

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION



Latitude Residential Project

Lead Agency:

City of Placentia

Development Services Department
401 East Chapman Avenue, Placentia, CA 92870
Contact: *Andrew A. Gonzales, Senior Planner*
(714) 993-8218; Email: agonzales@placentia.org

Prepared by:

Comprehensive Planning Service
Contact: *Joann Lombardo, Principal*
(949)243-5274; Email: joann@jalcps.com

August 10, 2020

This page is intentionally blank.

TABLE OF CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY	1
SECTION 1.0 – INTRODUCTION	2
1.1 INITIAL STUDY REQUIRED.....	2
1.2 STATUTORY AUTHORITY	2
1.3 INCORPORATION BY REFERENCE.....	3
SECTION 2.0 – PROJECT DESCRIPTION	5
2.1 PROJECT TITLE.....	5
2.2 LEAD AGENCY NAME AND ADDRESS	5
2.3 CONTACT PERSON AND PHONE NUMBER.....	5
2.4 PROJECT LOCATION.....	5
2.5 PROJECT SPONSOR’S NAME AND ADDRESS	8
2.6 GENERAL PLAN DESIGNATION	8
2.7 ZONING.....	8
2.8 DESCRIPTION OF PROJECT.....	8
2.9 EXISTING AND SURROUNDING LAND USES.....	16
2.10 OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED.....	21
2.11 HAVE CALIFORNIA NATIVE AMERICAN TRIBES TRADITIONALLY AND CULTURALLY AFFILIATED WITH THE PROJECT AREA REQUESTED CONSULTATION PURSUANT TO PUBLIC RESOURCES CODE SECTION 21080.3.1? IF SO, IS THERE A PLAN FOR CONSULTATION THAT INCLUDES, FOR EXAMPLE, THE DETERMINATION OF SIGNIFICANCE OF IMPACTS TO TRIBAL CULTURAL RESOURCES, PROCEDURES REGARDING CONFIDENTIALITY, ETC.?.....	21
SECTION 3.0 – ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	23
SECTION 4.0 – DETERMINATION: (TO BE COMPLETED BY THE LEAD AGENCY)	24
SECTION 5.0 – EVALUATION OF ENVIRONMENTAL IMPACTS	25
SECTION 6.0 – ANALYSIS OF ENVIRONMENTAL IMPACTS	27
6.1 AESTHETICS.....	27
6.2 AGRICULTURE AND FOREST SERVICES.....	30
6.3 AIR QUALITY.....	34
6.4 BIOLOGICAL RESOURCES	43
6.5 CULTURAL RESOURCES.....	47
6.6 ENERGY.....	51
6.7 GEOLOGY AND SOILS	53
6.8 GREENHOUSE GAS EMISSIONS.....	59

6.9 HAZARDS AND HAZARDOUS MATERIALS	64
6.10 HYDROLOGY AND WATER QUALITY.....	77
6.11 LAND USE AND PLANNING.....	83
6.12 MINERAL RESOURCES.....	91
6.13 NOISE.....	93
6.14 POPULATION AND HOUSING.....	104
6.15 PUBLIC SERVICES.....	106
6.16 RECREATION.....	110
6.17 TRANSPORTATION.....	112
6.18 TRIBAL CULTURAL RESOURCES.....	124
6.19 UTILITIES AND SERVICE SYSTEMS	128
6.20 WILDFIRE.....	134
6.21 MANDATORY FINDINGS OF SIGNIFICANCE	137

SECTION 7.0 – LIST OF PREPARERS.....	139
7.1 PREPARATION – ENVIRONMENTAL DOCUMENT.....	139
7.2 PREPARATION - AIR QUALITY / GHG ANALYSIS	139
7.3 PREPARATION - TRAFFIC ANALYSIS	139
7.4 PREPARATION - NOISE ANALYSIS	139

APPENDICES

- A. "Van Buren & Orangethorpe Residential Development Air Quality & Greenhouse Impact Study, City of Placentia", prepared by RK Engineering Group, Inc., June 24, 2020
- B. "Van Buren & Orangethorpe Residential Development Traffic Study, City of Placentia", prepared by RK Engineering Group, Inc., June 23, 2020
- C. South Central Coastal Information Center (SCCIC) correspondence dated February 21, 2018
- D. "Updated Noise Impact Analysis Van Buren and Orangethorpe, City of Placentia, California", prepared by Giroux & Associates, February 17, 2020
- E. "Phase I Environmental Site Assessment, 443, 449, 455 and 461 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, August 15, 2017; "Phase II Environmental Site Assessment, 443, 449, 455 and 461 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, August 30, 2017; "Additional Phase II Environmental Site Assessment, 443, 449, 455 and 461 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, September 29, 2017; "Phase II Environmental Site Assessment-Lead Investigation 443, 449, 455 and 461 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, April 30, 2019; "Well Installation and Sampling Report, 443 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, May 8, 2019; "Phase I Environmental Site Assessment and Shallow Soil Sampling

- (Subsurface Investigation) Rosemead (Willard & Garvey)”, prepared by Stantec Consulting Services, May 13, 2019.
- F. “Geotechnical Due Diligence Evaluation, Proposed Residential Development, Van Buren Street and Orangethorpe Avenue, Placentia, California”, prepared by ALBUS-KEEFE & ASSOCIATES, INC., August 24, 2017
- G. “City of Placentia, County of Orange/Santa Ana Region Priority Project Preliminary Water Quality Management Plan (WQMP) for Van Buren & Orangethorpe Residential”, prepared by C&V Engineers, February 2020
- H. “South Van Buren Street/East Orangethorpe Avenue Residential Development Vehicle Miles Traveled Analysis, City of Placentia”, prepared by RK Engineering Group, Inc., July 24, 2020

LIST OF FIGURES

	<u>Page</u>
Figure 1. Project Regional Location Map	6
Figure 2. Project Site Aerial Location	7
Figure 3. Project Site Plan.....	10
Figure 4. Project Conceptual Open Space Plan.....	11
Figure 5. Project Architecture – 6-Unit Townhomes.....	12
Figure 6. Project Architecture – 8-Unit Townhomes.....	13
Figure 7. Project Existing Site Facilities Aerial Map	18
Figure 8. Project Site Existing Conditions Photos	19
Figure 9. Surrounding Land Uses Aerial Map	20
Figure 10. Rail Line Locations	96
Figure 11. Noise Monitoring Locations.....	97
Figure 12. City of Placentia Existing and Proposed Bikeways.....	116

LIST OF TABLES

	<u>Page</u>
Table 1: Plan Summary	8
Table 2: SCAQMD Regional Significance Thresholds	35

Table 3: Comparison of Project Construction Emissions and Daily Criteria Values .	37
Table 4: Comparison of Project Operational Emissions and Daily Criteria Values ..	38
Table 5: Comparison of Project Construction and Operatoinal Emissions to SCAQMD Localized Significance Thresholds.....	40
Table 6: Construction Related Greenhouse Gas Emissions	62
Table 7: Operational Greenhouse Gas Emissions.....	63
Table 8: General Plan (Land Use Element) Consistency Analysis.....	85
Table 9: City of Placentia Residential Noise Standards	96
Table 10: Noise Level Measurements	99
Table 11: Multimodal Facilities in the Project Area	114
Table 12: Existing Plus Project Traffic Level Conditions	119
Table 13: Existing Plus Ambient Growth (2020) Plus Project Traffic Level Conditions	119
Table 14: Existing Plus Ambient Growth (2020) Plus Cumulative Projects Plus Project Conditions Traffic Level Conditions	120

EXECUTIVE SUMMARY

This Initial Study assesses the potential environmental impacts of a proposal by The Toffoli Investments to construct and operate the Latitude Residential Project, which consists of a 139-townhome unit community, located at 443 S. Van Buren Street, Placentia, California. This proposed Project includes the following applications through the City of Placentia Development Services Department:

- (1) Zone Change No. ZC 2018-01
- (2) Development Plan Review No. DPR 2018-01
- (3) Tentative Tract Map No. TTM 19104

This Initial Study finds with the imposition of mitigation measures related to Cultural Resources, Hazards and Hazardous Materials, Noise, Traffic, Tribal Cultural Resources and Mandatory Findings of Significance, all potentially significant impacts associated with the Project would be reduced to less than significant levels. Consequently, a Mitigated Negative Declaration will be prepared for the Project.

SECTION 1.0 – INTRODUCTION

1.1 INITIAL STUDY REQUIRED

Following preliminary review of the proposed Latitude Residential Project (Project), the City of Placentia (City) has determined that the Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study addresses the direct, indirect, and cumulative environmental effects associated with the Project, as proposed.

1.2 STATUTORY AUTHORITY

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000-21177) and pursuant to Section 15063 of Title 14 of the California Code of Regulations (CCR).

Consistent with the statutory authority, the purpose of this Initial Study is to provide the Lead Agency (i.e. the City) with information to determine if the proposed Project would have a significant environmental impact. Specifically, this Initial Study will:

- Facilitate environmental assessment early in the design of the Project;
- Provide the City with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or Negative Declaration;
- Enable the Applicant or City to modify the Project, mitigating adverse impacts, thereby enabling the Project to qualify for a Negative Declaration or Mitigated Negative Declaration;
- Provide documentation of the factual basis for the findings in a Negative Declaration or Mitigated Negative Declaration that the Project will not have a significant effect on the environment.

The environmental documentation, which is ultimately selected by the City of Placentia in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the Project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

The environmental documentation and supporting analysis is subject to a public review period. The proposed Project is not a project "of statewide, regional, or areawide significance" as prescribed in Section 15206 of the CEQA Guidelines because

it does not meet the criteria for such projects. The Project will not require approval of by a State Agency (i.e., “responsible” or “trustee” agency). A project is required to be submitted to the State Clearinghouse when according to Public Resources Code Section 21082.1(c)(4)(B) A state agency otherwise has jurisdiction by law with respect to the project. Jurisdiction by law as defined in Section 15366 of the CEQA Guidelines as the authority of any public agency to grant a permit or other entitlement for use, to provide funding for the project in question or to exercise authority over resources which may be affected by the project.

Therefore, the document will be submitted to the State Clearinghouse for review and the review period is determined to be 30 days in accordance with Section 15073 of the CEQA Guidelines. Following review of any comments received, the City of Placentia will consider these comments as a part of the Project’s environmental review and include them with the Initial Study documentation for consideration by the City of Placentia in accordance with Section 15074(b) of the CEQA Guidelines.

1.3 INCORPORATION BY REFERENCE

The information contained in this document is based, in part, on the following documents that include the Project site or provide information addressing the general project area or use:

- **City of Placentia General Plan, adopted October 2019** (General Plan). The General Plan is a policy document designed to provide long-range guidance for decision-making affecting the future character of Placentia. It represents the official statement of the community’s physical development, as well as its economic, social, and environmental goals. The General Plan is comprised of the following ten elements: Land Use; Mobility; Housing; Conservation; Open Space and Recreation; Safety; Noise; Economic Development; Health, Wellness and Environmental Justice; and Sustainability. The General Plan was used throughout this Initial Study as the fundamental planning document governing development on the Project site.
- **City of Placentia General Plan Environmental Impact Report (EIR), adopted October 2019** (General Plan EIR). The General Plan EIR (State Clearinghouse Number 2018101031) was prepared in support of the General Plan and in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).
- **City of Placentia Housing Element 2013-2021, adopted January 2014** (Housing Element). The Housing Element provides the identification and analysis of existing and projected housing needs and articulates the City’s official policies for the preservation, conservation, improvement, and production of housing within the City of Placentia for the 2013-2021 planning period.

- **City of Placentia Zoning Code.** Chapter 23 of the City of Placentia Municipal Code establishes the basic zoning regulations under which land is developed and utilized and by which the General Plan is systematically implemented. This includes allowable uses, building setback and height requirements, and other development standards. The basic intent of the Zoning Code (Code) is to promote and protect the public health, safety, convenience, and welfare of present and future citizens of the City.
- **California Building Code (2019) (CBC).** The 2019 California Building Standards Code (Cal. Code Regs., Title 24) was published July 1, 2019, with an effective date of January 1, 2020. It incorporates all parts of the state building standards, including the Residential Code and Green Standards Code.

SECTION 2.0 – PROJECT DESCRIPTION

2.1 PROJECT TITLE

The Latitude Residential Project Development Project

2.2 LEAD AGENCY NAME AND ADDRESS

City of Placentia
401 E. Chapman Avenue
Placentia CA, 92870

2.3 CONTACT PERSON AND PHONE NUMBER

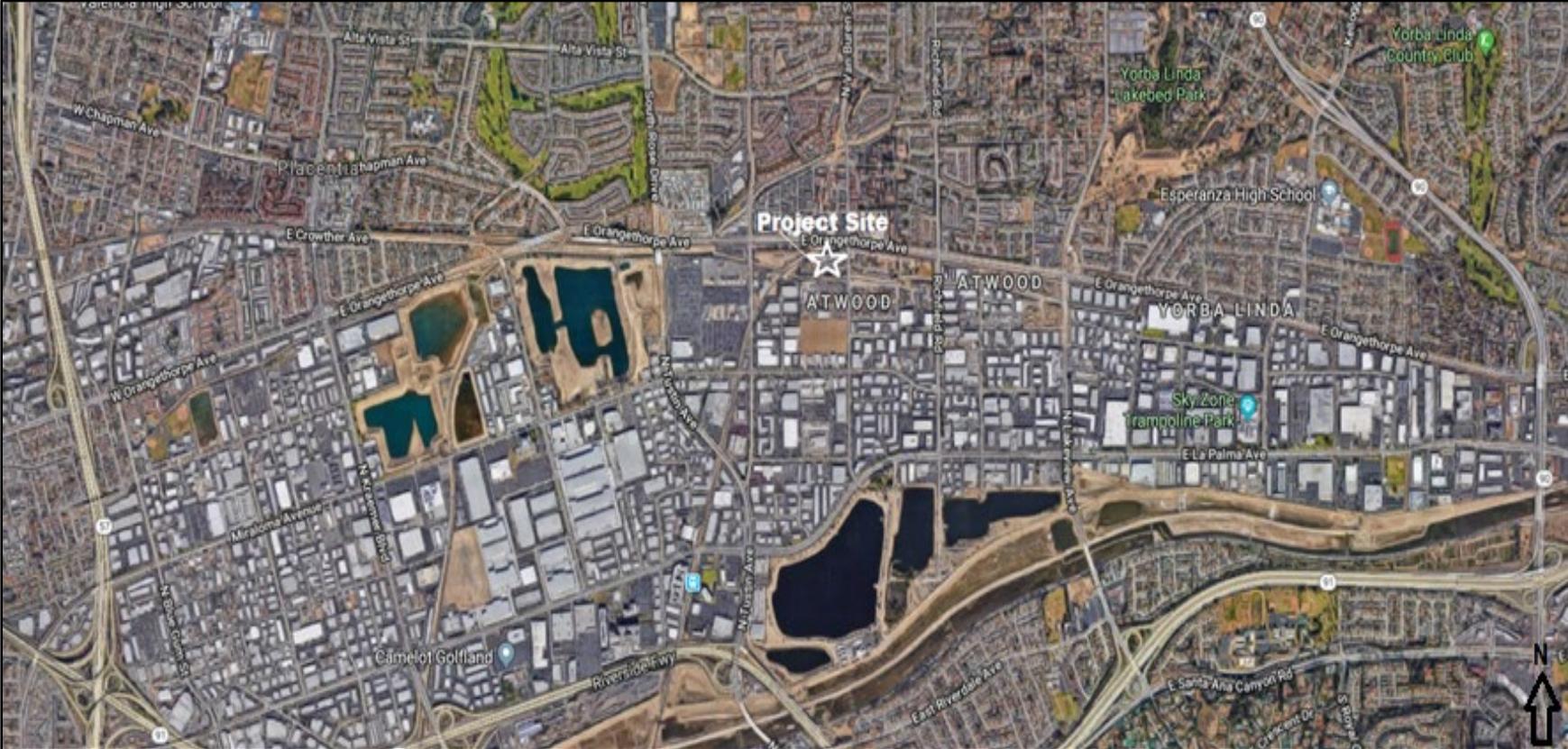
Andrew A. Gonzales, Senior Planner
(714) 993-8218

2.4 PROJECT LOCATION

Regionally, the Project site consists of approximately 5.6 acres located within the northern area of Orange County, north of State Route 91 (SR-91), west of State Route 90 (SR-90) and east of State Route 57 (SR-57), within the jurisdiction of the City of Placentia. (Reference Figure 1, Project Regional Location Map.)

Locally, the Project site is presently divided into three parcels by the County Assessor, with Assessor Parcel Map Numbers (APNs) of 346-164-25, 346-164-26, and 346-164-22. The site is also divided into four addresses: 443, 449, 455, and 461 South Van Buren Street. (Reference Figure 2, Project Site Aerial Map.) Near the center of the Project site, Latitude and Longitude are 33° 52' N / 117° 49' W.

Figure 1. Project Regional Location Map



(source: Google Maps)

Figure 2. Project Site Aerial Location



(source: Google Maps)

2.5 PROJECT SPONSOR’S NAME AND ADDRESS

Toffoli Investments
Contact: Alan Toffoli, 3 Hughes, Irvine, CA. 92618
(949) 768-2535

2.6 GENERAL PLAN DESIGNATION

High Density Residential

2.7 ZONING

- Existing: M Manufacturing and (O) Combining Oil District
- Proposed: High Density Multi-Family (R-3) (effective zoning consistent with General Plan Land Use Map designation)

2.8 DESCRIPTION OF PROJECT

2.8.1 SITE PLAN

The Project proposes to convert a former auto wrecking facility to site to High Density Residential, and to develop the site with 139 for-sale residential townhome units. The site is 5.6 acres, and the townhome development proposes a density of 25 units per acre. As proposed, the townhomes are dispersed throughout the site, with six different unit plan types ranging in size from 734 square feet to 1,333 square feet. (Reference Figure 3. Project Site Plan, and Table 1. Plan Summary.) Given the site’s three-sided shape, the townhome buildings would be setback from adjacent property lines 180 feet from the front at Van Buren Street, and 5 feet from the sides at railroad to the north and channel to the south. Where the Project site is intersected by the two existing residential properties that front on Van Buren Street, the townhome buildings would be set back a minimum of 27 feet from the rear of the existing residential properties. Maximum lot coverage would be 58.2%.

Proposed unit layouts are summarized in Table 1 below by Plan Type, Number of Units, Private Open Space square footage (sf) and Unit sf:

Table 1: Plan Summary			
Plan Type	# Units	Private Open Space Balcony/Patio (sf)	Unit (sf)
1	6	67 sf	734 sf
1x	18	67 sf	794 sf
2	36	84 sf	1233 sf
2x	17	84 sf	1278 sf
3	36	72 sf	1302 sf
3x	26	72 sf	1333 sf

Each of the units would have private balconies and patios. Common open space would be distributed throughout the site, totaling 101,534 square feet. Each area of common open space would provide amenities for gathering and recreation, including BBQs and seating areas, recreation center, tot lot, bocce ball court, dog park and woonerf courts (which are areas constructed with decorative paving and other amenities to encourage pedestrian activity). Combined total Project private and common open space would be 101,534 square feet (2.33 acres), comprising 41.8% of the Project site. (Reference Figure 4. Project Conceptual Open Space Plan.)

Each unit would have an attached garage. Plan 1 and 1X have a single car garage, and the balance of the plans have a two car garage. Total garage parking spaces for the Project is 254. An additional 45 open parking spaces would be provided at various locations throughout the site. A total of 299 parking spaces would be provided, a ratio of 2.15 parking spaces per unit.

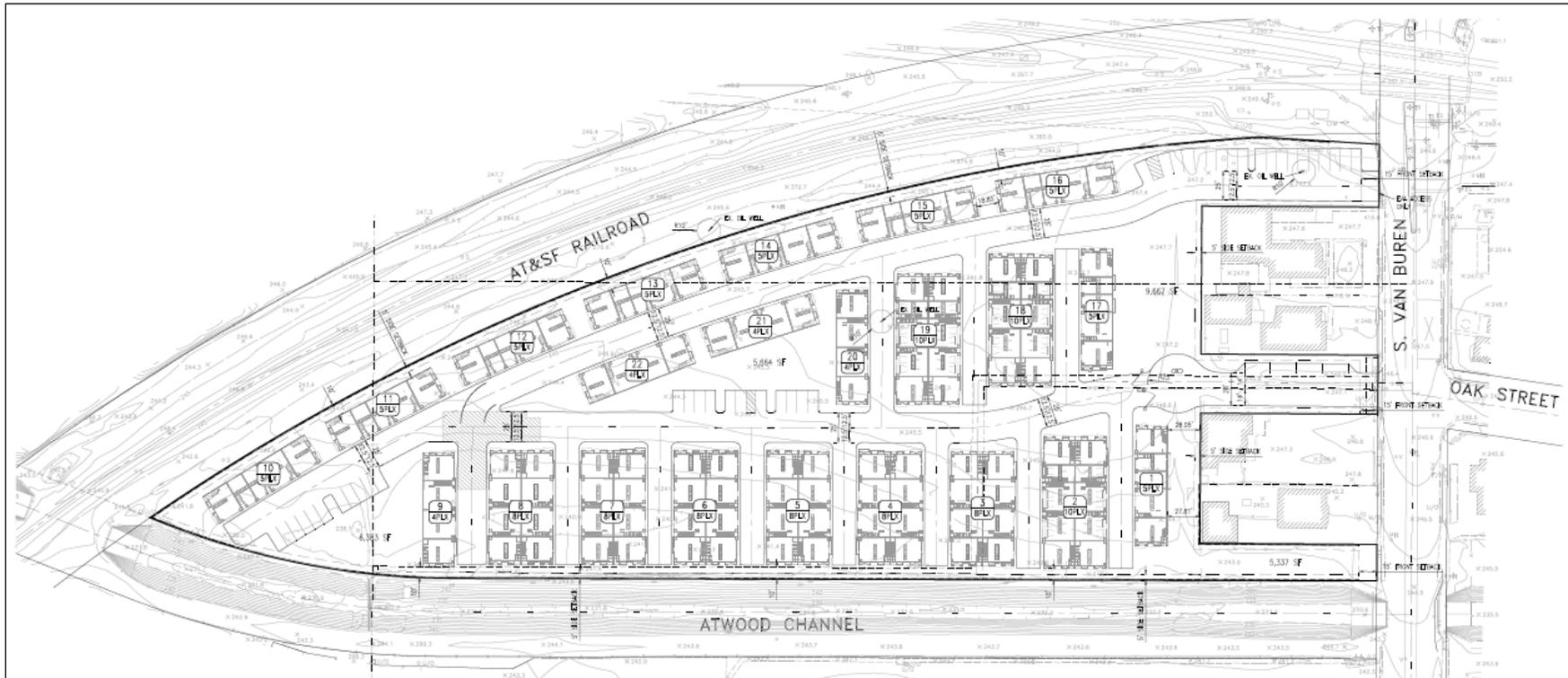
Vehicular and pedestrian entry into the Project would be from Oak Street, which is a private street. The entry would be gated and enhanced by decorative paving and a vehicle turnaround to facilitate easy vehicular movement through the entry. The entry gates are located at the top of the vehicular turnaround.

