Regular Meeting Agenda
February 6, 2024

Placentia City Council
Placentia City Council Acting as Successor Agency to the Placentia Redevelopment Agency
Placentia Industrial Commercial Development Authority
Placentia Public Financing Authority

Mayor Jeremy B. Yamaguchi
District 3

Mayor Pro Tem Kevin Kirwin
District 2

Rhonda Shader
Councilmember
District 1

Ward L. Smith
Councilmember
District 5

Chad P. Wanke
Councilmember
District 4

Robert S. McKinnell
City Clerk

Kevin A. Larson
City Treasurer

Damien R. Arrula
City Administrator

Christian L. Bettenhausen
City Attorney

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

Phone: (714) 993-8117
Fax: (714) 961-0283
Email:
administration@placentia.org
Website: www.placentia.org

Mission Statement

The City Council is committed to keeping Placentia a pleasant place by providing a safe family atmosphere, superior public services and policies that promote the highest standards of community life.

Vision Statement

The City of Placentia will maintain an open, honest, responsive, and innovative government that delivers quality services in a fair and equitable manner while optimizing available resources.

Copies of all agenda materials are available for public review in the Office of the City Clerk, online at www.placentia.org, and at the Placentia Library Reference Desk. Persons who have questions concerning any agenda item may call the City Clerk's Office, (714) 993-8231, to make inquiry concerning the nature of the item described on the agenda.

Procedures for Addressing the Council/Board Members

Any person who wishes to speak regarding an item on the agenda or on a subject within the City's jurisdiction during the "**Oral Communications**" portion of the agenda should fill out a "**Speaker Request Form**" and give it to the City Clerk BEFORE that portion of the agenda is called. Testimony for Public Hearings will only be taken at the time of the hearing. Any person who wishes to speak on a Public Hearing item should fill out a "**Speaker Request Form**" and give it to the City Clerk BEFORE the item is called.

The Council and Board members encourage free expression of all points of view. To allow all persons the opportunity to speak, please keep your remarks brief. If others have already expressed your position, you may simply indicate that you agree with a previous speaker. If appropriate, a spokesperson may present the views of an entire group. To encourage all views, the Council and Board discourage clapping, booing or shouts of approval or disagreement from the audience.

PLEASE SILENCE ALL PAGERS, CELL PHONES, AND OTHER ELECTRONIC EQUIPMENT WHILE COUNCIL AND BOARD MEMBERS ARE IN SESSION.

Special Accommodations

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the City Clerk's Office at (714) 993-8231. Notification 48 hours prior to the meeting will generally enable City Staff to make reasonable arrangements to ensure accessibility.
(28 CFR 35.102.35.104 ADA Title II)

In compliance with California Government Code § 54957.5, any writings or documents provided to a majority of the City Council regarding any item on this agenda that are not exempt from disclosure under the Public Records Act will be made available for public inspection at the City Clerk's Office at City Hall, 401 East Chapman Avenue, Placentia, during normal business hours.

Study Sessions are open to the public and held in the City Council Chambers or City Hall Community Room. Executive Sessions are held in the Council Caucus Room. While the public may be in attendance during oral announcements preceding Executive Sessions, Executive Sessions are not open to the public.

PLACENTIA CITY COUNCIL
PLACENTIA CITY COUNCIL ACTING AS SUCCESSOR AGENCY TO THE PLACENTIA REDEVELOPMENT AGENCY
PLACENTIA INDUSTRIAL COMMERCIAL DEVELOPMENT AUTHORITY
PLACENTIA PUBLIC FINANCING AUTHORITY
REGULAR MEETING AGENDA - CLOSED SESSION
February 6, 2024
5:30 p.m. – City Council Chambers
401 E. Chapman Avenue, Placentia, CA

CALL TO ORDER:

ROLL CALL: Councilmember/Board Member Shader
Councilmember/Board Member Smith
Councilmember/Board Member Wanke
Mayor Pro Tem/Board Vice Chair Kirwin
Mayor/Board Chair Yamaguchi

ORAL COMMUNICATIONS:
At this time, the public may address the City Council and Boards of Directors concerning any items on the Closed Session Agenda only. There is a five (5) minute time limit for each individual addressing the City Council and Boards of Directors.

The City Council and Boards of Directors will recess to the City Council Caucus Room for the purpose of conducting their Closed Session proceedings.

1. Pursuant to Government Code Section 54957(b)(1):
   PUBLIC EMPLOYEE PERFORMANCE EVALUATION
   Title: City Administrator

RECESS: The City Council and Boards of Directors will recess to their 7:00 p.m. Regular Meeting.

PLACENTIA CITY COUNCIL
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PLACENTIA INDUSTRIAL COMMERCIAL DEVELOPMENT AUTHORITY
PLACENTIA PUBLIC FINANCING AUTHORITY
REGULAR MEETING AGENDA
February 6, 2024
7:00 p.m. – City Council Chambers
401 E. Chapman Avenue, Placentia, CA

CALL TO ORDER:

ROLL CALL: Councilmember/Board Member Shader
Councilmember/Board Member Smith
Councilmember/Board Member Wanke
Mayor Pro Tem/Board Vice Chair Kirwin
Mayor/Board Chair Yamaguchi

INVOCATION: Chaplain Tony Mercado

PLEDGE OF ALLEGIANCE: Officer Herman Flores

PRESENTATION:

Placentia Public Safety Communications Center's recognition by The International Academies of Emergency Dispatch as an Accredited Center of Excellence (ACE) for emergency medical dispatching

Recipients: Stefanie Acosta-Reyes, Communications Manager and the Communications Center Dispatching Team
Presenters: Mayor Yamaguchi and Members of the City Council

CLOSED SESSION REPORT:

CITY ADMINISTRATOR REPORT:

ORAL COMMUNICATIONS:
At this time, the public may address the City Council and Boards of Directors concerning any agenda item, which is not a public hearing item, or on matters within the jurisdiction of the City Council and Boards of Directors. There is a five (5) minute time limit for each individual addressing the City Council and Boards of Directors.

CITY COUNCIL/BOARD MEMBER COMMENTS:

1. CONSENT CALENDAR (Items 1.a. through 1.e.):
All items on the Consent Calendar are considered routine and are enacted by one motion approving the recommended action listed on the Agenda. Any Member of the City Council and Boards of Directors or City Administrator may request an item be removed from the Consent Calendar for discussion. All items removed shall be considered immediately following action on the remaining items.

