

Strategic Services Section

tamyivers@ocfa.org

714-573-6199

- 2-16 The referenced text has been modified to incorporate this change in Chapter 4.16.
- 2-17 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project.

- Fire flow engine requirements are consistent with Insurance Service Office (ISO) recommendations; and
- The height of truck ladders and other equipment and apparatus are sufficient to protect multiple types of structures.

SAF-2.6 Continue public education efforts to inform residents, business owners and visitors of fire hazards and measures to minimize the damage caused by fires to life and property.

SAF-2.7 Conduct a survey to identify structures that pose a fire hazard, and initiate programs that will assist owners and renters to bring properties up to current Fire and Building Code requirements and to prevent overcrowding.

SAF-2.8 Ensure that city is up to date with the most recent fire code and that it is being enforced.

❖ **Hazardous Materials and Waste**

Goal SAF-4 *Decrease the risk of exposure for life, property and the environment to hazardous materials and hazardous waste.* Health Care Agency

Policies SAF-4.1 Follow the response procedures outlined within the ~~Orange County Fire Authority's~~ Hazardous Materials Area Plan in the event of a hazardous materials emergency.

Health, Wellness and Environmental Justice Element

Goal HW/EJ-5 *Seek to provide access to all public facilities such as government buildings, infrastructure, healthcare, emergency services, parks, cultural centers, transit centers for all residents, especially those in DACs.*

Policies HW/EJ-5.14 Create specialized programs for residents living with chronic diseases such as, diabetes and heart disease to improve physical activity, healthy eating and access to health care education and facilities.

HW/EJ-5.15 Implement a city-wide *Community Paramedicine Program*, which is an effective and efficient way of providing health care delivery, especially to those most vulnerable or underserved, such as seniors and disadvantaged communities. The program provides specially trained paramedics, working in partnership with healthcare providers such as St. Jude Healthcare, Placentia-Linda Hospital and others, leveraging City assets and support.

Mitigation Measures: No mitigation measures beyond the goals and policies identified in the proposed General Plan are required.

Level of Significance After Mitigation: Not Applicable

4.16.1.5 Cumulative Impacts

Development Associated with Implementation of the Proposed General Plan and Cumulative Development Could Result in Cumulatively Considerable Impacts to Fire Protection Personnel, Services, and Facilities.

Level of Significance Before Mitigation: Less Than Significant Impact

CA Code of Regulations Title 14

CA Code of Regulations Title 14 provides Fire Safe Regulations dealing with emergency access, address signage and water standards. These regulations have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction and development in State Responsibility Areas (SRA).²

California Building Code Chapter 7A

Building materials and construction methods for exterior wildfire exposure. The purpose of this section of the Code is to establish minimum standards for the protection of life and property by increasing the ability of a building located in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. This code applies to new buildings located in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area for which a building permit is submitted on or after December 1, 2005.³

CA Fire Code Chapter 47

Standards to increase a buildings ability to resist flames and burning embers. The purpose of this code is to provide minimum standards to increase the ability of a building to resist the intrusion of flame or burning embers being projected by a vegetation fire and contributes to a systematic reduction in conflagration losses through the use of performance and prescriptive requirements.⁴

Orange County Fire Authority

Orange County Fire Authority (OCFA) is a premier public safety agency providing superior services that result in no lives or property lost. OCFA protects and supports the needs of the service area, which includes the City of Placentia, to the fullest extent possible. The OCFA is a regional fire service agency that serves 23 cities in Orange County and all unincorporated areas. The OCFA protects over 1,680,000 residents from its 71 fire stations located throughout Orange County. OCFA Reserve Firefighters work 10 stations throughout Orange County.⁵ OCFA contributes to wildfire protection as well as urban fire projection.

4.21.2 Environmental Setting

The City of Placentia is near completely urbanized. The proposed General Plan indicates that the City is nearly completely built out, with only 1.3% of vacant land remaining available for development within the City. Placentia is surrounded by other built-out cities and is not adjacent to wildland areas. Therefore, the risk of Wildland-Urban Interface fires is relatively non-existent. This statement is bolstered by CAL FIRE's Fire and Resources Assessment Program Fire Hazard Severity Zones in SRA: Orange County map (Figure 4.21-1), which depicts the fire hazard severity zones as being located outside of and relatively far removed from the City of Placentia. CAL FIRE's Fire and Resources Assessment Program Very High Fire Hazard Severity Zones in Local Responsibility Areas: Orange County (Figure 4.21-2) also indicates that the City is relatively far removed from any very high fire hazard severity zone (VHFHSZ). The nearest VHFHSZ is located just north of the City's northernmost point at Rose Drive in the hills within the City of Brea.

² http://www.fire.ca.gov/fire_prevention/downloads/Title_14.pdf

³ http://www.fire.ca.gov/fire_prevention/downloads/ICC_2009_Ch7A_2007_rev_1Jan09_Supplement.pdf

⁴ http://www.fire.ca.gov/fire_prevention/downloads/2007_CBC_Ch47.pdf

⁵ <https://www.ocfa.org/AboutUs/AboutOCFA.aspx#briefhistory>

Hazards &
Hazardous

Waste:

Health Care
Agency

~~Orange County Fire Authority~~ and Department of Toxic Substances Control (DTSC) may be involved should for future projects that would store hazardous materials or that would be located on a site contaminated by hazardous materials.

Hydrology &
Water Quality:

The RWQCB will issue Waste Discharge Requirements (WDR), Water Quality Management Plans (WQMPs) and Stormwater Pollution Prevention Plans (SWPPP) for future projects within the City where applicable. To construct future projects (where applicable) within the City a Notice of Intent must be submitted to the State Water Resources Control Board for a General Construction Permit, which is then enforced by the RWQCB. Finally, if any flood hazard areas are affected by future projects within the City, Orange County Flood Control, and FEMA may perform reviews of such projects.

Land Use &
Planning:

Nearby cities, such as the Cities of Yorba Linda, Anaheim, Fullerton, and Brea may be impacted by the implementation of the General Plan through growth resulting from land use designation changes. Additionally, the Southern California Association of Governments (SCAG) is involved in regional planning, and as such will require review of the project to ensure consistency with their regional planning documents. Orange County Fire Authority would require a review of future projects within the City to ensure concurrence with Fire Codes for specific projects, unless the City establishes its own fire department.

Population/
Housing:

SCAG is involved in regional planning, and as such will require review of the project to ensure consistency with the SCAG Regional Housing Needs Assessment.

Transportation: The City of Yorba Linda, the City of Anaheim, the City of Fullerton, and the City of Brea roadways may be impacted by future growth within the City; similarly, the General Plan will require a review by Caltrans to ensure that State highways and roadways are not adversely impacted. Similarly, the California Highway Patrol may require a review of the document to ensure that changes to State highways and roadways do not adversely impact their ability to access roadways in emergencies. SCAG is involved in regional planning, and as such will require review of the project to ensure consistency with the SCAG Regional Transportation Plan.

No other reviewing or permitting agencies have been identified.

1.3 PROJECT OBJECTIVES

The City of Placentia's vision, which guides the objectives for Rich Heritage, Bright Future: Placentia General Plan (General Plan Update), is described below:

- "The citizens of Placentia aspire to maintain a beautiful, safe, and balanced community that provides a variety of community and cultural activities. Placentia will be a place where

- LU-2.4 Large, contiguous vacant or underutilized parcels should be comprehensively planned for development to be compatible with adjacent neighborhoods.
- LU-2.5 Ensure a sensitive transition between commercial or business park uses and residential uses by implementing precise development standards or design guidelines with such techniques as buffering, landscaping, setbacks and traffic calming features.
- LU-2.6 Require new multifamily development to provide adequate buffers (such as decorative walls and landscaped setbacks) along boundaries with single-family residential uses to reduce impacts on residences due to noise, traffic, parking, light and glare, and differences in scale; to ensure privacy; and to provide visual compatibility.
- LU-2.7 Allow small lot single-family and medium-density development as infill projects and provide adequate development standards or design guidelines to ensure compatibility with surrounding residential uses.
- LU-2.8 Preserve Placentia's low-density residential neighborhoods through enforcement of land use and property development standards while creating a harmonious blending of buildings and landscape when new development occurs.
- LU-2.9 Reduce the number of existing isolated commercial outlets through consolidation, where appropriate, and discourage small-scale strip commercial development.
- LU-2.10 Encourage non-conforming uses and buildings to be brought into compliance with City codes.
- LU-2.11 Preserve neighborhood integrity by routing extraneous traffic around neighborhoods.
- LU-2.12 Mitigate traffic congestion and unacceptable levels of noise, odors, dust, and light and glare which affect residential areas and sensitive receptors, when and where feasible.
- LU-2.13 Monitor the impact and intensity of land uses in adjacent jurisdictions on Placentia's transportation and circulation systems, so that traffic from projects in neighboring cities can move efficiently without interfering with existing development. Impacts from these projects shall be properly assessed to mitigate any impacts to the existing Placentia mobility network.
- LU-2.14 Encourage consolidation of parking and reciprocal access agreements among adjacent businesses to minimize curb cuts and disruption of traffic flow.
- LU-2.15 Work with Health Care Agency ← Orange County Fire Authority (OCFA) to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.
- LU-2.16 Establish and maintain recreational open space opportunities in proximity to residential areas.
- LU-2.17 Encourage the development of Mixed-Use and transit-oriented development to promote a wider range of residential opportunities, to help meet the regional housing needs, and to complement the principles of the Complete Streets model.

- SAF-3.2 Prohibit housing in the 100-year flood zone unless the plans mitigate the potential for flooding by elevating the ground floor or other mitigation measures recommended by a licensed civil engineer with expertise in flooding mitigation, and approved by the Development Services and Public Works Departments of the City.
- SAF-3.3 Continue to participate in the National Flood Insurance Program.
- SAF-3.4 Continue to comply with the Cobey-Alquist Floodplain Management Act requirements and State of California Model Floodplain Management Ordinance.
- SAF-3.5 Continue to work with the Orange County Flood Control District and the United States Army Corps of Engineers to receive and implement updated flood control measures and information.
- SAF-3.6 Utilize flood control methods that are consistent with Regional Water Quality Control Board Policies and Best Management Practices (BMPs).

❖ **Hazardous Materials and Waste**

- | | | |
|-------------|--------------|--|
| Goal | SAF-4 | <i>Decrease the risk of exposure for life, property and the environment to hazardous materials and hazardous waste.</i> |
|-------------|--------------|--|
- ↖ Health Care Agency's
- | | | |
|-----------------|---------|--|
| Policies | SAF-4.1 | Follow the response procedures outlined within the Orange County Fire Authority's Hazardous Materials Area Plan in the event of a hazardous materials emergency. |
| | SAF-4.2 | Implement Federal, State and local regulations for the disposal, handling, and storage of hazardous materials. |
| | SAF-4.3 | Promote the recovery and recycling of hazardous materials. |
| | SAF-4.4 | Employ effective emergency preparedness and emergency response strategies to minimize the impacts to health and safety that can result from hazardous materials emergencies such as spills or contamination. |
| | SAF-4.5 | Continually update maps of the City's emergency facilities, evacuation routes and hazardous areas to reflect additions or modifications. |
| | SAF-4.6 | Continue to partner with the County of Orange to provide needed programs such as the Regional Household Hazardous Waste Collection Center to provide disposal of household hazards at no cost to Placentia residents and participating agencies. |
| | SAF-4.7 | Work with Caltrans to plant, maintain and enhance landscaping abutting the California State Route 57 that passes through Placentia's disadvantaged communities. |
| | SAF-4.8 | Require enhanced landscaped buffers in industrial-zoned areas that abut residential zones, consisting of more densely planted trees in setback areas. |
| | SAF-4.9 | Prohibit outdoor industrial operations in industrial zones that abut residential areas. |

Solid Waste	Orange County
Drainage	Orange County Flood Control District
Telephone	Varies according to cell and land line providers
Internet	Varies from 15 providers

Services

Law Enforcement	Placentia Police Department
Fire Protection	Orange County Fire Department ← Orange County Fire Authority
Schools	Placentia-Yorba Linda Unified School District

3.8 USES OF THIS ENVIRONMENTAL IMPACT REPORT

The action being considered by the City of Placentia City Council is the consideration and adoption of a new General Plan for the City. The new General Plan establishes a new set of land use designations; goals for each of the elements included in the General Plan; and policies that define how each goal shall be implemented in the future. It is these components of the General Plan that will allow and guide future proposed development in the City to proceed and allow the corresponding changes to the physical environment. This DEIR will be used as the information source and CEQA compliance document for the adoption and implementation of the new General Plan for the City of Placentia.

Other Agencies That May Have Permitting Authority (Responsible or Trustee Agencies): After taking into consideration the contents of the Final EIR and all input from citizens and other interested parties, the Placentia City Council has sole authority over the approval and implementation of the new General Plan.

Pursuant to CEQA, the Southern California Association of Governments (SCAG) is responsible for reviewing regionally significant local plans for consistency with SCAG's adopted regional plans. SCAG encourages projects to demonstrate consistency with SCAG's adopted regional plans and policies through the use of the SCAG List of Mitigation Measures extracted from the 2012 RTP/SCS PEIR.

site needed hazardous waste management facilities; to promote on-site resource reduction, treatment and recycling; and to provide for the collection and treatment needs of small quantity hazardous waste generators. An important component of the County Hazardous Waste Management Plan is the monitoring of hazardous waste management facilities for compliance with Federal and State regulations. Siting criteria and subsequent environmental documentation required pursuant to CEQA will also ensure the mitigation of adverse impacts associated with the siting of hazardous waste facility.

Health Care Agency

■ Fire Regulations

Fire codes are important to all building construction. The Orange County Fire Authority (OCFA) provides services to the City of Placentia under a joint powers agreement (JPA) to provide fire prevention, suppression and emergency services to 22 jurisdictions within Orange County. OCFA monitors the storage of hazardous materials in the County for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the OCFA. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations.