2.8.2 PROJECT ARCHITECTURE

Architecture of the Project consists of three-story townhomes, enhanced with design elements including balconies, decorative metal guard rails, decorative shutters, gabled roofs with end details, arched soffits, exposed trusses, and concrete tile roofs. Two types of townhome buildings would be provided, 6-unit buildings and 8-unit buildings. (Reference Figure 5. Project Architecture – 6-Unit Townhomes, and Figure 6. Project Architecture 8-Unit Townhomes.) Maximum building height is 39'8".

On the northern border of the site, the Project proposes an 8-foot high concrete masonry wall (CMU) with a stucco finish. The balance of the site periphery would have 6-foot CMU walls with stucco finish.

Figure 3. Project Site Plan



(source: Toffoli Investments)

Figure 4. Project Conceptual Open Space Plan



(source: Toffoli Investments)

Figure 5. Project Architecture – 6-Unit Townhomes



(source: Toffoli Investments)

Figure 6. Project Architecture – 8-Unit Townhomes



(source: Toffoli Investments)

2.8.3 PROJECT ENTITLEMENTS

The Project would require several entitlements:

- (1) Zone Change No. ZC 2018-01
- (2) Development Plan Review No. DPR 2018-01
- (3) Tentative Tract Map No. TTM 19104

Pursuant to Title 23 ZONING, Chapter 23.96 of the Placentia Municipal Code, an amendment to the Zoning Map may be initiated by one or more property owners affected by the proposed amendment or by any member of the City Council, Planning Commission or Director of Development Services. ZC 2018-01 has been initiated by the Project Applicant as required by the Code to bring the zoning of the site into alignment with the updated General Plan High Density Residential designation. The request is to change the zoning classification from M – Manufacturing District and O – Combining Oil District to R-3 (High Density Multiple-Family District).

Approval of the Zoning Map amendment will require the Planning Commission to recommend and the City Council to make the following findings which are evaluated in Section 6.11 of this Initial Study:

- (1) The proposed amendment will not be: (A) detrimental to the health, safety or general welfare of the persons residing or working within the neighborhood of the proposed amendment or within the city, or (B) injurious to property or improvements within the neighborhood or within the city;
- (2) The proposed amendment will be consistent with the latest adopted General Plan.

Pursuant to Chapter 23.75 of the Municipal Code, a Development Plan Review application is required for construction of new buildings. DPR 2018-01 has been initiated by the Project Applicant as required by the Code, including the proposed Project site plan, conceptual open space plan and architecture presented in the figures above. Approval of the Project DPR will require the Planning Commission to make and the City Council to concur with the following findings which are evaluated in Section 6.11 of this Initial Study:

- (1) The project meets or exceeds the criteria established in Section 23.75.020;
- (2) There have been attached any other conditions necessary to prevent: (A) detriment to the health, safety or general welfare of the persons residing or working within the neighborhood of the proposed development or within the city, or (B) injurious to the property or improvements within the neighborhood or within the city, and;

- (3) The proposed development will be consistent with the latest adopted general plan; and
- (4) Conditions necessary to secure the purposes of this section, including guarantees and evidence of compliance with conditions, are made part of the development approval.

Pursuant to Chapter 22.72 of the Municipal Code, a Tentative Tract Map is required to ensure that subdivision of property promotes the public health, safety, convenience and general welfare. TTM 19104 has been initiated by the Project Applicant as required by the Code to subdivide the site for condominium purposes. Approval of the Project TTM will require the Planning Commission to recommend approval to the City Council for final approval and making following findings which are evaluated in 6.11 of this Initial Study:

- (1) The subdivision is consistent with the adopted general plan and any specific plans;
- (2) The design or improvement is consistent with the general plan and any specific plans;
- (3) The site is physically suitable for the proposed type and/or density of development;
- (4) The design or improvements are not likely to cause substantial environmental damage;
- (5) The design or type of improvement is not likely to cause serious public health problems;
- (6) The design or type of improvement will not conflict with easements of record, or established by judgment, acquired by the public at large for access through or use of property within the proposed subdivision or if an easement conflict exists, alternate easements which are substantially equivalent will be provided;
- (7) The subdivision is in conformity with the provisions of this title.

2.8.4 PROJECT DEMOLITION AND ENVIRONMENTAL CLEANUP PROCESS

As discussed in Section 6.9 of this Initial Study, the investigation, clean-up and remediation of the site would include a comprehensive site-wide geophysical survey of the property after removal/demolition of the site obstructions/buildings to identify if abandoned and/or active infrastructure is in-place on the property that could be avoided and/or appropriately addressed during redevelopment activities. These investigation and remediation processes will be conducted with appropriate regulatory oversight and approval. In addition, a Soil Management Plan is proposed as part of the Project to establish a plan should unknown materials or contamination be encountered during redevelopment. Clean-up would be performed under the

oversight of the Department of Toxic Substances Control (DTSC) and the Placentia Fire and Life Safety Department. The proposed plan is to investigate the nature and extent of contamination, evaluate feasibility and effectiveness of remedial alternatives to address contamination, including the excavation and disposal of soil with concentrations of total petroleum hydrocarbons (TPH) and lead above regulatory cleanup levels specified by the DTSC. The specific cleanup goals, sampling frequencies and remediation would be proposed in either a Removal Action Workplan (RAW) or a Remedial Action Plan (RAP) that would be submitted and approved by the DTSC and City prior to conducting the remediation work.

The Project estimates that 5,000 cubic yards (7,500 tons) of lead impacted soil and 670 cubic yards (1,000 tons) of TPH-impacted soil would require excavation and offsite disposal and a licensed landfill. Following the completion of the remedial excavations, and any remedy approved by DTSC such as a Remedial Action Completion report would be prepared for DTSC review requesting a “no further action” (NFA) for the property.

2.8.5 PROJECT GRADE ELEVATION PROCESS

Portions of the Project site are located within Special Flood Hazard Area (SFHA) “AE”, defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or 100-year flood.¹ As part of the Project development, the Applicant proposes to raise these portions of the site elevation approximately 3 feet to result in 248 feet above mean sea level (amsl) which would be outside the flood hazard area. Raising of the site would require approximately 24,500 cubic yards (CY) of fill and other remedial grading that would be reviewed further by the City as part of the post entitlement process grading plan review and permit issuance. To raise the site grades above the flood plain, the Project proposes to use 27,104 cubic yards (c.y.) of remedial grading with 27,279 c.y. of import.

2.9 EXISTING AND SURROUNDING LAND USES

The Project site was formerly used as an auto wrecking facility. Existing equipment on the site includes a variety structures used for the auto wrecking operations and vehicles stored prior to crushing. The site also contains two non-producing oil wells and the western terminus of Oak Street which is a private street east of S. Van Buren Street. (Reference Figure 7, Project Site Facilities Aerial Map, and Figure 8, Project Site Existing Conditions Photos.)

Previously, from about 1938 to 1946, the Project site was used for agricultural purposes as an orchard. Oil production operations occurred on the site since at least

**

¹ <https://www.fema.gov/flood-zones>, accessed March 13, 2020.

1929.² Since the 1970s, the site has been operated by several automobile wrecking/dismantling businesses.

An active railroad line is located along the northern Project site boundary, and Atwood drainage channel is located along the southern boundary. Surrounding properties are a mix of industrial and residential properties. North of the site and rail lines is an equipment yard and vacant land, then E. Orangethorpe Avenue and then new multi-family residential. East of the site is S. Van Buren Street then existing single family residential. Existing single family residential also occurs adjacent to the site on the west side of S. Van Buren Street. West of the site is vacant land and various manufacturing uses. South of the flood control channel is an equipment supply facility. (Reference Figure 9, Surrounding Land Uses Aerial Map.)

**

² *Phase 1 Environmental Site Assessment, 443, 449, 455, and 461 South Van Buren Street, Placentia California 90621*, prepared by Stantec Consulting Services on behalf, August 15, 2017 and contained as Appendix E.

Figure 7. Project Site Facilities Aerial Map



(Source: Stantec Phase I Environmental Assessment)

Figure 8. Project Site Existing Conditions Photos.



Figure 9. Surrounding Land Uses Aerial Map



(Source: Google Maps)

2.10 OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

Entitlement of the Project will require approval of this Initial Study/Mitigated Negative Declaration by the City of Placentia City Council, acting as lead agency. The Project also requires a series of entitlements that will require review and approval by the City of Placentia Planning Commission and City Council. These entitlements include a Zoning Map Amendment, Development Plan Review, and Tentative Tract Map.

The Project will not require approval of another public agency. However, Project implementation will require regulatory compliance review and oversight by the following public agencies:

- Federal Emergency Management Agency (FEMA) Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) for regulatory compliance regarding raising the site elevation above the flood hazard area
- State of California Department of Toxic Substances Control (DTSC) for regulatory compliance regarding clean-up of existing on-site hazardous materials
- State of California Department of Conservation Geologic Energy Management Division (CalGEM) (formerly DOGGR) for regulatory compliance regarding abandonment of existing on-site oil wells
- Regional Water Quality Control Board - Santa Ana Region (RWQCB) for regulatory compliance of the Project Storm Water Pollution Prevention Plan (SWPPP).

2.11 HAVE CALIFORNIA NATIVE AMERICAN TRIBES TRADITIONALLY AND CULTURALLY AFFILIATED WITH THE PROJECT AREA REQUESTED CONSULTATION PURSUANT TO PUBLIC RESOURCES CODE SECTION 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes. California Native American Tribes requested consultation, and the consultation was conducted and completed as discussed in Section 6.18 of this Initial Study and mitigation measures are included to ensure potential identified Native American resources are protected.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage

Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

SECTION 3.0 – ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/ Soils | <input type="checkbox"/> Greenhouse Gas | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/ Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/ Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

SECTION 4.0 – DETERMINATION: (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

- I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

SECTION 5.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the Project falls outside a fault rupture zone.) A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

SECTION 6.0 – ANALYSIS OF ENVIRONMENTAL IMPACTS

The following section identifies the environmental topics contained in the Initial Study, Appendix G of the CEQA Guidelines. For each environmental topic, the thresholds of significance are presented and the finding relative to each threshold is checked. An analysis supporting each finding is then presented along with an assessment of cumulative impacts and applicable mitigation requirements.

6.1 AESTHETICS

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

6.1.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) Would the Project have a substantial adverse effect on a scenic vista?

No Impact. The City of Placentia General Plan does not identify scenic vistas. The Project site is currently a manufacturing site with a former auto wrecking use. An active railroad line is located along the northern Project site boundary, and a drainage channel is located along the southern boundary. Surrounding properties include a mix of manufacturing and residential uses. The Project proposes to replace the existing land uses on the site with residential townhomes, including landscaping and amenities. The Project would be compatible with the existing single family residential uses east of the site and north across E. Orangethorpe Avenue. Consequently, the Project would not have an adverse effect on a scenic vista.

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

No Impact. The City of Placentia General Plan does not identify scenic resources or state scenic highways. Current facilities on the Project site are a variety structures used for the former auto wrecking operations and vehicles stored prior to crushing. The site also contains two non-producing oil wells and the western terminus of Oak Street. The buildings on the site are aluminum type structures and woodsheds. (Reference Figure 8, Project Site Existing Conditions Photos.) These buildings have no identified historical value. The site is generally flat and covered by the various auto wrecking facilities. Existing rows of trees border the site on the north and south. The Project proposes to retain some of these trees and replace the balance with new landscaping. There is no tree preservation ordinance in the City that requires protection of the existing onsite trees. Consequently, the Project would not damage scenic resources.

- c) Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. As discussed in Section 6.1.a, above, the Project would replace a former auto wrecking facility which is currently in a cluttered and unkept condition. (Reference Figure 7, Project Site Facilities Aerial Map and Figure 8, Project Site Existing Conditions Photos.) As proposed, the Project would develop architecturally cohesive residential townhomes, including landscaping and amenities. The Project would be compatible with the existing single family residential uses east of the site and north across E. Orangethorpe Avenue. The Project would improve the visual character and quality of the site and its surrounding, and no significant adverse impacts would occur.

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

No Impact. Existing light sources in the vicinity of the Project site include exterior lighting onsite and from surrounding uses. Vehicles on the adjacent streets and trains on the adjacent rail line also have nighttime lighting. The Project would create new exterior lighting associated with the townhomes, interior private streets and Project entry. These new light sources would be directed onsite and would not create glare or adversely affect the surrounding uses. Consequently, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

6.1.2 CUMULATIVE IMPACTS

The analysis determined that the proposed Project would not result in significant adverse aesthetic impacts. The Project would improve the visual character of the site and surrounding area and would be consistent with existing residential development east and north of the site. Consequently, the Project would not result in significant adverse cumulative aesthetics impacts.

6.1.3 MITIGATION MEASURES

The analysis determined that the proposed Project would not result in any significant adverse impacts regarding aesthetics. Consequently, no mitigation is required.

6.2 AGRICULTURE AND FOREST SERVICES

AGRICULTURAL/FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-				X

<p>AGRICULTURAL/FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
agricultural use or conversion of forest land to non-forest use?				

6.2.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?

No Impact. Although the Project site was used for agricultural purposes, as an orchard, from at least 1938 until 1946,³ the City of Placentia inclusive of the Project site is developed with urban land uses. The state of California Department of Conversation classifies the Project site and its surrounding areas as “urban and built-up land”.⁴ Similarly, Section 4.3 of the General Plan EIR states there are no agricultural resources in the City. Consequently, the Project would not convert farmland to a non-agricultural use.

- b) Would the Project conflict with existing zoning for agricultural use or a Williamson Act Contract?

No Impact. The Williamson Act (Cal. Govt. Code, §51200 et seq.) allows county governments to enter into contracts with private landowners who agree to restrict parcels of land to agricultural uses or uses compatible with agriculture

**

³ Phase 1 Environmental Site Assessment, 443, 449, 455, and 461 South Van Buren Street, Placentia California 90621, prepared by Stantec Consulting Services on behalf, August 15, 2017 and contained as Appendix E.

⁴<https://maps.conservation.ca.gov/dlrp/ciff/>; accessed January 23, 2020.

for at least ten years. In return, landowners receive property tax assessments that are much lower than normal because they are based upon income derived from farming and open space uses as opposed to full market value of the property. As stated in Section 4.3.3.2. of the General Plan EIR, there are no dedicated agriculture uses currently within the City and no agricultural zoning designation or Williamson Act contracts. Consequently, the Project would not conflict with an agricultural use or Williamson Act contract.

- c) Would the Project conflict with existing zoning for or cause rezoning of, forest land or timberland?

No Impact. The City, inclusive of the Project site, is developed with urban land uses. There are no forest, timberlands or forest/timberland zoning in the City. This finding is consistent with Section 4.3.3.3. of the General Plan EIR which states that the City does not include any farmland. Consequently, the Project would not conflict with zoning for forest land or timberland.

- d) Would the Project result in the loss of forest land or the conversion of forest land to a non-forest use?

No Impact. As discussed in Section 6.2.c of this Initial Study, above, the City, inclusive of the Project site, is developed with urban land uses. There is no forest, timberlands or forest zoning in the City. Consequently, the Project would not result in the loss or conversion of forest land.

- e) Would the Project involve other changes in the existing environment that, due to their location or nature, may result in conversion of farmland to non-agricultural use

No Impact. As discussed in Sections 6.2.a, b and c of this Initial Study, above, the City, inclusive of the Project site, is developed with urban land uses. There are no farmlands or forests in the City. Consequently, the Project would not result in the loss or conversion of farmland or forest land.

6.2.2 CUMULATIVE IMPACTS

The analysis determined that the proposed Project would not result in any significant adverse impacts to agriculture and forest resources. Consequently, the Project would not result in significant adverse cumulative agriculture and or forest resource impacts.

6.2.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on agriculture and or forest resources. As a result, no mitigation is required.

6.3 AIR QUALITY

AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

6.3.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

Data presented in this Air Quality section is based on the "Van Buren & Orangethorpe Residential Development Air Quality & Greenhouse Impact Study, City of Placentia", prepared by RK Engineering Group, Inc. (Air Quality Impact Study) and contained as Appendix A to this Initial Study.

- a) Would the Project conflict with or obstruct the implementation of the applicable air quality plan?

Less Than Significant Impact. The City of Placentia is within the South Coast Air Basin (SCAB), which is bounded by the Pacific Ocean to the south and west and mountains to the north and east. Air quality in the South Coast Air Basin is managed by the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) are the agencies responsible for preparing the Air Quality Management Plan (AQMP)

for the SCAB. The AQMP was designed to comply with State and federal requirements, reduce the high level of pollutant emissions in the SCAB, and ensure clean air for the region through various control measures.

The regional AQMP is updated periodically with the most recent SCAB AQMP adopted in March 2017 and referred to as the 2016 AQMP. According to the 2016 AQMP, the most significant air quality challenge in the SCAB is to reduce nitrogen oxide (NOx) emissions sufficiently to meet the upcoming ozone standard deadlines. The 2016 AQMP suggests that total SCAB emissions of NOx must be reduced to approximately 141 tons per day (tpd) in 2023 and 96 tpd in 2031 to attain the 8-hour ozone standards. This represents an additional 45 percent reduction in NOx in 2023, and an additional 55 percent NOx reduction beyond 2031 levels.

In compliance with the 2016 AQMP, the SCAQMD establishes air quality emissions thresholds for criteria air pollutants for the purposes of determining whether a project may have a significant effect on the environment per Section 15002(g) of the Guidelines for implementing CEQA. By complying with the thresholds of significance, the Project would be in compliance with the SCAQMD AQMP as well as federal and state air quality standards.

Table 2 lists the air quality significance thresholds for the six criteria air pollutants, including NOx, that are relevant to the Project and analyzed in the Air Quality Impact Study.

Table 2: SCAQMD Regional Significance Thresholds		
Pollutant ¹	Construction (lbs²/day)	Operation (lbs/day)
NO_x	100	55
VOC	75	55
PM₁₀	150	150
PM_{2.5}	55	55
SO_x	150	150
CO	550	550

Table 2: SCAQMD Regional Significance Thresholds		
Pollutant ¹	Construction (lbs²/day)	Operation (lbs/day)
¹ ROG (reactive organic gases); NOx (oxides of nitrogen); CO (carbon monoxide); PM-10 (respirable 10-micron diameter particulate matter); PM-2.5 (respirable 2.5-micron diameter particulate matter); SOx (oxides of sulfur).		
² Pounds		

As discussed in Section 6.3.b, below, neither the construction nor the operation would exceed NOx thresholds set by the 2016 AQMP or any of the other air pollutant thresholds set by the SCAQMD and listed above in Table 2. Consequently, the Project is consistent with the goals of 2016 AQMP and its potential impacts are less than significant.

- b) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard

Less Than Significant Impact. A violation of an air quality standard could occur over the short-term during construction, or over the long-term during its subsequent operation. Each is addressed below.

Construction Impacts: Project construction raises localized ambient pollutant concentrations. Construction air quality impacts are considered significant if they exceed any of the construction thresholds listed in Table 2.

During construction air quality impacts may occur during demolition, remediation activities described in Section 2.8.4 of this Initial Study, site preparation, and construction activities associated with the Project. Major sources of emissions during construction include exhaust emissions, fugitive dust generated as a result of soil and material disturbance during site preparation, and grading activities, and painting of the structures.

Table 3 presents the calculation of daily emissions projected for site construction. The calculations presented in the Table are the results of the CalEEMod Model which applies typical construction equipment, labor, phasing and materials to the project, based on its size, location and proposed timing. The CalEEMod Model is not intended as an exact accounting of what equipment will ultimately be used and what emissions are produced by a project. Rather, the model represents a "yard stick" by which projects may be compared on a

one-to-one basis. The methodology applied by the CalEEMod Model is based on studies performed by the SCAQMD for construction projects in the southern California. The SCAQMD recommends use of the CalEEMod Model for typical construction projects.

To assess air quality construction impacts for the Project, the Air Quality Impact Study inputted the following assumptions into the CalEEMod Model: (1) Construction of the Project is assumed to begin in year 2020 and last approximately 15 months; (2) Approximately 5,000 cubic yards (7,500 tons) of lead impacted soil and 670 cubic yards (1,000 tons) of TPH-impacted soil would require excavation and offsite disposal at a licensed landfill. Grading the site would require the import of approximately 24,500 cubic yards of soil during the grading phase. For purposes of this analysis, construction phases are not expected to overlap. (Reference Appendix A.) As shown in Table 3, all construction related emissions are within their respective threshold values and the impact is less than significant.

Activity	VOC	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Demolition	3.80	48.57	26.23	0.08	7.39	2.59
Site Preparation	4.15	42.47	22.10	0.04	9.31	5.87
Grading	3.63	66.82	27.25	0.14	6.69	3.34
Building Construction	2.50	20.65	19.76	0.04	2.09	1.32
Paving	1.32	12.96	15.11	0.02	0.85	0.67
Architectural Coating	34.70	1.57	2.30	0.00	0.27	0.14
Maximum	34.70	66.82	27.25	0.14	9.31	5.87
SCAQMD Threshold	75	100	550	150	150	55
Exceeds Threshold (?)	No	No	No	No	No	No

Operational Impacts: The major source of long-term air quality impacts is that associated with the emissions produced from project-generated vehicle trips. With the exception of wood combustion, stationary sources add only minimally to these values.

Mobile Source Emissions: To assess the traffic impacts associated with the Project, a traffic impact study was prepared (“Van Buren & Orangethorpe Residential Development Traffic Study, City of Placentia”, prepared by RK Engineering Group, Inc. (Traffic Impact Study) and contained as Appendix B to this Initial Study). According to the Traffic Impact Study, the Project is estimated to generate a net of approximately 832 average daily vehicle trips (ADT), with 52 net AM ADT and 64 net PM ADT.

Stationary Source Emissions: In addition to vehicle trips, the future Project occupants would produce emissions from on-site sources including the combustion of natural gas for space and water heating and the use other heating sources (e.g., hearths). Additionally, the structures would be maintained and this requires repainting over time, thus resulting in the release of additional emissions. Also, the use of consumer aerosol products, such as cleaners, is associated with the Project and these release emissions. Finally, the landscape would require maintenance and this equipment produces combustion emissions.