1.a. **Consideration to Waive Reading in Full of all Ordinances and Resolutions**
Fiscal Impact: None
Recommended Action: Approve

1.b. **City Fiscal Year 2023-24 Registers for February 6, 2024**
Check Register
Fiscal Impact: $1,503,968.75
Electronic Disbursement Register
Fiscal Impact: $ 868,334.86
Recommended Action: It is recommended that the City Council:
1) Receive and file

1.c. **Acceptance of Construction Work and Notice of Completion for the 2022-2023 Concrete Repair Project, City Project No. 1302**

Fiscal Impact:

Expense:

$ 97,500.00	Construction Contract (Grigolla)
$ 9,744.00	Approved Change Order No. 1
$ 2,665.50	Balancing Change Order No. 2
$109,909.50	Total Construction Cost
$ 1,617.29	Arborist Inspections (Dudek)
$ 7,740.00	Tree Removals (WCA)
$119,266.79	Total Project Cost

Budget:

$119,723.56	Total FY 22-23 CIP Budget
$119,723.56	Measure U Fund (791302-6740)

Recommended Action: It is recommended that the City Council:

1) Authorize the City Administrator to approve Balancing Contract Change Order No. 2 with Grigolla & Sons Construction Co. Inc, in the amount of $2,665.50; and
2) Accept the work performed by Grigolla & Sons Construction Co. Inc, for construction of the 2022-2023 Concrete Repairs Project, City Project No. 1302 for a grand total amount of $109,909.50; and
3) Authorize the City Administrator to file a Notice of Completion with the Orange County Clerk-Recorder's Office for the Project; and
4) Authorize the City Administrator to release retention funds in accordance with the terms of the contract.

1.d. **Approve Amendment No. 3 to Professional Services Agreement with Totum Corporation for Construction Management and Inspection Services for the Placentia Public Safety Center Project**

Fiscal Impact:

Expense:	$ 470,000	Total Construction Management & Inspection Contract Amount
Available Budget:	$ 1,832,148	Fiscal Year 2023-24 CIP Budget (105213-6850 JL# 229999-6850)

Recommended Action: It is recommended that the City Council:

1) Approve Amendment No. 3 to a professional services agreement with Totum Corp for project construction management and inspection services in the amount of $470,000 and extend the Agreement term an additional two-years to May 18, 2026; and
2) Authorize the City Administrator to approve the agreement in a form approved by the City Attorney.

1.e. **Revise the Defined Contribution Plan for Designated Miscellaneous Employees Participating in the 2.0% at 60 or 2.0% at 62 Retirement Formula under CalPERS**

Fiscal Impact: $35,000 in one lump sum. Ongoing Annual increase of $14,000 for the entire program.

Recommended Action: It is recommended that the City Council:

Approve a revised Defined Contribution Plan administered by Mission Square Retirement Solutions (Mission Square).

2. PUBLIC HEARINGS:

2.a. **Public Hearing Regarding General Plan Amendment No. GPA 2021-02, 2021-2029 Housing Element Update (Amendment to the Adopted 2021-2029 Housing Element to address additional California Department of Housing and Community Development (HCD) Comments)**

Fiscal Impact: None

Recommended Action: It is recommended that the City Council:

1) Open the public hearing concerning General Plan Amendment No. GPA 2021-02; and

2) Receive the Staff report and Staff presentation, and consider all public testimony and Planning Commission recommendations; and
3) Adopt Resolution R-2024-06, a Resolution of the City Council of the City of Placentia, California, finding that adoption of the Housing Element is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Section 15061(b)(3) and approving and adopting General Plan Amendment No. GPA 2021-02, an amendment to the City of Placentia General Plan Housing Element, including any additional revisions required by the California Department of Housing and Community Development (HCD); and
4) Authorize the Director of Development Services or designee to file all documents with the California Department of Housing and Community Development (HCD) on behalf of the City.

2.b. **Public Hearing Regarding General Plan Amendment No. GPA 2023-01, Zone Change No. ZCA 2023-01, and Supplemental Initial Study/Mitigated Negative Declaration No. EA 2023-01 Expanding the City's Existing Transit Oriented Development (TOD) Packing House District Zoning and Land Use Designation to Include Approximately 11.5 Acres Located South of Crowther Avenue and West of South Melrose Street and Approximately Three (3) Acres along Cameron Street South of Crowther Avenue**

Fiscal Impact: Potential for significant increase in annual sustainable revenue (property tax, transient occupancy tax, sales tax) and approximately $8-$10 million in one-time revenue including development impact fees. Infrastructure costs associated with TOD District will be funded by impact fees and annual assessments. No General Fund dollars will be utilized for the proposed District.

Recommended Action: It is recommended that the City Council:

1) Open the Public Hearing concerning General Plan Amendment No. GPA 2023-01 and Zone Change No. ZCA 2023-01; and
2) Receive the Staff Report and consider all Public Testimony; and
3) Close the Public Hearing; and
4) Adopt Resolution No. R-2024-07, a Resolution of the City Council of the City of Placentia, California, adopting Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration of Environmental Impacts for GPA 2023-01 and ZCA 2023-01, prepared in full compliance with the California Environmental Quality Act ("CEQA"), California Public Resources Code §§ 21000, *et seq.*, and the Environmental Guidelines of the City of Placentia; and adopting General Plan Amendment No. GPA 2023-01 to change the current land use designation from Industrial to Transit Oriented Development (TOD) for the approximately 14.5 acre project area; and
5) Waive full reading, by title only, and introduce for first reading Ordinance No. O-2024-01, an Ordinance of the City Council of the City of Placentia, California Approving Zone Change No. ZCA 2023-01, expanding the Transit Oriented Development (TOD) Zone for the approximately 14.5-acre project area.

3. REGULAR AGENDA:

3.a. Verbal Progress Report on Senior Center/Community Center

Recommended Action: It is recommended that the City Council:

1) Receive and file the report and provide policy direction to Staff.

CITY COUNCIL/BOARD MEMBERS REQUESTS:

Council/Board Members may make requests or ask questions of Staff. If a Council/Board Member would like to have formal action taken on a requested matter, it will be placed on a future Council or Board Agenda.

ADJOURNMENT:

The City Council/Successor Agency/ICDA/PPFA Board of Directors will adjourn to a regular City Council meeting on Tuesday, February 20, 2024 at 5:30 p.m.

TENTATIVE AGENDA FORECAST

The Tentative Agenda Forecast is subject to change up until the posting of the Agenda for the Council Meeting listed below:

- NOC: Urban Forest Planting Project
- NOC: Fire Station Roof Replacement Project
- NOC: Public Safety Collaborative
- Mitigation Fee Update
- Amendment to Agreement with HF&H for Waste Handling and SB 1383 Contract Negotiations
- Amendment to Put Option Agreement with Mercy Housing – 325 Baker Street
- Development Agreement and Related Ground Lease Agreement for Mercy Housing
- Update to Policy No. 620 – Streetlights on Arterial Highways
- Second Reading: Ordinance No. O-2024-01, Approving Zone Change No. ZCA 2023-01, expanding the Transit Oriented Development (TOD) project area
- Mid-Year Budget
- Committee and Commission Manual

CERTIFICATION OF POSTING

I, Carole M. Wayman, Deputy City Clerk of the City of Placentia and Assistant Secretary of the Industrial Commercial Development Authority, the Successor Agency, and the Placentia Public Financing Authority hereby certify that the Agenda for the February 6, 2024 meetings of the City Council, Successor Agency, Industrial Commercial Development Authority, and the Placentia Public Financing Authority was posted on February 1, 2024.