Health Care Agency

■ Other County Hazardous Materials Requirements

In 1997, the Orange County Environmental Health Care Agency ("OCHCA") was designated as the CUPA for the County of Orange. As the CUPA, the OCHCA coordinates the regulation of hazardous materials and hazardous wastes in Orange County through the following six programs: Hazardous Materials Disclosure ("HMD"), Business Emergency Plan ("BEP"), Hazardous Waste, Underground Storage Tank ("UST"), Aboveground Petroleum Storage Tank ("APST"), and the California Accidental Release Prevention ("CalARP"). These regulations include, but are not limited to, delineation and (if necessary) remediation and disposal of ACMs and lead-based paint ("LBP") prior to demolition of existing older structures.

■ Hazardous Materials Disclosure and Business Emergency Plan

Federal, State and local laws require a Hazardous Materials Business Emergency Plan (HMBEP) to be prepared and submitted by owners and/or operators of facilities that store hazardous materials at or above reportable threshold quantities. In the City of Placentia, the County of Orange is charged with the responsibility to oversee compliance of these laws.

A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of an HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

Per the California Health and Safety Code (HSC), Chapter 6.95, Section 25500 - 25532, a HMBEP must be submitted by any business that handles a hazardous material or a mixture containing a hazardous material in quantities equal to, or greater than, those outlined below:

- A total weight of 500 pounds or a total volume of 55 gallons.
- 200 cubic feet at standard temperature and pressure for compressed gas.
- A radioactive material handled in quantities for which an emergency plan is required pursuant to Parts 30, 40 or 70 of Chapter 10, Title 10, Code of Federal Regulations (CFR), or equal to or greater than the amounts specified above, whichever amount is less.

require or engage in operations that involve the use and transport of hazardous materials. The consequence of this increase of hazardous materials in the City is an increase in the potential for human exposure to these substances, with possible public health and safety consequences.

Chemical storage of any kind over specific quantities (such as 55 gallons of petroleum product) must be publicly reported in accordance with California Proposition 65. Emergency response plans are in place with the City in the event a hazardous or toxic materials event occurs. In addition, the Orange County Fire Authority provides emergency response to incidents involving hazardous materials. The Orange County Fire Authority Hazardous Materials Response Team (HMRT) directly responds to hazardous materials incidents. ~~The Orange County Fire Authority Hazardous Materials Disclosure Office~~ also identifies facilities that contain or handle hazardous materials.

Health Care Agency

Health Care Agency

The ~~OCFA~~ provides services to the City of Placentia and monitors the storage of hazardous materials in the County for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the ~~OCFA~~.

Health Care Agency

Monitoring of sites which have contamination associated with underground tanks used to store petroleum products is the primary responsibility of the California Department of Health Services and the Regional Water Quality Control Board. Aboveground tanks storing hazardous chemicals would have secondary containment to collect fluids that are accidentally released. Underground storage tanks and connecting piping would be double-walled and would have monitoring devices with alarms installed to constantly monitor for unauthorized releases in accordance with Federal, State, and local standards.

There are many elementary, middle, and high schools located within the City, and the development of new businesses, which use hazardous materials, near residential areas or within one-quarter mile of a school may expose these sensitive land uses to greater risk of exposure to hazardous materials, wastes, or emissions. As such, minimal development is anticipated within the City as only 1.3% of the City remains underdeveloped, which limits the amount of land available for new development. However, methods such as a buffer in the form of a major street, channel, or intervening land use can be used to separate residential areas from industrial areas, where applicable within the City.

The development of new uses within the City as build-out of the General Plan occurs, implementation of mitigation measures requiring the adoption of development standards to ensure that future developments that include residential uses near commercial or office development does not create unacceptable risk to residents to hazardous materials would reduce impacts to a less than significant level.

While the risk of exposure to hazardous materials cannot be eliminated, measures can be implemented to maintain risk to acceptable levels. Compliance with measures established by Federal, State and local regulatory agencies is considered adequate to offset the negative effects related to the use, storage and transport of hazardous materials in the City. In addition, the following goals and policies in the General Plan Update Safety Element, as well as the recommended mitigation measures, would further reduce hazardous materials impacts to a less than significant level.

Goals and Policies in the Proposed General Plan

Land Use Element

- Goal LU-2** *Ensure that new development is compatible with surrounding land uses, the circulation network, and existing development constraints.*
- Policies LU-2.15** Work with ~~Orange County Fire Authority (OCFA)~~ to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.

Health Care Agency

Conservation Element

❖ **Water Resources**

- Goal CON-1** *Conserve groundwater and imported water resources.*
- Policies CON-1.6** Reduce the amounts of hazardous materials (i.e. used oil, pesticides, etc.) entering storm drains through public education efforts.

❖ **Solid Waste**

- Goal CON-8** *Reduce solid waste produced in the City.*
- Policies CON-8.7** Continue to provide public information regarding residential collection of household hazardous wastes including paint containers, electronics, household chemicals, motor oils, and pesticides, and promote development of facilities that collect these materials.
- CON-8.8** Coordinate with the County and surrounding jurisdictions to dispose of special waste including tires, construction/demolition debris, medical waste, asbestos, household hazardous waste, and computer technology waste.

Safety Element

❖ **Hazardous Materials and Waste**

- Goal SAF-4** *Decrease the risk of exposure for life, property and the environment to hazardous materials and hazardous waste.*
- Policies SAF-4.1** Follow the response procedures outlined within the ~~Orange County Fire Authority's~~ Hazardous Materials Area Plan in the event of a hazardous materials emergency.
- SAF-4.2** Implement Federal, State and local regulations for the disposal, handling, and storage of hazardous materials.
- SAF-4.3** Promote the recovery and recycling of hazardous materials.
- SAF-4.4** Employ effective emergency preparedness and emergency response strategies to minimize the impacts to health and safety that can result from hazardous materials emergencies such as spills or contamination.
- SAF-4.5** Continually update maps of the City's emergency facilities, evacuation routes and hazardous areas to reflect additions or modifications.

Health Care Agency

- SAF-4.6 Continue to partner with the County of Orange to provide needed programs such as the Regional Household Hazardous Waste Collection Center to provide disposal of household hazards at no cost to Placentia residents and participating agencies.
- SAF-4.7 Work with Caltrans to plant, maintain and enhance landscaping abutting the California State Route 57 that passes through Placentia's disadvantaged communities.
- SAF-4.8 Require enhanced landscaped buffers in industrial-zoned areas that abut residential zones, consisting of more densely planted trees in setback areas.
- SAF-4.9 Prohibit outdoor industrial operations in industrial zones that abut residential areas.

Mitigation Measures:

- HAZ-1** *The City shall collaborate with Orange County Community Development, the Orange County Health Care Agency, and the ~~Orange County Fire Authority~~ to create an informational pamphlet with existing hazardous material substitutions and retailers that sell the materials. Offer the information to applicable business owners who are required to file as a hazardous waste handler in the City.*
- HAZ-2** *The City shall collaborate with Orange County Community Development, the Orange County Health Care Agency, and the ~~Orange County Fire Authority~~ and provide information on viable alternatives to household hazardous materials on the City's website so households may use alternatives. Information will also educate the public to the health, safety, and environmental benefits of using non-hazardous substitutions.*

Level of Significance After Mitigation: Less Than Significant Impact

4.10.4.2 Accidental Release of Hazardous Materials

Reasonably Foreseeable Upset and Accident Conditions Involving the Use of Hazardous Materials in the City as a Result of Implementation of the General Plan Update Could Result in a Public Health Risk.

Level of Significance Before Mitigation: Potentially Significant Impact

Impact Analysis: Implementation of the General Plan would result in a minor increase in development within the City beyond that which exists at present. As previously stated, the City has only 54.5 acres of vacant land, which equates to 1.3% of land within the City. Many of the uses that could be developed under the General Plan within the remaining vacant parcels, would have a potential to increase the use and transport of hazardous materials within the City. The increased use and transport of hazardous materials in the City increases the potential for accidental releases of hazardous materials, which poses a threat to the health and safety of residents.

Typical incidents that could result in accidental release of hazardous materials include leaking underground storage tanks, accidents during transport causing a "spill" of a hazardous materials and/or natural disasters causing the unauthorized release of a substance. If not cleaned up immediately and completely, these and other types of incidents could cause contamination of soil,

- LU-2.2 Develop residential and commercial design guidelines to both protect existing development and allow for future development that is attractive, compatible, and sensitive to surrounding uses.
- LU-2.3 Orient land uses that create employment opportunities toward major and primary arterial streets so that activities associated with these uses will have minimal effect upon adjacent residential neighborhoods.
- LU-2.4 Large, contiguous vacant or underutilized parcels should be comprehensively planned for development to be compatible with adjacent neighborhoods.
- LU-2.5 Ensure a sensitive transition between commercial or business park uses and residential uses by implementing precise development standards or design guidelines with such techniques as buffering, landscaping, setbacks and traffic calming features.
- LU-2.6 Require new multifamily development to provide adequate buffers (such as decorative walls and landscaped setbacks) along boundaries with single-family residential uses to reduce impacts on residences due to noise, traffic, parking, light and glare, and differences in scale; to ensure privacy; and to provide visual compatibility.
- LU-2.7 Allow small lot single-family and medium-density development as infill projects and provide adequate development standards or design guidelines to ensure compatibility with surrounding residential uses.
- LU-2.8 Preserve Placentia's low-density residential neighborhoods through enforcement of land use and property development standards while creating a harmonious blending of buildings and landscape when new development occurs.
- LU-2.9 Reduce the number of existing isolated commercial outlets through consolidation, where appropriate, and discourage small-scale strip commercial development.
- LU-2.10 Encourage non-conforming uses and buildings to be brought into compliance with City codes.
- LU-2.11 Preserve neighborhood integrity by routing extraneous traffic around neighborhoods.
- LU-2.12 Mitigate traffic congestion and unacceptable levels of noise, odors, dust, and light and glare which affect residential areas and sensitive receptors, when and where feasible.
- LU-2.13 Monitor the impact and intensity of land uses in adjacent jurisdictions on Placentia's transportation and circulation systems, so that traffic from projects in neighboring cities can move efficiently without interfering with existing development. Impacts from these projects shall be properly assessed to mitigate any impacts to the existing Placentia mobility network.
- LU-2.14 Encourage consolidation of parking and reciprocal access agreements among adjacent businesses to minimize curb cuts and disruption of traffic flow.
- LU-2.15 Work with ~~Orange County Fire Authority (OCFA)~~ Health Care Agency to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.

4.16 PUBLIC SERVICES

This section identifies police and fire protection services within the City of Placentia and provides an analysis of potential impacts associated with the buildout of the proposed General Plan. This section also discusses provides an analysis of potential impacts associated with the buildout of the proposed General Plan to Schools and Other Public Services. This Subchapter does not include a discussion of Parks; the discussion of Parks can be found in Subchapter 4.16, Recreation and Parks, and is therefore omitted from this Chapter.

4.16.1 Fire Protection

This section identifies fire protection services within the City of Placentia and provides an analysis of potential impacts associated with the buildout of the proposed General Plan.

4.16.1.1 Regulatory Setting

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's privately-owned wildland. In addition, the Department provides varied emergency services in 36 of the State's 58 counties via contracts with local governments. The Department's firefighters, fire engines, and aircraft respond to an average of more than 5,600 wildland fires each year. Those fires burn more than 172,000 acres annually.¹

Orange County Fire Authority

Orange County Fire Authority (OCFA) is a premier public safety agency providing superior services that result in no lives or property lost. OCFA protects and supports the needs of the service area, which includes the City of Placentia, to the fullest extent possible. The OCFA is a regional fire service agency that serves 23 cities in Orange County and all unincorporated areas. The OCFA protects over 1,680,000 residents from its 71 fire stations located throughout Orange County. OCFA Reserve Firefighters work 10 stations throughout Orange County.²

The City's fire services are currently provided by the Orange County Fire Authority (OCFA). The OCFA is the regional fire service provider serving 23 cities and the unincorporated areas of Orange County, and as a result of this service, Placentia has access to the various special operations programs such as helicopters, heavy equipment, and specialized teams such as Hazardous Material teams. To adequately respond to urban fires, Placentia has two fire stations (Station 34 and 35).

Besides fire suppression, the OCFA services also include fire investigation, public safety education, fire protection engineering, building inspections for code compliance, weed abatement, hazardous materials inspections, and emergency preparedness planning and training.

Forthcoming Changes to Fire Protection

Fire Codes Hazardous Material Inspections

On June 19, 2018, the City Council voted unanimously (5-0) to approve issuing a notice of withdrawal to the OCFA to preserve the City's ability to review all service models available being used by comparable cities. The City is currently soliciting competitive proposals from qualified

¹ <http://calfire.ca.gov/about/about>

² <https://www.ocfa.org/AboutUs/AboutOCFA.aspx#briefhistory>

³ <https://www.placentia.org/DocumentCenter/View/7871/Fire-EMS-Fact-SheetLEGPUBLICVERSIONv2?bidId=>

- TAPs are growing in importance with their relation to land use planning and the development associated with high-density housing. As new development in the Transit-Oriented Development (TOD) and Old Town areas allow for high density populations and encourage diversified methods of transportation (e.g. ride-sharing, mass transit), TAPs will continue to grow in importance and will need to be revisited as populations increase.

WILDFIRE AND HIGH FIRE HAZARD ZONES

Many factors contribute to the severity of fires including weather; specifically, winds locally referred to as the Santa Ana winds (strong, extremely dry, downslope winds). The Santa Ana winds pose a significant fire hazard to the City each year, and typically occur from September to the first significant rain in December. The combination of dry air, low humidity, and heavy winds contributes to what is ultimately referred to as "fire weather" due to the limited amount of moisture in the air and increased dry, dead vegetation. As the City of Placentia approaches "build-out" fires resulting from the combination of the Santa Ana winds and dry, dead vegetation will continue to decrease as the undeveloped parcels are reduced.