The resultant emissions are projected by the Air Quality Impact Study CalEEMod computer model and included in Table 4. As discussed above, the CalEEMod Model methodology is based on studies performed by the SCAQMD for typical projects in the southern California and represents a “yard stick” by which projects may be compared on a one-to-one basis. As shown in Table 4, all operational related emissions are within their respective threshold values and the impact is less than significant.

In accordance with SCAQMD methodology, projects that do not exceed or can be mitigated to less than the daily threshold values do not add significantly to a cumulative impact. Neither the construction nor the operation of the Project would exceed the recommended SCAQMD threshold levels and this impact is less than significant.

Activity	VOC	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Mobile Sources	1.94	8.20	26.41	0.10	8.29	2.28
Energy Sources	0.05	0.40	0.17	0.00	0.03	0.03
Area Sources	3.56	2.44	12.47	0.02	0.25	0.25
Total	5.54	11.04	39.06	0.11	8.58	2.56

Table 4: Comparison of Projected Daily Operational Emissions and Daily Criteria Values (Pounds/day)¹						
Activity	VOC	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold (?)	No	No	No	No	No	No
¹ Maximum daily emissions during summer or winter; includes both on-site and off-site project emissions.						

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

Less Than Significant Impact. Project construction and operation have the potential to raise localized ambient pollutant concentrations. This could present a significant impact to sensitive receptors if these concentrations were to exceed the State or federal ambient air quality standards at receptor locations. Sensitive receptors include residential, school and hospital uses. Sensitive receptors proximate to the Project site include a residential uses east and north of the Project site.

The Project will be required to follow the standard SCAQMD rules and requirements with regards to fugitive dust control, which includes, but are not limited to the following:

1. All active construction areas shall be watered two (2) times daily.
2. Speed on unpaved roads shall be reduced to less than 15 mph.
3. Any visible dirt deposition on any public roadway shall be swept or washed at the site access points within 30 minutes.
4. Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered twice daily.
5. All operations on any unpaved surface shall be suspended if winds exceed 15 mph.
6. Access points shall be washed or swept daily.
7. Construction sites shall be sandbagged for erosion control.
8. Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).

9. Cover all trucks hauling dirt, sand, soil, or other loose materials, and maintain at least 2 feet of freeboard space in accordance with the requirements of California Vehicle Code (CVC) section 23114.
10. Pave or gravel construction access roads at least 100 feet onto the site from the main road and use gravel aprons at truck exits.
11. Replace the ground cover of disturbed areas as quickly possible.
12. A fugitive dust control plan should be prepared and submitted to SCAQMD prior to the start of construction.

Application of these standard SCAQMD fugitive dust control measures are incorporated into this analysis of Project exposure of sensitive receptors to substantial pollutant concentrations.

Localized Significance Thresholds: SCAQMD establishes localized significance thresholds (LSTs) based on the ambient concentrations of four applicable air pollutants for source receptor area (SRA) 16 – North Orange County. The nearest existing sensitive receptors are the residential uses located approximately 10 feet (<25 meters) to the east of the Project site. The sensitive receptor distance from the site boundary is assumed to be 25 meters and the daily disturbance area is calculated to be 5 acres. These calculated LST thresholds are presented in Table 5 for both construction and operational emissions. As shown in the Table, emissions would be below levels of significance, and consequently, operational localized impacts to sensitive receptors would be less than significant.

Table 5: Comparison of Projected Construction and Operational Emissions to SCAQMD Localized Significance Thresholds¹ (LST) (Pounds/day)				
	Pollutant			
	NO_x	CO	PM₁₀	PM_{2.5}
Project Construction Maximum Emissions (Reference Table 3)	42.42	21.75	9.11	5.82
LST Construction Thresholds	221	1,311	11	6
Exceeds LST Construction Thresholds?	No	No	No	No
Project Operation Emissions (Reference Table 4)	3.25	13.97	0.70	0.40
LST Operational Thresholds	221	1,311	3	2

Table 5: Comparison of Projected Construction and Operational Emissions to SCAQMD Localized Significance Thresholds¹ (LST) (Pounds/day)				
Pollutant				
	NO_x	CO	PM₁₀	PM_{2.5}
Exceeds LST Operational Thresholds?	No	No	No	No

Toxic Air Contaminants: Other potential impacts that could affect sensitive receptors are Toxic Air Contaminants (TACs) is defined as air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health, and for which there is no concentration that does not present some risk. The primary source of TACs from non-industrial land use development projects would include diesel particulate matter (DPM) generated from diesel exhaust emissions. The Project would consist of residential uses. This type of project does not include major sources of toxic air contaminants (TAC) emissions that would result in significant exposure of sensitive receptors to substantial pollutant concentrations. Therefore, the Project TAC impact is considered less than significant.

CO Hot Spot Emissions: A CO hot spot is a localized concentration of carbon monoxide (CO) that is above the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. At the time of the publishing of the 1993 CEQA Air Quality Handbook, the SCAB was designated nonattainment, and projects were required to perform hot spot analyses to ensure they did not exacerbate an existing problem. Since this time, the SCAB has achieved attainment status and the potential for hot spots caused by vehicular traffic congestion has been greatly reduced. In fact, the SCAQMD AQMP found that peak CO concentrations were primarily the result of unusual meteorological and topographical conditions, not traffic congestion. Additionally, the 2003 SCAQMD AQMP found that, at four of the busiest intersections in SCAB, there were no CO hot spots concentrations.

Furthermore, the Van Buren and Orangethorpe Residential Project Traffic Impact Study, RK Engineering Group, Inc. (Appendix B), found that all significant Project traffic impacts would be mitigated to less than significant levels. Therefore, the Project would not significantly increase traffic congestion in the vicinity of the site that would lead to the formation of CO Hot Spots. The Project impact to CO Hot Spots is less than significant.

- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. Project construction would involve the use of heavy equipment creating exhaust pollutants from on-site earth movement and from equipment bringing concrete and other building materials to the site. Odors associated with this exhaust would be confined to the immediate vicinity of the equipment itself. By the time such emissions reach any sensitive receptor sites away from the Project site, they will be diluted to well below any level of air quality concern. Additionally, some odor would be produced from the application of asphalt, paints, and coatings. Any exposure to these common odors would be of short-term duration and, while unpleasant and potentially adverse, are not associated with a specific health hazard and are less than significant. Operational odors could be produced from on-site cooking or barbeque typical of a residential use. Because these odors are common in the environment, they would not constitute a significant impact.⁵

6.3.2 CUMULATIVE IMPACTS

As discussed above, in accordance with SCAQMD methodology, projects that do not exceed or can be mitigated to less than the daily threshold values do not add significantly to a cumulative impact. Neither the construction nor the operation of the Project would exceed the recommended SCAQMD threshold levels and consequently, the Project would not create significant cumulative impacts relative to air quality.

6.3.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts relative to air quality. As a result, no mitigation is required.

**

⁵ SCAQMD CEQA Air Quality Handbook, Figure 5-4, Land Uses Associated with Odor Complaints identifies potentially significant odor impacts from such uses as agriculture (farming and livestock), a wastewater treatment plant, a food processing plant, a chemical plant, a composting facility, a refinery, a landfill, or a dairy. No significant odor impacts are identified from residential uses.

6.4 BIOLOGICAL RESOURCES

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

BIOLOGICAL RESOURCES. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

6.4.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) Would the Project adversely impact either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project site is fully disturbed by former auto wrecking facilities, paving, vehicles and related apparatus. Trees are located on the north and south borders of the site and scattered within the site. Surrounding uses include a rail line, channel, streets and manufacturing and residential land uses. There are no species identified as candidate, sensitive, or special status species within the limits of either the site or in the immediate area which has been completely altered by development. As stated in Section 4.5.2 of the General Plan EIR, the City is almost completely urbanized and landscaped with mostly non-native species. No known rare or endangered plant or animal species have been identified within the City based on a review of State and Federal data bases. Consequently, no significant impact would occur to any sensitive species designated by the resources agencies as a result of Project implementation.

- b) Would the Project have a substantial impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. As noted above, the Project site is fully disturbed with former auto wrecking facilities, paving and minimal ornamental landscaping. The adjacent channel is concrete open channel with a below ground reinforced concrete box

(RCB) 10 feet wide, 7.5 feet high and 330 feet long. Because the channel is concrete, it does not support riparian habitat. Similarly, because of the urbanized condition of the Project site and surrounding properties, the Project site does not contain riparian habitat or other sensitive natural community. Although some small rodents and mammals that adapt to urban development may exist on the site, no native habitat or grasslands occur on the site that would represent a significant source of foraging for raptors and other sensitive or protected species. As noted above, no significant biological resources are identified in the General Plan EIR for the City. Consequently, Project implementation would not result in significant adverse impacts to riparian or other sensitive natural community

- c) Would the Project have a substantial impact on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, streams, lakes, and bogs. According to the USFWS National Wetlands Mapper⁶, there no wetlands within the vicinity of the Project site. Further as discussed above, the adjacent channel is concreted sided. The Project site and its surrounding area are fully development and do not contain riparian habitat or non-channelized water courses. Consequently, the Project would not cause a substantial adverse effect on state or federally protected wetlands.

- d) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?

Less Than Significant. As discussed above, the Project site is surrounded by urban land uses and does not contain identified native or sensitive species, riparian or sensitive habitats or wetlands. There are a substantial number of non-native trees on the site, but because they are surrounded by asphalt and structures and noise generating vehicle crushing operations, the trees are unlikely to provide suitable habitat, including nesting habitat, for migratory birds under the federal Migratory

**

⁶ <http://www.fws.gov/wetlands/data/mapper.HTML>; accessed January 23, 2020.

Bird Treaty Act (MBTA) and under Section 3513 et. seq. of the CDFW Code.⁷ The site and surroundings provide no evidence of burrows or rodent populations to support burrowing owls. Consequently, Project impacts regarding substantial interference with the movement of a species would be less than significant.

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

No Impact. Existing vegetation on the site consists of trees and scattered grasses. The City's General Plan does not identify the Project area as supporting sensitive habitat and/or important biological resources, and the Code does not have an ordinance that identifies and/or regulates heritage trees on private property. The Project proposes to retain some of the existing trees and to landscape the periphery and common areas of the site with ornamental trees and shrubs. Consequently, the Project would not conflict with a policy that protects biological resources such as a tree preservation policy.

- f) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. The City does not have any adopted Habitat Conservation Plans, Natural Community Conservation Plans or other conservation plans within its corporate boundaries. Consequently, the Project would not conflict with provisions of an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

6.4.2 CUMULATIVE IMPACTS

The impacts on biological resources are typically site specific. The proposed Project would not involve any loss of protected habitat since no such habitat is found within the Project site's boundaries. As a result, no significant cumulative impacts on biological resources will be associated with the proposed project's implementation.

6.4.3 MITIGATION MEASURES

The Project would not have significant impacts relative to biological resources, and no mitigation is required.

**

⁷ Migratory birds include all native birds in the United States, as listed in 50 CFR (Code of Federal Regulations) 10.13 (List of Migratory Birds).

6.5 CULTURAL RESOURCES

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

6.5.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. The CEQA Guidelines, Section 15064.5, define “historic resources” as resources listed in the California Register of Historical Resources, or determined to be eligible by the California Historical Resources Commission for listing in the California Register of Historic Resources.⁸ The criteria for eligibility are generally set by the Historic Sites Act of 1935, which established the National Register which recognizes properties that are significant at the national, state and local levels. To be eligible for listing in the National Register, a district, site, building, structure, or object that must possess integrity of location, design, setting, materials, workmanship, feeling and association relative to American history, architecture,

**

⁸ California Public Resources Code Section 5020.1(k), Section 5024.1(g).

archaeology, engineering, or culture.⁹ In addition, unless the property possesses exceptional significance, it must be at least 45 years old to be eligible.

The former auto wrecking facilities have been operating on the Project site since the 1970s. It's possible that the existing structures on the site were constructed about that time, making them as old as 58 years. The buildings on the site are aluminum type structures and woodsheds. (Reference Figure 8, Project Site Existing Conditions Photos.) These structures are not associated with a significant event in American history, architecture, archaeology, engineering, or culture, and have no identified historical value. There are no national, state or locally identified historic resources in the vicinity of the site. Consequently, the Project would not result in an impact to a historical resource.

- b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?

Less Than Significant with Mitigation Incorporated. This Section discusses potential impacts to other "unique archaeological resources" which are defined by §15064.5 of the CEQA Guidelines as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

To identify potential archaeological resources on the Project site and its vicinity, a records search by the South Central Coastal Information Center (SCCIC) was conducted and the results are summarized in a February 21, 2018 letter from SCCIC, contained in Appendix C of this Initial Study document. The SCCIC search included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of

**

⁹ Guidelines for Completing National Register Forms, National Register Bulletin 16, U.S. Department of the Interior, National Park Service, September 30, 1986 ("National Register Bulletin 16").

Historic Places (NRHP), and the California State Historic Properties Directory (HPD) listings were reviewed for the Project site.

As summarized in the SCCIC letter of February 2018, the Project area is on edge of the Richfield-Atwood Historic District as identified by Placentia Historical Committee as part of their survey of Placentia properties in 1988. None of the previously recorded properties that are near the Project area are listed (or determined to be eligible for listing) on state or federal registers. Additionally, the Project site does not appear to have been previously surveyed for archaeological resources. SCCIC recommends that a halt-work condition be in place for all ground-disturbing activities. In the event that any evidence of cultural resources is discovered, all work within the vicinity of the find should stop until a qualified archaeological consultant can assess the find and make recommendations. Mitigation Measure CUL-1, below, is added to the Project to protect potential archaeological resources. With inclusion of this measure, potential impacts relative to archaeological resources would be reduced to less than significant levels.

- c) Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant with Mitigation Incorporated. As discussed in Section 6.5.b, above, the Project site is not within the vicinity of identified archaeological resources, has already been graded and developed, and does not include substantial excavation. There are no cemeteries within Placentia. However, similar to many communities within the region, Native Americans historically occupied the region. Should human remains be encountered during Project grading and construction activities, pursuant to state of California Health and Safety Code provisions (notably § 7050.5-7055), all construction activities must cease and the Orange County Coroner, City Development Services Department and Police Department be immediately contacted. Mitigation Measure CUL-2, below, is added to the Project to reduce the potential impacts related to encountering or disturbing human remains to less than significant levels.

6.5.2 CUMULATIVE IMPACTS

The analysis determined that the proposed Project would not result in any significant adverse cultural resource impacts. Consequently, no significant cumulative impacts relative to cultural resources are expected to occur as a result of the Project.

6.5.3 MITIGATION MEASURES

The following mitigation will be required to protect potential archaeological resources:

Mitigation Measure CUL-1: Unanticipated Discovery of Archaeological Resources.

Timing: Prior to Issuance of Grading Permits.

Department Responsible: Development Services.

If an archaeological resource is encountered during ground-disturbing activities, work within 50 feet of the find must halt and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology must be contacted immediately to evaluate the find. If the discovery proves to be significant under CEQA, additional work such as data recovery excavation may be warranted. The on-site monitoring shall end when the project site excavation activities are completed, or sooner if the archaeologist indicates that the site has a low potential for archeological resources. During monitoring, the archaeologist shall complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. Following completion of monitoring, the archaeologist shall prepare a summary memorandum of finds, their significance under CEQA and their disposition. (*Note: The California Historical Resources Information System contains a listing of qualified archaeologists at www.chrisinfo.org.)

Mitigation Measure CUL-2: Unanticipated Discovery of Human Remains.

Timing: Prior to Issuance of Grading Permits.

Department Responsible: Development Services.

The discovery of human remains is always a possibility during ground-disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

6.6 ENERGY

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

6.6.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

a) Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No Impact. As a new development, the Project would be required to comply with the California Building Code (CBC). The proposed Project will incorporate energy efficient measures such as the following:

- Drip irrigation
- Low flow plumbing fixtures
- Energy efficient appliances and light fixtures
- Net Zero 2020 (enhanced Title 24 standards)

Development of the site as a high density residential use is consistent with General Plan designation for the site. Section 4.7 of the General Plan EIR finds that use of the Project site as a residential use consistent with the General Plan would not result in wasteful, inefficient, or unnecessary consumption of electricity resources, or could conflict with a state or local plan for renewable energy or energy efficiency. The Project would be high density residential use consistent with the General Plan. Consequently, the Project would not result in the potentially significant wasteful consumption of energy resources.

- b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. As noted above, the development of the site as a high density residential use is consistent with General Plan designation for the site including General Plan policies that promote infill development and compliance with the CBC. The proposed development is an infill project that would connect to existing on- and off-site utilities. Consequently, the Project would not conflict with or obstruct a plan for renewable energy or energy efficiency.

6.6.2 CUMULATIVE IMPACTS

As an infill development built in accordance with the CBC, the Project would not have adverse impacts relative to energy. As a result, no significant cumulative impacts relative to energy will be associated with the proposed Project's implementation.

6.6.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts relative to energy. As a result, no mitigation is required.

6.7 GEOLOGY AND SOILS

GEOLOGY AND SOILS. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994),			X	

GEOLOGY AND SOILS. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
creating substantial direct or indirect risks to life or property?				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

6.7.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

a) Would the Project cause exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault (as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault), ground-shaking, liquefaction, or landslides?

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Map issued by the State Geologist for the area or base on other substantial evidence of a known fault?

No Impact. The City of Placentia is within the seismically active Southern California region that includes nearby faults, including the Puente Fault located 3.4 miles to the north and the Elsinore Fault located 3.86 miles to the east. A geotechnical evaluation of the site prepared for the Project site found that no seismic faults are known to occur on the Project site and the site does not lie within an "Earthquake Fault Zone" as defined by the State of California in the

Alquist-Priolo Earthquake Fault Zoning Act.¹⁰ This information is confirmed by Section 4.8.4 of the General Plan EIR which states there are no Alquist Priolo Earthquake Fault Zones in the City. Consequently, there would be no Project impacts related to rupture of a known earthquake fault as delineated on the Alquist-Priolo Earthquake Fault Map.

ii) Strong seismic ground shaking?

Less Than Significant Impact. As discussed above, the site is situated in a seismically active area and near several seismically active faults that could generate ground shaking in Placentia. As required by the CBC, the Project would be required to provide a geotechnical study for review and approval by the City prior to issuance of a grading permit. Project construction must then comply with the requirements of the approved geotechnical report and CBC. Compliance with these measures would mitigate potential adverse impacts from strong seismic ground shaking. Consequently, Project impacts related to rupture of a known earthquake fault would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction can be defined as the loss of soil strength or stiffness due to a buildup of pore-water pressure during a seismic event and is associated primarily with relatively loose, saturated fine- to medium-grained unconsolidated soils. Seismic ground shaking of relatively loose, granular soils that are saturated or submerged can cause the soils to liquefy and temporarily behave as a dense fluid. A relatively shallow groundwater table (within approximately 60 feet below ground surface) or completely saturated soil conditions that contribute to liquefaction.

**

¹⁰ *Geotechnical Due Diligence Evaluation, Proposed Residential Development, Van Buren Street and Orangethorpe Avenue, Placentia, California*, prepared by ALBUS-KEEFE & ASSOCIATES, INC., August 24, 2017;

The *Well Installation and Sampling Report*¹¹ prepared for the Project site, and contained in Appendix E, performed subsurface borings to a depth of 80 feet, with ground water first encountered between 60-66 feet below ground surface (bgs). According to Figure 4.8-2 of the General Plan EIR, the Project site is within a designated liquefaction area that generally is located in the southeastern portion of the City. As discussed above, Project construction must comply with the requirements of the approved geotechnical report and CBC. Compliance with these measures would reduce potential adverse impacts from potential liquefaction areas. Consequently, Project impacts related to seismic-related ground failure including liquefaction are less than significant.

iv) Landslides?

No Impact. The Project site and surrounding areas are generally flat, and as noted above, groundwater levels are approximately 60-66 feet below the existing ground surface. According to Figure 4.8-2 of the General Plan EIR, the majority of the city including the Project site is not within a designated landslide area. Project construction must comply with the requirements of the approved geotechnical report and CBC. Although no probability of landslides in the vicinity of the Project site is expected, compliance with these measures would further reduce potential adverse impacts from geologic hazards. Consequently, there would be no Project impacts related to landslides.

b) Would the Project cause substantial soil erosion or the loss of topsoil?

No Impact. The Project site is currently developed with paving. Past uses of the site include agriculture and oil drilling and the surrounding area is fully urbanized. No topsoil exists on the site. The Project would remove all existing structures and paving and result in additional disturbance. However, Project construction would be required to comply with the City Code provisions (including Section 20.40.050 Grading regulations) requiring erosion control. Consequently, there would be no Project impacts relative to soil erosion or loss of topsoil.

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

**

¹¹ *Well Installation and Sampling Report, 443 South Van Buren Street, Placentia, California 92870*, prepared by Stantec Consulting Services, May 8, 2019; and contained on Appendix E.

Less Than Significant Impact. As discussed above, although groundwater levels at the site are approximately 60-66 feet below the existing ground surface, the Project site is within a designated liquefaction area according to Figure 4.8-2 of the General Plan EIR. Project construction must comply with the requirements of the approved geotechnical report and CBC. Compliance with these measures would reduce potential adverse impacts from potential unstable soils or liquefaction areas. Consequently, Project impacts related to unstable soils, including liquefaction or collapse liquefaction are less than significant.

- d) Would the Project be located on expansive soil, creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. The geotechnical evaluation of the site prepared for the Project site found that the near-surface soils within the site are generally non-expansive or possess Very Low expansion potentials. Additional testing for soil expansion will be required subsequent to rough grading and prior to construction of foundations and other concrete work to confirm these conditions. This testing would ensure that any potential for expansive soils are identified and if required the project geotechnical report would recommend remediation. Consequently, Project impacts related to expansive soils are less than significant.

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

No Impact. An existing City sanitary sewer line runs along S. Van Buren Street adjacent to the Project site. The Project proposes to connect to the existing sewer line. The Project would connect to the existing public sewer line and not use septic tanks or an alternative wastewater disposal system.

- f) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The Project site is located within an urbanized area of Placentia and the site and surrounding area have been previously graded and developed. Any near-surface paleontological resources that may have existed at one time have likely been disturbed and/or destroyed by prior development activities. Development of the Project would require only surficial excavation needed to lay out utility lines and flatten pads. The site is also flat with no identified unique geologic features. Consequently, the Project would not destroy a unique paleontological resource or site or unique geologic feature.