_____
Carole M. Wayman
Deputy City Clerk

City of Placentia

Check Register
For 02/06/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
				Grand Total:	1,503,968.75				

Check Totals by ID	
AP	1,503,968.75
EP	0.00
IP	0.00
OP	0.00

Void Total:	0.00
Check Total:	1,503,968.75

Fund Name	Check Totals by Fund
101-General Fund (0010)	777,656.35
117-Measure U Fund (0079)	321,940.35
205-State Gas Tax (0017)	2,911.77
208-Sccssr Agncy Ret Oblg (0054)	49.03
210-Measure M (0018)	10,126.64
211-PEG Fund (0058)	1,888.00
215-Air Quality Management (0019)	2,531.66
231-Placentia Reg Nav Cent(0078)	269,760.81
233-Gen Plan Update Fees (0074)	42,534.38
234-Technology Impact Fees (0075)	173.88
242-Police Impact Fee (0067)	8,425.50
246-TOD Traffic Impact Fees (0070)	560.00
247-TOD Sewer Impact Fees (0071)	27,642.59
248-TOD Strscape Impct Fee (0072)	560.00
249-TOD District CFD (0080)	190.52
265-Landscape Maintenance (0029)	6,276.94
275-Sewer Maintenance (0048)	795.15
280-Misc Grants Fund (0050)	6,354.05
401-City Capital Projects (0033)	7,604.45
501-Refuse Administration (0037)	2,768.25
605-Risk Management (0040)	8,527.58
701-Special Deposits (0044)	4,690.85
Check Total:	1,503,968.75

1.b.
Feb 06, 2024

Funds will be transferred from the Cash Basis Fund as needed to fund the warrants included on this warrant register

City of Placentia
Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
MW OH	ALLSTAR FIRE EQUIPMENT V011950	FIRE FIGHTING FOAM	103066-6301 Special Department Expenses	AP011624	2,325.87	252770		00129809	01/18/2024
				Check Total:	**2,325.87**				
MW OH	AMAZON CAPITAL SERVICES V012336	SR- OFFICE SUPPLIES	101512-6315 Office Supplies	AP011624	282.47	17FF-NQ69-		00129810	01/18/2024
MW OH	AMAZON CAPITAL SERVICES V012336	OFFICE SUPPLIES	102531-6315 Office Supplies	AP011624	52.18	1G6N-QRX-		00129810	01/18/2024
MW OH	AMAZON CAPITAL SERVICES V012336	OFFICE SUPPLIES	102532-6315 Office Supplies	AP011624	143.01	1G6N-QRX-		00129810	01/18/2024
MW OH	AMAZON CAPITAL SERVICES V012336	TIME & DATE STAMP	103040-6315 Office Supplies	AP011624	30.42	1P11-QJ4C-XT47		00129810	01/18/2024
				Check Total:	**508.08**				
MW OH	AT & T V008736	12/27-1/26 POWELL BLDG INT.	109595-6215 Telephone/Internet	AP011624	85.60	24-JAN		00129811	01/18/2024
				Check Total:	**85.60**				
MW OH	AUDI NORTH OC V012263	DEC PLACENTIA VH REBATE PROG	101534-6363 Resident Vehicle Rebate Prog	AP011624	1,500.00	DEC, 2023		00129812	01/18/2024
				Check Total:	**1,500.00**				
MW OH	BESTWAY LAUNDRY V011658	FS1 - DRAIN PUMP REPLACEMENT	103066-6137 Repair Maint/Equipment	AP011624	234.00	I313304		00129813	01/18/2024
				Check Total:	**234.00**				
MW OH	BUENA PARK PLAQUE & V011364	CITIZENS ACADEMY PLAQUES	103040-6301 Special Department Expenses	AP011624	31.19	30026		00129814	01/18/2024
				Check Total:	**31.19**				
MW OH	CALIFORNIA FORENSIC V000232	DEC BLOOD DRAWS	103040-6055 Medical Services	AP011624	798.00	2461	P12976	00129815	01/18/2024
				Check Total:	**798.00**				
MW OH	CALIFORNIA MARKETING	COMMUNITY SERVICES PROMOS	104071-6301	AP011624	601.59	93683		00129816	01/18/2024

City of Placentia
Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	V009347		Special Department Expenses						
MW OH	CALIFORNIA MARKETING V009347	COMMUNITY SERVICES PROMOS	104071-6301 Special Department Expenses	AP011624	443.47	93687		00129816	01/18/2024
				Check Total:	**1,045.06**				
MW OH	CALIFORNIA YELLOW CAB V003323	SENIOR TRANSPORT SVS	194071-6401 Community Programs	AP011624	2,531.66	12487023	P13106	00129817	01/18/2024
MW OH	CALIFORNIA YELLOW CAB V003323	SENIOR TRANSPORT SVS	184071-6401 Community Programs	AP011624	10,126.64	12487023	P13106	00129817	01/18/2024
				Check Total:	**12,658.30**				
MW OH	CAMACHO, KASSANDRA V012599	FALL 2023 - TUITION REIMB.	109595-5150 Tuition Reimbursement	AP011624	2,423.23	22-26		00129818	01/18/2024
				Check Total:	**2,423.23**				
MW OH	COUNTY OF ORANGE V007152	2023/24 PROPERTY TAX	484356-6122 Sewer User Fees	AP011624	616.16	2023-24-2A		00129819	01/18/2024
				Check Total:	**616.16**				
MW OH	COUNTY OF ORANGE V008881	RADIO REPAIRS	103041-6137 Repair Maint/Equipment	AP011624	69.50	STTM001707		00129820	01/18/2024
MW OH	COUNTY OF ORANGE V008881	JAN AFIS SERVICES	103040-6290 Dept. Contract Services	AP011624	1,858.00	SH 67437	P12980	00129820	01/18/2024
				Check Total:	**1,927.50**				
MW OH	CRISTANDO HOUSE INC V010371	CIVILIAN POLICE LDRSP-REG	103043-6250 Staff Training	AP011624	240.00	CRISTANDO192		00129821	01/18/2024
				Check Total:	**240.00**				
MW OH	DATA TICKET INC. V006119	NOV CITATION PROCESSING	102533-6290 Dept. Contract Services	AP011624	1,367.14	159723	P13114	00129822	01/18/2024
				Check Total:	**1,367.14**				
MW OH	DEROTIC EMERGENCY	T2 REPAIRS	103066-6134	AP011624	843.29	SO-4094		00129823	01/18/2024