There are no special fire zones in Placentia, given that there is very little undeveloped open space. OCFA has a Community Risk Reduction Department that conducts regular, required fire inspections of all businesses in Placentia pursuant to state law. This Department also conducts plan reviews on proposed construction, to make sure the structures are designed to reduce risk of fire before the projects are even built.

For further discussion of wildfire hazards within the City, please refer to Subchapter 4-20, Wildfire.

FUNDING

The most significant local economic factor impacting OCFA is Orange County's housing market, including fluctuations in new construction activities and housing prices. Property taxes derived from these activities comprised 61.2% of the OCFA's total governmental funds revenues in Fiscal Year 2017/18.⁵ The OCFA is also partially funded through individual City's Development Impact Fees (DIF). The City of Placentia collects the following DIFs for Public Safety, a portion of which is dedicated to fire protection services:⁶

- Single Family Detached Housing: \$1,049 per dwelling unit
- Single Family Attached Housing: \$851 per dwelling unit
- Multi-Family Housing: \$966 per dwelling unit
- Mobile Homes: \$768 per dwelling unit
- Retail/Commercial: \$0.71 per building square footage
- Office: \$1.02 per building square footage
- Industrial: \$0.51 per building square footage

Placentia is a Contract City with OCFA. Funding for Fire Services with OCFA are from the General Fund

4.16.1.3 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

Result in a in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental

⁵ <https://www.ocfa.org/Uploads/Transparency/OCFA%202017-2018%20CAFR.pdf>

⁶ <http://placentia.org/DocumentCenter/View/6259/Developer-Fees?bidId=>

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.

Based on these significance thresholds and criteria, the proposed General Plan's effects have been categorized as either "no impact," a "less than significant impact," or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant unavoidable impact.

4.16.1.4 Project Impacts and Mitigation Measures

FIRE PROTECTION SERVICES AND FACILITIES

Buildout of the City in Accordance with the Proposed General Plan Could Result in the Need for Additional Fire Facilities or Personnel

Level of Significance Before Mitigation: Less Than Significant Impact

Impact Analysis: Future fire protection levels would be considered adequate if existing emergency response times and staffing levels could be maintained and if OCFA's fire service standards and fire flow requirements are met. As such, should levels of service and/or standards not be met, implementation of the General Plan would cause a significant impact. As a result, additional facilities, personnel, and equipment may be required to maintain adequate levels of fire protection within the City.

The City of Placentia has not renewed its contract with OCFA, and will be providing local fire and medical services to their residents through the formation of a City Fire Department. The existing fire protection and paramedic service levels currently enjoyed by City residents will be maintained and, in many cases, enhanced by the implementation of alternate service delivery models which also reduce costs. The City views public safety in a holistic approach that includes not only fire protection but also local Police Department which includes proactive community policing, investigation, gang reduction and intervention efforts and other ways of preventing crime before it starts.⁷ Regardless of the provider of the fire protection services—OCFA or the City of Placentia—as the City grows, additional demand would be placed on existing fire services. The City has little remaining acreage available to be developed, though the City is anticipated to experience substantial population growth at buildout and therefore it is anticipated that the City will experience an increased demand for fire protection services. However, new developments associated with the buildout of the proposed General Plan would be required to comply with all applicable fire code and ordinance requirements for construction, access, water mains, fire flows, and hydrants. Individual projects would be reviewed by the OCFA or other fire service provider should the City develop one in the future to determine the specific fire requirements applicable to the specific development and to ensure compliance with these requirements. **This would ensure that new developments would not reduce the staffing, response times, or existing service levels within the City. Furthermore, the City imposes DIFs on new developments within the City, which would contribute to the OCFA's funding for expanded services within the City should they be required. Additionally, OCFA collects funding from collection of property taxes, which would increase in amount collected as vacant parcels are developed within the City and as**

⁷ <https://www.placentia.org/DocumentCenter/View/7872/FAQPublicFireEMSv5?bidId=>

redevelopment within City occurs. Therefore, implementation of the proposed General Plan would result in a less than significant impact to fire protection services.

Additionally, the proposed General Plan Safety Element includes goals and policies that address fire protection services and identify the need to provide adequate resources to respond to health and fire emergencies within the City, including adequate staffing of fire response personnel and trained medical technicians. Adherence to the goals and policies would reduce fire protection service impacts to a less than significant level.

Goals and Policies in the Proposed General Plan

Land Use Element

Goal	LU-2	<i>Ensure that new development is compatible with surrounding circulation network, and existing development constraints.</i>
Policies	LU-2.15	Work with Orange County Fire Authority (OCFA) to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.
Goal	LU-7	<i>Ensure that public facilities and services are available to accommodate development allowed under the General Plan and Zoning Ordinance.</i>
Policies	LU-7.1	Encourage a wide range of accessible public facilities and community services, including fire and police protection, flood control and drainage, educational, cultural and recreational opportunities and other governmental and municipal services.

Placentia is a Contract City with OCFA. Funding for Fire Services with OCFA are from the General Fund

Health Care Agency

Safety Element

❖ **Urban Fire Hazards**

Goal	SAF-2	<i>Protect the lives and property of residents, businesses owners, and visitors from the hazards of urban fires.</i>
Policies	SAF-2.1	Continue to conduct long-range fire safety planning, including enforcement of stringent building, fire, subdivision and other Municipal Code standards, improved infrastructure, and mutual aid agreements with other public agencies and the private sector.
	SAF-2.2	Continue to refine procedures and processes to minimize the risk of fire hazards, requiring new development, where appropriate, to: <ul style="list-style-type: none">• Utilize fire-resistant building materials;• Incorporate Fire retardant landscaping;• Incorporate fire sprinklers as appropriate; and• Provide Fire Protection Plans.
	SAF-2.3	Encourage owners of homes with wood roofs and flammable siding to replace them with Class-A, non-wood roof systems.
	SAF-2.4	Monitor fire response times to ensure they are keeping to desired levels of service.
	SAF-2.5	Ensure adequate fire-fighting resources are available to meet the demands of new development, especially with increases in the construction of mid- to high-rise structures, by ensuring that:



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

August 23, 2019

JLambert@placentia.org

Joe Lambert, Director
City of Placentia, Development Services Department
401 East Chapman Avenue
Placentia, CA 92870

Draft Environmental Impact Report (Draft EIR) for the Proposed Rich Heritage, Bright Future, Placentia General Plan (SCH No.:2018101031)

3-1 | South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

South Coast AQMD Staff's Summary of Project Description

3-2 | The Lead Agency proposes a comprehensive update to the City of Placentia's (City) General Plan to guide future development and accommodate growth projections in the City through the horizon year 2040¹ (Proposed Project). The Proposed Project encompasses 4,238 acres, which is bounded by the City of Anaheim to the south, the City of Yorba Linda to the East, the City of Brea to the North, and the City of Fullerton to the west. The Lead Agency anticipates a net growth of 18,721 residents, 6,523 residential units, and 784,000 square feet of commercial, office, and industrial uses by 2040²³.

South Coast AQMD Staff's Summary of Air Quality Analysis

3-3 | In the Air Quality Section, the Lead Agency did not quantify construction emissions. The Lead Agency quantified the Proposed Project's operational emissions in tons per year at full buildout (future conditions in year 2040 with the Proposed Project) and compared the emissions to the existing baseline conditions (year 2018) in tons per year⁴. The Lead Agency found that implementation of the Proposed Project would result in increases in PM10 and PM2.5 emissions and decreases in ROG, NOx, CO, and SOx emissions⁵. The Lead Agency found that construction and operation of the Proposed Project would result in less than significant air quality impacts, after the implementation of mitigation measure (MM) AQ-1. MM AQ-1 requires the Lead Agency to confer with South Coast AQMD to identify project-specific and City-wide PM2.5 emission reduction strategies beginning in 2020.

South Coast AQMD Staff's General Comments

3-4 | South Coast AQMD staff has comments on the Air Quality Analysis. The use of a future baseline to analyze the Proposed Project's air quality impacts improperly credits the Proposed Project with emission reductions that will occur independent of the Proposed Project. The Lead Agency should use South Coast AQMD air quality CEQA significance thresholds to determine the level of significance for the Proposed Project's construction and operation air quality impacts. Since the Proposed Project will be implemented over a 20-year period, interim milestone years, in addition to year 2018 and year 2040, should be used to

¹ Draft EIR. Section 1, *Executive Summary*. Page 1-5.

² *Ibid.* Section 3, *Project Description*. Table 3-4, *Future Build-out Changes Based on New Land Use Designations*. Page 3-5.

³ In the Draft EIR, the Lead Agency identified the horizon year as 2035 in the project description and 2040 in the Air Quality and Transportation Analyses.

⁴ Draft EIR. Section 3, *Project Description*. Page 3-6.

⁵ *Ibid.* Section 4.4, *Air Quality*. Table 4-5, *Summary Of Estimated Existing Emissions Inventory For The City Of Placentia*. Page 4.4-26.

3-4
cont.

analyze the Proposed Project's air quality impacts. Additionally, since information on the Proposed Project's development potential at full buildout (e.g., 6,523 residential units and 784,000 square feet of non-residential uses) is available⁶, the Lead Agency should use this information to quantify the Proposed Project's construction emissions. Furthermore, to facilitate the implementation of the Health, Wellness, and Environmental Justice (HW/EJ) Goal 12, policies 12-2 through 12-6, which aim to reducing pollution exposure and improving air quality in disadvantaged communities, primarily through avoiding siting sensitive receptors near major sources of air pollution, such as freeways, distribution centers, and rail yards, South Coast AQMD staff recommends that the Lead Agency require enhanced filtration units when siting sensitive receptors near sources of air pollution and implement strategies to maximize protection against exposure of sensitive receptors to air pollution. Finally, South Coast AQMD staff recommends that the Lead Agency include additional air quality mitigation measures including a commitment to periodic technology review in the Final EIR as guidance to future individual projects subject to CEQA reviews in the subsequent, project-specific CEQA air quality analyses. Please see the attachment for more information.

3-5

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

3-6

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:RD
ORC190716-02
Control Number

⁶ Draft EIR. Section 3, Project Description. Page 3-5.

RESPONSES TO COMMENTS
LETTER #3
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

- 3-1 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project.
- 3-2 The future development scenario is accurate, but please note only 54.5 acres of land remain undeveloped within the City of Placentia. The City has assumed that redevelopment at a certain scale will occur over the next approximate 20 years, but when, where, and how such development may occur cannot be forecast. Thus, the City considers creation of future development scenarios to be “speculative” as outlined in Section 15145 of the current State CEQA Guidelines.
- 3-3 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. The General Plan provides a planning scenario for future development within the City of Placentia. The Plan does not identify any specific development projects for which a realistic construction scenario could be reasonably established. Therefore, it was not possible to provide a construction scenario that would not be speculative, i.e., with any factual basis. Note that the operations/occupancy emission forecast relied substantially on the implementation of the extensive air quality emission control policies as well as the two mitigation measures. Further note that with only 54.5 vacant acres available for development, the growth in the City is almost wholly dependent on redevelopment for which a reasonable potential development scenario cannot be identified at this time; i.e., it would be speculative (refer to State CEQA Guidelines Section 15145).
- 3-4 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. Please refer to response to comment 3-3. The City’s General Plan Update incorporates detailed Plan policies that are designed to minimize future air emissions. These policies range from reductions in future energy use to extensive efforts to support non-vehicular modes of transportation. As noted in the preceding comment (3-3), it was not possible to define a specific project to analyze and attempt to use the standard emission thresholds established by SCAQMD. If transportation alone is considered, full development of the City will result in a total of 1,992 new trips. This is such a small increase that emission thresholds will not be exceeded, but when examined over a 20-year period, it equates to about 50 new vehicle trips per year, on average. The number of units and future City occupants identified in this comment, fail to understand future residential development as being built with 20 ten-story residential structures or wholesale redevelopment of single-family detached units. When confronted with this inherent future development dilemma (in both type and timing of development), the City concluded that it would be too speculative to create specific air emission forecast scenarios. Instead, the City decided to establish goals and policies that would minimize emissions. These goals and policies are incorporated throughout all of the Update’s elements, but the following examples from the Conservation Element of the General Plan are designed to ensure minimum emissions for all future development, whether it is only on the remaining 54.5 undeveloped acreage in the City or encompasses future redevelopment of existing developed land which will be evaluated at the specific level when being considered by the City for future entitlements.

Goal **CON-2** ***Reduce air pollution through proper land use and transportation planning.***

Policies CON-2.1 Cooperate with the South Coast Air Quality Management District and the Southern California Association of Governments in their effort to implement provisions of the region's current Air Quality Management Plan.

CON-2.2 Design safe and efficient vehicular access to commercial land uses from arterial streets to ensure efficient vehicular ingress and egress.

CON-2.3 Locate multiple family developments close to commercial areas to encourage pedestrian rather than vehicular travel.

CON-2.4 Develop neighborhood parks near concentrations of residents to encourage walking to parks. Use the Quimby in-lieu to fund new and expanded park space.

CON-2.5 Implement through design requirements, the Complete Street tenets. Encourage the design of commercial areas to foster pedestrian circulation.

CON-2.6 Cooperate and participate in regional air quality management plans, programs, and enforcement measures.

CON-2.7 Implement the required components of the Congestion Management Plan, and continue to work with Orange County Transportation Authority on annual updates to the CMP.

CON-2.8 Encourage and expand the use of electric charging station for EV vehicles. This would be in private and public development.

CON-2.9 Adopt a Climate Action Plan by December 2022.

CON-2.10 Utilize California Air Resources Board (CARB) recommendations to evaluate the siting of dry cleaners, chrome platers, large gas stations, freeways, and other high pollutant sources near residences, health care facilities, schools, and other sensitive land uses.