6.7.2 CUMULATIVE IMPACTS

The potential cumulative impacts related to geology and soils are site specific. Furthermore, the analysis presented above determined that the implementation of the Project would not result in impacts to geology or soils. Consequently, no significant cumulative impacts relative to geology or soils are expected to occur as a result of the Project.

6.7.3 MITIGATION MEASURES

The Project would not have significant impacts relative to geology and soils, and no mitigation is required.

6.8 GREENHOUSE GAS EMISSIONS

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

6.8.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

Data presented in this Air Quality section is based on the "Van Buren & Orangethorpe Residential Development Air Quality & Greenhouse Impact Study, City of Placentia", prepared by RK Engineering Group, Inc. (Air Quality Impact Study) and contained as Appendix A to this Initial Study.

- a) Generate greenhouse gas emissions either directly or indirectly, that may have a significant impact on the environment.

Less Than Significant Impact. Greenhouse gases (GHGs) comprise less than 0.1 percent of the total atmospheric composition, yet they play an essential role in influencing climate. Greenhouse gases include naturally occurring compounds such as carbon dioxide (CO₂), methane (CH₄), water vapor (H₂O), and nitrous oxide (N₂O), while others are synthetic. Man-made GHGs include the chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs) and Perfluorocarbons (PFCs), as well as sulfur hexafluoride (SF₆). Different GHGs have different effects on the Earth's warming. GHGs differ from each other in their ability to absorb energy (their "radiative efficiency") and how long they stay in the atmosphere, also known as the "lifetime".

To provide guidance to local lead agencies on determining significance for greenhouse gas (GHG) emissions in their CEQA documents, the SCAQMD has convened a GHG CEQA Significance Threshold Working Group. The SCAQMD is in the process of establishing a threshold for GHG emissions to determine a project's regional contribution toward global climate change impacts for California. On December 5, 2008, SCAQMD adopted a threshold of 3,000 metric tons (Mtons) of CO₂e per year for residential and commercial projects for which it is the lead agency under CEQA.

Construction: As presented in the Air Quality & Greenhouse Impact Study, greenhouse gas emissions are estimated for on-site and off-site construction activity using CalEEMod. Table 6 shows the construction greenhouse gas emissions, including equipment and worker vehicle emissions for all phases of construction. Construction emissions are averaged over 30 years and added to the long term operational emissions, pursuant to SCAQMD recommendations. As demonstrated in the Table, total construction emissions would be 648.89 Mtons of CO₂e or 21.63 Mtons averaged over 30 years. These estimated Project construction GHG emissions are well within the 3,000 Mtons threshold and therefore below a level of significance.

Site Operations: As presented in the Air Quality & Greenhouse Impact Study, greenhouse gas emissions are estimated for on-site and off-site operational activity using CalEEMod. During project operation, the majority of greenhouse gas emissions, and specifically CO₂, is due to vehicle travel and energy consumption. As shown in Table 7, total operational emissions would be 1,571.76 Mtons of CO₂e, below the 3,000 Mtons threshold and therefore below a level of significance.

Table 6: Construction-Related Greenhouse Gas Emissions (Mtons/year)			
Activity	Emissions (MTons CO₂e)¹		
	On-site	Off-site	Total
Demolition	34.24	43.87	78.11
Site Preparation	16.85	0.86	17.71
Grading	26.27	114.69	140.96
Building Construction	267.98	118.53	386.51
Paving	20.19	1.38	21.57
Architectural Coating	2.56	1.47	4.03
Total	368.09	280.80	648.89
Averaged over 30 years²	12.27	9.36	21.63
Threshold	3,000 Total		
Notes: ¹ MTCO ₂ e = metric tons of carbon dioxide equivalents (includes carbon dioxide, methane, nitrous oxide, and/or hydroflurocarbons). ² The emissions are averaged over 30 years and added to the operational emissions, pursuant to SCAQMD recommendations.			

Table 7: Operational Greenhouse Gas Emissions (Mtons/year)	
Emission Source	Unmitigated GHG Emissions (MTCO_{2e})¹
Mobile Source	1,386.32
Energy Source	261.96
Area Source	35.98
Water	55.65
Waste	25.45
Carbon Sequestration	-215.23
Construction (30 year average)	21.63
Total Annual Emissions	1,571.76
SCAQMD Tier 3 Screening Threshold ²	3,000
Exceed Tier 3 Threshold?	No
Notes: ¹ MTCO _{2e} = metric tons of carbon dioxide equivalents ² Per South Coast Air Quality Management District (SCAQMD) Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008 ³ Service population based on average 20 jobs/acre	

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

Less Than Significant Impact. In 2006, California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500, et seq.), which requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide greenhouse gas emissions are reduced to 1990 levels by 2020 (representing an approximate 25 percent reduction in emissions). Statewide strategies to reduce GHG emissions include reduced building emission requirements specified in the 2013 Building and Energy Efficiency Standards and California Green Building Standards Code.

Additionally, the California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB

375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted as a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. Infill development is included as a strategy for achieving SB375 compliance. An update to the RTP/SCS, currently proposed by SCAG through the Draft Connect SoCal Plan, continues to include infill development as a strategy. Consequently, the Project would not conflict with policies or regulations aimed at reducing greenhouse gas.

6.8.2 CUMULATIVE IMPACTS

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts relative to greenhouse gas emissions. Consequently, no significant cumulative impacts relative to no greenhouse gas mitigation is expected to occur as a result of the Project.

6.8.3 MITIGATION MEASURES

The Project would not have significant impacts relative to greenhouse gas emissions, and no mitigation is required.

6.9 HAZARDS AND HAZARDOUS MATERIALS

HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		X		
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		X		
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?				X

HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		X		
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

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

Less Than Significant with Mitigation Incorporated. The Project is a proposed residential use and would not create a significant hazard to public health. However, existing and past uses on the Project site and adjacent uses may create hazards. Historical uses of the Project site, including past agricultural use as an orchard from at least 1938 until 1946. Oil production operations are known to have occurred on the site since at least 1929. California Geologic Energy Management (CalGEM) maps and files indicate that there are two oil wells on site, one that was abandoned in 1959 and one that is an idle well that still has pumping equipment mounted over it. The idle oil well is located in the northeast corner of the site and the abandoned oil well is documented to have existed in the central portion of the Property and was accompanied by multiple aboveground storage tanks (ASTs). (Reference Figure 7, Project Site Facilities Aerial Map.) The idle oil and gas well produced approximately 802 barrels of oil in 1977 and 120 barrels of oil in 1993. No production since that time has occurred and the Applicant proposes to remove the well as part of the Project.

To assess these potential hazards, a series of Phase I and Phase II Environmental Site Assessment and Sampling Reports were conducted. These reports (collectively referenced as ESA Reports) are listed below and included in Appendix E of this Initial Study.

- "Phase I Environmental Site Assessment, 443, 449, 455 and 461 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, August 15, 2017
- "Phase II Environmental Site Assessment, 443, 449, 455 and 461 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, August 30, 2017
- "Additional Phase II Environmental Site Assessment, 443, 449, 455 and 461 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, September 29, 2017
- "Phase II Environmental Site Assessment-Lead Investigation 443, 449, 455 and 461 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, April 30, 2019
- "Well Installation and Sampling Report, 443 South Van Buren Street, Placentia, California 92870", prepared by Stantec Consulting Services, May 8, 2019
- "Phase I Environmental Site Assessment and Shallow Soil Sampling (Subsurface Investigation) Rosemead (Willard & Garvey)", prepared by Stantec Consulting Services, May 13, 2019.

Based on review of historical records and soil sampling, the ESA Reports identified the following Recognized Environmental Conditions (RECs) and non-ASTM environmental conditions in connection with the Project site:

- **Radon.** Radon is a colorless, tasteless radioactive gas with an United States Environmental Protection Agency (EPA) specified action level of 4.0 picoCuries per liter of air (pCi/L) for residential properties. The health risk potential of radon is primarily associated with its rate of accumulation within confined areas near or in the ground, such as basements, where vapors can readily transfer to indoor air from the ground through foundation cracks or other pathways. Large, adequately ventilated rooms generally present limited risk for radon exposure. The site is located in an area designated as Federal EPA Radon Zone Level 3 with a predicted average indoor screening level less than 2 pCi/L. However, nine of the sixty-three sites tested in the Placentia area exhibited levels above 4 pCi/L. Therefore, the site may be in an area where radon can exist at levels above EPA standards.
- **Lead-Based Paint (LBP).** Concern for lead-based paint (LBP) is primarily related to residential structures. The EPA's Final Rule on Disclosure of Lead-Based Paint in Housing (40 CFR Part 745) defines LBP as paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter or 0.5 percent by weight. Several small structures occur on site with outside painted surfaces that appear to be in poor condition. These surfaces may contain LBP.

- **Asbestos Containing Materials (ACM).** The several small structures that occur on site could contain ACM. The greatest asbestos-related human health risks are associated with friable asbestos, which is ACM that can be reduced to powder by hand pressure. Friable asbestos can become airborne and be inhaled and has been associated with specific types of respiratory disease. The manufacturing and use of asbestos in most building products was curtailed during the late 1970s.
- **Lead-Impacted Soil.** An area of the central portion of the site has a detected concentration of lead that exceeds the California Department of Toxic Substances Control (DTSC) acceptable screening level for residential uses.
- **Cadmium-Impacted Soil.** Elevated levels of cadmium have been identified at two surface locations in the north-central portion of the site exceeding the DTSC acceptable residential screening level.
- **Oil-Impacted Soil.** Oil in the central portion of the site exceeds DTSC acceptable screening levels for residential uses.
- **On-Site Oil Well.** Soils in the vicinity of the idle oil and gas well identified in the northeastern portion of the site Property trace amounts of total petroleum hydrocarbons gasoline (TPHg) and soil vapor.
- **Historical On-Site Oil Well.** Soils in the vicinity the abandoned oil and gas well in the central portion of the site do not demonstrate toxicity levels above DTSC acceptable residential screening levels. However, given that the well was originally abandoned in 1959, it is highly likely that CalGEM will require that the well be re-abandoned to their current standard.
- **Historical Off-Site Oil Wells.** From a review of historical photos, the ESA Reports identified two additional oil derricks along the north site boundary from 1946 until 1972. However, no listings or records exist for these oil wells on the online CalGEM database. Subsequent survey work is required to determine the locations of these wells. If the wells are located on the site, CalGEM and local regulatory agencies should be engaged for purposes of determining the appropriate course of action (i.e. abandonment and/or setback requirements) in regard to the wells.
- **Historical Above Ground Storage Tanks.** Two aboveground storage tanks (ASTs) were observed in the southwestern portion of the site on historic aerial photographs taken between 1963 and 1985. It is unclear if these ASTs were

within the site boundaries. However, soil in the vicinity of the ASTs could contain methane.

- **Site-Wide Soil Vapor.** Because of these historic on-site tanks and wells, there is potential for volatile organic compounds (VOCs) in soil vapor occur on the site.
- **Historical Agricultural Use.** Agricultural cultivation (an orchard) which occurred on the site from 1938 until 1946 could have left residual concentrations of organochlorine pesticides.
- **Former UST.** According to records on file with the Orange County Health Care Agency (OCHCA), a concrete UST was removed from the 461 S. Van Buren Street address on December 19, 1991. Soil samples suggest elevated levels of total recoverable petroleum hydrocarbons (TRPH) and levels of tetrachloroethylene ("PCE").
- **Asphaltic Soil.** An asphaltic soil layer appeared to cover an area roughly making up 0.33 acre in the western portion of the site. This asphaltic layer appears to be used oil mixed with soil which has solidified which could contain total petroleum hydrocarbons (TPH).
- **Mounded Soil.** Among a dense collection of automobile parts, a small mound of soil was observed in the western portion of 455 S. Van Buren Street. To evaluate the physical presence of buried materials in this area, exploratory hand auger boring is required.
- **Adjacent Railroad Easement.** A railroad easement has been located along the northern Property boundary since the late 1800s. Shallow soil sampling for metals near the northern site is required to determine if any RECs were caused by the rail line.

To determine the extent of the above listed RECs and non-ASTM environmental conditions, subsequent soil and groundwater sampling and testing, and additional reconnaissance were conducted and documented in the ESA Reports. Findings and recommendation of the ESA Reports are as follows:

- **TPH and VOC Issues.** An interview with a former Site business employee was conducted as part of the subsequent reconnaissance. The employee states that he was employed at the site between 1994 and 1997, and that during that time he witnessed the illegal disposal of engine oil in the southwest corner of 461 S. Van Buren Street. He further indicated that the southwest corner was a designated area where the oil contained within vehicle engines was

allowed to drain, and that the area was eventually capped with concrete. He also suggested that similar activities were likely done in other portions of the site.

Subsequent soil sampling found approximately 10 cubic yards (15 tons) of TPH impacted soil adjacent to the abandoned well located in the central portion of the site. There is also TPH at the former crusher facility on site, the volume of which is undetermined. These findings warranted additional soil and soil vapor sampling at the above-referenced areas for TPH and VOCs at 5 feet below ground surface (bgs).

In April 2019, additional soil and groundwater sampling was conducted and analyzed for TPH, VOCs and lead impacted soil. Based on the April 2019 soil sampling, TPH impacted soil appears to be localized and extends to approximately 4 feet bgs. The TPH-impacted soil represents a REC. To remove the impacted soil, approximately 670 cubic yards (1,000 tons) will require excavation and offsite disposal. This removal is recommended by the ESA Reports to remediate the TPH-impacted soil to levels acceptable for the proposed residential use. Following the completion of the remedial excavations, a remedy completion certification report would be prepared for DTSC review requesting a "no further action" (NFA) for the property. VOCs were non-detect in all soil samples analyzed.

Groundwater sampling was conducted between April 15 and April 23, 2019. Depth to groundwater was measured in the wells between approximately 60 and 66 feet bgs with a flow direction to the northwest. The analytical results of groundwater samples collected from the wells reported no TPH or VOCs above laboratory reporting limits.

- **Lead in Soil Issues.** The soil samples detected lead above the residential threshold of 80 mg/kg to a depth of 6-inches to 3 feet bgs at various locations throughout the site. These detected elevated lead concentrations in shallow soil are considered a REC. Remedial action, as discussed in the ESA Reports, require excavation and offsite disposal of approximately 4,500 to 5,000 cubic yards (6,750 to 7,500 tons) of soil. Contaminated soils would be transported off site following United States Department of Transportation (DOT) requirements. Trucks transporting the soil would be required to be covered and consistent with SCAQMD dust control measures.

Following the completion of the remedial excavations, as confirmed through soil sampling, a closure report would be prepared for DTSC review requesting a NFA for the property.

- **Oil Well Abandonment.** The inactive well will require to be abandoned under appropriate permitting in accordance with the current standard set forth by CalGEM. The previously abandoned site also will undergo appropriate permitting in accordance with the current standard set forth by CalGEM.

In addition to these wells, if the two potential oil wells near the site boundary are determined to be on the site and confirmed to be oil wells, abandonment (or re- abandonment) would be necessary since there appears to be no record of them with CalGEM. As recommended in the ESA Reports, the CalGEM recommended setback of 10 feet from well to building should be incorporated in the Project site plan.

- **Methane.** No methane was detected during the soil sample testing for the Project site. However, because there remains the potential for on-site methane from past oil operations, prior to Project development, a larger scale site-wide methane survey will need to be conducted under oversight of the City of Placentia Fire and Life Safety Department in accordance with their "Combustible Soil Gas Hazardous Mitigation Guideline C-03". At a minimum, the ESA Reports recommend the following mitigation procedures due to the presence of oil wells on the site and potential offsite wells near the northern site boundary:
 - All abandoned onsite oil wells within 25 feet of any structure or within 25 feet from a continuous hardscape that covers an abandoned well will need to be vented;
 - Subslab passive venting systems will need to be installed below all proposed buildings within 25 feet of any well or within 25 feet from a continuous hardscape that covers an abandoned well.
- **Unknown Structures and/or Contamination.** The site has a long history of oil drilling/production and automobile salvage activities, and approximately 65% of the site is covered with stored vehicles and vehicle parts, some of which cannot easily be moved. Unknown/undocumented issues or features (including soil contamination, sumps, oil pipelines, or unregistered storage tanks) could be encountered during grading. In preparation for such occurrences, the ESA Reports recommend that a Soil Management Plan (SMP) be prepared for the site that can be followed should unknown materials or contamination be encountered during redevelopment. The ESA Reports also advise that, if feasible, a comprehensive site-wide geophysical survey of the site be performed after removal of all vehicles and site structures to identify if abandoned and/or active infrastructure is in-place on the site that could be

avoided in connection with redevelopment activities.

Each of these above recommendations identified in the ESA Reports are incorporated as Mitigation Measures HAZ-1 – HAZ-9. With incorporation of HAZ-1 through HAZ-9, potential Project impacts regarding on-site hazardous materials would be reduced to less than significant levels.

In addition, a RAW or a RAP proposing remediation to meet residential cleanup goals would be submitted and approved by the DTSC and City prior to conducting the remediation work at the site.

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

Less Than Significant with Mitigation Incorporated. As a residential development, the Project is not associated with the transport or use of hazardous materials. However, the past uses on the Project site are associated with RECs. As discussed in Section 6.9.a, above, these potential hazards would be mitigated through Mitigation Measures HAZ-1 through HAZ-9. With inclusion of these measures, potential Project impacts regarding significant hazards from the release of hazardous materials would be reduced to less than significant levels.

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

Less Than Significant with Mitigation Incorporated. The closest school to the Project site is the El Camino Real High School located approximately 0.4 miles northwest of the site. As discussed above, the proposed residential Project is not associated with the transport or use of hazardous materials. However, the past uses and existing buildings and paving on the Project site are associated with RECs. These potential hazards would be mitigated through Mitigation Measures HAZ-1 through HAZ-9. With inclusion of these measures, Project impacts regarding emitting hazardous emissions, materials, substances or waste within one-quarter mile of a school would be reduced to less than significant levels.

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

No Impact. The Phase I and Phase II assessments conducted for the Project site do not identify the Project site as being listed as a hazardous materials site

pursuant to Government Code Section 65962.5. This finding is supported by the state of California Department of Toxic Substances Envirostar website.¹² Consequently, the Project would not create a significant hazard to the public or the environment pursuant to Government Code Section 65962.5.

- e) Would the Project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?

No Impact. Fullerton Municipal Airport is the nearest airport to the City of Placentia and is located approximately 11 miles west of the site. Consequently, the Project would not result in significant impacts related to airport safety hazards.

- f) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant with Mitigation Incorporated. Construction activities associated with future development in the City could temporarily impact street traffic adjacent to the proposed development site during the construction phase due to roadway improvements and potential extension of construction activities into the right-of-way. This could reduce the number of lanes or temporarily close certain street segments. Any such impacts would be limited to the construction period and would affect only adjacent streets or intersections. With implementation of construction traffic plan, temporary street closures would not affect emergency access in the vicinity of future developments, and potential impacts would be less than significant. Mitigation Measure HAZ-10 is added to require a construction traffic plan. Consequently, with implementation of Mitigation Measure HAZ-10, the Project would not impair implementation or interfere with the City's emergency response or evacuation plans.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project site is neither within nor adjacent to a designated wildland area and would not, therefore, be exposed to the potential for wildland

**

¹²<http://www.envirostar.dtsc.ca.gov/public/mapfull.asp?global>; accessed January 29, 2018.

fire. The City of Placentia Fire and Life Safety Department will provide fire protection and would respond to fire and/or emergency situations occurring in the project area, including the subject site. Consequently, the Project would not expose people or structure to a significant risk from wildland fires.

6.9.2 CUMULATIVE IMPACTS

The Project could disturb hazardous materials that were used during the past agricultural uses and when the existing buildings and paving on the Project site were constructed. Mitigation Measures HAZ-1 through HAZ-9 are added to the Project to reduce potential impacts related to hazardous materials to less than significant levels. In addition, Mitigation Measure HAZ-10 is added to require a construction traffic control plan to ensure emergency access routes are not obstructed. As a result, no significant cumulative impacts relative to hazards or hazardous materials will be associated with the proposed Project implementation.

6.9.3 MITIGATION MEASURES

The following measures will be required to mitigate potential Project impacts related to hazards or hazardous materials to less than significant levels:

Mitigation Measure HAZ-1: **Radon.**

Timing: Prior to Issuance of Building Permits.

Department Responsible: Development Services.

Prior to issuance of any building permit for the Project, the Applicant shall demonstrate that buildings have been designed with positive ventilation to reduce the potential for radon accumulation. The U.S. EPA recommends that positive ventilation and the absence of basements or subsurface parking reduces the risk of Radon accumulations and exposure.

Mitigation Measure HAZ-2: **Lead-Based Paint (LBP).**

Timing: Prior to Issuance of Demolition Permits.

Department Responsible: Development Services.

Prior to issuance of any demolition permit for the Project, the Applicant shall demonstrate that the existing onsite structures haven been surveyed for LBP, and that any identified LBP have been prior to activities with the potential to disturb painted surfaces, in accordance with all applicable laws.

Mitigation Measure HAZ-3: **Asbestos Containing Materials (ACM).**

Timing: Prior to Issuance of Demolition Permits.

Department Responsible: Development Services.

Prior to issuance of any demolition permit for the Project, the Applicant shall demonstrate that the existing onsite structures haven been surveyed for ACM.

The survey shall include sampling of suspect ACM which shall be collected for laboratory analysis of asbestos in order to determine the need for compliance with EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations. All ACM shall be removed from the site prior to activities with the potential to disturb affected surfaces, in accordance with all applicable laws.

Mitigation Measure HAZ-4: Recognized Environmental Conditions - Total petroleum hydrocarbons (TPH).

Timing: Prior to Issuance of Building Permits.

Department Responsible: Development Services / Public Works.

Prior to issuance of any building permit for the Project, the Applicant shall demonstrate that the following measure has been completed and the site is cleared of this Recognized Environmental Conditions (RECs) subject to City Development Services Director and City Engineer review and approval: Approximately 670 cubic yards (1,000 tons) of soils will be excavated and disposed of offsite to remediate the TPH-impacted soil to levels acceptable for the residential use. Following the completion of the remedial excavations, a remedy completion report shall be prepared for DTSC review requesting a no further action letter (NFA) for the property.

Mitigation Measure HAZ-5: Recognized Environmental Conditions – Lead impacted soils.

Timing: Prior to Issuance of Building Permits.

Department Responsible: Development Services / Public Works.