City of Placentia
Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	V011295		Vehicle Repair & Maintenance						
MW OH	DEROTIC EMERGENCY V011295	T2 REPAIRS	103066-6134 Vehicle Repair & Maintenance	AP011624	454.27	SO-4133		00129823	01/18/2024
MW OH	DEROTIC EMERGENCY V011295	E2 PARTS & SERVICES	103066-6134 Vehicle Repair & Maintenance	AP011624	1,532.55	SO-4046	P13248	00129823	01/18/2024
				Check Total:	**2,830.11**				
MW OH	DIAMOND ENVIRONMENTAL V004152	RESTROOM/SINK RENT - TAMALE F.	104073-6299 / 79398-6299 Other Purchased Services	AP011624	3,986.40	0005088215	P13271	00129824	01/18/2024
				Check Total:	**3,986.40**				
MW OH	DJE SOUND & LIGHTING INC V011877	SOUND SVS - TREE LIGHTING	104071-6099 / 79394-6099 Professional Services	AP011624	15,340.81	INV-00609	P13269	00129825	01/18/2024
MW OH	DJE SOUND & LIGHTING INC V011877	SOUND SVS - TAMALE FEST	104073-6099 Professional Services	AP011624	10,568.86	INV-00620	P13269	00129825	01/18/2024
MW OH	DJE SOUND & LIGHTING INC V011877	SOUND SVS - HERITAGE FEST	104078-6099 Professional Services	AP011624	7,842.08	INV00582	P13269	00129825	01/18/2024
				Check Total:	**33,751.75**				
MW OH	FIFTH AVENUE CLEANERS V010431	NOV PD DRY CLEANING SVS	103040-6290 Dept. Contract Services	AP011624	587.18	DECEMBER 23		00129826	01/18/2024
				Check Total:	**587.18**				
MW OH	FIS V008518	NOV CREDIT CARD TRANS. FEES	102020-6025 Third Party Administration	AP011624	2,274.88	34719622		00129827	01/18/2024
				Check Total:	**2,274.88**				
MW OH	GALLS LLC V000438	PD UNIFORM NAMETAG - SERVIN	103041-6360 Uniforms	AP011624	14.55	026662460		00129828	01/18/2024
				Check Total:	**14.55**				
MW OH	GOVERNMENT FINANCE V000450	CERT OF ACHIEVEMENT REVIEW '22	102020-6301 Special Department Expenses	AP011624	610.00	15824		00129829	01/18/2024

City of Placentia
Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
				Check Total:	**610.00**				
MW OH	GST GOLDEN STAR V009410	DEC MANAGED SERVICES	101523-6290 Dept. Contract Services	AP011624	20,475.00	INV96238	P13185	00129830	01/18/2024
				Check Total:	**20,475.00**				
MW OH	HALO CONFIDENTIAL V011712	DEC PD TRAINING MGMT	103040-6290 Dept. Contract Services	AP011624	1,150.00	0225T	P12939	00129831	01/18/2024
MW OH	HALO CONFIDENTIAL V011712	DEC BACKGROUND SVS	103040-6290 Dept. Contract Services	AP011624	1,350.00	0226	P12939	00129831	01/18/2024
				Check Total:	**2,500.00**				
MW OH	HEALTHPOINTE MEDICAL V010713	DEC PRE-EMPLOYMENT SCREENINGS	101512-6099 Professional Services	AP011624	1,048.00	30601-4200379		00129832	01/18/2024
				Check Total:	**1,048.00**				
MW OH	HEREDIA, MEGAN V012750	TRAINING MEAL, MILEAGE	101515-6250 Staff Training	AP011624	341.87	121223		00129833	01/18/2024
				Check Total:	**341.87**				
MW OH	HINDERLITER DE LLAMAS & V000465	OCT-DEC TRANS TAX AUDIT SVS	102020-6099 Professional Services	AP011624	2,232.61	SIN033921	P13141	00129834	01/18/2024
MW OH	HINDERLITER DE LLAMAS & V000465	OCT-DEC SALES TAX AUDIT SVS	102020-6099 Professional Services	AP011624	300.00	SIN034667	P13141	00129834	01/18/2024
				Check Total:	**2,532.61**				
MW OH	HR GREEN PACIFIC INC V010735	DEC ENG & LANDSCAPE DESIGN	109202-6770 / 229999-6770 Infrastructure - Major Studies	AP011624	43,391.77	170707	P13078	00129835	01/18/2024
MW OH	HR GREEN PACIFIC INC V010735	DEC ENG & LANDSCAPE DESIGN	799202-6770 / 229999-6770 Infrastructure - Major Studies	AP011624	42,294.98	170707	P13078	00129835	01/18/2024
				Check Total:	**85,686.75**				
MW OH	IMPERIAL SPRINKLER V006506	SPRINKLER SUPPLIES	104076-6139 Repair/Maint - Parks & Fields	AP011624	205.83	0013472431-001	P13272	00129836	01/18/2024
MW OH	IMPERIAL SPRINKLER	SPRINKLER SUPPLIES	104076-6139	AP011624	121.91	0013519178-001	P13272	00129836	01/18/2024

City of Placentia
Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	V006506		Repair/Maint - Parks & Fields						
MW OH	IMPERIAL SPRINKLER V006506	SPRINKLER SUPPLIES	104076-6139 Repair/Maint - Parks & Fields	AP011624	504.73	0013573767-001	P13272	00129836	01/18/2024
MW OH	IMPERIAL SPRINKLER V006506	SPRINKLER SUPPLIES	104076-6139 Repair/Maint - Parks & Fields	AP011624	89.53	0013607717-001	P13272	00129836	01/18/2024
				Check Total:	**922.00**				
MW OH	INFRASTRUCTURE V012600	DEC PM SERVICES	331801-6740 / 331801-6740 Infrastructure - Streets	AP011624	7,090.86	466	P12987	00129837	01/18/2024
MW OH	INFRASTRUCTURE V012600	DEC PM SERVICES	713101-6750 / 713101-6750 Infrastructure - Sewer	AP011624	2,685.14	466	P12987	00129837	01/18/2024
				Check Total:	**9,776.00**				
MW OH	JIMMYS BUFFET V012596	7/20 ENTERTAINER	104074-6299 Other Purchased Services	AP011624	1,600.00	07202023A		00129838	01/18/2024
				Check Total:	**1,600.00**				
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6006 Litigation	AP011624	26.25	119208		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6006 Litigation	AP011624	1,076.41	119543		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6005 Legal Services	AP011624	6,661.29	119545		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6006 Litigation	AP011624	288.79	119546		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6006 Litigation	AP011624	682.58	119550		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES - CREDIT	101005-6005 Legal Services	AP011624	-43.10	119551		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES - CREDIT	101005-6005 Legal Services	AP011624	-54.37	119553		00129839	01/18/2024