CON-2.11 Encourage alternative modes of travel to work and school by maximizing transit service, purchasing alternative fuel vehicles, completing all sidewalks, rideshare, bikeshare programs (and scooter share programs) and creating and expanding a network of multiuse trails and bicycle paths. Focus on connecting Placentia and Fullerton along bikeways, using the Placentia Metrolink station as a catalyst.

CON-2.12 Encourage mixed use development as a way to preserve natural resources.

Goal **CON-3** ***Improve air quality by reducing the amount of vehicular emissions in Placentia.***

Policies CON-3.1 Utilize incentives, regulations and/or Transportation Demand Management (TDM) programs in cooperation with other jurisdictions in the South Coast Air Basin to reduce and eliminate vehicle trips.

CON-3.3 Promote and establish modified work schedules for private development and employers which reduce peak period auto travel. This applies to the City government services but supports private industry efforts as well.

CON-3.4 Cooperate in and encourage efforts to promote the Metrolink Station by residents and visitors to Placentia. Expand bus, railroad and other forms of transit serving the City and the urbanized portions of Orange County.

	CON-3.5	Expand the use of alternative fueled vehicles for city services.
	CON-3.6	Encourage non-motorized transportation through the provision of bicycle and pedestrian pathways.
	CON-3.7	Encourage employer rideshare and transit incentives programs by local businesses.
	CON-3.8	Manage parking supply to discourage auto use, while ensuring that economic development goals are not sacrificed.
	CON-3.9	Encourage businesses to alter truck delivery routes and local delivery schedules to lesser traveled roads during peak hours, or switch to off-peak delivery hours.
	CON-3.10	Implement Citywide traffic flow improvements outlined in the Mobility Element.
	CON-3.11	Support state and federal legislation which would improve vehicle/transportation technology and cleaner fuels.
	CON-3.12	Support efforts to balance jobs and housing to provide housing options and job opportunities to reduce commuting.
	CON-3.13	Encourage a mix of land uses located together to reduce vehicle trips and miles traveled.
	CON-3.14	Participate in and create incentive and rebate programs for alternative fuel vehicles.
	CON-3.15	Educate residents and commercial business owner on any rebate programs for solar heating and cooling in both residential and commercial structures.
	CON-3.16	Require new developments to install electric vehicle charging stations.
	CON-3.17	Install electric vehicle charging stations at City owned properties.
	CON-3.18	Implement a bicycle sharing program at the new transit station.
Goal	CON-4	<i>Reduce particulate emissions to the greatest extent feasible.</i>
Policy	CON-4.1	Continue policies to minimize particulate matter emissions during road and building construction and demolition.
Goal	CON-5	<i>Reduce emissions through reduced energy consumption and promote sustainable and renewable energy sources.</i>
Policies	CON-5.1	Promote energy conservation in all sectors of the City including residential, commercial, and industrial.
	CON-5.2	Promote local recycling of wastes and the use of recycled materials in both private and public projects and uses.
	CON-5.3	Encourage solar swimming pool heaters and residential and commercial water heaters and other energy using appliances.

Goal **CON-6** ***Conserve energy resources through the use of available technology such as solar and other conservation practices.***

Policies CON-6.1 Encourage innovative site planning and building designs that minimize energy consumption by taking advantage of sun/shade patterns, prevailing winds, landscaping, and building materials.

 CON-6.2 Encourage new development and existing structures to install energy efficient equipment.

The City believes that these goals and policies will be more effective than mitigation measures because developers will be required to demonstrate that future projects are consistent with the above requirements as they are designed, not after the fact. Based on the preceding information, the City believes it has embarked on a future of development that will meet and exceed the SCAQMD goals for reducing air emissions in the South Coast Air Basin.

3-5 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. These responses will be made available to the District as prescribed by Para. 21092.5 of the CEQA statute.

3-6 The City appreciates the identification of a District point of contact.

ATTACHMENT

CEQA Baseline

1. Notwithstanding the general rule that baseline conditions exist at the time of the environmental review is initiated and that a project's environmental impacts are assessed by limiting the examination to changes in the existing physical conditions in the affected area as they exist at the time the Notice of Preparation (NOP) is published, if there is a published NOP, the use of future baseline is proper in some cases, supported by substantial evidence in the record. Consideration of future conditions in determining whether a project's impacts may be significant is consistent with CEQA's rules regarding baseline, especially when the project has a long-term buildout schedule. "[N]othing in CEQA law precludes an agency ... from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 454.). "Even when a project is intended and expected to improve conditions in the long term—20 or 30 years after an EIR is prepared—decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. ... [¶] ... The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal." (See also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310).

The Proposed Project's operational emissions were estimated for the 2018 CEQA baseline year and the 2040 future buildout year. The 2018 existing conditions were held constant (i.e. using emission factors from year 2018) and compared to the future year (i.e. using emission factors from the future year). The Lead Agency found that overall emissions, except for PM10 and PM2.5, are anticipated to be lower than existing conditions⁷. This approach using a comparison between the Proposed Project's impacts in the future year (using emission factors from year 2040) and the 2018 baseline (using emission factors from year 2018) improperly credits the Proposed Project with emission reductions that will occur independent of the Proposed Project due to adopted state and federal rules and regulations and technology advancements, since these rules and regulations and technology are expected to improve air quality over time, even in the absence of the Proposed Project. For example, the California Air Resources Board's (CARB) current regulation for trucks and buses will provide significant near-term and long-term reductions in NOx emissions from trucks and buses, at 124 tons per day for 2014 and 98 tons per day for 2023⁸. This state regulation might have led to the reduction in NOx and CO emissions in 2040. Therefore, the methodology used to analyze the Proposed Project's long-term operational impacts in the Draft EIR has likely underestimated the Proposed Project's actual emissions.

The purpose of CEQA is to disclose environmental impacts from the Proposed Project to the public and decision makers in order to provide the public and decision makers with the actual changes to the environment from the activities involved in the Proposed Project. By taking credit for future emission reductions from existing air quality rules, regulations, emissions reductions strategies, and technological advancements that are not attributable to the Proposed Project, the Proposed Project's air quality impacts are likely underestimated. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Air Quality Analysis to include comparisons between emissions in year 2018, year 2020, year 2025, year 2030, year 2035, and year 2040 with the Proposed Project and emissions in the same respective years without the Proposed Project, and use the comparisons to

⁷ Draft EIR. Section 4.4, *Air Quality*. Page 4.4-30.

⁸ California Air Resources Board. July 14, 2017. Trucks and Bus Regulation: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation. Accessed at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>, and <https://www.arb.ca.gov/msprog/onrdiesel/documents/truckrulehealth.pdf>.

3-7 The City concluded that it is speculative to assume what type of redevelopment might occur in the future. As outlined in the DEIR, only 54.5 acres of developable land are currently vacant within City. In five-year increments over 20 years this would result in about 2.7 acres of development within each year. This is clearly a *de minimis* amount of development from both a construction and operational/occupancy standpoint for air emissions. Under such a circumstance it is highly unrealistic to have the City speculate about future development with no rational basis to even make reasonable assumptions, let alone speculate about future rules and regulations pertaining to air quality. As noted in the previous responses, the City believes that the goals and policies of the General Plan Update will control air emissions from any future development better than listing specific mitigation measures in this EIR

3-7 | determine the level of significance for the Proposed Project's air quality impacts. Please also see
cont. | Comment No. 3 below on Interim Milestone Years.

South Coast AQMD's Air Quality CEQA Significance Thresholds

2. While CEQA allows a Lead Agency to apply appropriate thresholds to determine the level of significance, the Lead Agency may not apply thresholds in a manner that precludes consideration of substantial evidence demonstrating that there may be a significant effect on the environment. Evaluation of air quality impacts, unlike some other impact areas, easily lends itself to quantification. Not only does quantification make it easier for the public and decision-makers to understand the breadth and depth of the potential air quality impacts, but it also facilitates the identification of mitigation measures required to reduce any significant adverse air quality impacts. South Coast AQMD's CEQA significance thresholds for air quality provide a clear quantitative benchmark to determine the significance of a project's air quality impacts. Therefore, for most projects within the South Coast AQMD, South Coast AQMD's air quality CEQA thresholds of significance for construction and operation⁹ are used to determine the level of significance for a project's air quality impacts.

3-8 | The Lead Agency quantified the Proposed Project's existing operational emissions in tons per year, compared those emissions to the future conditions in year 2040 with the Proposed Project, and found that the Proposed Project's operational air quality impacts would be less than significant. South Coast AQMD's regional air quality CEQA significance thresholds are in pounds per day¹⁰ and should be used to determine the level of significance for the Proposed Project's air quality impacts. Using South Coast AQMD's CEQA significance thresholds would clearly identify whether the Proposed Project would result in significant air quality impacts under CEQA, disclose the magnitude of the impacts, facilitate the identification of feasible mitigation measures, and evaluate the level of impacts before and after mitigation measures. Therefore, South Coast AQMD staff recommends that the Lead Agency compare the Proposed Project's emissions to South Coast AQMD's regional air quality CEQA significance thresholds in the Final EIR to determine the level of significance.

Air Quality Analysis – Interim Milestone Years

3. This Comment is related to Comment No. 1. The Air Quality Analysis in the Draft EIR included only two analysis years: baseline year (2018) and buildout year (2040). By 2040, the Proposed Project is assumed to reach full buildout. Although the Proposed Project may not be at peak capacity in earlier years, it is possible that due to higher emission factors of vehicles, trucks, and equipment in earlier years, peak daily emissions may occur in 2019 and beyond. For Example, the Lead Agency stated that "the projected housing unit growth between 2016 and 2025 is much greater for the City of Placentia than projected for the entirety of Orange County." Additionally, the overall emission factors of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and cleaner technologies have not been fully implemented, and fleets have not fully turned over. Air quality is improving overtime with substantial emission reductions occurring in later years. Therefore, South Coast AQMD staff recommends that the Lead Agency include interim milestone years in the analysis to ensure that peak daily emissions are identified and adequately disclosed in the Final EIR. The interim milestone years will also demonstrate progress in emission reductions overtime from implementing the air quality-related goals and policies that are included in the General Plan Update and Draft EIR.

3-9 |

⁹ South Coast AQMD. March 2015. *South Coast AQMD Air Quality Significance Thresholds*. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

¹⁰ South Coast AQMD. Air Quality Significance Thresholds. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

- 3-8 The use of SCAQMD thresholds of significance is not mandatory as this comment indicates. The City finds that the emission comparison approach used in the DEIR is appropriate where there are no reasonable scenarios from which to construct a specific-emissions forecast during any discrete period. As noted, the City has only 54.5 acres of vacant land with varying land use designations and it is not feasible or reasonable to create any redevelopment scenarios “whole cloth” in this current environment where redevelopment areas do not even exist. For the time being the City believes it is more realistic to evaluate impacts of the Plans goals and policies on future emission reductions than to arbitrarily create forecasting scenarios that would be totally speculative.
- 3-9 For the reasons outlined in responses 3-3, 3-4, 3-5 and 3-7, the City does not concur with this recommendation to analyze interim years.

Air Quality Impact Analysis – Construction Impact Analysis

4. The Lead Agency did not quantify the Proposed Project’s construction emissions in the Draft EIR or provide substantial evidence to support the finding that construction of the Proposed Project would have less than significant impacts on regional and localized air quality.

When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Preparing the CEQA analysis “necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can” (CEQA Guideline Section 15144).

Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips).

When the precise construction schedule or scenario is unknown, the Lead Agency should use its best efforts to identify and quantify a worst-case construction impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared. In the Draft EIR, the Lead Agency has identified the estimated development potential of the Proposed Project. For example, the Lead Agency anticipates growth over existing (2018) conditions to be approximately 18,721 persons, 6,523 additional dwelling units, and 784,000 additional square feet of non-residential uses¹¹. Therefore, the Lead Agency can and should use this information to develop construction scenarios that would be required to implement the full buildout of the Proposed Project, quantify associated construction emissions, including emissions from any demolition activities, and compare the emissions to South Coast AQMD’s air quality CEQA significance thresholds to determine the level of significance. The Lead Agency should use the most current version of California Emission Estimator Model (CalEEMod)¹² to quantify construction emissions. A quantitative analysis will facilitate the goal and purpose of CEQA on public disclosure with useful information on the kind, size, scope, intensity, duration, density, and location of subsequent project-level development to foster meaningful public participation and informed decision making. Alternatively, the Lead Agency should consider to include an additional mitigation measure regarding project-level construction air quality impact analysis. Please see Comment No. 8 for more information.

Air Quality Analysis – Overlapping Construction and Operational Impacts

5. When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in a CEQA document. Based on a review of the Air Quality Analysis, South Coast AQMD staff found that the Lead Agency did not analyze a scenario where construction emissions overlap with operational emissions. Since implementation of the Proposed Project is expected to occur over a period of 20 years, an overlapping construction and operation scenario may be reasonably foreseeable, unless the Proposed Project includes requirement(s) that will prohibit overlapping construction and operational activities. To conservatively analyze a worst-case impact scenario that is

¹¹ Draft EIR. Section 1, *Executive Summary*. Page 1-1.

¹² South Coast AQMD. CalEEMod Version 2016.3.2. Accessed at: <http://www.aqmd.gov/caleemod/download-model>.

3-10 Please refer to responses to comments 3-4, 3-7 and 3-8. As stated, the City does not believe it is possible to construct feasible or reasonable scenarios that will allow the forecasts identified within the scope of this comment.

reasonably foreseeable at the time the Draft EIR is prepared, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify the overlapping years, combine construction emissions (including emissions from demolition) with operational emissions from the overlapping years, and compare the combined emissions to South Coast AQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR.

Air Quality Analysis – Localized Significance Thresholds (LSTs) Analysis

3-10
cont.