Prior to issuance of any building permit for the Project, the Applicant shall demonstrate that the following measure has been completed and the site is cleared of this Recognized Environmental Conditions (RECs) subject to City Development Services Director and City Engineer review and approval: Approximately 4,500 to 5,000 cubic yards (6,750 to 7,500 tons) of soils will be excavated and disposed of offsite to remediate the lead-impacted soil to levels acceptable for the residential use. Contaminated soils will be transported off site following United States Department of Transportation (DOT) requirements. Trucks transporting the soil will be covered and consistent with SCAQMD dust control measures. Following the completion of the remedial excavations, a remedy completion report would be prepared for DTSC review requesting a no further action letter (NFA) for the property.

Mitigation Measure HAZ-6: Recognized Environmental Conditions – Oil wells.

Timing: Prior to Issuance of Building Permits.

Department Responsible: Development Services/Public Works.

Prior to issuance of any building permit for the Project, the Applicant shall demonstrate that the following measure has been completed and the site is

cleared of this Recognized Environmental Conditions (RECs) subject to City Development Services Director and City Engineer review and approval: All existing and abandoned oil wells on site have completed permitting in accordance with the current standard set forth by California Geologic Energy Management (CalGEM).

Mitigation Measure HAZ-7: Recognized Environmental Conditions – Methane.

Timing: Prior to Issuance of Building Permits.

Department Responsible: Development Services/Public Works.

Prior to issuance of any building permit for the Project, the Applicant shall demonstrate that the following measure has been completed and the site is cleared of this Recognized Environmental Conditions (RECs) subject to City Development Services Director and City Engineer review and approval: A site-wide methane survey will be conducted under the City of Placentia Fire and Life Safety Department oversight and at a minimum the following will be implemented:

- a. All abandoned onsite oil wells within 25 feet of any structure or within 25 feet from a continuous hardscape that covers an abandoned well will need to be vented;
- b. Subslab passive venting systems will need to be installed below all proposed buildings within 25 feet of any well or within 25 feet from a continuous hardscape that covers an abandoned well.

Mitigation Measure HAZ-8: Recognized Environmental Conditions – Geophysical survey.

Timing: Prior to Issuance of Building Permits.

Department Responsible: Development Services/Public Works.

Prior to issuance of any building permit for the Project, the Applicant shall demonstrate that the following measure has been completed and the site is cleared of this Recognized Environmental Conditions (RECs) subject to City Development Services Director and City Engineer review and approval: A comprehensive site-wide geophysical survey of the site has been performed after removal of the site obstructions to identify if abandoned and/or active infrastructure is in-place on the site that could be avoided in connection with redevelopment activities.

Mitigation Measure HAZ-9: Recognized Environmental Conditions – Soil Management Plan.

Timing: Prior to Issuance of Building Permits.

Department Responsible: Development Services/Public Works.

Prior to issuance of any building permit for the Project, the Applicant shall demonstrate that the following measure has been completed and the site is

cleared of this Recognized Environmental Conditions (RECs) subject to City Development Services Director and City Engineer review and approval: A Soil Management Plan has been prepared for the site that can be followed should unknown materials or contamination be encountered during redevelopment.

Mitigation Measure HAZ-10 Traffic Control Plan.

Timing: Prior to Issuance of Grading Permits.

Department Responsible: Public Works.

Prior to any grading or construction activities, the Applicant shall be prepare a construction traffic control plan for review and approval by the City Engineer to ensure emergency access routes are not obstructed.

6.10 HYDROLOGY AND WATER QUALITY

HYDROLOGY AND WATER QUALITY. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in a substantial erosion or siltation on- or off-site;				X
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				X
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				X

HYDROLOGY AND WATER QUALITY. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
iv) Impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

6.10.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. Pursuant to the federal Water Pollution Control Act, also known as the Clean Water Act (CWA) and the National Pollution Discharge Elimination System (NPDES), new developments in the City are required to include the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for the construction phase of a project, and a Water Quality Management Plan (WQMP) for the operation phase of a project. The City of Placentia is in the jurisdictional area of the Santa Ana Regional Water Quality Control Board (RWQCB). WQMP requirements within the RWQCB were further clarified by the County of Orange Drainage Area Management Plan (DAMP) which requires the preparation and implementation of WQMPs for development projects. Consistent with the DAMP, the Applicant has submitted for City review and approval a Preliminary Water Quality Management Plan (Project WQMP) for the proposed Project.¹³ The City has reviewed the Project WQMP and has found it to be acceptable

**

¹³ City of Placentia, County of Orange/Santa Ana Region Priority Project Preliminary Water Quality Management Plan (WQMP) for Van Buren & Orangethorpe Residential”, prepared by C&V Engineers; contained as Appendix G of this Initial Study.

As described in the Project WQMP (Appendix G of this Initial Study), the existing site is generally flat and drains southwards toward the Atwood Channel. As part of the Project improvements, a local storm drain system would be provided that would collect and convey stormwater runoff to an underground catch basin and infiltration system near the southwest corner of the site for treatment and retention. Primary overflow from the infiltration system would be conveyed to the existing City 24" storm drain which discharges to Atwood Channel. The Project WQMP finds that there would be no hydrologic conditions of concern from the site. The Project would also be required to submit a SWPPP for City Engineer review and approval prior to construction. The required preparation and implementation of the SWPPP and WQMP would reduce potential Project violations of water quality standards and waste discharge requirements to less than significant levels.

- b) Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. The Project **Well Installation and Sampling Report** identifies groundwater depth at the Project site at a depth of approximately 60-66 feet below the existing ground surface. Existing site conditions contain about 22% impervious ground cover. With development, the Project would contain about 85% impervious ground cover. As presented in the Project WQMP, the Project would install a system to capture and filter stormwater underground without depleting or interfering with groundwater levels. Consequently, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge.

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

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

No Impact. There are no streams or rivers in the vicinity of the Project site. The site is currently developed with buildings, paving and auto wrecking facilities. As described in Section 6.10.a, above, the existing site is generally flat and drains southwards toward the Atwood Channel. As part of the Project improvements, a local storm drain system would be provided that would collect stormwater runoff in an underground catch basin and infiltration system near the southwest corner of the site for treatment and retention. Primary overflow from the infiltration system would be conveyed to the existing City 24" storm drain which discharges

to Atwood Channel. Consequently, no Project impacts would occur relative to substantial alteration of the existing drainage pattern of the site or area or substantial erosion.

- ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

No Impact. As discussed in Section 6.10.c.i, above, the Project would retain the existing drainage flow and filter the runoff water in compliance with the Project WQMP. Filtered stormwater runoff from the Project would then be conveyed to the existing City 24" storm drain which discharges to the Atwood Channel. Consequently, the Project would not increase the rate of surface runoff in a manner that would result in any flooding.

- iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No Impact. As discussed above, the Project would retain the existing drainage flow and filter the runoff water in compliance with the Project WQMP. Filtered stormwater runoff from the Project would then be conveyed to the existing City 24" storm drain which discharges to the Atwood Channel. Consequently, the Project would exceed capacity of existing stormwater drainage systems or add polluted runoff.

- iv) Impede or redirect flood flows?

No Impact. Despite the Project proposal to raise the site elevation approximately 3 feet to result in 248 feet amsl, Project drainage would be consistent with historical flow patterns with site flowing from east to west, ultimately discharging through existing pipe connection to channel. Post development, as discussed in Section 6.10.c.i, above, the Project would retain and filter the existing drainage flow and then convey primary overflow to the existing City 24" storm drain which discharges to the Atwood Channel. Consequently, the Project would not impede or redirect flood flows or exceed capacity of existing stormwater drainage systems or add polluted runoff.

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

No Impact. The Environmental Site Assessment for the Project reports that the Project site Property is located at approximately 245 feet above mean sea level (amsl) and groundwater in the vicinity at approximately 60-66 feet below ground

surface. At this amsl, portions of the Project site are within a 100-year flood hazard area. As part of the Project development, the Applicant proposes to raise the site elevation approximately 3 feet to result in 248 feet amsl which would be outside the flood hazard area. As discussed in Section 2.8, raising of the site would require approximately 24,500 cubic yards of fill, with 23,500 of that amount imported fill, and other remedial grading that would be reviewed further by the City as part of the post entitlement process grading plan review and permit issuance.

A tsunami is a tidal wave or sea wave caused by seismic activity. Placentia is located inland approximately 36 miles from the Pacific Ocean and is not subject to tsunamis. A seiche involves the oscillation of a body of water in an enclosed basin, such as a reservoir, storage tank, or lake. According to the City's General Plan, no enclosed bodies of water are located in the immediate vicinity of the Project site. As discussed in Section 6.9.3 of this Initial Study, Project development would include removal of existing onsite contaminants and soil remediation. Post development pollutants associated with site runoff would be collected and filtered as discussed in Section 6.10.c.i. Consequently, the Project would not result in risk of pollutant release during flood hazard, tsunami or seiche.

- e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. As discussed in Section 6.10.b, above, the Project **Well Installation and Sampling Report** identifies groundwater depth at the Project site at approximately 60-66 feet below the existing ground surface. Existing site conditions contain about 22% impervious ground cover. With development, the Project would contain about 85% impervious ground cover. As presented in the Project WQMP, the Project would install a system to capture and filter stormwater underground without adversely affecting water quality or groundwater levels. Consequently, the Project would not conflict with or obstruct implementation of a water quality control or groundwater management plan.

6.10.2 CUMULATIVE IMPACTS

The required preparation and implementation of the SWPPP and WQMP would reduce potential Project impacts to stormwater runoff and water quality. As a result, no significant cumulative impacts relative to hydrology and water quality will be associated with the proposed project's implementation.

6.10.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on hydrology or water quality. As a result, no mitigation is required.

6.11 LAND USE AND PLANNING

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

6.11.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

a) Would the Project physically divide an established community?

No Impact. The Project site was most recently used by an auto wrecking facility, which is no longer operating. Existing equipment on the site includes a variety of structures used for the auto wrecking operations and vehicles stored prior to crushing. The site also contains two non-producing oil wells and the western terminus of Oak Street which is a private street east of S. Van Buren Street. North of the site are rail lines, then an equipment yard and vacant land, then E. Orangethorpe Avenue and then new multi-family residential. East of the site is S. Van Buren Street then existing single family residential. Existing single family residential also occurs adjacent to the site on the west side of S. Van Buren Street. (Reference Figure 9, Surrounding Land Uses Aerial Map.)

The Project would replace the former auto wrecking facility which is currently in a cluttered and unkept condition with an architecturally cohesive residential townhomes, including landscaping and amenities. Recognizing the reasonable transition of the site to a residential designation, the General Plan which was updated in 2019 changed the land use designation of the site from Industrial to High Density Residential. The Project would be compatible with the High Density Residential land use designation and with existing single family residential communities east of the site and north across E. Orangethorpe Avenue. Consequently, the Project would not physically divide an established community.

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

No Impact. The Project requires the following entitlements:

- Zone Change No. ZC 2018-01
- Development Plan Review No. DPR 2018-01
- Tentative Tract Map No. TTM 19104.

Zone Change. If approved, the Project would convert the Zoning Map land use designation from M-O Manufacturing and Combining Oil District to R-3 Multiple-Family Residential. Pursuant to Chapter 23.60 of the Code, the purpose of the "O" district is to provide for the use of land or the surface thereof in connection with the removal of minerals, including, but not limited to, oil, gas and other hydrocarbon substances. The current General Plan which was updated in 2019 changed the land use designation of the Project site from Industrial to High Density Residential. The General Plan states that the High Density Residential designation is intended to accommodate multiple family residences with a maximum development of 25 dwelling units per acre, and that the designation is compatible with the High-Density Multi-Family (R-3) zone. ZC 2018-01 has been initiated by the Project Applicant as required by the Code to bring the zoning of the site into alignment with the updated General Plan High Density Residential designation.

ZC 2018-01 will be processed pursuant to Chapter 23.96 of the Code, which requires the Planning Commission to recommend and the City Council to make the following findings:

- (1) The proposed amendment will not be: (A) detrimental to the health, safety or general welfare of the persons residing or working within the neighborhood of the proposed amendment or within the city, or (B) injurious to property or improvements within the neighborhood or within the city;
- (2) The proposed amendment will be consistent with the latest adopted General Plan.

As discussed in Section 6.9 of this Initial Study, the Project includes the removal and remediation of on-site oil wells. Other potential hazardous materials on site associated with past uses and existing structures would be removed and rebated through the Project. These Project clean-up activities would remove potential conditions detrimental to health, safety or general welfare.

Table 8, below, identifies the General Plan Land Use Element policies relevant to the Project and the Project’s consistency with the policies. As summarized in the Table, the Project is consistent with the applicable goals and policies of the Placentia General Plan Land Use Element. Consequently, the Project meets the required findings of Chapter 23.96: (1) The Project would not be detrimental to the health, safety or general welfare, or injurious to persons or property; (2) The Project would be consistent with the General Plan.

Table 8: General Plan (Land Use Element) Consistency Analysis		
Policy No.	Land Use Element Policy	Consistency Assessment
Goal LU-1: Provide a well-balanced land use pattern that accommodates existing and future needs for housing, commercial, industrial and open space/recreation uses, while providing adequate community services to City residents.		
1.1	Preserve single-family neighborhoods in Placentia, which provide support for the city’s commercial and industrial uses.	Consistent: The Project will convert the industrial site into a cohesively designed single-family attached residential community. It will help preserve and enhance the existing single family neighborhoods east and west of the site.
1.2	Allow for a variety of residential infill opportunities including single family, multi-family, mixed-use, manufactured housing, and mobile homes, in designated areas to satisfy regional housing needs.	Consistent: The Project will convert the industrial site into a cohesively designed single-family attached residential community. Its residential character and density is consistent with the General Plan Land Use Map designation for the site.
1.8	Monitor and amend ordinances periodically to provide incentives for the development of workforce housing, affordable housing, and mixed-use multi-family housing.	Consistent: The General Plan states that the High Density Residential designation is intended to accommodate multiple family residences with a maximum development of 25 dwelling units per acre, and that the designation is compatible with the High-Density Multi-Family (R-3) zone. ZC 2018-01 has been initiated by the Project Applicant as required by the Code to bring the zoning of the site into alignment with the updated General Plan High Density Residential designation.
Goal LU-2: Ensure that new development is compatible with surrounding land uses, the circulation network, and existing development constraints.		
2.4	Large, contiguous vacant or underutilized parcels should be comprehensively planned for development to be compatible with adjacent neighborhoods.	Consistent: The 5.56-acre site is currently underutilized as a former auto-wrecking facility. The Project will convert the industrial site into a cohesively designed single-family attached residential community. Its residential character and density is consistent with the General Plan Land Use Map designation for the site and would be compatible with existing residential neighborhoods east and west of the site.

Table 8: General Plan (Land Use Element) Consistency Analysis

Policy No.	Land Use Element Policy	Consistency Assessment
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.	Consistent: The Project proposes landscaped setbacks on each side of the site, creating a buffer from railroad tracks north of the site and the channel and existing industrial type use south of the site.
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.	Consistent: The Project is a new multifamily development and would provide landscaped buffers on all sides. Masonry walls would be provided to reduce noise impacts from the adjacent rail line.
2.10	Encourage non-conforming uses and buildings to be brought into compliance with City codes.	Consistent: The Project will change the zoning designation of the site to R-3 consistent with the updated General Plan designation of High Density Residential, and would develop the site in accordance with the High Density Residential designation.
2.15	Work with Placentia Fire and Life Safety Department (PFLSD) to ensure adequate monitoring of those uses that utilize hazardous materials to avoid industrial accidents, chemical spills, fires, and explosions.	Consistent: The Project includes the clean-up and remediation of the site from past oil operations. All clean up and remediation will be done in accordance with City, regional and state requirements.
2.21	Ensure development provides adequate infrastructure improvements are provided to support new multi-family development, including on-site recreational amenities.	Consistent: The Project proposes on-site infrastructure improvements to support the new residential development. Each unit within the development would have private patio/balcony space and would share common recreational amenities including a dog-park and recreation area.
Goal LU-4: Ensure that new development minimizes the impacts on the natural environment including the natural landscape, vegetation, air and water resources.		
4.1	Require all new development to adhere to the standards of the Low Impact Development (LID) guidance.	Consistent: As part of the Project development plan, a preliminary WQMP has been prepared which has been reviewed and approved by the City. The Project would comply with SWPPP and DAMP requirements as discussed in Section 6.10 of this Initial Study.

Table 8: General Plan (Land Use Element) Consistency Analysis

Policy No.	Land Use Element Policy	Consistency Assessment
4.2	Require all new development to minimize impervious surfaces wherever feasible.	Consistent: As discussed within the Project WQMP (Appendix G), the development would minimize impervious surfaces wherever feasible.
4.6	Ensure that all new development adheres to the Water Quality Management best practices and approved plans beginning at the grading stage of construction.	Consistent: As discussed within Section 6.10 of this Initial Study, the Project would comply with SWPPP requirements to control runoff during the construction process.
Goal LU-5: Improve urban design in Placentia to ensure that development is both architecturally attractive and functionally compatible and to create identifiable neighborhoods, and community areas.		
5.1	Encourage development projects to utilize high quality design for architecture and site planning through the City's design review process. Create Design Guidelines for focused areas and for development Citywide.	Consistent: The Project will convert the industrial site into a cohesively designed single-family attached residential community consistent with the General Plan land use designation for the site and compatible with residential uses east and west of the site.
5.4	Ensure compatible design with sensitive building massing and proportion.	Consistent: The Project will convert the industrial site into a cohesively designed single-family attached residential community consistent with the General Plan land use designation for the site and compatible with residential uses east and west of the site.

Development Plan Review. The Project also includes a Development Plan Review (DPR). Approval of the Project DPR will require the Planning Commission to find and the City Council to concur that the Project meets or exceeds the provisions of Chapter 23.21 "R-3" High Density Multiple Family District, and the following findings pursuant to Chapter 23.75 of the Code:

- (1) The project meets or exceeds the criteria established in Section 23.75.020;
- (2) There have been attached any other conditions necessary to prevent:
 - (A) detriment to the health, safety or general welfare of the persons residing or working within the neighborhood of the proposed development or within the city, or
 - (B) injurious to the property or improvements within the neighborhood or within the city, and;

- (3) The proposed development will be consistent with the latest adopted general plan; and
- (4) Conditions necessary to secure the purposes of this section, including guarantees and evidence of compliance with conditions, are made part of the development approval.

Finding 1, above, requires the Project to meet or exceed development standards listed in Section 23.75.020 of the Code. Through the City entitlement, Project compliance with building setback and height, landscape, circulation, landscaping and lighting standards, and police and fire protection requirements will be evaluated. In this manner, the Project is expected to comply with the listed standards, including the development standards for the R-3 zone.

Chapter 23.21 "R-3 High Density Multiple-Family District" establishes standards for use, setbacks, parking, lot coverage, minimum site area and building separation. The Project meets each of these standards as summarized below:

- Townhomes are a permitted use in the R-3 zone.
- Required R-3 zone setbacks are 15 feet front, 5 feet side, 10 feet street side and rear. As discussed in Section 2.8 of this Initial Study, with the site's three-sided shape, the townhome buildings would be setback from adjacent property lines 180 feet from the front at Van Buren Street, and 5 feet from the sides at railroad to the north and channel to the south. Where the Project site is intersected by the two existing residential properties that front on Van Buren Street, the townhome buildings would be set back a minimum of 27 feet from the rear of the existing residential properties.
- Required R-3 zone maximum building height is 35 feet, measured at average roof height. As proposed, the Project 6-unit townhome buildings would be 35'2" in height at its highest point, but below 35 feet at average roof height. The 8-unit townhome buildings would be a maximum of 36'8" in height, but below 35 feet at average roof height.
- Required R-3 zone parking is 215 spaces which the Project proposes to meet with a total of 299 parking spaces.
- Maximum required lot coverage is 60%. Lot coverage for the Project includes buildings, parking areas, patios and driveways, and totals 141,177 square feet (3.24 acres), comprising 58.2% of the site below the required maximum.

- Minimum site area in the R-3 zone is 9,000 square feet for a corner lot and 8,000 square feet for an interior lot. Because of the site's unusual location bordered on the north by railroad tracks and the south by a channel, it is neither a corner lot nor interior lot as described in the Code. However, with a site size of approximately 5.6 acres (5.57 acres or 242,629 square feet), the Project meets the minimum site area.
- Required minimum distances between buildings in the R-3 zone are 20 feet for double row dwelling buildings, 12 feet for single row dwelling group and 10 feet between all other buildings. The Project site plan would meet these minimum distance separations.

As discussed above under "Zone Change", the Project would remove and remediate on-site oil wells and would bring the site zoning and use into compliance with the General Plan High Density Residential designation for the site. The City entitlement process as well as mitigation measures recommended through this Initial Study will ensure appropriate conditions are made part of the Project development approval. Consequently, the Project meets the required findings of Chapter 23.75: (1) The Project meets the applicable development standards; (2) The Project would not be detrimental to the health, safety or general welfare, or injurious to persons or property; (3) The Project would be consistent with the General Plan; (4) The Project would comply with necessary conditions.

Tentative Tract Map. The Project also includes a Tentative Tract Map to subdivide the site for condominium purposes. Pursuant to Chapter 22.72 of the Code, a Tentative Tract Map is required to ensure that subdivision of property promotes the public health, safety, convenience and general welfare. Approval of the Project TTM will require the Planning Commission to make and the City Council to concur with the following findings:

- (1) The subdivision is consistent with the adopted general plan and any specific plans;
- (2) The design or improvement is consistent with the general plan and any specific plans;
- (3) The site is physically suitable for the proposed type and/or density of development;
- (4) The design or improvements are not likely to cause substantial environmental damage;
- (5) The design or type of improvement is not likely to cause serious public health problems;

- (6) The design or type of improvement will not conflict with easements of record, or established by judgment, acquired by the public at large for access through or use of property within the proposed subdivision or if an easement conflict exists, alternate easements which are substantially equivalent will be provided;
- (7) The subdivision is in conformity with the provisions of this title.

As presented in this Initial Study, the Project is consistent with the General Plan; would comply with applicable development standards; the Project would remove and remediate existing on-site oil wells; and through City entitlement process as well as mitigation measures recommended through this Initial Study, Project design, improvements and subdivision will conform to City Municipal and Building Code requirements. Consequently, the Project meets the above seven required findings of Chapter 22.72, and there would be no Project conflicts with an applicable land use plan, policy or regulation.