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MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6006 Litigation	AP011624	577.57	119554		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6006 Litigation	AP011624	420.07	119557		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6006 Litigation	AP011624	105.02	119558		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6005 Legal Services	AP011624	7,501.59	119561		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES - CREDIT	101005-6005 Legal Services	AP011624	-50.62	119951		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES	101005-6005 Legal Services	AP011624	341.31	119952		00129839	01/18/2024
MW OH	JONES & MAYER V009822	LITIGATION SERVICES - CREDIT	101005-6005 Legal Services	AP011624	-75.00	119955		00129839	01/18/2024
MW OH	JONES & MAYER V009822	RETAINER	101005-6005 Legal Services	AP011624	34,294.40	119956		00129839	01/18/2024
MW OH	JONES & MAYER V009822	RETAINER CREDIT	101005-6005 Legal Services	AP011624	-1,249.40	119956CR		00129839	01/18/2024
				Check Total:	**50,502.79**				
MW OH	KAYLEY PARTY SUPPLY V012424	TAMALE FEST - JUMPER	104073-6299 Other Purchased Services	AP011624	245.00	12-07-23-01		00129840	01/18/2024
				Check Total:	**245.00**				
MW OH	KIMLEY-HORN AND V012601	NOV DRAFT HOUSING ELEMENT	749102-6017 / 749102-6017 Special Studies	AP011624	7,262.50	26678878	P13121	00129841	01/18/2024
MW OH	KIMLEY-HORN AND V012601	DEC DRAFT HOUSING ELEMENT PRE	749102-6017 / 749102-6017 Special Studies	AP011624	11,545.00	26833536	P13121	00129841	01/18/2024
				Check Total:	**18,807.50**				
MW OH	KOA HILLS CONSULTING LLC	12/29-1/5 CONSULTING SVS	102020-6099	AP011624	4,068.75	13360	P13026	00129842	01/18/2024

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	V011519		Professional Services						
				Check Total:	**4,068.75**				
MW OH	KRONOS SAASHR INC. V012554	NOV KRONOS SUBSCRIPTION	101512-6099 Professional Services	AP011624	6,817.69	12173179	P13211	00129843	01/18/2024
				Check Total:	**6,817.69**				
MW OH	LEAGUE OF CALIFORNIA V000565	2024 - MEMBERSHIP DUES	101001-6255 Dues & Memberships	AP011624	20,135.00	11888-T2X7S7		00129844	01/18/2024
				Check Total:	**20,135.00**				
MW OH	LIEBERT CASSIDY V000597	NOV PPROFESSIONAL SVS	101512-6255 Dues & Memberships	AP011624	7,960.50	255653		00129845	01/18/2024
MW OH	LIEBERT CASSIDY V000597	NOV PROFESSIONAL SVS	101512-6255 Dues & Memberships	AP011624	609.50	256558		00129845	01/18/2024
				Check Total:	**8,570.00**				
MW OH	LN CURTIS & SONS V011267	PD UNIFORMS - SERVIN	103041-6360 Uniforms	AP011624	157.13	INV778833	P13019	00129846	01/18/2024
				Check Total:	**157.13**				
MW OH	LOS ALTOS TROPHY CO V000584	HERITAGE MEDALS	104078-6301 Special Department Expenses	AP011624	150.08	93669		00129847	01/18/2024
MW OH	LOS ALTOS TROPHY CO V000584	PONY BASEBALL MEDALS	104071-6301 Special Department Expenses	AP011624	91.35	93885		00129847	01/18/2024
MW OH	LOS ALTOS TROPHY CO V000584	HERITAGE AWARDS NAME PLATES	104078-6301 Special Department Expenses	AP011624	58.73	93886		00129847	01/18/2024
				Check Total:	**300.16**				
MW OH	LYNCH EMS V011542	JAN EMT SERVICE	101516-6290 Dept. Contract Services	AP011624	88,784.06	24-165	P12935	00129848	01/18/2024
				Check Total:	**88,784.06**				
MW OH	MARK COMPANY	NOV CONSTRUCTION SVS	719800-6740 / 24101-6740	AP011624	24,957.45	35493	P13123	00129849	01/18/2024

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	V012657		Infrastructure - Streets						
				Check Total:	**24,957.45**				
MW OH	MCKESSON MEDICAL- V012321	EMERGENCY MEDICAL SUPPLY	103066-6362 Emergency Medical Supples	AP011624	778.26	21525676		00129850	01/18/2024
				Check Total:	**778.26**				
MW OH	MENDOZA, SERGIO V012220	PD TRAINING MEALS, MILEAGE	103041-6250 Staff Training	AP011624	30.86	MENDOZA1112		00129851	01/18/2024
MW OH	MENDOZA, SERGIO V012220	PD TRAINING MEALS, MILEAGE	103041-6250 Staff Training	AP011624	31.53	MENDOZA1152		00129851	01/18/2024
				Check Total:	**62.39**				
MW OH	MICHAEL BAKER V010699	OCT SDMP CONSULTING SVS	794201-6751 / 794201-6751 Infrastructure - Storm Drain	AP011624	2,170.25	1199544	P13062	00129852	01/18/2024
				Check Total:	**2,170.25**				
MW OH	NAPA AUTO PARTS V011456	CITY VEHICLE PARTS	103658-6134 Vehicle Repair & Maintenance	AP011624	107.74	112633A		00129853	01/18/2024
MW OH	NAPA AUTO PARTS V011456	CITY VEHICLE PARTS	103658-6134 Vehicle Repair & Maintenance	AP011624	122.82	113159A		00129853	01/18/2024
MW OH	NAPA AUTO PARTS V011456	CITY VEHICLE PARTS	103658-6134 Vehicle Repair & Maintenance	AP011624	114.90	114667A		00129853	01/18/2024
				Check Total:	**345.46**				
MW OH	NAPA AUTO PARTS V012662	CITY VEHICLE PARTS	103658-6134 Vehicle Repair & Maintenance	AP011624	47.37	847729A		00129854	01/18/2024
MW OH	NAPA AUTO PARTS V012662	CITY VEHICLE PARTS	103658-6134 Vehicle Repair & Maintenance	AP011624	350.06	847732A		00129854	01/18/2024
MW OH	NAPA AUTO PARTS V012662	CITY VEHICLE PARTS	103658-6134 Vehicle Repair & Maintenance	AP011624	123.29	849937A		00129854	01/18/2024
MW OH	NAPA AUTO PARTS V012662	CITY VEHICLE PARTS	103658-6134 Vehicle Repair & Maintenance	AP011624	62.44	853176A		00129854	01/18/2024