6. The Proposed Project has numerous land uses with sensitive receptors, and these land uses are expected to increase with the implementation of the Proposed Project¹³. South Coast AQMD staff recommends that the Lead Agency use its best efforts, based on already available Proposed Project development potential information, such as the maximum dwelling units and build-out of nonresidential uses in square feet¹⁴, to quantify and disclose the Proposed Project's localized emissions in the Final EIR. South Coast AQMD guidance for performing a localized air quality analysis is available on South Coast AQMD's website¹⁵. Alternatively, the Lead Agency should consider to include an additional mitigation measure regarding project-level LSTs analysis. Please see Comment No. 8 for more information.

Health Risk Reduction Strategies

7. Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways and other sources of air pollution, South Coast AQMD staff recommends that, prior to approving the project, lead agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

The Lead Agency proposes multiple Health, Wellness, and Environmental Justice (HW/EJ) goals and policies that are aimed at minimizing the health risks imposed on residents of disadvantaged communities resulting from exposure to air pollution, such as Goal HW/EJ-12. HW/EJ-12 requires developers to take measures to reduce pollution exposure and improve air quality in disadvantaged communities, primarily through avoiding siting sensitive receptors near major sources of air pollution, such as freeways, distribution centers, and rail yards. HW/EJ-12-6 also requires the preparation of a health risk assessment (HRA) for any project being proposed within the buffer distances identified in HW/EJ-12-3 through HW/EJ 12-5.

3-11

To facilitate the implementation of the City's General Plan Update Health, Wellness, and Environmental Justice Goal HW/EJ-12, South Coast AQMD staff recommends that the Lead Agency consider incorporating the following strategies to maximize protection against exposure to toxic air contaminants in the Final EIR.

Health Risk Reduction Strategies for Implementing Goal HW/EJ-12

- a) The Lead Agency should consider the use of high efficiency filters or enhanced filtration units, such as filters with a Minimum Efficiency Reporting Value (MERV) 13 or better, for projects within the buffer distances identified in HW/EJ-12-3 through HW/EJ12-5 to reduce exposure to diesel particulate matter (DPM) emissions from vehicles and trucks traveling on the nearby freeways (e.g., State Route 57) or visiting industrial uses. Enhanced filtration units are capable of

¹³ Draft EIR. Section 1, *Executive Summary*. 1-1.

¹⁴ *Ibid.*

¹⁵ South Coast AQMD. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

reducing exposure. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

- b) Enhanced filtration systems have limitations. In a study that South Coast AQMD conducted to investigate filters¹⁶, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the building tenants. It is typically assumed that the filters operate 100 percent of the time while sensitive receptors are indoors, and the environmental analysis does not generally account for the times when sensitive receptors have windows or doors open or are in common space areas of a project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residents prior to assuming that they will sufficiently alleviate exposure to DPM emissions.
- c) Because of the limitations, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular monitoring and maintenance of filters in the Final EIR. To facilitate a good faith effort at full disclosure and provide useful information to future residents who will live and/or work in proximity to freeways and other sources of air pollution, the Lead Agency should require the following information be included, at a minimum, in the subsequent, project-level CEQA documents:

- Disclose potential health impacts to prospective sensitive receptors from living and/or working in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open and/or when sensitive receptors are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency such as the Lead Agency, to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system;
- Provide information to sensitive receptors living and/or working at the Proposed Project on where MERV filters can be purchased;
- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;
- Identify the responsible entity (e.g. future residents, Homeowner's Associations (HOAs), or property managers) for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if tenants and/or residents should be responsible for the periodic and regular

3-11
cont.

¹⁶ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

3-11
cont.

- purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units;
 - Set City-wide or project-specific criteria for assessing progress in installing and replacing the enhanced filtration units; and
 - Develop a City-wide or project-specific process for evaluating the effectiveness of the enhanced filtration units.

Recommended Mitigation Measures

8. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate significant adverse impacts. In addition to the goals and policies aimed at reducing air quality impacts resulting from subsequent development projects under the Proposed Project, South Coast AQMD staff recommends that the Lead Agency include a specific requirement for future, project-specific construction air quality analysis, in order to provide useful information to guide subsequent, project-specific air quality analyses and mitigation measures. These details will assist in the Lead Agency's decision-making when it reviews and approves subsequent individual projects implemented under the Proposed Project. The details will also provide guidance for project-level air quality analysis and facilitates CEQA streamlining and tiering as an option, where appropriate. Specifically, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measure in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website¹⁷.

3-12

For projects subject to California Environmental Quality Act (CEQA) review (non-exempt projects), project-specific air emissions impacts shall be determined in compliance with the latest version of the South Coast AQMD CEQA Guidelines. To address potential regional and localized impacts, the air quality analysis shall be completed pursuant to the latest version of South Coast AQMD's CEQA Handbook and Final Localized Significance Threshold Methodology document, or other appropriate methodologies as determined in conjunction with South Coast AQMD. The results of the regional and localized construction air quality impacts analyses shall be included in the development project's CEQA documentation. Construction emissions should be compared to the most recent version of South Coast AQMD's CEQA air quality regional¹⁸ and localized¹⁹ significance thresholds in order to identify if a Proposed Project will result in significant air quality impacts. If such analyses identify potentially significant regional or local air quality impacts, the Lead Agency shall require the incorporation of appropriate mitigation to reduce such impacts as required by CEQA Guidelines Section 15126.4. In Addition, prior to issuance of a grading permit for new development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NOx, CO, PM10, and PM2.5) associated with the maximum daily grading activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, the maximum daily grading activities of the proposed development shall be limited to the extent that could occur without resulting in emissions in excess of

¹⁷ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹⁸ South Coast AQMD. Regional Air Quality Significance Thresholds. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

¹⁹ South Coast AQMD. Localized Air Quality Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

South Coast AQMD's significance thresholds for those emissions. Examples of air quality mitigation measures that the project-specific development can and should do include the followings:

- Require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB-certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions²⁰. A list of CARB verified DPFs are available on the CARB website²¹.

The Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or South Coast AQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. The Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable. Any approved alternative technologies/strategies for use by the Lead Agency should be included and disclosed in the Air Quality Section of the Final EIR as a project requirement or mitigation measure as a condition of approval.

- Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)'s adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent²². Since the Proposed Project extends beyond 2023 to 2040, 2010 model year trucks will be required for the Proposed Project and should become more widely available

²⁰ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

²¹ *Ibid.* Page 18.

²² California Air Resources Board. December 20, 2018. <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

commercially. Therefore, South Coast AQMD staff recommends that the Lead Agency implement the Truck and Bus Regulation early and require, at a minimum, that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines, or establish a vendor(s)/contractor(s) selection policy that prefers vendor(s)/contractor(s) who can supply 2010 model year trucks. The Lead Agency's commitment to early implementation of the Truck and Bus Regulation throughout the City helps facilitate the Project's transition to 2010 model year trucks in 2023, provides time and opportunity to resolve any implementation challenges ahead of 2023, eases the costs and burden of regulatory compliance, and yields emission reductions from fleets earlier than 2023.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors, and conduct regular inspections of the records to the maximum extent feasible and practicable.

- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

3-12
cont.

South Coast AQMD staff has also identified the following operational air quality mitigation measures that the Lead Agency should include in the Final EIR to provide guidance to future, individual development projects in the subsequent, project-level air quality analyses for operation if the analyses show that the individual development's operational air quality impacts will be significant.

- To facilitate the implementation of General Plan Conservation Goals CON-2 and CON-3²³, which encourages alternative modes of transportation to reduce emissions associated with automobile use, the Lead Agency should provide electric vehicle (EV) charging stations. Require at least 5% of all vehicle parking spaces include EV charging stations, or at a minimum, require subsequent development implemented under the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use. The Lead Agency should also include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.
- Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility and/or EV charging stations.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.

²³ Draft EIR. Section 4.4, *Air Quality*. Page 4.4-8 through 4.4-10.

- Require the use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

9. Since the Proposed Project would be implemented over an estimated period of 20 years, the Lead Agency should take this opportunity at a general plan, program level to incorporate a periodic, technology review for both off-road construction equipment and on-road haul trucks that will be used by future, individual projects that will be proposed and carried to implement the Proposed Project within the City. South Coast AQMD staff recommends that the Lead Agency develop strategies to foster and facilitate the deployment of the lowest emissions technologies as they become available. This may include incorporating a performance standards-based technology review, or developing other comparable strategies or tools, to periodically assess equipment availability, equipment fleet mixtures, and best available emissions control devices. The deployment should include those technologies that are “capable of being accomplished in a successful manner within a reasonable period of time” (California Public Resources Code Section 21061.1), such as zero and near-zero emission technologies or best available control technologies (BACTs) that are expected to become more readily available over the life of the Proposed Project. A technology review should also incorporate an appropriate timeline/schedule for the assessment that will also be supportive of emissions reductions goals being implemented at local, regional, state, and federal levels (e.g. South Coast AQMD’s AQMP and other air quality and public health goals). If the technology review identifies that cleaner equipment and fleets have become available, the Lead Agency should commit to incorporating this new technology into the Proposed Project to further reduce the Proposed Project’s emissions. South Coast AQMD staff encourages the Lead Agency to involve the public and interested parties, such as South Coast AQMD and CARB, in developing an appropriate process and performance standards for technology review.

3-12
cont.

Compliance with South Coast AQMD Rule 403(e) – Large Operations

10. In the event that a subsequent individual project implementing the Proposed Project is a large operation (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, it will be required to comply with South Coast AQMD Rule 403(e) – Additional Requirements for Large Operations²⁴, which includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class²⁵. Therefore, South Coast AQMD staff recommends that the Lead Agency include a requirement for subsequent individual projects to demonstrate specific compliance with South Coast AQMD Rule 403(e) in the Final EIR. Compliance with South Coast AQMD Rule 403(e) will further reduce particulate matter from the Proposed Project.

²⁴ South Coast AQMD. Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

²⁵ South Coast AQMD. Compliance and Enforcement Staff’s contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.

3-11 The City concurs with the SCQMD recommendations in this extended comment on Health Risk Reduction Strategies, and the City concludes that the following policies require implementation of these strategies.

Goal	HW/EJ-10	<i>Promote to land use and development patterns that reduce greenhouse gas emissions, improve respiratory health, enhance air quality and reduce climate change impacts in disadvantage communities.</i>
Policies	HW/EJ-10.1	Promote land use patterns that reduce driving and promote walking, cycling, and transit use.
	HW/EJ-10.2	Discourage locating truck routes on primarily residential streets and in DACs.
	HW/EJ-10.3	Pursue funding for and implement transportation projects, policies, and guidelines that improve air quality.
	HW/EJ-10.4	Continue to promote and support transit improvements or public facilities that are powered by electricity, solar, alternative fuels (i.e., CNG or LNG), or that meet or exceed SULEV (Super Ultra Low Emissions Vehicle) emission standards.
	HW/EJ-10.5	Require landscaping, ventilation systems, double-paned windows, setbacks, landscaping, barriers, ventilation systems, air filters and other measures to achieve healthy indoor air quality and noise levels in the development of new sensitive land uses.
	HW/EJ-10.6	Continue purchase or lease of fuel-efficient and low- emissions vehicles for City fleet vehicles. Include electric vehicle charging stations and priority parking for alternative fuel vehicles at all public facilities. Require EV charging stations and priority parking in all new private development.
	HW/EJ-10.7	Prohibit new sources of air pollutant emissions in the disadvantaged communities to minimize impacts on the population, especially children and the senior community and encourage any existing sources of emissions to use feasible measures to minimize emissions that could impact air quality.
	HW/EJ-10.8	Working with Caltrans, determine what if any mitigation measures can be implemented to reduce air quality impacts from freeway adjacencies, particularly impacting the DACs.
	HW/EJ-10.9	Consider any potential air quality impacts when making land use decisions for new development, even if not required by California Environmental Quality Act.
	HW/EJ-10.10	Consider adopting a Second-Hand Smoke Ordinance to reduce exposure to harmful effects of second-hand smoke in indoor and outdoor areas. Continue to make efforts to protect vulnerable populations, such as children and seniors from exposure to second-hand smoke.
	HW/EJ-10.11	Distribute information on how to reduce or eliminate sources of indoor air pollution.
	HW/EJ-10.12	Conduct a public information campaign to let residents living within 1,000 feet of a freeway know what mitigation measures they can take. These would include things such as installing high-efficiency air filters, keeping windows closed in the early morning, refraining from outdoor exercise in the mornings, installing thick landscaping, reducing driving, and using public transport instead.

Goal	<i>HW/EJ-11</i>	<i>Promote land use and development patterns that reduce greenhouse gas emissions and reduce climate change impacts in DACs.</i>
Policies	HW/EJ-11-1	Prepare a Climate Action Plan to identify ways to reduce citywide GHG emissions and minimize the impacts of climate change on Placentia residents.
	HW/EJ-11-2	Create an “Urban Forest” Plan to address the need for planning, planting, and maintaining trees in the City and DACs to mitigate heat exposure for Placentia residents. The plan should focus on providing shade trees to reduce the “heat-island” effect.
	HW/EJ-11-4	Create a “Green Roof” program or provide incentives to construct green roofs in the City to minimize the “heat-island” effect in DACs.
Goal	<i>HW/EJ 12</i>	<i>Take measures to reduce pollution exposure and improve air quality in disadvantaged communities.</i>
Policies	HW/EJ-12-1	Review and update City regulations and/or requirements, as needed, based on improved technology and new regulations including updates to the Air Quality Management Plan (AQMP) and rules and regulations from South Coast Air Quality Management District (SCAQMD).
	HW/EJ-12-2	In reviewing development proposals, site sensitive receptors (i.e., residences, schools, playgrounds, childcare centers, athletic facilities, churches, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes) away from significant pollution sources to the maximum extent feasible.
	HW/EJ-12-3	Avoid locating new homes, schools, childcare and elder care facilities, and health care facilities within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
	HW/EJ-12-4	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).
	HW/EJ-12-5	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard.
	HW/EJ-12-6	Require project proponents to prepare health risk assessments in accordance with CARB and SCAQMD recommended procedures if new land uses are proposed within the distances described above for freeways, distribution facilities, and rail yards.
	HW/EJ-12-7	Re-designate truck routes away from sensitive land uses including schools, hospitals, elder and childcare facilities, or residences, where feasible.
	HW/EJ-12-8	Reduce industrial truck idling by enforcing California’s five (5) minute maximum law, requiring warehouse and distribution facilities to provide adequate on-site truck parking, and requiring refrigerated warehouses to provide generators for refrigerated trucks.
	HW/EJ-12-9	The City shall continue to minimize stationary source pollution through the following:

- Ensure that industrial and commercial land uses are meeting existing SCAQMD air quality thresholds by adhering to established rules and regulations.
- Encourage the use of new technology to neutralize harmful criteria pollutants from stationary sources.
- Reduce exposure of the City's sensitive receptors to poor air quality nodes through smart land use decisions.