6.11.2 CUMULATIVE IMPACTS

Converting the Project site to a residential could encourage adjacent commercial or manufacturing properties to similarly convert. However, each proposed General Plan Land Use Map and Zoning Map amendment would be subject to its own review including review under CEQA. Consequently, cumulative impacts relative to land use and planning would be less than significant.

6.11.3 MITIGATION MEASURES

The analysis determined that the proposed Project would not result in any significant adverse impacts regarding land use and planning. Consequently, no mitigation is required.

6.12 MINERAL RESOURCES

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

6.12.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

Less Than Significant Impact. Oil production operations are known to have occurred on the site since at least 1929. As discussed in Section 6.9 of this Initial Study, CalGEM maps and files indicate that there are two oil wells on site, one that was abandoned in 1959 and one that is an idle well that still has pumping equipment mounted over it. The idle oil well is located in the northeast corner of the site and the abandoned oil well is documented to have existed in the central portion of the site. Because both wells are non-producing, the Project's proposal to remove, clean-up and remediate the wells would not affect oil production.

Similarly, because the wells are non-productive and generally inconsistent with the existing residential uses east and north of the site, the Project proposal to permanently remove to remove the "O" designation from the site would not result in a significant regional or statewide loss of a mineral resource. Consequently, Project impacts relative to the loss of a known mineral resource would be less than significant.

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

Less Than Significant Impact. Oil production is not identified as a locally important mineral in the City General Plan. Consequently, the Project would not result in the loss of a locally important mineral resource recovery site.

6.12.3 CUMULATIVE IMPACTS

The analysis determined that the proposed Project would not result in any significant adverse impacts to mineral resources. Consequently, no significant adverse cumulative impacts to mineral resources would occur as a result of the project.

6.12.4 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on mineral resources. As a result, no mitigation is required.

6.13 NOISE

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

6.13.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

Data presented in this Noise section is based on the "Updated Noise Impact Analysis Van Buren and Orangethorpe, City of Placentia, California" (Noise Impact Analysis), prepared by Giroux & Associates, contained as Appendix D.

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

Less Than Significant with Mitigation Incorporated. **Noise Measurements:** Since the human ear is not equally sensitive to all sound frequencies within the entire auditory spectrum, human response is factored into sound descriptions by

weighting sounds within the range of maximum human sensitivity more heavily in a process called "A-weighting," written as dB(A). Any further reference in this discussion to decibels written as "dB" should be understood to be A-weighted. Time variations in noise exposure are typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called LEQ), or alternately, as a statistical description of the sound pressure level that is exceeded over some fraction of a given observation period.

Typical human hearing can detect changes in sound levels of approximately 3 dBA under normal conditions. Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is discernable to most people in an exterior environment while a change of 10 dBA is perceived as a doubling (or halving) of the noise. Because people are generally more sensitive to unwanted noise intrusion during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Ldn (day-night) or the Community Noise Equivalent Level (CNEL). The CNEL metric has gradually replaced the Ldn factor, but the two descriptors are essentially identical.

Noise Standards: A noise level of 65 dB is the level at which ambient noise begins to interfere with one's ability to carry on a normal conversation at reasonable separation without raising one's voice. A noise exposure of 65 dB CNEL is typically recommended as the exterior noise land use compatibility guideline for new residential dwellings in California. CNEL-based standards generally apply to usable outdoor recreational space at backyards, patios or balconies. Interior exposures of noise-sensitive uses are controlled through adequate structural attenuation.

An interior CNEL of 45 dB is mandated by the State of California Noise Insulation Standards (CCR, Title 24, Part 6, Section T25-28) for multiple family dwellings and hotel and motel rooms. In 1988, the State Building Standards Commission expanded that standard to include all habitable rooms in any residential use, included single-family dwelling units. Since normal noise attenuation within residential structures with closed windows is 25-30 dB, an exterior noise exposure of 70-75 dB CNEL allows the interior standard to be met without any specialized structural attenuation (dual paned windows, etc.), but with closed windows and fresh air supply systems or air conditioning in order to maintain a comfortable living environment.

Noise ordinance limits generally apply to "stationary" sources such as mechanical equipment or vehicles operating on private property. The City of Placentia noise standards are presented in Table 9. Applicable noise standards must be met at

the nearest residential property line. For residential use, the noise standard is 55 dB Leq daytime and 50 dB Leq nighttime.

In accordance with Section 23.81.170 of the Placentia Municipal Code, construction related activities are exempt from noise regulations provided the activities take place during the hours of 7 a.m. to 7 p.m. Monday through Friday and 9:00 a.m. to 6:00 p.m. on Saturday. No construction activities are allowed on Sundays or federal holidays. Since the project will not create noise generating operational activities, the noise standards were not used for project evaluation and are presented for informational purposes only.

Table 9: City of Placentia Residential Noise Standards		
Noise Zone	Noise Level	Time Period
Residential	55 dB(A)	7:00 a.m.--10:00 p.m.
	50 dB(A)	10:00 p.m.--7:00 a.m.
Commercial	65 dB(A)	Anytime
Industrial	70 dB(A)	Anytime

Baseline Noise: The Project site is affected by train activity on the two rail lines along the northern boundary. (Reference Figure 10. Rail Line Locations.) The nearest rail line carries freight and is operated by Burlington Northern (BNSF). This rail line is only minimally used and is within 50 feet of the entire site’s northern boundary. The more heavily utilized lines are operated by Metrolink and located farther north and range from 100 feet distance from the closest property line on the east side of the site to 250 feet on the west side of the site. Metrolink rail lines handle commuter rail and freight trains. Based on recent train schedules 14 Metrolink trains traverse the line each day. No precise numbers of daily freight trains were available.

Train noise nuisance is exacerbated by the required use of train horns for safety near at-grade crossings. The Van Buren crossing is a “quiet zone” where horns are not used except in an emergency. Of the two rail operators, freight rail noise is the more dominant, though a less frequent, noise source. Although the noise metric used to address train noise is a CNEL or a daily average, the single event noise intrusion potential from a nearby train is high.

Figure 10. Rail Line Locations



To determine existing noise levels in the Project area, Giroux & Associates conducted baseline noise measurements from two meters at the locations shown in Figure 11. Meter 1 was located on the northeastern site perimeter and captures both train noise as well as traffic noise from E. Orangethorpe Avenue. Along the northern site perimeter, to the east, the rail line is very close to the site; about 100 feet from the track centerline. Traveling west the distance separation becomes progressively larger so that readings at Meter 1 would presumably be much higher than at Meter 2. Meter 2 is approximately 350 feet from the main Metrolink track centerline.

Noise measurements were taken from the two meter locations to document existing baseline levels in the area, particularly train noise along the adjacent rail line to serve as a basis to determine noise exposure from ambient noise activities upon the proposed project. Long term (24-hour) noise measurements were conducted on Thursday, August 17 to Friday August 18, 2017, at the two on-site locations. The monitoring results from the two meters are shown in Table 10.

Meter 1 was sited approximately 100 feet from the railway centerline and the observed noise level was 74 dB CNEL. This is the maximum recorded noise level at

the property line. Meter 2 has a greater separation and as a result, the observed noise levels at this location were lower, about 69 dB CNEL.

Because CNEL is a weighted 24-hour noise metric, it is the average noise levels that are primarily evaluated. Given that noise levels may vary by location due to use of bells and distance to busy roadways, the above values are considered consistent and are considered to provide an accurate characterization of the existing acoustic baseline. From this data, the Noise Impact Analysis assesses baseline noise levels in proximity to the railroad tracks and identifies required mitigation that could be necessary to meet the City of Placentia recommended noise compatibility guidelines for usable outdoor space and possibly for habitable rooms close to the railroad track.

Figure 11. Noise Monitoring Locations

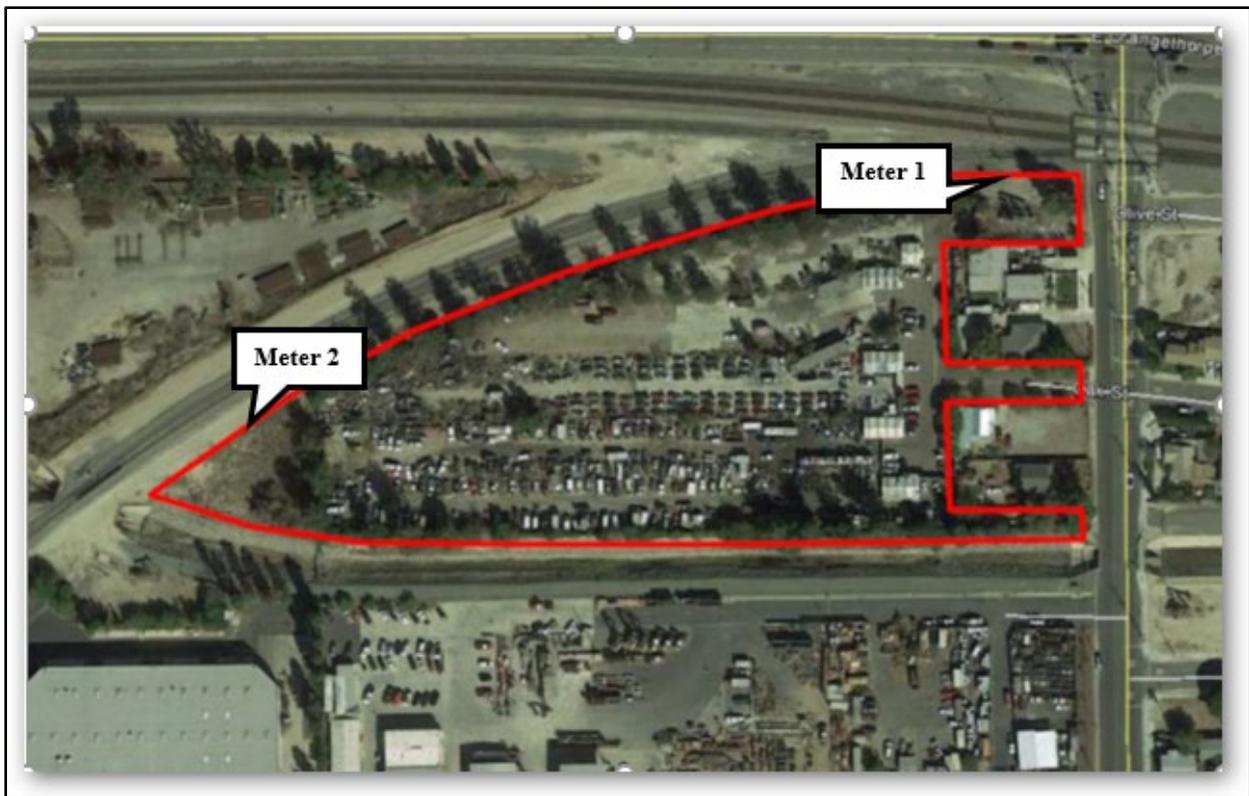


Table 10: Noise Level Measurements¹		
Time Interval	Leqs Meter 1	Leqs Meter 2
13:00-14:00	66.4	64.5
14:00-15:00	66.0	54.5
15:00-16:00	67.4	61.2
16:00-17:00	66.8	62.2
17:00-18:00	68.1	62.1
18:00-19:00	65.9	54.8
19:00-20:00	71.0	73.9
20:00-21:00	68.6	66.4
21:00-22:00	65.5	52.8
22:00-23:00	66.6	55.3
23:00-24:00	70.5	58.9
0:00-1:00	64.3	53.5
1:00-2:00	67.7	64.3
2:00-3:00	68.7	67.1
3:00-4:00	64.3	53
4:00-5:00	68.3	58.6
5:00-6:00	66.8	55.8
6:00-7:00	62.2	52.3
7:00-8:00	63.1	52.2
8:00-9:00	67.4	64.9
9:00-10:00	54.0	48.3
10:00-11:00	64.0	63.3
11:00-12:00	64.0	53.9
12:00-13:00	66.8	53.2
CNEL	73.9	69.4

¹ The Leq represents the equivalent sound level and is the numeric value of a constant level that over the given period of time transmits the same amount of acoustic energy as the actual time-varying sound level.

On-Site Impacts - Operational Noise - Exterior: As shown in Table 10, the northeastern portion of the property closest to the Metrolink lines has a maximum noise level of 74 dB CNEL. It will be desirable to meet the 65 dB CNEL typically recommended as the exterior noise land use compatibility guideline for new residential dwellings in California. For the Project, this means achieving a 65 dB CNEL within the common open space areas located throughout the site.

The Noise Impact Analysis determined that recreational space may slightly exceed the City's noise standard for outdoor uses. However, inclusion of an 8-foot CMU wall on the north boundary of the site adjacent to the rail lines would provide an extra measure of sound attenuation to ensure acceptable noise levels for recreational use.

Operational Noise – Interior: The requirement for habitable interior space is a noise level less than 45 dB CNEL. Standard requirements of the CBC include acoustical upgrades capable of reducing interior noise to 45 dB CNEL, such as:

- All facades must be constructed with substantial weight and insulation;
- Sound-rated windows providing noise reduction performance similar to that of the façade must be included for habitable rooms; a minimum sound reduction of 30 dB sound transmission class (STC) is required for all north-facing windows; a more upgraded set of windows on upstairs units directly abutting the northern site perimeter rated at STC = 33 or higher is recommended to reduce single event noise from late night train passages in upstairs bedrooms;
- Sound-rated doors or storm doors providing noise reduction performance similar to that of the façade must be included for all exterior entries;
- Acoustic baffling of vents is required for chimneys, fans and gable ends;
- Installation of a mechanical ventilation system affording comfort under closed window conditions is required.

Interior noise levels at the proposed residential units closest to the tracks will be reduced to the 45 dB CNEL interior standard for habitable rooms by standard construction practice with closed windows. However, single event noise from trains may be intrusive even if the interior standard is met. To reduce intrusive train noise, the Noise Impact Analysis recommends locating non-habitable rooms (kitchens, baths, hallways, stairwells, etc.) along the building facades directly facing the tracks is suggested. The option to close windows to shut out noise requires the provision of supplemental ventilation. Window upgrades from "standard" to STC=30 or better are recommended to reduce intrusive train noise for habitable rooms for the units closest to the tracks.

The Noise Impact Analysis recommends the following measures to reduce intrusive train noise from the interior of the proposed units:

- All windows throughout the Project will be dual-paned glass and all upstairs living and bedrooms of units abutting the tracks shall be equipped with supplemental ventilation supplying at least 30 CFM of fresh make-up air (Building Code requirement), and
- Upstairs windows of living or bedrooms in units with a line-of-site to the tracks shall be rated at STC=30 or better (single event noise nuisance reduction) with STC = 33 rated windows recommended for upstairs windows directly facing the train tracks.
- Because window closure is a necessary condition to meet the noise standard, the code requires the provision of supplemental ventilation, including a fresh air intake that provides 30 CFM of fresh outside air. In order to not compromise acoustic protection integrity of the HVAC systems, the fresh air inlet shall be located on the building facades away from the track.

On-Site Impacts – Construction Noise: Temporary construction noise impacts vary markedly because the noise strength of construction equipment ranges widely as a function of the equipment used and its activity level. Short-term construction noise impacts tend to occur in discrete phases dominated by large, earth-moving equipment sources for demolition and grading. During construction and paving, equipment is generally less noisy. The closest existing sensitive uses to the Project site are the single family homes to the east. Only paving activities will be adjacent to this area and there is a minimum setback of 100 feet. According to the City of Placentia Municipal Code, permissible hours of construction are 7 a.m. to 7 p.m. Monday through Friday and 9:00 a.m. to 6:00 p.m. on Saturday. Construction is not allowed on Sundays or federal holidays. Adherence to this schedule reduces construction noise impacts on adjacent sensitive uses to less than significant levels. However, to further reduce construction noise impacts, the Noise Impact Analysis recommends the following measures:

- All construction and general maintenance activities, except in an emergency, shall be limited to the hours of hours of 7 a.m. to 7 p.m. Monday through Friday and 9:00 a.m. to 6:00 p.m. on Saturday.
- All on-site construction equipment shall have properly operating mufflers.
- All construction staging areas should be located as far away as practical from the nearest homes.

Each of the measures recommended by the Noise Impact study to reduce noise are incorporated as mitigation measures to the Project. These measures include NOI-1 to reduce exterior noise levels, NOI-2 to reduce interior noise levels, and NOI-3 to require additional measures to reduce impacts of Project construction

noise on adjacent residential uses. With inclusion of these mitigation measures, presented below, Project impacts relative to exposure to noise levels in excess of established standards would be reduced to less than significant levels. The operation of the Project itself would generate noise typical of adjacent residential uses and would not exceed established noise standards.

- b) Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated. Vibration is most commonly expressed in terms of the root mean square (RMS) velocity of a vibrating object. RMS velocities are expressed in units of vibration decibels. Although the perceptibility threshold is about 65 VdB, human response to vibration is not usually significant unless the vibration exceeds 70 VdB. The range of vibration decibels (VdB) is as follows:

65 VdB	-	threshold of human perception
72 VdB	-	annoyance due to frequent events
80 VdB	-	annoyance due to infrequent events
94-98 VdB	-	minor cosmetic damage

The United States DOT data estimates vibration levels of 83 VdB at 60 feet from a train traveling at 50 mph. The Metrolink trains typically travel at a typical speed of 30 mph and as a light rail train, produce a lower vibration level of 72 VdB. The Noise Impact Analysis assessed the potential vibration impacts from the adjacent trains on future Project residents. It found that the recommended dual paned windows would reduce vibration levels for second floor residential space but vibration levels from track activities could exceed annoyance level at the ground floor if hard surfaces are used. The Noise Impact Analysis recommends the use of soft materials such as carpet to would ensure vibration levels are below even annoyance thresholds. This recommendation is added as Mitigation Measure NOI-4, below, and would reduce Project impacts relative to ground-borne noise levels to less than significant levels. The structural damage threshold would not be exceeded at any unit. Vibrations generated during Project construction, including excavation and remediation activities, would be short term and required to comply with Mitigation Measure NOI-3, below. Adherence to this mitigation measure would reduce construction generated vibration from the Project to less than significant levels.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. Fullerton Municipal Airport is the nearest airport to the City of Placentia and is located approximately 11 miles west of the site. The site is not located in the airport land use plan area for the Fullerton Municipal Airport. As a result, Project implementation would not expose people to excessive airport noise levels. Consequently, the Project would not result in significant impacts related to exposure to excessive airport related noise levels.

6.13.2 CUMULATIVE IMPACTS

Potential noise impacts associated with the Project location could affect the future residents of the site. These impacts are site specific and not cumulative in nature. Mitigation Measures NOI-1, NOI-2, NOI-3 and NOI-4 are added to the Project to reduce potential noise impacts to Project residents and adjacent properties to less than significant levels. Consequently, no cumulative impacts relative to noise would occur from or to the Project.

6.13.3 MITIGATION MEASURES

The following mitigations will be required to ensure City noise land use compatibility standards are met:

Mitigation Measure NOI-1: Operational Noise - Exterior.

Timing: Prior to Issuance of Building Permits for Design Approval/Prior to Certificate of Occupancy for construction.

Department Responsible: Development Services.

An 8-foot masonry wall shall be constructed at the northern boundary of the Project site adjacent to the existing rail lines. This wall shall reduce exterior noise levels at the common open spaces to 65 dB CNEL. The final location and design of the wall shall be subject to Development Services Director review and approval.

Mitigation Measure NOI-2: Operational Noise – Interior.

Timing: Prior to Issuance of Building Permits for Design Approval/Prior to Certificate of Occupancy for construction.

Department Responsible: Development Services.

The following upgrades shall be incorporated into the building design to reduce interior noise levels to 45 dB CNEL:

- All windows throughout the Project will be dual-paned glass and all upstairs living and bedrooms of units abutting the tracks shall be equipped with supplemental ventilation supplying at least 30 CFM of fresh make-up air (Building Code requirement), and
- Upstairs windows of living or bedrooms in units with a line-of-site to the tracks shall be rated at STC=30 or better (single event noise nuisance reduction) with STC = 33 rated windows recommended for upstairs windows directly facing the train tracks.
- Because window closure is a necessary condition to meet the noise standard, the code requires the provision of supplemental ventilation, including a fresh air intake that provides 30 CFM of fresh outside air. In order to not compromise acoustic protection integrity of the HVAC systems, the fresh air inlet shall be located on the building facades away from the track.

Mitigation Measure NOI-3: Construction Noise.

Timing: During all demolition, grading and construction activities.

Department Responsible: Development Services.

During all demolition, grading and construction activities, the Applicant shall ensure that the following measures are followed:

- All construction and general maintenance activities, except in an emergency, shall be limited to the hours of hours of 7 a.m. to 7 p.m. Monday through Friday and 9:00 a.m. to 6:00 p.m. on Saturday.
- All on-site construction equipment shall have properly operating mufflers.
- All construction staging areas should be located as far away as practical from the nearest homes.

Mitigation Measure NOI-4: Vibration.

Timing: Prior to Issuance of Building Permits for Design Approval/Prior to Certificate of Occupancy for construction.

Department Responsible: Development Services.

Floors of ground level areas that are used for living or sleeping shall be covered with a soft material such as carpet to reduce vibration levels.

6.14 POPULATION AND HOUSING

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

6.14.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Less Than Significant Impact. The Project would amend the Zoning Map land use designation from M-O Manufacturing and Oil Combing District to R-3 Multiple-Family Residential. The Project is consistent with the General Plan Housing Element Goal to develop and maintain housing supply and variety. Assuming an average household size of 3.11 persons¹⁴, the Project would generate 432 additional persons in the City, which represents a 0.83% increase over the City's current 52,333 population. This increase is nominal. As discussed in Section 6.11.2, converting the Project site to a residential could encourage adjacent

**

¹⁴ State of California, Department of Finance, Table 2: E-5 City/County Population and Housing Estimates, 1 May 2019.

commercial or manufacturing properties to similarly convert. However, each proposed General Plan Land Use Map and Zoning Map amendment would be subject to its own review including review under CEQA. Consequently, Project impacts relative to inducement of substantial population growth would be less than significant.

- b) Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is currently occupied by a former auto wrecking facility and there is no housing on the site. Consequently, the Project would not displace existing people or housing.

6.14.2 CUMULATIVE IMPACTS

Converting the Project site to a residential designation could encourage adjacent commercial or manufacturing properties to similarly convert, potentially bringing additional residential population to the Project area. However, each proposed General Plan Land Use Map and Zoning Map amendment would be subject to its own review including review under CEQA. Consequently, cumulative impacts relative to population and housing would be less than significant.

6.14.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on population and housing. As a result, no mitigation is required.

6.15 PUBLIC SERVICES

PUBLIC SERVICES. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?			X	
ii) Police protection?			X	
iii) Schools?			X	
iv) Parks?			X	
v) Other public facilities?			X	

6.15.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

a)i) Fire Protection?