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				Check Total:	**583.16**				
MW OH	ORTCO INC V010660	WAGNER - ADA RAMP/CONCRETE	797203-6760 / 797203-6760 Infrastructure - Parks	AP011624	3,550.00	2023-306	P13270	00129855	01/18/2024
				Check Total:	**3,550.00**				
MW OH	PATH V011455	CR FOR ELECTRIC BILL	0078-1227 Accts Rec/Grants	AP011624	-4,905.85	CR ELECTRIC		00129856	01/18/2024
MW OH	PATH V011455	DEC NAV CTR MGMT SVS	784070-6290 Dept. Contract Services	AP011624	137,333.33	800-23.12	P12993	00129856	01/18/2024
MW OH	PATH V011455	JAN NAV CTR MGMT SVS	784070-6290 Dept. Contract Services	AP011624	137,333.33	800-24.01	P12993	00129856	01/18/2024
				Check Total:	**269,760.81**				
MW OH	PBK-WLC ARCHITECTS V012022	NOV PSC - ARCHITECT. & ENG SVS	105213-6850 / 105213-6850 Building & Facilities	AP011624	5,250.00	000000000025	P13047	00129857	01/18/2024
				Check Total:	**5,250.00**				
MW OH	PINEDA, YESENIA V012108	REFUND PERMIT CHARGE -R3428	104071-4385 Facility Rental	AP011624	100.00	2003786.002		00129858	01/18/2024
				Check Total:	**100.00**				
MW OH	PRIORITY DISPATCH CORP V011406	COURSE TRAINING & CERT	101515-6250 Staff Training	AP011624	550.00	SIN359862		00129859	01/18/2024
				Check Total:	**550.00**				
MW OH	QUADIENT FINANCE USA INC V011439	ADD POSTAGE - MAILING MACHINE	109595-6325 Postage	AP011624	4,431.88	12/18/2023		00129860	01/18/2024
				Check Total:	**4,431.88**				
MW OH	QUALITY CODE PUBLISHING V010866	CODE360 ANNUAL MAINTENANCE	101513-6299 Other Purchased Services	AP011624	1,435.00	GC00123716		00129861	01/18/2024
				Check Total:	**1,435.00**				
MW OH	RODRIGUEZ, SARAH	PD TRAINING MEAL, MILEAGE	103041-6250	AP011624	353.44	RODRIGUEZ182		00129862	01/18/2024

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	V012714		Staff Training						
				Check Total:	**353.44**				
MW OH	RUBALCAVA, OSBALDO V012739	WALKING CHALLENGE PRIZE REIMB	109595-6999 Other Expenditure	AP011624	148.67	011024		00129863	01/18/2024
				Check Total:	**148.67**				
MW OH	SELBERT PERKINS DESIGN V012172	NOV WAYFINDING DESIGN SVS	709201-6770 / 709201-6770 Infrastructure - Major Studies	AP011624	160.00	20231199	P13083	00129864	01/18/2024
MW OH	SELBERT PERKINS DESIGN V012172	NOV WAYFINDING DESIGN SVS	729201-6770 / 729201-6770 Infrastructure - Major Studies	AP011624	160.00	20231199	P13083	00129864	01/18/2024
				Check Total:	**320.00**				
MW OH	SESAC INC V008428	2024 MUSIC LICENSE RENEWAL	581573-6290 Dept. Contract Services	AP011624	1,888.00	747215-2024		00129865	01/18/2024
				Check Total:	**1,888.00**				
MW OH	SHADER, RHONDA V010255	TRAVEL EXPENSES	101001-6245 Meetings & Conferences	AP011624	260.62	11124		00129866	01/18/2024
				Check Total:	**260.62**				
MW OH	SOUTHERN CALIFORNIA V009955	DEC NEWSPAPER PUBLICATIONS	101002-6225 Advertising/Promotional	AP011624	818.24	579827		00129867	01/18/2024
MW OH	SOUTHERN CALIFORNIA V009955	DEC NEWSPAPER PUBLICATIONS	799800-6760 Infrastructure - Parks	AP011624	417.12	579827		00129867	01/18/2024
				Check Total:	**1,235.36**				
MW OH	STRATEGIC OPERATIONS INC V012748	PD TMT COURSE REGISTRATION	103041-6250 Staff Training	AP011624	2,500.00	NAEMT010424		00129868	01/18/2024
				Check Total:	**2,500.00**				
MW OH	SVA ARCHITECTS INC. V012625	DEC ARCHITECTURAL/ ENG SVS	109800-6850 / 105208-6850 Building & Facilities	AP011624	5,414.03	61495	P13031	00129869	01/18/2024
MW OH	SVA ARCHITECTS INC.	DEC ARCHITECTURAL/ ENG SVS	799800-6850 / 795208-6850	AP011624	5,201.72	61495	P13031	00129869	01/18/2024

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	V012625		Building & Facilities						
				Check Total:	**10,615.75**				
MW OH	THE PAPER DEPOT V012197	1/20 SHREDDING EVENT	374386-6299 Other Purchased Services	AP011624	500.00	012024		00129870	01/18/2024
				Check Total:	**500.00**				
MW OH	THINKSUPPLIES.COM V007047	OFFICE SUPPLIES - ENVELOPES	109595-6315 Office Supplies	AP011624	244.21	70389		00129871	01/18/2024
				Check Total:	**244.21**				
MW OH	TOWNSEND PUBLIC AFFAIRS V004165	AUG CONSULTING SVS	101005-6001 Management Consulting Servics	AP011624	5,500.00	20284	P12998	00129872	01/18/2024
				Check Total:	**5,500.00**				
MW OH	TREJO, DANIELA V012221	PD TRAINING MEALS, MILEAGE	103041-6250 Staff Training	AP011624	30.86	TREJO11124		00129873	01/18/2024
MW OH	TREJO, DANIELA V012221	PD TRAINING MEAL, MILEAGE	103041-6250 Staff Training	AP011624	31.53	TREJO11524		00129873	01/18/2024
				Check Total:	**62.39**				
MW OH	TURNOUT MAINTENANCE V011543	TURNOUTS	103066-6361 Personal Protection Equipment	AP011624	119.63	27862		00129874	01/18/2024
				Check Total:	**119.63**				
MW OH	UNIQUE PRINTING V010259	PD UNIFORM EMBROIDERY	103041-6360 Uniforms	AP011624	48.94	45584		00129875	01/18/2024
				Check Total:	**48.94**				
MW OH	VERDIN, LYDIA V010478	DAMAGE DEPOSIT REFUND R3435	104071-4385 Facility Rental	AP011624	158.00	2003794.002		00129876	01/18/2024
				Check Total:	**158.00**				
MW OH	5 STAR ROOFING V012756	ROOFING BOND REFUND	0044-2033 Construction & Demo Deposit	AP012224	1,800.00	30-23-414		00129878	01/25/2024