HW/EJ-12-10 Encourage non-polluting industry and clean green technology companies to locate to the City.

HW/EJ-12-11 Work with the industrial business community to improve outdoor air quality through improved operations and practices.

HW/EJ-12-12 During the design review process, encourage the use of measures to reduce indoor air quality impacts (i.e., air filtration systems, kitchen range top exhaust fans, and low-VOC paint and carpet for new developments busy roadways with significant volumes of heavy truck traffic).

3-12 The City appreciates the recommended mitigation measures from the District. At this time the City finds that these are project specific measures that do not necessarily apply to a General Plan. The City will incorporate these measures as an Attachment to the DEIR Air Quality Study. These measures will be considered for each specific project considered by the City after the General Plan Update is approved and the City will implement individual measures contained in this comment where appropriate and feasible for these specific projects.

COMMENT LETTER #4

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
1750 EAST FOURTH STREET, SUITE 100
SANTA ANA, CA 92705
PHONE (657) 328-6368
FAX (657) 328-6510
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

August 26, 2019

Joseph Lambert
City of Placentia
401 East Chapman Avenue
Placentia, CA 92870

File: IGR/CEQA
SCH: #2018101031
12-ORA-2019-01178
General Plan Update

Dear Mr. Lambert,

4-1

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report (DEIR) for the Placentia General Plan Update, also termed Rich Heritage, Bright Future, the Placentia General Plan, Draft Environmental Impact Report (EIR) for the City of Placentia. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

4-2

The proposed General Plan is a comprehensive update of the previous General Plan and its elements. The General Plan expresses the relationship between community values and vision with how we utilize public land, private land and other community resources. It serves as a long-term document that provides guidance for future programs, projects, and policy. This document examines the total population at build-out of the new General Plan relative to the existing level of build-out. The City has only 54.5 acres of vacant land and the total number of residences within the City is forecast to increase by about one-third (an increase of 6,523 dwelling units over the life of the proposed General Plan, resulting in a forecast total population of about 70,984 persons). Assuming that 18 of the 54.5 acres that remain within the City will be developed with non-residential uses at a FAR up to 1.0, this equates to an estimated 784,000 square feet of new non-residential uses within the City of Placentia based on the proposed General Plan designations. This assumption further implies that if future redevelopment occurs within the City in non-residential areas additional environmental review will be necessary since no redevelopment is incorporated in this analysis. Non-residential development is forecast to marginally increase over the life of the proposed General Plan and for planning purposes it is assumed that 261,360 square feet of commercial, office and industrial development (each) will occur for impact forecast purposes.

**RESPONSES TO COMMENTS
LETTER #4
DEPARTMENT OF TRANSPORTATION, DISTRICT 12**

- 4-1 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project.
- 4-2 The summary description included in this comment is accurate.

4-2
cont.

The City of Placentia is located in northern Orange County and encompasses about 6.62 square miles. Surrounding cities include: Anaheim to the south, Yorba Linda to the East, Brea to the North, and Fullerton to the west. The Los Angeles County line lies to the west and north beyond the cities of Fullerton and Brea, the San Bernardino County line lies to the northeast beyond the city of Yorba Linda and unincorporated Orange County, and Riverside County lies to the east beyond unincorporated Orange County. Regional access to the City is provided by California State Routes 91 and 57.

The project includes the areas surrounding State Routes (SR) 91 and 57. SR 91 and SR 57 are overseen by Caltrans. Caltrans is the responsible agency and has the following comments:

Traffic Operations:

4-3

1. Figure 4-1 (Study Area): The study area of the analysis is limited to the boundary of the City. The boundary of the traffic analysis should be expanded to cover all areas that are expected to be impacted adversely. Refer to Caltrans' "Guide for the Preparation of Traffic Impact Studies" to determine state facilities including mainline freeway/highways and ramps to be adversely impacted:

https://transplanning.onramp.dot.ca.gov/downloads/transplanning/files/susc_ommplan/Emerging_Priorities/tisguide.pdf

4-4

2. The City of Placentia General Plan Mobility Element Technical Traffic Study analyzes existing and future conditions at city intersections and roadway segments. The report shows the potential traffic impacts of the Current General Plan and the Proposed General Plan land use development. Recommendations are presented for intersections operating at LOS E or F conditions.
6.1.2.5 Orangethorpe Avenue at SR-57 Northbound Ramps
 - a. Please notify Caltrans District 12 when there are more details of the proposed improvement at NB SR-57 @ Orangethorpe off-ramp.
 - b. We observed queue back-up at NB/SB SR-57 on and off-ramps. Are there any plans/or proposals to help reduce queue lengths at these locations?

Transportation Planning

4-5

1. Project mitigation measures to improve the intersections of Rose Drive/Imperial Highway (State Route (SR) 90) and Orangethorpe Avenue/SR 57 Northbound Ramps should be coordinated with Caltrans.

- 4-3 Please refer to the Traffic Section of the DEIR (4-18) and the supporting Traffic Study in Volume 2 of the DEIR, Appendix 5. The analysis included the Orangethorpe/SR-57 onramps as part of the circulation system being evaluated. Based on the maximum 1,992 new trips generated with buildout of the 54.5 vacant acres remaining in the City, intersection analysis indicated this intersection would experience an unacceptable level of service. When this might occur over the next 20 years is not known as development within the City is not occurring at a predictable rate. Because of the limited volume of new traffic associated with buildout of the City, a decision was made that the mainline freeways would not incur significant impact and no evaluation of the mainline was conducted. If redevelopment occurs in the future, each of the individual and cumulative traffic impacts will be given further evaluation.
- 4-4 When the City proceeds with improvements to the SR-57/Orangethorpe onramps and the Rose Drive/Imperial Highway (SR-90) intersection, it will closely coordinate any improvements with Caltrans. This will include detailed engineering and a schedule for construction which have not yet been developed.
- 4-5 Refer to response 4-4 regarding coordination of improvements in Caltrans right-of-way. The City has committed to giving priority to alternative modes of transportation and will explore the possibility of a multimodal transportation fee. The City is committed to Travel Demand Management (TDM) as embodied in many of the General Plan Update goals and policies. Several of the six TDM options are already embodied in these policies, and the City will consider others such as working with OCTA to reduce headway times for transit routes.

4-5
cont.

2. Explore the potential of establishing a city-wide multimodal transportation fee to fund non-auto infrastructure improvement projects. A fee program as such would support the management of vehicular trip demand.
3. We also encourage you to develop Travel Demand Management (TDM) policies to encourage smart mobility and the use of nearby Orange County Transit Routes 24, 26, 30, 71, 129, 153, and 213. To reduce regional VMT and traffic impacts to the State Highway System please consider requiring future development to adopt the TDM options listed below:
 - Project design to encourage walking, bicycling, and convenient transit access;
 - Dedicate carpool parking spaces;
 - Allocate space for bicycle parking;
 - Adopt an aggressive trip reduction target with Lead Agency monitoring and enforcement;
 - Reduce headway times for adjacent transit routes; and
 - Provide and/or subsidize transit passes for employees and residents on a continuing basis.

System Planning

4-6

1. Under Policy MOB-1.5, please consider refining the language to include more emphasis on Active Transportation infrastructure. Walking and bicycling can help achieve the objectives listed in this policy and Goal MOB-1, as well as improve air quality and reduce congestion on existing roadways. Complete Streets facilities integrate all modes of transportation, including transit, bicycles, pedestrians, and vehicles. Thus, promoting Complete Streets facilities can improve safety, mobility, and efficiency for all modes. More information and guidance on Complete Streets can be found here: <https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/smart-mobility-active-transportation/complete-streets>.
2. Also, consider adding a policy or refining an existing policy to encourage future developers to offer bicycle facilities such as storage and showers. These types of facilities promote bicycling by providing extra safety measures and conveniences to riders.

LD-IGR

4-7

1. Please clarify whether the City will be handling the "recommended improvements" as identified on page 1-20 (PDF pg. 40). Several of these intersections (Rose Drive/Imperial Highway (State Route (SR) 90) and Orangethorpe Avenue/SR 57 Northbound Ramps) are owned and

- 4-6 The City believes that MOB-1.5 and other related policies already incorporate Active Transportation Infrastructure, but the text of MOB-1.5 will be modified to include reference to this transportation measure. Also, the new General Plan Update policies clearly support encouraging future development to include bicycle facilities. For future commercial and industrial development, the inclusion of storage and shower facilities will be considered.
- 4-7 Refer to response to comment 4-5.

4-7
cont.

operated by Caltrans. Therefore, any work to be done on these designated roadways should be coordinated through the Caltrans District 12 Office.

Permits:

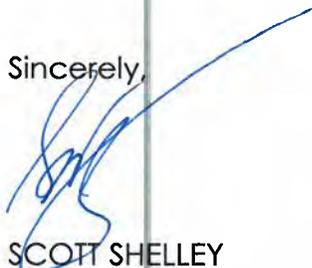
4-8

1. Any project work proposed in the vicinity of the State right of way would require an encroachment permit, and all environmental concerns must be adequately addressed. Please coordinate with Caltrans in order to meet the requirements for any work within or near State Right-of-Way. A fee may apply. If the cost of work within the State right of way is below one Million Dollars, the Encroachment Permit process will be handled by our Permits Branch; otherwise the permit should be authorized through the Caltrans's Project Development Department. When applying for Encroachment Permit, please incorporate all Environmental Documentation, SWPPP/ WPCP, Hydraulic Calculations, R/W certification and all relevant design details including design exception approvals. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual. The latest edition of the Manual is available on the web site: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>

4-9

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, do not hesitate to contact Julie Lugaro at 657-328-6368 or Julie.lugaro@dot.ca.gov.

Sincerely,



SCOTT SHELLEY
Branch Chief, Regional-IGR-Transit Planning
District 12

- 4-8 In addition to coordinating with Caltrans in instances where they own right-of-way at intersections proposed for improvement, the City will apply for and obtain permits as indicated in this comment.
- 4-9 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. The City appreciates having a Caltrans point of contact for future reference.

COMMENT LETTER #5



METROLINK.

SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY
900 Wilshire Blvd. Suite 1500 Los Angeles, CA 90017

metrolinktrains.com

August 26, 2019

City of Placentia
Attn: Joe Lambert
401 E. Chapman Avenue
Placentia, CA 92870

RE: Draft Environmental Impact Report (DEIR) and Technical Appendices for the Placentia General Plan Update Project

Dear Mr. Lambert:

5-1 | The Southern California Regional Rail Authority (SCRRA) has received the DEIR and Technical Appendices for the Placentia General Plan Update Project. Thank you for the opportunity to comment on key issues relative to SCRRA and operations of the railroad adjacent to the project site. As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (METRO), San Bernardino County Transportation Authority (SBCTA), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

SCRRA operates the Metrolink commuter trains on two lines that traverse parts of the City of Placentia. Metrolink operates the 91/Perris Valley Line along the BNSF-owned San Bernardino Subdivision rail line that parallels the Orangethorpe corridor and the Inland Empire-Orange County Line that operates on a rail line owned by OCTA, known as the Olive Subdivision.

5-2 | SCRRA supports the general concepts conveyed in the Placentia General Plan update for transit-oriented development (TOD) around the future Metrolink station. The Placentia General Plan Update supports smart growth principles that promote increased rail use and more direct pedestrian access for the station area residents, both of which support ridership growth on the Metrolink service and the viability of the future station.

Initial general comments on the DEIR include the following:

5-3 | 1. Our administrative office's address has changed since the DEIR was first developed. Please change our mailing address to Southern California Regional Rail Authority (Metrolink), Planning and Development Department, 900 Wilshire Blvd., Ste. 1500, Los Angeles, CA 90017, under Appendix 8.1 and wherever applicable.

5-4 | 2. SCRRA should be included within the List of Abbreviations and Acronyms in the Table of Contents since the SCRRA acronym is used in section 4.18.2.

RESPONSES TO COMMENTS
LETTER #5
METROLINK

- 5-1 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project.
- 5-2 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project.
- 5-3 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. The new address is noted and will be integrated into the document where appropriate.
- 5-4 The reference to SCRRA has been included in the Final EIR text.

5-5 3. There appears to be a discrepancy between the General Plan and SCRRA train traffic quantities presented in Section 4.18.2.5: Rail Transportation on page 4.18-23. The existing Metrolink 91/Perris Valley Line on BNSF owned San Bernardino Subdivision currently carries nine Metrolink commuter trains, two Amtrak passenger trains, and more than 40 BNSF freight trains per day during the week. The OCTA-owned Olive Subdivision carries 16 Metrolink commuter trains and three BNSF trains per weekday. BNSF freight traffic information should be verified with BNSF. Under Section 4.18.2.5, it should be noted that SCRRA is also an operator, given the Metrolink traffic along both the BNSF and OCTA rail lines.