Less Than Significant Impact. Placentia had been a member of the Orange County Fire Authority Joint Powers Authority (OCFA). However, beginning July 2020, City of Placentia Fire and Life Safety Department will provide fire protection to the City of Placentia. City fire stations available to serve the Project site include Fire Station 34 is located at 1530 North Valencia approximately 2.7 miles from the Project site; Fire Station 35 is located at 120

South Bradford approximately 2.6 miles from the Project site. Battalion 2 provides firefighting services at these locations. Services include structural fire protection, emergency medical and rescue services.

The Project would replace a former auto wrecking facility with a new residential development constructed to the latest Building and Fire Codes. The proposed Project site plan has been reviewed and accepted by OCFA and, effective July 1, 2020, the City Fire and Life Safety Department will oversee compliance with the fire codes. Also as previously noted, the Project would increase City population by approximately 432 persons or 0.83% which is a nominal increase. The transition of the site to the proposed residential use is not expected to create increased demands for fire protection services. Consequently, Project impacts relative to new or physically altered fire protection facilities would be less than significant levels.

a)ii) Police Protection?

Less Than Significant Impact. The City of Placentia police protections services are provided by the City Police Department, which is headquartered at 401 East Chapman Avenue. The Project would replace a former auto wrecking facility with a new residential development constructed to the latest Development and Building Codes, including installation of contemporary fencing and exterior lighting. The Project would increase City population by approximately 432 persons or 0.83% which is a nominal increase. The transition of the site to the proposed residential use is not expected to create increased demands for police services. Consequently, Project impacts relative to new or physically altered police protection facilities would be less than significant.

a)iii) Schools?

Less Than Significant Impact. The Placentia-Yorba Linda Unified School District serves the City and the Project site. The district operates 30 schools, including 20 elementary schools (K-6), six middle schools (7-8), and four high schools (9-12). The site is currently located within the attendance area boundaries of Van Buren Elementary School, Kraemer Middle School, and Valencia High School.

The transition of the Project site from an auto wrecking facility to 139 residential townhomes could put new demands on school services. However, per California Government Code (CGC), the Project would be subject to the payment of school impact fees (Section 53080, CGC). As authorized under Section 17620(a) of the California Education Code (CEC) and Section 65995(b) of the CGC, local school districts are authorized to impose and collect school

“impact fees” for all residential and non-residential development activities that occur within their jurisdiction to off-set the additional costs associated with the new students that result directly from the construction of new homes. Payment of school impact fees constitutes full mitigation for the impacts associated with new residential development. Consequently, Project impacts relative to new or physically altered school facilities would be less than significant.

a)iv) Parks?

Less Than Significant Impact. The City of Placentia Community Services Department is responsible for maintaining the parks and recreation facilities within Placentia. The City currently operates and maintains several parks and other recreational facilities that serve the residents of Placentia. Section 22.54.030 of the Placentia Municipal Code requires that 2.5 acres of City parks per 1,000 persons existing within the City be dedicated to local parks. Based on an expected Project population of 432 persons, the Project would create a requirement for 1.08 acre of park. In lieu of land dedication, Title 5, Section 5.02.070 of the Municipal Code, which establishes the in-lieu park fee of \$3,682 per R-3 zoned residential unit. Payment of the park in-lieu fee would off-set the Project’s incremental demand for park facilities. Consequently, Project impacts relative to new or physically altered park facilities would be reduced to less than significant levels.

a)v) Other Public Facilities?

Less Than Significant Impact. Other public facilities include library and general municipal services. The Placentia Library District is responsible for providing library services in the City of Placentia. The Placentia Library is located at 411 East Chapman Avenue. The transition of the Project site from an industrial use to 139 residential townhomes could put new demands on other the library and other public facilities. As indicated previously, the Project would generate 432 additional residents. However, the potential increase in residents in the City is not anticipated to result in significant adverse impacts on the existing library services and facilities and/or other public services provided by the City due to the availability and accessibility of electronic library services, which reduce the need and demand for library facilities. Similarly, other municipal services are typically funded through user fees, property tax or sales tax revenues to which the future Project residents would contribute. Consequently, Project impacts relative to new or physically altered public facilities would be less than significant.

6.15.2 CUMULATIVE IMPACTS

The analysis determined that the proposed Project would not result in any significant adverse public services impacts subject to payment of park fees. Consequently, the Project would not result in significant adverse cumulative impacts to public services.

6.15.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on public services. As a result, no mitigation is required.

6.16 RECREATION

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

6.16.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

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

Less Than Significant Impact. The City of Placentia Community Services Department provides a variety of parks and recreation facilities in the City, including recreation, sports and senior programs. The transition of the Project site from an industrial facility to 139 residential townhomes could put new demands on recreational services. However, the Project is also proposing common open space within its site plan that consists of 101,534 square feet distributed in five areas. Each area of common open space would provide amenities such as shade structures, lounge seating, fire pit, concrete ping pong table and barbeques. In addition, the Project would be required to pay the applicable park in-lieu fee and park and recreation impact fees pursuant to the Placentia Municipal Code to offset the project's demand for parks and recreational facilities. Payment of the park in-lieu and park and recreation impact fees would off-set the Project's incremental demand for park and recreational facilities. Consequently, Project impacts relative

to substantial physical deterioration of parks or other recreational facilities would be less than significant.

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

Less Than Significant Impact. As discussed previously, the Project includes common open space area totaling 101,534 square feet which includes with a variety of amenities. The potential environmental impacts of these common open spaces are evaluated within this Initial Study and are not found to have a significant effect on the environment. In addition, the Project would be required to pay the applicable park in-lieu fee pursuant to Section 5.02.070 and park and recreation impact fees pursuant to Section 5.02.060 of the Municipal Code to offset the project's demand for parks and recreational facilities. Payment of the park in-lieu fee and park and recreation impact fee would off-set the Project's incremental demand for park and recreational facilities. Consequently, Project impacts relative to construction or expansion of recreational facilities which might have an adverse physical effect on the environment would be less than significant.

6.16.2 CUMULATIVE IMPACTS

The analysis determined that the proposed Project would not result in any significant adverse recreation impacts subject to payment of park fees. Consequently, the Project would not result in significant adverse cumulative impacts to recreation facilities or services.

6.16.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts on recreation. As a result, no mitigation is required.

6.17 TRANSPORTATION

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

6.17.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

Data presented in this Transportation/Traffic section is based on the "Van Buren & Orangethorpe Residential Development Traffic Impact Study, City of Placentia, California", (Traffic Impact Study) prepared by RK Engineering Group Inc., contained as Appendix B to this Initial Study; and "South Van Buren Street / East Orangethorpe Avenue Residential Development Vehicle Miles Traveled Analysis, City of Placentia", prepared by RK Engineering Group, Inc., July 24, 2020 contained as Appendix H to this Initial Study.

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

No Impact. Transit Facilities. Transit is available to the City from Orange County Transportation Authority (OCTA) with Route 30 providing service to the Project area between Cerritos and Anaheim Hills via Orangethorpe Avenue. OCTA Route

38 servicing Lakewood to Anaheim Hills via La Palma Avenue has a stop approximately 0.6 miles from the site at intersection of Van Buren/La Palma. In addition, OCTA Route 71 provides service from Yorba Linda to Balboa via Rose Drive/Tustin Avenue, Redhill Avenue and Newport Boulevard. All of these routes provide service in the vicinity of the Project.

An existing Metrolink rail line is located just north of the Project site. Currently, the nearest Metrolink station for Placentia residents is located in Fullerton, about 6.5 miles east of the Project site. Plans for a new Placentia Metrolink station are currently underway with an anticipated opening in 2023. This station will be located at S. Melrose Street and W. Crowther Avenue about 2.6 miles east of the Project site.

Table 11, Multimodal Transportation Facilities in the Project Area, below, identifies existing transit facilities near the Project site. With the site’s proximity to existing and planned transit, there will be ample transit available to future Project residents, and the Project would not conflict with circulation or mobility plans related to transit.

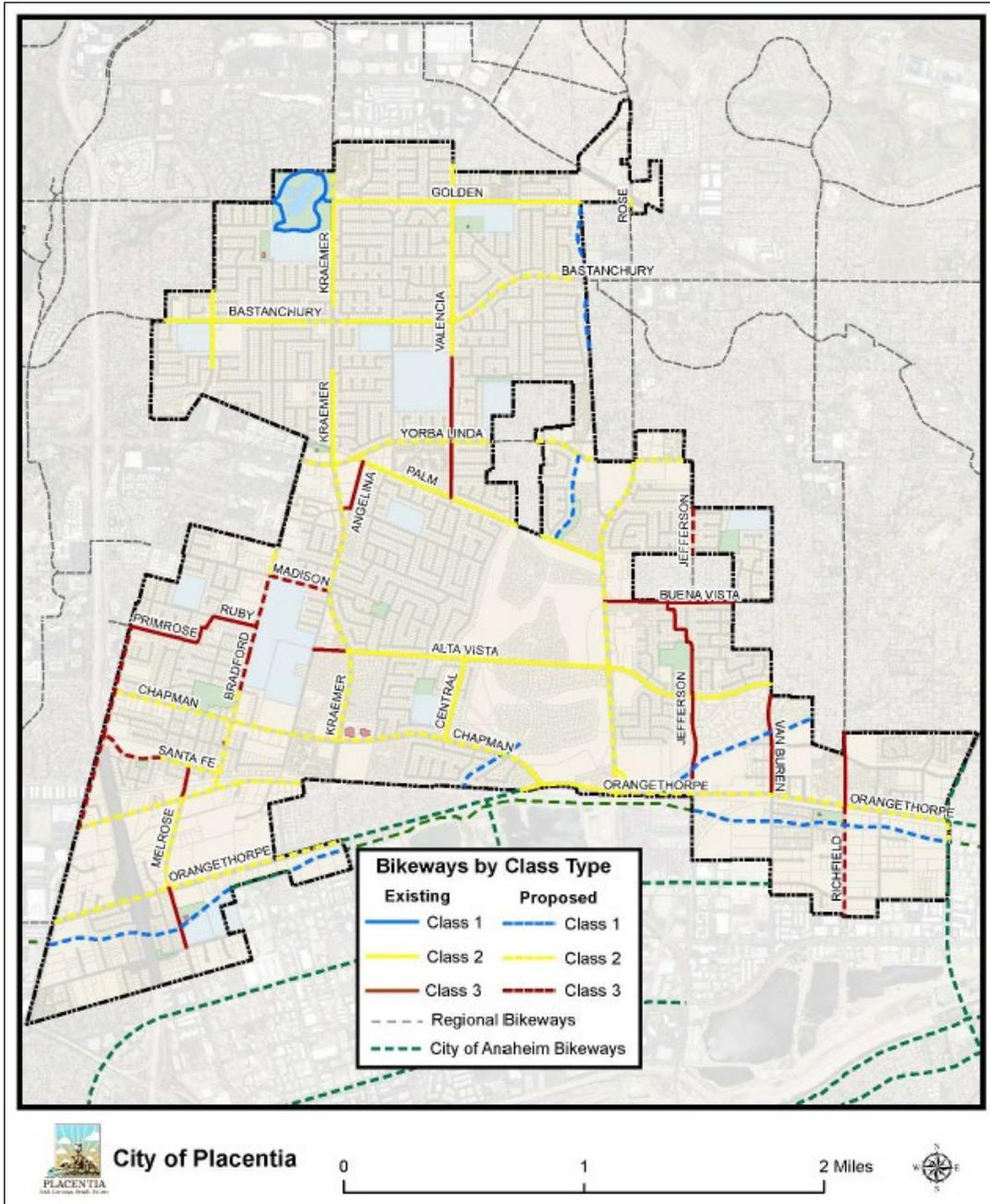
Table 11: Multimodal Transportation Facilities in Project Area	
Facility	Proximity to Project
<i>Transit Services</i>	
OCTA Bus Route 30	Less than 500 feet (Van Buren / Orangethorpe)
OCTA Bus Route 38	~0.6 miles (Van Buren / La Palma)
OCTA Bus Route 71	~0.6 miles (Tustin / Orangethorpe)
Metrolink Anaheim Canyon Station - Inland Empire-Orange County Line	~1.0 miles
Metrolink Placentia Station (future) 91/Perris Valley Line	~2.6 miles
<i>Bikeways</i>	
Orangethorpe Avenue – Class II (Proposed)	Less than 500 feet
OCFCD Atwood Channel – Class I (Proposed)	Less than 500 feet
Miraloma Avenue (w/o Van Buren) - Class II	~0.3 miles
Santa Ana River Trail – Class I	~1.25 miles

Bicycle and Pedestrian Facilities. Exhibit 3-4, Existing and Proposed Bike Network, of the General Plan Mobility Element identifies bikeways in the City by type. (Reference Figure 12, below.) An existing Class III bikeway is designated on S. Van Buren Street from just below Alta Vista Street to the north to E. Orangethorpe Avenue to the south, running just north of the Project site. Class III bike routes are signed as bikeways intended to provide continuity to the bikeway system. Typically, Class III bike routes have no designated area for bicyclists as they are shared with motor vehicles on the street. Another existing Class III bikeway is designated on Jefferson Street west of the Project site, running from Buena Vista to Orangethorpe Avenue.

A Class II bikeway is planned along the length of Orangethorpe where it traverses the City. Class II bicycle facilities are signed and striped bicycle lanes located to the right of the vehicle traffic lane along a roadway. Bicycle lanes are typically located along collector and arterial roadways that provide connections through the City street system. A Class I bikeway is planned along the Atwood Channel by the Orange County Flood Control District directly west of the Project site. Class I bike paths are located off roadways, with at-grade or grade-separated roadway crossings. Class I bike paths are paved and do not allow motor vehicle traffic. Class I bike paths are typically located along long uninterrupted corridors such as rivers, creeks, flood control channels, and railroad rights-of-way.

Table 11 identifies existing bikeway facilities near the Project site. The Project proposes sidewalks and pedestrian areas within its site plan. With existing and planned bikeways nearby and sidewalks and pedestrian areas within the proposed site plan, the Project would not conflict with circulation or mobility plans related to bicycle or pedestrian facilities.

Figure 12. City of Placentia Existing and Proposed Bike Network



Roadways. To determine the vehicular traffic impacts on local roadways, the City of Placentia applies level of service (LOS) thresholds, which rate traffic

congestion on a scale from A to F, based on the volume of traffic to the capacity of the roadway (V/C):

A: Free Flow. Traffic flows at or above the posted speed limit and motorists have complete mobility between lanes. (V/C=0-0.60)

B: Reasonably Free Flow. LOS A speeds are maintained, maneuverability within the traffic stream is slightly restricted. (V/C=0.61-0.70)

C: Stable Flow, at or near free flow. Ability to maneuver through lanes is noticeably restricted and lane changes require more driver awareness. (V/C=0.71-0.80)

D: approaching Unstable Flow. Speeds slightly decrease as traffic volume slightly increase. Freedom to maneuver within the traffic stream is much more limited and driver comfort levels decrease. (V/C=0.81-0.90)

E: Unstable Flow, Operating At Capacity. Flow becomes irregular and speed varies rapidly because there are virtually no usable gaps to maneuver in the traffic stream and speeds rarely reach the posted limit. (V/C=0.91-100)

F: Forced or Breakdown Flow. Every vehicle moves in lockstep with the vehicle in front of it, with frequent slowing required. Travel time cannot be predicted, with generally more demand than capacity. The road is in a constant traffic jam. (V/C>1.00)

In the City of Placentia, traffic flow is considered acceptable if it moves at LOS D or better. Any intersection operating at a LOS E or LOS F will be considered deficient and will be considered impacted and would require mitigation to achieve acceptable operations when any of the following changes in the volume to capacity (V/C) ratios occur between the "without Project" and the "with Project":

<u>Pre-Project LOS</u>	<u>Pre-Project V/C</u>	<u>Project V/C Increase</u>
C	0.71 – 0.80	0.04 or more
D	0.81 – 0.90	0.02 or more
E/F	0.91 or more	0.01 or more

Project Traffic: For the Project, the Traffic Impact Study evaluated both Project construction trips and Project operational trips.

Construction Traffic: Project construction would consist of demolition, site remediation and preparation, grading, building, paving and coatings. As discussed in the Traffic Impact Study, these construction activities would generate a total of 714 total truck and vehicle trips. These trips are short term and intermittent during the duration of the Project construction and would not result in a significant impact. However to reduce the short term congestion caused by Project construction traffic, the Traffic Study recommends a series

of measures which are incorporated in Mitigation Measure TR-1, presented below.

Operational Traffic: Project traffic impacts by analyzing traffic levels on the following intersections which were selected by the City Traffic Engineer:

North-South Street

1. S. Van Buren Street
2. S. Van Buren Street
3. S. Van Buren Street
4. S. Van Buren Street

East-West Street

- E. Orangethorpe Avenue
- Olive Street
- Oak Street
- Miraloma Avenue

For each of these intersections, the Traffic Impact Study evaluated the following scenarios:

- Existing Conditions;
- Existing Plus Project Conditions;
- Existing Plus Ambient Growth (2020) Conditions;
- Existing Plus Ambient Growth (2020) Plus Project Conditions;
- Existing Plus Ambient Growth (2020) Plus Cumulative Projects Conditions;
and
- Existing Plus Ambient Growth (2020) Plus Cumulative Projects
Plus Project Conditions.

The Traffic Impact Study estimated Project traffic based on the Institute of Traffic Engineers (ITE) 10th Edition Traffic Planning Handbook, and subtracted traffic from the existing uses on the Project site from the proposed uses. Based on this analysis, the Project is forecast to generate approximately 832 net daily trips which include approximately 52 net AM peak hour trip and approximately 64 net PM peak hour trips. The Traffic Impact Study applied the net Project trips to existing conditions at the four studied intersections. Existing conditions are based on traffic counts taken in February 2018 for all the study intersections with the exception of the Van Buren Street/Orangethorpe Avenue for which the traffic counts were provided by the City staff for use in the analysis.

As shown in Table 12, under existing conditions, all of the four intersections listed were found to operate at LOS A or B during AM and PM peak hours. Adding the Project to existing conditions, the intersection traffic levels would remain unchanged, with the exception of S. Van Buren and Miraloma during the PM when peak hour traffic would increase from LOS B under existing conditions to LOS C under with Project conditions. A LOS C represents a stable flow of traffic and is not a significant increase.

Table 12: Existing Plus Project Traffic Level Conditions												
Intersection	Existing Conditions				Existing Plus Project Conditions				Change in V/C		Significant Impact?	
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM		
	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS				
S. Van Buren / E. Orangethorpe Ave	0.611	B	0.624	B	0.618	B	0.632	B	0.007	0.008	No	
S. Van Buren / Olive	-	A	-	A	-	A	-	A	0.1	0.0	No	
S. Van Buren / Oak	-	B	-	B	-	B	-	B	0.7	0.4	No	
S. Van Buren / Miraloma	-	B	-	B	-	B	-	C	0.2	0.7	No	

The Traffic Impact Study also assessed year 2020 conditions by adding an ambient growth rate of 2% to existing traffic levels, and then compared the 2020 ambient growth conditions to a plus Project condition. As shown in Table 13, traffic levels S. Van Buren and Miraloma during the PM would be LOS C without. The Project would have nominal effect on 2020 ambient growth traffic conditions and would not affect LOS at any of the four studied intersections, including S. Van Buren and Miraloma. The Project would not have a significant impact on year 2020 traffic conditions inclusive of ambient growth.

Table 13: Existing Plus Ambient Growth (2020) And Plus Project Conditions Traffic Level Conditions												
Intersection	Existing Conditions Plus Ambient Growth				Existing Plus Ambient Growth Plus Project Conditions				Change in V/C		Significant Impact?	
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM		
	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS				
S. Van Buren / E. Orangethorpe Ave	0.619	B	0.633	B	0.626	B	0.641	B	0.007	0.008	No	
S. Van Buren / Olive	-	A	-	A	-	A	-	A	0.1	0.0	No	
S. Van Buren / Oak	-	B	-	B	-	B	-	B	0.8	0.5	No	
S. Van Buren / Miraloma	-	B	-	C	-	B	-	C	0.3	0.8	No	

The Traffic Impact Study also assessed year 2020 ambient growth conditions and added cumulative projects planned in the surrounding area, and then compared the 2020 ambient growth plus cumulative projects to a plus Project condition. As shown in Table 14, the Project would have nominal effect on 2020 ambient growth plus cumulative traffic conditions and would not affect LOS at any of the four studied intersections. The Project would not have a significant impact on cumulative year 2020 traffic conditions.

Table 14: Existing Plus Ambient Growth (2020) Plus Cumulative Projects Plus Project Conditions Traffic Volumes											
Intersection	Existing Conditions Plus Ambient Growth Plus Cumulative Projects				Existing Plus Ambient Growth Plus Cumulative Plus Project Conditions				Change in V/C		Significant Impact?
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM	PM	
	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS	V/C ³ Ratio	LOS			
S. Van Buren / E. Orangethorpe Ave	0.624	B	0.638	B	0.631	B	0.646	B	0.007	0.008	No
S. Van Buren / Olive	-	A	-	A	-	A	-	A	0.1	0.1	No
S. Van Buren / Oak	-	B	-	B	-	B	-	B	0.8	0.4	No
S. Van Buren / Miraloma	-	B	-	C	-	B	-	C	0.4	0.7	No

Consequently, the Project would not conflict with applicable plans or policies relative to circulation or mobility.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant. In response to Senate Bill (SB) 743, the California Natural Resource Agency certified and adopted new CEQA Guidelines in December 2018 which now identify Vehicle Miles Traveled (VMT) as the most appropriate metric to evaluate a project's transportation impact under CEQA Guidelines Section 15064.3. Subsection b of the Section 15064.3 established the criteria for analyzing VMT transportation impacts, including criteria for: land use projects, transportation projects and qualitative analysis. Regarding the use of qualitative analysis, subsection b notes that if existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project's VMT qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc.

The City of Placentia is still in the process of adopting criteria for evaluating VMT impacts under CEQA, including the preferred analysis methodology and thresholds of significance. Consistent with Section 15064.3 (b) of the CEQA Guidelines, noted

above, the VMT Analysis for the Project followed the qualitative analysis criteria. (Reference Appendix H.)