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				Check Total:	**1,800.00**				
MW OH	AIM TD LLC V012426	TRAFFIC STUDY 24H	103590-6290 Dept. Contract Services	AP012224	296.00	I5473B		00129879	01/25/2024
				Check Total:	**296.00**				
MW OH	ALL CITY MANAGEMENT V000005	11/26-12/9 CROSSING GUARD SVS	103047-6290 Dept. Contract Services	AP012224	4,412.40	89835	P12977	00129880	01/25/2024
MW OH	ALL CITY MANAGEMENT V000005	12/10-23 CROSSING GUARD SVS	103047-6290 Dept. Contract Services	AP012224	4,431.60	90279	P12977	00129880	01/25/2024
				Check Total:	**8,844.00**				
MW OH	ALLIANCE BUSINESS V011660	JAN FIBER LINES FOR FD1&2	109595-6215 Telephone/Internet	AP012224	1,452.39	3177072		00129881	01/25/2024
				Check Total:	**1,452.39**				
MW OH	AMAZON CAPITAL SERVICES V012336	FIRE ST. SUPPLIES	103066-6134 Vehicle Repair & Maintenance	AP012224	239.17	1H3T-CJCN-		00129882	01/25/2024
MW OH	AMAZON CAPITAL SERVICES V012336	FIRE ST. SUPPLIES	103065-6301 Special Department Expenses	AP012224	90.20	1H3T-CJCN-		00129882	01/25/2024
MW OH	AMAZON CAPITAL SERVICES V012336	FIRE ST. SUPPLIES	103066-6301 Special Department Expenses	AP012224	287.68	1H3T-CJCN-		00129882	01/25/2024
MW OH	AMAZON CAPITAL SERVICES V012336	OFFICE SUPPLIES	103066-6315 Office Supplies	AP012224	122.13	1H3T-CJCN-		00129882	01/25/2024
MW OH	AMAZON CAPITAL SERVICES V012336	OFFICE SUPPLIES	103067-6315 Office Supplies	AP012224	34.39	1H3T-CJCN-		00129882	01/25/2024
MW OH	AMAZON CAPITAL SERVICES V012336	OFFICE SUPPLIES	103065-6315 Office Supplies	AP012224	51.44	1H3T-CJCN-		00129882	01/25/2024
				Check Total:	**825.01**				
MW OH	AQS MECHANAL INC. V012753	PERMIT B23-2977- 50% REFUND	102532-4164 Electrical Permits	AP012224	85.00	B23-2977		00129883	01/25/2024
				Check Total:	**85.00**				

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MW OH	ARAMARK REFRESHMENT V000081	401 E CHAPMAN -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	612.02	105821720		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	401 E CHAPMAN -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	444.24	105823124		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	401 E CHAPMAN -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	520.56	105823919		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	401 E CHAPMAN -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	530.96	105824926		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	120 S BRADFORD -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	246.08	105824928		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	401 E CHAPMAN -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	1,534.39	105826621		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	401 E CHAPMAN -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	23.72	105826622		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	401 E CHAPMAN -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	478.57	105826623		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	WATER FILTER - 201 BRADFORD	109595-6301 Special Department Expenses	AP012224	148.44	3421977		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	WATER FILTER - 143 S BRADFORD	109595-6301 Special Department Expenses	AP012224	81.65	3422059		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	WATER FILTER - 120 S BRADFORD	109595-6301 Special Department Expenses	AP012224	10.86	3439791_1		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	1701 ATWOOD - COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	85.08	3468408		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	1701 ATWOOD - COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	247.13	7288220		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	120 S BRADFORD -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	19.99	7307236-1		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT	1701 ATWOOD - COFFEE/WATER	109595-6301	AP012224	12.00	7307276		00129884	01/25/2024

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	V000081		Special Department Expenses						
MW OH	ARAMARK REFRESHMENT V000081	1701 ATWOOD - COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	40.00	7530672		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	1701 ATWOOD - COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	40.00	7727706		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	401 E CHAPMAN -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	365.00	80057898		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	900 S MELROSE -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	75.00	8009992		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	143 S BRADFORD -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	75.00	8009993		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	110 S BRADFORD -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	75.00	8009995		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	1530 VALENCIA -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	75.00	8009996		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	2999 E LA JOLLA -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	75.00	8009998		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	120 S BRADFORD -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	70.00	8010059		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	1701 ATWOOD - COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	40.00	8010106		00129884	01/25/2024
MW OH	ARAMARK REFRESHMENT V000081	201 S BRADFORD -COFFEE/WATER	109595-6301 Special Department Expenses	AP012224	40.00	8010107		00129884	01/25/2024
				Check Total:	**5,965.69**				
MW OH	AT & T V008736	12/14-1/13 PD FIRSTNET SVS	109595-6215 Telephone/Internet	AP012224	4,949.02	22540323		00129885	01/25/2024
MW OH	AT & T V008736	12/14-1/13 FD FIRSTNET SVS	109595-6215 Telephone/Internet	AP012224	408.02	22540323		00129885	01/25/2024
MW OH	AT & T	1/1-31 PD YARD INTERNET	109595-6215	AP012224	53.50	JAN 24		00129885	01/25/2024

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	V008736		Telephone/Internet						
				Check Total:	**5,410.54**				
MW OH	AT & T V012754	UNDERGROUND AERIAL CABLES	331801-6740 Infrastructure - Streets	AP012224	500.00	CWO-28832		00129886	01/25/2024
				Check Total:	**500.00**				
MW OH	AT&T V004144	DEC-JAN PHONE CHARGES	109595-6215 Telephone/Internet	AP012224	2,719.21	011724		00129887	01/25/2024
MW OH	AT&T V004144	DEC-JAN PHONE CHARGES	109595-6215 / 21008-6215 Telephone/Internet	AP012224	12.17	011724		00129887	01/25/2024
MW OH	AT&T V004144	DEC-JAN PHONE CHARGES	296561-6215 Telephone/Internet	AP012224	740.96	011724		00129887	01/25/2024
				Check Total:	**3,472.34**				
MW OH	AT&T V011189	CELL PHONE TRACKING - DR23-040	103042-6290 Dept. Contract Services	AP012224	875.00	493148		00129888	01/25/2024
				Check Total:	**875.00**				
MW OH	AT&T MOBILITY V011025	12/11-1/10 PW INTERNET	109595-6215 Telephone/Internet	AP012224	1,437.60	22533445		00129889	01/25/2024
MW OH	AT&T MOBILITY V011025	12/11-1/10 PW OUTST. INT	109595-6215 Telephone/Internet	AP012224	40.24	22533445		00129889	01/25/2024
MW OH	AT&T MOBILITY V011025	12/11-1/10 CS MOBILE INT.	109595-6215 Telephone/Internet	AP012224	400.73	22533445		00129889	01/25/2024
MW OH	AT&T MOBILITY V011025	12/11-1/10 ADMIN INTERNET	109595-6215 Telephone/Internet	AP012224	80.48	22533445		00129889	01/25/2024
				Check Total:	**1,959.05**				
MW OH	BADGE FRAME INC V010144	PD ORG. CHART NAMES	103040-6301 Special Department Expenses	AP012224	76.00	611585		00129890	01/25/2024
				Check Total:	**76.00**				
MW OH	BEAR ELECTRICAL	OCT TS ROUTINE MAINTENANCE	103590-6099	AP012224	3,212.45	20813	P13120	00129891	01/25/2024