5-6 4. We are encouraged to see a focus on rail use via the future Placentia Metrolink Station. This station will provide an attractive, more local option to commuters and other riders who typically frequent the Fullerton Metrolink Station in order to travel towards Los Angeles Union Station (LAUS). SCRRA applauds efforts to increase connectivity between rail and other forms of transportation, including bicycling and OCTA buses. We also support plans for the TOD area located south of the future Metrolink station. The inclusion of affordable units with an emphasis on transit connectivity are crucial to increasing equity and mobility within the City of Placentia. The establishment of the future Metrolink station will draw more ridership from TOD areas, other residential neighborhoods, job hubs, and tourist attractions within the City of Placentia. This promotion of increased ridership aligns with Metrolink's vision to double ridership by 2023.

5-7 5. All new developments, including TOD zones, planned to be developed adjacent to either the rail line owned by BNSF or by OCTA within the General Plan area must be designed and constructed to preclude any trespassing within the rail corridor. Safety measures could include fencing and walls.

5-8 Thank you again for giving SCRRA an opportunity to comment on the General Plan EIR. We look forward to further collaboration with the City of Placentia, OCTA, and BNSF regarding station design and railroad track alignment. If you have any questions regarding these comments, please contact Roderick Diaz, Director of Planning and Development, at 213-452-0455 or via e-mail at diazr@scrna.net.

Sincerely,



Todd P. McIntyre
Chief Strategy Officer

Cc: Roderick Diaz, SCRRA
Ron Mathieu, SCRRA
Danielle Dirksen, SCRRA
Lora Cross, OCTA
Dan Phu, OCTA
Walt Smith, BNSF

- 5-5 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. The new information provided in this comment will be integrated into the Final EIR.
- 5-6 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project.
- 5-7 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. The City will incorporate the design measures referenced in this comment to control trespass or conflict with the rail corridor and coordinate these measures with Metrolink, SCRRA and BNSF.
- 5-8 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. The City appreciates having a Metrolink point of contact for future reference.

COMMENT LETTER #6



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Darrell E. Johnson
Chief Executive Officer

August 26, 2019

Mr. Joe Lambert
Director of Development Services
City of Placentia
401 E. Chapman Ave.
Placentia, CA 92870

Subject: **Placentia General Plan (General Plan Update) Draft
Environmental Impact Report (SCH No. 2018101031)**

Dear Mr. Lambert:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Draft Environmental Impact Report (DEIR) for the Placentia General Plan ([General Plan Update] Project). Please see the attachment for comments related to the Congestion Management Program, Master Plan of Arterial Highways, rail, and transit service.

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,

Dan Phu
Manager, Environmental Programs

Attachment

6-1

**RESPONSES TO COMMENTS
LETTER #6
ORANGE COUNTY TRANSPORTATION AUTHORITY**

- 6-1 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project.

Attachment

OCTA Comments

Placentia General Plan (General Plan Update) Draft Environmental Impact Report (SCH No. 2018101031)

- 6-2 | 1. Page xiv ('LIST OF ABBREVIATIONS AND ACRONYMS') identifies the CMP as the "Congestion Management Plan." Please revise this and all additional document references to Congestion Management "Program."
- 6-3 | 2. Section 4.18.2.2 ('Current Traffic Conditions') identifies four Congestion Management Program (CMP) intersections within the City of Placentia (City). Please revise to identify the following five CMP intersections within the City of Placentia:
 - a. Rose Drive/Imperial Highway
 - b. SR-57 Northbound Ramps/Orangethorpe Avenue
 - c. SR-57 Southbound Ramps/Orangethorpe Avenue
 - d. Del Cerro Drive/Orangethorpe Avenue
 - e. Rose Drive/Del Cerro Drive
- 6-4 | 3. The DEIR, Appendix 1, and Appendix 5 have tables named "General Description of Roadways, Existing Conditions" and "General Description of Roadways, MPAH Conditions" which show slight variations from one another. Please review and ensure the respective tables are consistent and accurate across these three documents.
- 6-5 | 4. Table 4.18-1 ('GENERAL DESCRIPTION OF ROADWAYS, EXISTING CONDITIONS') and Appendix 1, Table 3-1 ('General Description of Roadways, Existing Conditions') incorrectly identify some roadways classifications. Additionally, please be consistent with the functional classification and existing lanes determinations. For example, according to Table 4.18-1, Yorba Linda Boulevard is identified as a "Modified Major Arterial" with 4-6D lanes whereas Orangethorpe Avenue is identified as a "Primary Arterial" with 4-6D lanes. Please consider consistency in the functional classification and existing lanes description (i.e. classifying both streets as either Primary or Major). Some of the roadways that have been incorrectly identified include:
 - a. Placentia Avenue
 - b. Bradford Avenue
 - c. Jefferson Street
 - d. Richfield Road
 - e. Lakeview Avenue
 - f. Golden Avenue
 - g. Yorba Linda Boulevard
- 6-6 | 5. Table 4.18-2 ('GENERAL DESCRIPTION OF ROADWAYS, MPAH CONDITIONS'); Appendix 1, Table 3-2 ('General Description of Roadways, MPAH Conditions'); and Appendix 5, Table 3-3 ('GENERAL DESCRIPTION OF ROADWAYS, MPAH CONDITIONS') identify:

- 6-2 The suggested change in text has been incorporated into the Final EIR.
- 6-3 The suggested change in text has been incorporated into the Final EIR.
- 6-4 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate. A copy of the revised tables and maps are provided as Attachment 1 of this package.
- 6-5 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
- 6-6 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
-

6-6
cont.

- a. Bastanchury Road as a "Major Arterial." Bastanchury Road is classified as a Major Arterial from the western city limit to Valencia Avenue and as a Primary Arterial from Valencia Avenue to the eastern city limit. Please revise to show that Bastanchury Road is a Major/Primary Arterial.
- b. Placentia Avenue as a "Primary Arterial." Placentia Avenue is classified as a Secondary Arterial from the southern city limit to Orangethorpe Avenue and as a Primary Arterial from Chapman to the northern city limit. Please revise to show that Bastanchury Road is a Primary/Secondary Arterial.

6-7

6. Appendix 1, Table 3-2 identifies Kraemer Boulevard as a "Primary Arterial." Kraemer Boulevard is classified as a Primary Arterial from the south city limit to Hawaii Way and as a Major Arterial from Hawaii Way to the north city limit. Please revise to show that Kraemer Boulevard is a Primary/Major Arterial.

6-8

7. Appendix 5, Figure 3-1 ('ORANGE COUNTY MASTER PLAN OF ARTERIAL HIGHWAYS') shows Golden Avenue and Crowther Avenue as two-lane divided collectors. Similar to the notation in Table 3-3, please note on Figure 3-1 that in 2017 the OCTA Board of Directors conditionally approved the City's request to reclassify Golden Avenue and Crowther Avenue from Secondary Arterials to Divided Collectors, contingent on OCTA receiving documentation that the City has amended its General Plan and complied with the requirements of the California Environmental Quality Act.

6-9

8. Appendix 1, Exhibit 3-1 ('Orange County Master Plan of Arterial Highway'); Appendix 1, Exhibit 3-7 ('Proposed General Plan Functional Roadway Classifications,'); Appendix 5, Figure 3-1; and Appendix 5, Figure 3-2 ('CURRENT GENERAL PLAN [2018] FUNCTIONAL ROADWAY CALSSIFICATIONS') do not include the following segments:

- a. Miraloma Avenue from Fee Ana Street to Lakeview Avenue
- b. Buena Vista Avenue from east of Mammoth Street to N. Van Buren Street

Please confirm whether these segments are located within the City and whether they should be included in these exhibits/figures.

6-10

9. Appendix 1, Exhibit 3-7; Appendix 5, Figure 3-1; and Appendix 5, Figure 3-2 show Golden Avenue with different roadway limits. Please clarify the limits of Golden Avenue within the City and update Figure 3-1 or 3-2 as appropriate.

6-11

10. Please confirm whether Appendix 5, Figure 3-2 shows existing roadway classifications or the classifications of the existing General Plan. If Figure 3-2 shows the existing roadway classifications, please note that the figure incorrectly classifies some roadways, such as Placentia Avenue, Yorba Linda Boulevard, and Rose Drive. If Figure 3-2 shows the existing General Plan, please note that the figure incorrectly classifies some roadways, such as Crowther Avenue, Orangethorpe Avenue, Kraemer Boulevard, and Golden Avenue.

- 6-7 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
- 6-8 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
- 6-9 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
- 6-10 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
- 6-11 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.

- 6-12 | 11. Appendix 1, Table 3-1 shows an asterisk next to Imperial Highway. Please note that the asterisk below the table references Golden Avenue and Crowther Avenue, but not Imperial Highway. OCTA does not have records of any MPAH amendments on this segment of Imperial Highway. Please add an explanation of why Imperial Highway is emphasized, such as "Imperial Highway is a Caltrans highway."
- 6-13 | 12. Appendix 1, Table 3-2 shows an asterisk below the table that references Imperial Highway, but there is no asterisk next to Imperial Highway on the table. Please add an asterisk to Imperial Highway.
- 6-14 | 13. Appendix 1, Table 3-7 ('Change in Level-of-Service with Improvements, Study Intersections, Proposed General Plan Scenario') shows:
a. An asterisk for study intersections 3 and 31. Please explain why these study intersections are emphasized, such as "Intersections are CMP intersections."
b. Study intersection 3 operates at an acceptable Level-of-Service (LOS) with mitigation. Please explain why, considering the intersection operates at LOS E with mitigation.
- 6-15 | 14. Appendix 1, page 3-36 states "A new Metrolink Station in Placentia will be constructed by 2020 and will be located near the intersection of Melrose Avenue and Crowther Avenue in the heart of Old Town." Please note that the current anticipated construction completion date for the Placentia Metrolink station is December 2021.
- 6-16 | 15. Appendix 5, Section 4.3 ('TRANSIT SERVICE');
Table 4-3 ('EXISTING TRANSIT SERVICE'):
a. Route 26 starts at 7:17 AM, Sunday-Saturday. OCTA recommends listing "7:00 AM" or "7:30 AM" as the appropriate start of service time to be consistent with the remaining hours of operation listed in the table that are rounded to the nearest half hour.
b. Route 153 starts at 4:22 AM, Monday-Friday. OCTA recommends adjusting the start of service time to "4:30 AM."
c. Please note, Route 213 will no longer serve Placentia after OCTA's October service change, which will be implemented on October 13, 2019.
Route descriptions:
d. Route 26 will have average headways of 40 minutes Monday through Friday.
e. Route 30 will have average headways of 65 minutes.

- 6-12 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
- 6-13 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
- 6-14 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.
- 6-15 The suggested change in text has been incorporated into the Final EIR.
- 6-16 The City paid particular attention to the roadway classifications during preparation of the General Plan and traffic study. However, based on this comment the City will review the suggested changes in the classifications in Appendix 1 and Appendix 5 and will make corrections where appropriate.



COMMENT LETTER #7

BOARD OF DIRECTORS

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Vice Chairman

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Director

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Director

Gregory T. Winterbottom
Director

Ryan Chamberlain
Ex-Officio Member

August 28, 2019

Mr. Joe Lambert
Director of Development Services
City of Placentia
401 E. Chapman Ave.
Placentia, CA 92870

Subject: **Placentia General Plan (General Plan Update) Draft
Environmental Impact Report (SCH No. 2018101031)**

Dear Mr. Lambert:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Draft Environmental Impact Report (DEIR) for the Placentia General Plan ([General Plan Update] Project). On August 26, 2019, OCTA provided comments related to the Congestion Management Program, Master Plan of Arterial Highways, rail, and transit service. We discovered a typographical error on comment 5. b.

Comment 5. b. should be revised as follows: "Placentia Avenue as a 'Primary Arterial.' Placentia Avenue is classified as a Secondary Arterial from the southern city limit to Orangethorpe Avenue and as a Primary Arterial from Orangethorpe Avenue to the northern city limit. Please revise to show that Placentia Avenue is a Primary/Secondary Arterial."

All other comments from the August 26, 2019 letter remain valid. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,

Dan Phu
Manager, Environmental Programs

7-1

CHIEF EXECUTIVE OFFICE

Darrell E. Johnson
Chief Executive Officer

RESPONSES TO COMMENTS
LETTER #7
ORANGE COUNTY TRANSPORTATION AUTHORITY

- 7-1 The comment is noted and will be retained in the project file that is made available to the City decision-makers prior to a decision on the proposed project. This revision to Comment 5.b will be addressed in place of the original.