The Project VMT Analysis follows the methodology and significance criteria described in Section 21099 of the Public Resources Code and the California Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR Advisory), including:

- a. Reducing greenhouse gas emissions
- b. Development of diversifying land uses
- c. Promoting multimodal transportation.

a. Reducing Greenhouse Gas (GHG) Emissions: GHG emissions have been quantified and analyzed in the Project Air Quality Study (Appendix A) and are discussed in Section 6.8 of this Initial Study. Mobile source GHG emissions generated by the Project would generate approximately 1,386.32 metric tons of carbon dioxide equivalent (CO₂e) annually from VMT, which are below the applicable threshold of significance for GHG. This demonstrates that the Project's contribution to VMT, which is directly correlated to GHG emissions, would not lead to a significant impact under CEQA. Also, as discussed in Section 6.8, above, the Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Therefore, Project VMT would not contribute to a significant impact to GHG.

b. Development of Diversifying Land Uses: Section 21099 of the California Public Resources Code states that the criteria for determining the significance of transportation impacts must promote a diversity of land uses. The California Air Pollution Control Officers Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures, August 2010 report recognizes that by diversifying land uses, such as providing more housing and increasing density, land use development can achieve up to 30% reduction in VMT. Increased densities affect the distance people travel and provide greater options for the mode of travel they choose. The Transportation Research Board (TRB) Special Report 298 literature suggests that doubling neighborhood density across a metropolitan area might lower household VMT by about 5 to 12 percent.

The Project would increase the allowable zoning to R-3, High Density Multiple-Family, and as a result, the project would increase the population density of the site as compared to the existing surrounding neighborhood. Therefore, as a result of the increased housing diversity and density, the Project would help to reduce

VMT compared to a single use low density development, such as the former industrial use. Per the CEQA Guidelines, if the Project results in a decrease in VMT in the project area compared to existing conditions, then it should be presumed to have a less than significant transportation impact.

c. Promote Multimodal Transportation: The Project will promote multimodal transportation by locating near several different transit lines and bicycle routes. Table 11, above, lists existing and proposed transit and bikeways near the Project site. As discussed in Section 6.17.a, above, with existing and planned transit and bikeways nearby, there will be ample multimodal facilities available to future Project residents. Therefore, the Project would promote multimodal transportation and may be presumed to have a less than significant transportation impact.

The Project meets each of the criteria outlined above: (a) reducing greenhouse gas emissions; (b) development of diversifying land uses; and (c) promoting multimodal transportation. In addition, the Project would provide the following transportation demand management (TDM) strategies and design features to help further reduce single occupancy vehicle trips and decrease vehicle miles traveled:

- a. Electric vehicle charging spaces will be provided, per California Building Standards requirements.
- b. On-site and off-site pedestrian connections will be provided to serve the project site.

Consequently, based on the Project VMT Analysis, Project impacts to VMT would be less than significant, and the Project complies with State CEQA Guidelines Section 15064.3, subdivision (b).

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

Less Than Significant with Mitigation Incorporated. Although the Project would not result in a significant impact traffic levels on City streets, the Traffic Impact Study recommended the following measures to improve Project vehicular ingress and egress:

- Sight distance at all Project access points should be reviewed with respect to City of Placentia sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

- Provide appropriate signage and pavement markings at the project site driveways, including stop bars and stop signs and restrict project access through clear signage and other means.

These measures are incorporated as Mitigation Measures TR-2 and TR-3. With inclusion of these mitigations, the Project would not substantially increase hazards due to a design feature.

d) Result in inadequate emergency access?

No Impact. Primary access to the Project site will be provided via proposed full-access driveway from Oak Street, a private street, to South Van Buren Street. As Project site plan has been reviewed and accepted by City Development Service and Engineering Department staff and the City Fire and Life Safety Department staff. As part of the City Fire and Life Safety Department's review of the Project, their staff considered the ability of their equipment and vehicles to adequately access the site and provide fire protection services. Consequently, the Project would not result in inadequate emergency access.

6.17.3 CUMULATIVE IMPACTS

The analysis determined that the proposed Project, including proposed cumulative projects, would not result in any significant adverse transportation or traffic impacts subject to conditions. Consequently, no significant adverse cumulative transportation or traffic impacts would result from the project.

6.17.4 MITIGATION MEASURES

The following mitigation measures are required to ensure internal circulation, project entry and roadway circulation system continue to operate in an efficient, effective, and safe manner.

Mitigation Measure TR-1: **Construction Traffic.**

Timing: During Project construction.

Department Responsible: Public Works.

As part of its Traffic Control Plan (Mitigation Measure HAZ-10), the Applicant shall direct and monitor Project construction crews to ensure the following measures are implemented:

- Promote use of car-pool and can pool by the construction workers.
- Reduce inbound and outbound construction trips during the weekday peak traffic periods of between 7:00 AM to 9:00 AM to maintain 52 or less (inbound and outbound combined) AM trips per hour.

- Reduce inbound and outbound construction trips during the weekday peak traffic periods of between 4:00 PM to 6:00 PM to maintain 64 or less (inbound and outbound combined) PM trips per hour.
- Provide unrestricted access to schools for school buses;
- Avoid delays to transported students resulted by truck and construction traffic.
- Avoid adverse impacts on school buses' on-time performance and passenger safety resulting from changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops during and after construction.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Haul routes should not pass by any school, except when school is not in session.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

Mitigation Measure TR-2: Site Access.

Timing: Prior to Issuance of Grading Permits.

Department Responsible: Public Works.

Prior to issuance of grading plans, the Applicant shall submit for Engineering Department review and approval site access plans demonstrating that the sight distance at all Project access points is adequate and complies with City standards.

Mitigation Measure TR-3: Signage and Striping.

Timing: Prior to Issuance of Certificate of Occupancy.

Department Responsible: Public Works.

Prior to issuance of a certificate of occupancy, the Applicant shall demonstrate that appropriate signage and pavement markings at the Project site driveways, including stop bars and stop signs and restrict project access through clear signage and other means have been installed subject to Public Works Department review and approval.

6.18 TRIBAL CULTURAL RESOURCES

TRIBAL CULTURAL RESOURCES.				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or		X		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

6.18.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 6.5.a, above, the Project site does not contain historical resources. However the SCCIC survey prepared for the site recommends that an archaeological monitor be retained to monitor ground-disturbing activities. (Reference Appendix C.) Mitigation Measure CUL-1 presented in Section 6.5.a provide for monitoring should archaeological resources be encountered. With inclusion of this measure, potential impacts relative to historical archaeological resources would be reduced to less than significant levels.

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

Less Than Significant Impact with Mitigation Incorporated. California Public Resources Code § 21080.3.1 and Assembly Bill (AB) 52 established a process to assess tribal cultural resources through consultation with the Native American tribal representatives. Pursuant to these requirements, on March 12, 2018 the City of Placentia sent letters to the two tribal representatives that have requested consultation: Andrew Salas, Chairman for Gabrieleño Band of Mission Indians/Kizh Nation, and Joyce Stanfield Perry, Tribal Manager for the Juaneño Band of Mission Indians - Acjachemen Nation. In a letter dated March 19, 2018, Chairman Andrew Salas responded to the City's letter requesting consultation.¹⁵ A consultation with

**

¹⁵ Letter from Andrew Salas, Chairman of Gabrieleño Band of Mission Indians/Kizh Nation, to Andrew Gonzales, Senior Manager, City of Placentia, dated March 18, 2018; available at City of Placentia available at City of Placentia Development Services offices.

Chairman Salas was subsequently conducted via a conference call on April 12, 2018. During the consultation, Chairman Salas summarized his tribal history in the region and in the recent tribal resource finds within the region. To ensure any possible tribal resources are properly identified, Chairman Salas requested that mitigation be added to the Project requiring a Native American monitor during grading activities. This request for mitigation is incorporated in Mitigation Measure TCR-1, below. In addition, Mitigation Measure CUL-2 (Section 6.5.3) addresses the potential for discovery of human remains if determined to be prehistoric, requiring notification of the NAHC and determination and notification most likely descendant (MLD). Ms. Stanfield Perry did not respond to the City's letter requesting consultation nor a subsequent email by City staff reminding her of the consultation request. The statutory 30-day consultation period ended and the City has determined Ms. Stanfield Perry's nonresponse as abandonment for consultation. Consequently with inclusion of Mitigation Measures CUL-2 and TCR-1, potential impacts to tribal resources would be reduced to less than significant levels.

6.18.2 CUMULATIVE IMPACTS

Mitigation Measure TRC-1 is added to the Project to protect potential tribal resources that could be found on site during excavation activities. Further Mitigation Measure CUL-2 presented in Section 6.5.3 of this Initial Study would reduce potential impacts to potential tribal remains. By reducing on site impacts to less than significant levels, cumulative impacts relative to tribal resources would also be reduced to less than significant levels.

6.18.3 MITIGATION MEASURES

The following measure will be required to mitigate potential Project impacts related to tribal resources to less than significant levels:

Mitigation Measure TRC-1: Native American Monitoring.

Timing: Prior to Issuance of Grading Permits.

Department Responsible: Development Services.

Prior to any grading or construction activities, the Applicant shall retain representative(s) of Gabrieleño heritage to perform Native American monitoring of excavation activities. If prehistoric tribal resources are recovered, all interested tribal groups shall have input in regard to treatment and all materials will be reburied on site at a location deep enough not to be disturbed in the future. If requested by the City, a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology must also be contacted immediately to evaluate the find and determine compliance with California Public Resources Code § 21080.3.1 and

Assembly Bill (AB) 52. (Reference Mitigation Measure CUL-1). Native American monitoring shall cease when ground disturbance activities are completed, or sooner if the Native American monitor indicates that the site has a low potential for Native American resources. During monitoring, the tribal representative shall complete monitoring logs on a daily basis. The tribal representative document his/her findings according to accepted protocols and provide that documentation to the City Development Services Director upon completion monitoring activities.

6.19 UTILITIES AND SERVICE SYSTEMS

UTILITIES AND SERVICE SYSTEMS. Would the project:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		X		
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?		X		
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?		X		
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

6.19.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact with Mitigation Incorporated. The Project is an infill development that would connect to existing utility connections currently available to the site. Redevelopment of the site from an industrial use to a high density residential use was considered as part of the 2019 General Plan and General Plan EIR. As discussed in Section 4.20.2.3 of the General Plan EIR, utility requirements for the redevelopment of the Project site are analyzed along with other redevelopment areas proposed through the General Plan. Redevelopment of the Project would be required to comply with General Plan goals and policies, and applicable General Plan EIR mitigation measures including utility mitigations WW-1, WW-2 and WW-3, which are applied to the Project as measures UTL-1, UTL-2 and UTL-3 below. Consequently with inclusion of these measures, potential adverse impacts relative to relocation of new or expanded utilities would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 4.20.3.5 of the General Plan EIR, the City of Placentia receives direct water service from the Yorba Linda Water District (YLWD) and the Golden State Water Company (GSWC). Water supplied is a blend of ground water and imported water. Both water service providers prepare Urban Water Master Plans (UWMPs) that include demand forecasts and supply reliability forecasts for normal, dry and multiple year dry conditions. The YLWD 2015 UMWP predicts 100 percent reliability for normal year and single dry year demands from 2020 through 2040.

Redevelopment of the site from an industrial use to a high density residential use was considered as part of the 2019 General Plan and General Plan EIR. Redevelopment of the Project would be required to comply with General Plan goals and policies, and applicable General Plan EIR mitigation measures including water mitigations WW-1, WW-2, WW-3 and WW-4, which are applied to the Project as measures UTL-4, UTL-5, and UTL-6 below. Consequently with inclusion of these measures, potential adverse impacts relative to water supplies would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 6.19.a., above, the Project is an infill development that would connect to existing utility connections currently available to the site. Redevelopment of the site from an industrial use to a high density residential use was considered as part of the 2019 General Plan and General Plan EIR. As discussed in Section 4.20.2.3 of the General Plan EIR, wastewater requirements for the redevelopment of the Project site are analyzed along with other redevelopment areas proposed through the General Plan.

Orange County Sanitation District (OCSD) is a public agency that provides wastewater collection, treatment, and disposal services to the City of Placentia as well as other areas within the County. OCSD has two operating facilities (Wastewater Treatment Plants (WWTP) or Water Reclamation Facilities (WRF)) with a combined capacity of 332 million gallons per day (MGD) that treat an average daily flow of 184 MGD of wastewater from residential, commercial and industrial sources. During peak flow events, wastewater flows can be shifted between plants to meet changing flow conditions. As discussed in the General Plan EIR, the OCSD 2017 Facilities Master Plan concluded that due to lower population projections and less wastewater flows than were forecast in the 2009 Facilities Master Plan, wastewater flow capacity is not the driving factor for the OCSD capital improvement program, but rather replacement and rehabilitation of OCSD's aging infrastructure and maximizing resource recovery are OCSD's facilities planning challenges.

Redevelopment of the Project would be required to comply with General Plan goals and policies, and applicable General Plan EIR mitigation measures including wastewater mitigations WW-1, WW-2 and WW-3, which are applied to the Project as measures UTL-1, UTL-2 and UTL-3 below. Consequently with inclusion of these measures, potential adverse impacts relative to wastewater treatment capacity would be less than significant.

- d) Would the Project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. As discussed in Section 4.20.4.2 of the General Plan EIR, trash collected from the City is disposed at several landfills throughout the State, though the majority (about 96.8%) of the City's solid waste was disposed at the Olinda Alpha Landfill. The balance of the City's solid waste is disposed at the Azusa Land Reclamation Landfill, the Commerce Refuse-to-Energy Facility, the El Sobrante Landfill, the Frank R. Bowerman Sanitary Landfill and the Prima Deshecha Landfill.

The State of California has established 50 percent as the minimum waste reduction rate for all cities. However, the goal has been updated to divert 75% (previously 50%) of California's waste stream away from the landfill and instead towards recycling by the year 2020. The City of Placentia is considered to be in compliance with the State's target disposal rates for both residential and employment generated solid waste.

As discussed in the General Plan EIR, buildout associated with implementation of the proposed General Plan would increase the volume of solid waste generated in the City that is diverted to existing landfills, which would contribute to the acceleration of the landfill closures or possibly the use of landfills at a greater distance from the City. The closure dates for the various landfills range from 2021 until 2102. However, through the combination of the remaining capacities at the landfills, adequate capacity would be available to accommodate the buildout of the proposed General Plan, which includes redevelopment of the Project site to high density residential. Redevelopment of the Project would be required to comply with General Plan goals and policies, including Conservation Element goals and policies that address opportunities to reduce solid waste generation and disposal within the City.

Additionally, as discussed in the General Plan EIR, future developments resulting from the implementation of the General Plan would be reviewed on a project-by-project basis to ensure that solid waste disposal services and landfill facilities would be available to serve the development. As part of the entitlement process for the Project, it would be conditioned to comply with federal, state, and local statutes and regulations related to solid waste. Consequently, the Project would be consistent with the General Plan and would result in less than significant impacts relative to solid waste capacity and regulations.

- e) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. As discussed above, the Project would be required to comply with General Plan Conservation Element goals and policies with require conformity with federal, state and local regulations related to solid waste.

Consequently, Project impacts relative to compliance with solid waste regulations would be less than significant.

6.19.2 CUMULATIVE IMPACTS

Mitigation Measures UTL-1 through UTL-6 are added to the Project to ensure adequate wastewater and water capacity. The Project also would be consistent with General Plan goals and policies, which together with the mitigation measures, would reduce Project impacts related to utilities and service systems to less than significant levels. By reducing Project impacts to less than significant levels, cumulative impacts relative to utilities and service systems would also be reduced to less than significant levels.

6.19.3 MITIGATION MEASURES

The following measures will be required to mitigate potential Project impacts related to utilities and service systems to less than significant levels:

Mitigation Measure UTL-1: Utilities/Wastewater.

Timing: Prior to Issuance of Occupancy Permits.

Department Responsible: Public Works.

Prior to issuance of a wastewater permit for any future development project, the Project Applicant shall pay applicable connection and/or user fees to the appropriate sewer service provider.

Mitigation Measure UTL-2: Utilities/Wastewater.

Timing: Prior to Issuance of Building Permits for Design Approval/Prior to Certificate of Occupancy Permits.

Department Responsible: Public Works.

Prior to issuance of a building permit, the Project Applicant shall prepare an engineering study to support the adequacy of the sewer collection system and submit the engineering study to the City Engineer for review and approval. Any improvements recommended in the engineering study shall be installed prior to the certificate of occupancy for the development project.

Mitigation Measure UTL-3: Utilities/Wastewater.

Timing: Prior to Issuance of Building Permits.

Department Responsible: Public Works.

Prior to issuance of a building permit, the Project Applicant shall provide evidence that the transmission and treatment plant capacity to accept sewage flows from buildings for which building permits are being requested.

Mitigation Measure UTL-4: Water.

Timing: Prior to Issuance of Grading Permits.

Department Responsible: Public Works.

Project Applicant shall pay applicable connection and/or user fees to the appropriate water service provider.

Mitigation Measure UTL-5: **Water.**

Timing: Prior to Issuance of Building Permits for Design Approval/Prior to Certificate of Occupancy.

Department Responsible: Public Works.

Prior to issuance of a building permit, the Project Applicant shall prepare an engineering study to support the adequacy of the water systems and submit the engineering study to the City Engineer for review and approval. Any improvements recommended in the engineering study shall be installed prior to the certificate of occupancy for the development project.

Mitigation Measure UTL-6: **Water.**

Timing: Prior to Issuance of Building Permits.

Department Responsible: Public Works.

Prior to issuance of a building permit, the Project Applicant shall provide evidence of water supply availability and transmission capacity to service buildings for which building permits are being requested.

6.20 WILDFIRE

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

6.20.1 ANALYSIS OF ENVIRONMENTAL IMPACTS

- a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As discussed in Section 4.21.4 of the General Plan EIR, the City of Placentia is nearly entirely built out, and is near completely urbanized. The General

Plan is intended to improve circulation as the City continues to grow including mobility systems that improve emergency response times. The Safety Element of the General Plan includes goals and policies that encourage updated and improving emergency response procedures. Implementation of the General Plan was found to improve emergency response.

Development of the Project site as high density residential is anticipated in the General Plan. It would be developed consistent with General Plan goals and policies and would replace scattered automotive uses with new buildings constructed to current CBC and Fire Code standards. Consequently, the Project would not substantially impair an adopted emergency response or evacuation plan.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As discussed in Section 4.21.4 of the General Plan EIR, the City of Placentia is relatively flat with hills located on the outskirts of surrounding cities, such as those to the north near Brea. Prevailing winds during the fall wildfire season are generally from the northeast, which could exacerbate fire risk to the City under extreme conditions; however, the wildfire risk in the City is less than significant.

The Project would replace scattered automotive uses with a contemporary development built to current CBC and Fire Code standards. As part of the Project, existing site hazardous materials would be removed and the site would be remediated. Consequently, the Project would not exacerbate wildfire risks.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As discussed in Section 4.21.4 of the General Plan EIR, the City of Placentia is almost completely urbanized. The risk of Wildland-Urban Interface fires in the City is relatively low. According to CAL FIRE's Fire and Resources Assessment Program Fire Hazard Severity Zones map for Orange County map, contained in Figure 4.21-1 of the General Plan EIR, no fire hazard severity zones occur within or in the vicinity of the City of Placentia.

The Project would be located on an infill site surrounded by urban development. Consequently, the Project would not require installation or maintenance of roads, fuel breaks, emergency water sources, power lines or other utilities that could exacerbate fire risk.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. As discussed in Section 4.21.4 of the General Plan EIR, the City is not immediately adjacent to any landforms that could create significant exposure to flooding or landslides. The Project site, as discussed in Section 6.10 of this Initial Study, does contain portions that are within a 100-year flood hazard area. As part of the Project development, the Applicant proposes to raise the site elevation to 248 feet amsl which would be outside the flood hazard area. As discussed in Section 2.8, raising of the site would require approximately 24,500 cubic yards of fill, with 23,500 of that amount imported fill, and other remedial grading that would be reviewed further by the City as part of the post entitlement process grading plan review and permit issuance. In addition, Project construction must comply with the requirements of the approved geotechnical report and CBC. Consequently, compliance with these measures would reduce potential adverse impacts related to flooding or landslides to less than significant levels.

6.20.2 CUMULATIVE IMPACTS

The analysis determined that the proposed Project would not result in any significant adverse impacts relative to wildfire. Consequently, the Project would not result in significant adverse cumulative impacts related to wildfire risks.

6.20.3 MITIGATION MEASURES

The analysis indicated that the implementation of the proposed Project would not result in any significant impacts related to wildfire. As a result, no mitigation is required.

6.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

a) Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare

or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. The Project would not have substantial impacts on special status species, stream habitat, and wildlife dispersal and migration. Furthermore, the Project would not affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. There is potential for inadvertent finds of archaeological and Native American archeological resources during project grading. Potential impacts to Native American resources would be mitigated by Mitigation Measures CUL-1, CUL-2 and TRC-1. With implementation of these mitigation measures, the Project's Mandatory Finding of Significance relative to degrading the quality of the environment would be less significant.

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

Less Than Significant with Mitigation Incorporated. The Project would result in potential significant impacts relative to cultural resources, hazards and hazardous materials, noise, transportation and utilities/service systems. Mitigation measures CUL-1, CUL-2, TRC-1, HAZ-1 to HAZ-10, NOI-1 to NOI-4, TR-1, TR-2 and UTL-1 to ULT-6 are added to the Project to reduce these impacts to less than significant levels. Consequently, with these mitigation measures added, cumulative impacts relative to these environmental areas would also be less than significant. Consequently, the Project's Mandatory Finding of Significance relative to contribution to cumulative impacts would be less than significant with mitigation incorporated.

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

Less Than Significant with Mitigation Incorporated. The Project would result in potential significant impacts relative to hazards and hazardous materials, noise, and transportation. Mitigation measures HAZ-1 through HAZ-10, NOI-1 to NOI-4, TR-1 to TR-3 are added to the Project to reduce these impacts to less than significant levels. Consequently, the Project's Mandatory Finding of Significance relative to a substantial adverse effect on human beings would be less than significant with mitigation incorporated.

SECTION 7.0 – LIST OF PREPARERS

7.1 PREPARATION – ENVIRONMENTAL DOCUMENT

- Joann Lombardo, Comprehensive Planning Services

7.2 PREPARATION - AIR QUALITY / GHG ANALYSIS

- Bryan Estrada, RK Engineering Group, Inc.
- Darshan Shivaiah, Engineering Group, Inc.

7.3 PREPARATION - TRAFFIC ANALYSIS

- Alex Tabrizi, RK Engineering Group, Inc.
- Michael Torres, RK Engineering Group, Inc.

7.4 PREPARATION - NOISE ANALYSIS

- Hans Giroux, Giroux & Associates