ATTACHMENT 1

Placential General Plan Update

Table 3-2 in Appendix 5, Traffic Impact Study

Table 3-1. General Description of Roadways, Existing Conditions, in Appendix 1, General Plan

Table 4.18-1 GENERAL DESCRIPTION OF ROADWAYS, EXISTING CONDITIONS in EIR

TABLE 3-2 –EXISTING ROADWAY CONDITIONS

Roadway	Functional Classification	Existing Lanes	LOS E Capacity
Imperial Highway	Major Arterial	6D	56,300
Golden Avenue	Collector	2U	12,500
Bastanchury Road (Valentia Avenue to Eastern City Limit)	Secondary Arterial	4U	25,000
Bastanchury Road (Western City Limit to Valentia Avenue)	Primary Arterial	4D	37,500
Yorba Linda Boulevard (Western City Limit to Palm Drive)	Major Arterial	6D	56,300
Yorba Linda Boulevard (Palm Drive to Eastern City Limit)	Primary Arterial	4U/4D	37,500
Palm Drive (Yorba Linda Boulevard to Valencia Ave)	Secondary Arterial	2U/4U	25,000
Palm Drive (Valencia Avenue to Rose Drive)	Primary Arterial	4D	37,500
Madison Avenue	Collector	2U	12,500
Buena Vista Avenue (Rose Drive to Westmoreland Drive)	Collector	2U	12,500
Buena Vista Avenue (Westmoreland Drive to Eastern City Limit)	Secondary Arterial	4U/4D	25,000
Alta Vista Street	Secondary Arterial	2U/4U/4D	25,000
Chapman Avenue (Western City Limit to Angelina Drive)	Secondary Arterial	4U	25,000
Chapman Avenue (Angelina Drive to Orangethorpe Ave)	Primary Arterial	4D	37,500
Crowther Avenue	Collector	2U/2D/4U	12,500
Orangethorpe Avenue (Western City Limit to Melrose Street)	Major Arterial	6D/6U	56,300
Orangethorpe Avenue (Melrose Street to Kraemer Boulevard)	Secondary Arterial	4U	25,000
Orangethorpe Avenue (BNFS rail track to Rose Drive)	Major Arterial	6D	56,300
Orangethorpe Avenue (Rose Drive to Eastern City Limit)	Primary Arterial	4D	37,500
Miraloma Avenue	Secondary Arterial	4U	25,000
Placentia Avenue (Southern City Limit to Ruby Drive)	Secondary Arterial	4U/4D	25,000
Placentia Avenue (Macadamia Lane to Northern City Limit)	Secondary Arterial	4U/4D	25,000
Melrose Street (Santa Fe Avenue to Southern City Limit)	Secondary Arterial	3D/4U/4D	25,000
Melrose Street (Santa Fe Avenue to Chapman Avenue)	Collector	2U	12,500
Bradford Avenue (Chapman Avenue to Stratford Circle)	Collector	2U	12,500

Bradford Avenue (Stratford Circle to Yorba Linda Boulevard)	Secondary Arterial	4U	25,000
Kraemer Boulevard (Connecticut Way to Northern City Limit)	Primary Arterial	4D	37,500
Kraemer Boulevard (BNFS Rail Tracks to Connecticut Way)	Major Arterial	6D	56,300
Kraemer Boulevard (Southern City Limit to Orangethorpe Avenue)	Primary Arterial	4U	25,000
Valencia Avenue	Secondary Arterial	4U	25,000
Rose Drive	Primary Arterial	4D	37,500
Jefferson Street (Alta Vista Street to Orangethorpe Avenue)	Secondary Arterial	4U	25,000
Jefferson Street (Orangethorpe Avenue to Southern City Limit)	Collector	2U	12,500
Van Buren Street	Collector	2U/2D	12,500
Richfield Road	Secondary Arterial	4U	25,000
Lakeview Avenue	Primary Arterial	3U/3D/4U/4D	37,500

SOURCE: KOA, 2018 Note 1: U = Undivided; D = Divided

LOS: level-of-service

Placential General Plan Update

Table 3-3 in Appendix 5, Traffic Impact Study

Table 3-2. General Description of Roadways, MPAH Conditions, in Appendix 1, General Plan

Table 4.18-2, GENERAL DESCRIPTION OF ROADWAYS, MPAH CONDITIONS, in EIR

Table 3-3 – ROADWAYS MPAH DEFINATION

Roadway	Functional Classification	MPAH Lanes	LOS E Capacity
Imperial Highway	Smart Street	6D	56,300
Golden Avenue*	Divided Collector	2D	22,000
Bastanchury Road (Valentia Avenue to Eastern City Limit)	Primary Arterial	4D	37,500
Bastanchury Road (Western City Limit to Valentia Avenue)	Major Arterial	6D	56,300
Yorba Linda Boulevard	Major Arterial	6D	56,300
Palm Drive	Secondary Arterial	4U	25,000
Madison Avenue	Secondary Arterial	4U	25,000
Buena Vista Avenue (Rose Drive to Jefferson Street)	Collector	2U	12,500
Buena Vista Avenue (Jefferson Street to Eastern City Limit)	Secondary Arterial	4U	25,000
Alta Vista Street	Secondary Arterial	4U	25,000
Chapman Avenue	Primary Arterial	4D	37,500
Crowther Avenue*	Divided Collector	2D	22,000
Orangethorpe Avenue	Major Arterial	6D	56,300
Miraloma Avenue	Secondary Arterial	4U	25,000
Placentia Avenue (Northern City Limit to Orangethorpe Avenue)	Primary Arterial	4D	37,500
Placentia Avenue (Orangethorpe Avenue to Southern City Limit)	Secondary Arterial	4U	25,000
Melrose Street	Secondary Arterial	4U	25,000
Bradford Avenue	Secondary Arterial	4U	25,000
Kraemer Boulevard (Northern City Limit to Hawaii Way)	Major Arterial	6D	56,300
Kraemer Boulevard (Hawaii Way to BNSF Rail Tracks)	Primary Arterial	4D	37,500
Kraemer Boulevard (BNSF Rail Tracks to Southern City Limit)	Major Arterial	6D	56,300
Valencia Avenue	Secondary Arterial	4U	25,000
Rose Drive (Northern City Limit to Yorba Linda Boulevard)	Primary Arterial	4D	37,500
Rose Drive (Yorba Linda Boulevard to Southern City Limit)	Major Arterial	6D	56,300
Jefferson Street	Secondary Arterial	4U	25,000
Van Buren Street	Collector	2U	12,500
Richfield Road	Secondary Arterial	4U	25,000
Lakeview Avenue	Primary Arterial	4D	37,500

SOURCE: OCTA MPAH 2017, Note 1: U = Undivided; D = Divided

Note: Golden Avenue and Crowther Avenue were reclassified as part of separate amendments to the MPAH approved by the OCTA Board of Directors in 2017

LOS: level-of-service

LOS: level-of-service



CITY of PLACENTIA
General Plan Update
ORANGE COUNTY MASTER
PLAN OF ARTERIAL
HIGHWAYS (MPAH)

Legend

- Placentia City Limits
- ++++ Railroad
- Major Arterial
- Primary Arterial
- Secondary Arterial
- Two-Lane Divided Collector*
- Collector
- Augmented Arterial (Smart Street)

* Golden Avenue and Crowther Avenue were reclassified as part of separate amendments to the MPAH approved by the OCTA Board of Directors in 2017.

Source: OCTA MPAH 2017

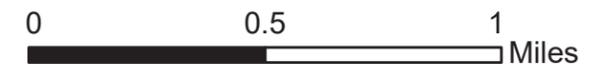
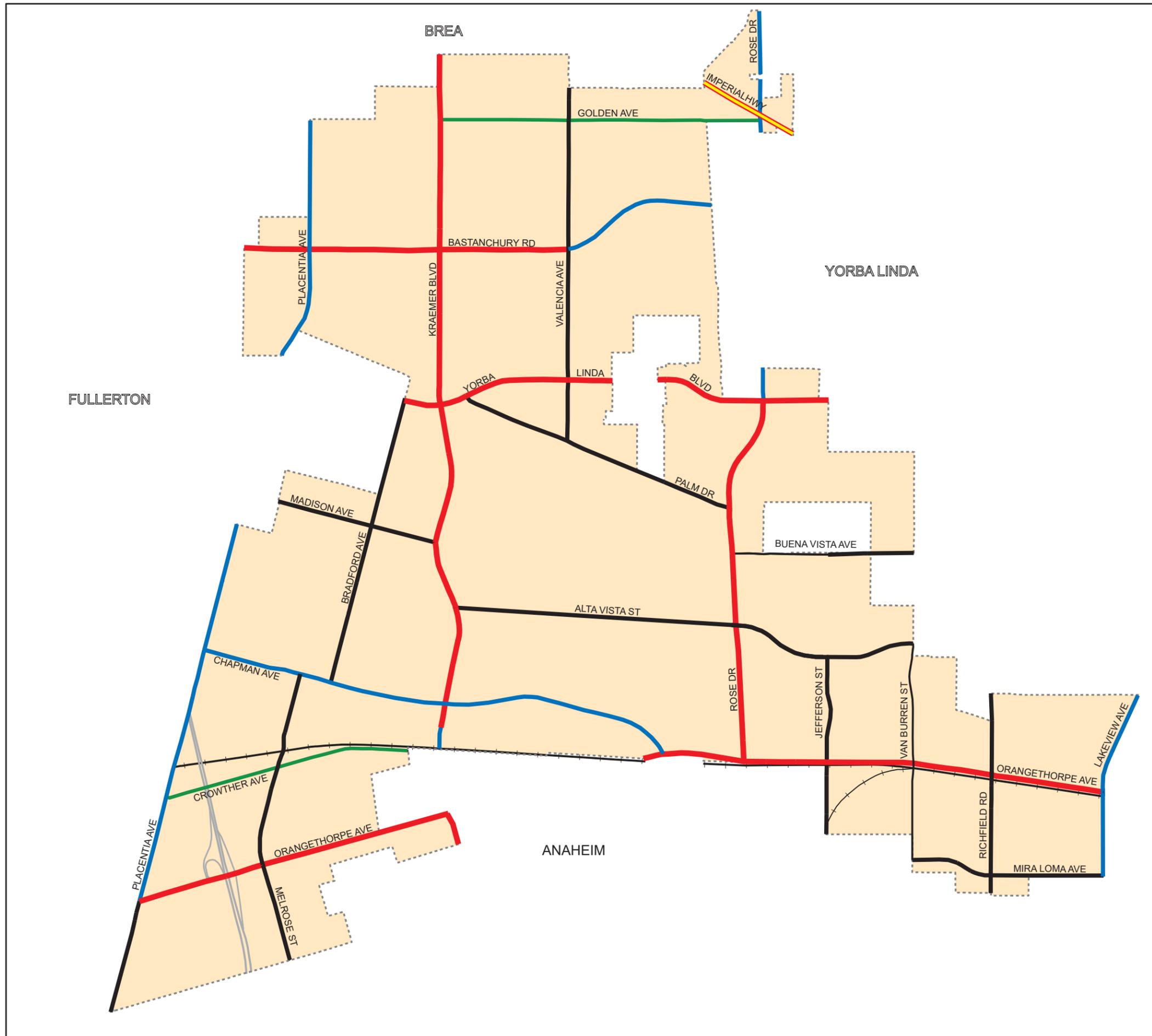


Figure 3-1





CITY of PLACENTIA
General Plan Update

**Existing
Roadway
Conditions**

Legend

- Placentia City Limits
- ++++ Railroad
- Major Arterial
- Primary Arterial
- Secondary Arterial
- Collector

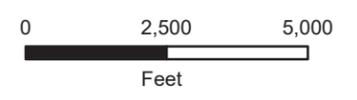
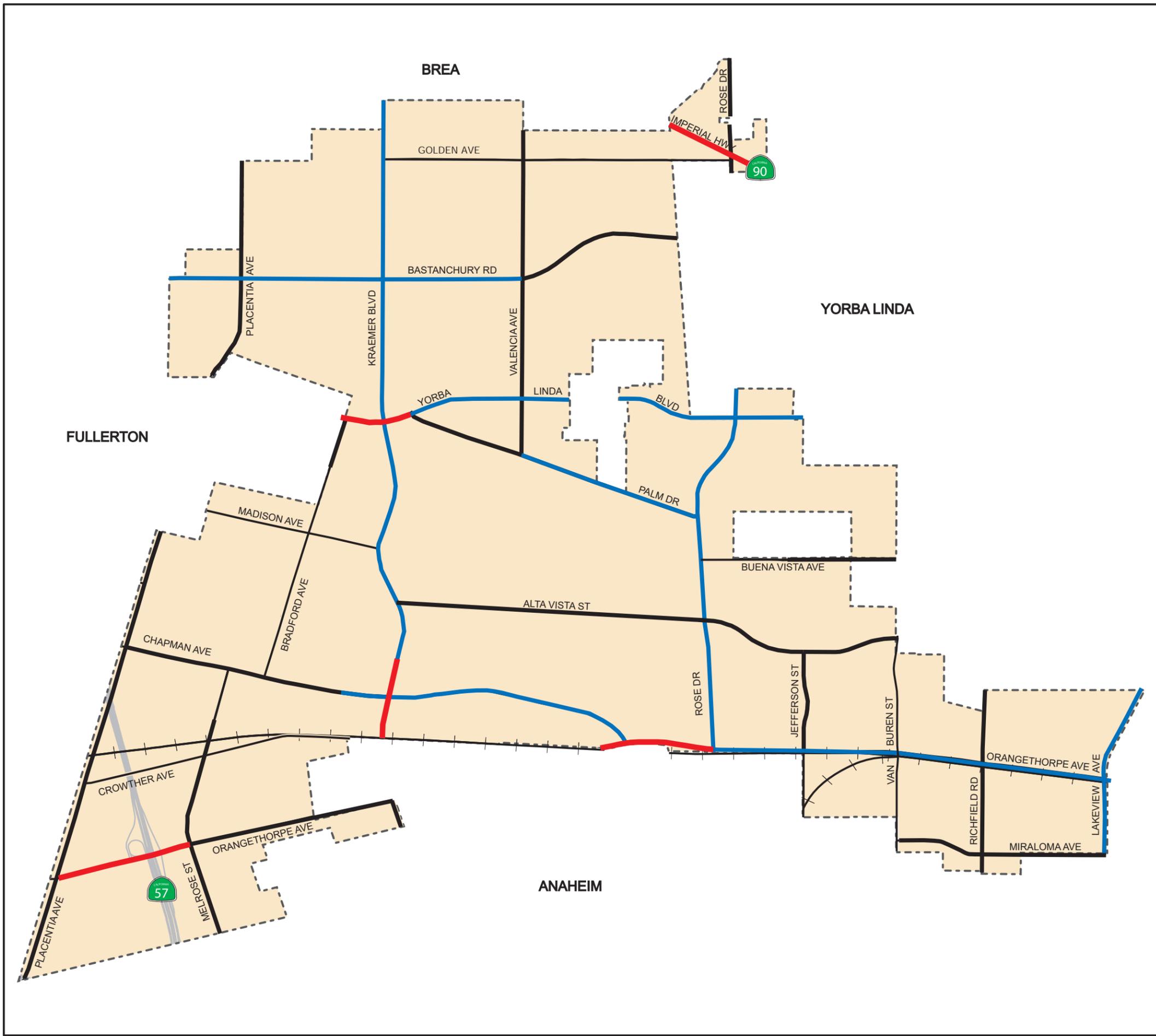


Figure 3-2