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	V010997		Professional Services						
MW OH	BEAR ELECTRICAL V010997	OCT TS ROUTINE MAINTENANCE	103590-6099 / 21009-6099 Professional Services	AP012224	247.50	20813	P13120	00129891	01/25/2024
MW OH	BEAR ELECTRICAL V010997	OCT TS ROUTINE MAINTENANCE	103590-6099 / 21010-6099 Professional Services	AP012224	120.05	20813	P13120	00129891	01/25/2024
MW OH	BEAR ELECTRICAL V010997	OCT TS ROUTINE MAINTENANCE	103590-6099 / 21011-6099 Professional Services	AP012224	85.00	20813	P13120	00129891	01/25/2024
				Check Total:	**3,665.00**				
MW OH	BORDIN SEMMER LLP V012114	LITIGATION FEES	404582-6006 Litigation	AP012224	2,369.38	11-05223		00129892	01/25/2024
MW OH	BORDIN SEMMER LLP V012114	LITIGATION FEES	404582-6006 Litigation	AP012224	1,713.70	12-092723		00129892	01/25/2024
MW OH	BORDIN SEMMER LLP V012114	LITIGATION FEES	404582-6006 Litigation	AP012224	2,734.50	13-112823		00129892	01/25/2024
				Check Total:	**6,817.58**				
MW OH	BRENNAN ESTIMATING V011259	DEC FIRE & SECURITY ALARM	103654-6127 Alarm Monitoring	AP012224	360.00	11281	P13006	00129893	01/25/2024
MW OH	BRENNAN ESTIMATING V011259	JAN FIRE & SECURITY ALARM	103654-6127 Alarm Monitoring	AP012224	360.00	11392	P13006	00129893	01/25/2024
				Check Total:	**720.00**				
MW OH	CARL WARREN & CO V008011	DEC PROFESSIONAL SVS	404582-6025 Third Party Administration	AP012224	1,710.00	CWC-2039196		00129894	01/25/2024
				Check Total:	**1,710.00**				
MW OH	CFCIA V012473	MEMBERSHIP RENEW - FLOOD	103042-6255 Dues & Memberships	AP012224	25.00	1/16/2024		00129895	01/25/2024
				Check Total:	**25.00**				
MW OH	CONSOLIDATED OFFICE V000245	WORKSTATIONS - TRAFFIC BUREAU	675308-6850 / 675308-6850 Building & Facilities	AP012224	8,425.50	31214	P13126	00129896	01/25/2024

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				Check Total:	**8,425.50**				
MW OH	COUNTY OF ORANGE V000715	Q3 -800 MHZ CCCS - PD 76%	103043-6137 Repair Maint/Equipment	AP012224	20,507.27	STCS002132	P12937	00129897	01/25/2024
MW OH	COUNTY OF ORANGE V000715	Q-3 800 MHZ CCCS - FD 24%	103066-6137 Repair Maint/Equipment	AP012224	6,475.98	STCS002132	P12937	00129897	01/25/2024
				Check Total:	**26,983.25**				
MW OH	CSG CONSULTANTS INC V011609	SEP BUILDING INSP SVS	102532-6290 Dept. Contract Services	AP012224	7,947.25	53718	P13169	00129898	01/25/2024
MW OH	CSG CONSULTANTS INC V011609	OCT BUILDING INSP SVS	102532-6290 Dept. Contract Services	AP012224	21,908.25	53812	P13169	00129898	01/25/2024
				Check Total:	**29,855.50**				
MW OH	DEROTIC EMERGENCY V011295	E2 PARTS & SERVICES	103066-6134 Vehicle Repair & Maintenance	AP012224	330.00	SO-4110	P13248	00129899	01/25/2024
				Check Total:	**330.00**				
MW OH	DIAMONDS SPORTS FIELD V011978	DEC FIELD MAINTENANCE	104076-6139 Repair/Maint - Parks & Fields	AP012224	1,500.00	6367	P13235	00129900	01/25/2024
				Check Total:	**1,500.00**				
MW OH	DIVISION OF THE STATE V008904	Q-4 2023 - SB1186 & SB1379	0044-2032 SB 1186 BL State Fee	AP012224	2,852.00	12224		00129901	01/25/2024
MW OH	DIVISION OF THE STATE V008904	Q-4 2023 - SB1186 & SB1379	100000-4101 Business License Fees	AP012224	-2,566.80	12224		00129901	01/25/2024
				Check Total:	**285.20**				
MW OH	DLW CONSULTING & V011427	BACKGROUND CHECK - IT TECH	101512-6295 City Admin Services	AP012224	1,500.00	PFLS 2023 -14		00129902	01/25/2024
				Check Total:	**1,500.00**				
MW OH	ENTERPRISE FLEET V003312	JAN LEASE CHARGE	103041-6165 Vehicle Lease	AP012224	6,736.78	FBN4931612	P13005	00129903	01/25/2024
MW OH	ENTERPRISE FLEET	JAN LEASE CHARGE	103042-6165	AP012224	6,736.77	FBN4931612	P13005	00129903	01/25/2024

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	V003312		Vehicle Lease						
				Check Total:	**13,473.55**				
MW OH	EVERYTABLE PBC V012738	DEC SMART FRIDGE FEE	503040-6301 / 233004-6301 Special Department Expenses	AP012224	200.00	SI031430		00129904	01/25/2024
				Check Total:	**200.00**				
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	6.24	102-200272	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	24.76	102-200576	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	18.10	102-200639	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	123.08	102-200962	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	30.49	102-201045	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	94.27	102-201103	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	54.20	102-201160	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	8.00	102-201209	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	39.36	102-201387	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	25.26	102-201430	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	39.43	102-201505	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS	PARTS/SUPPLIES FOR VH MAINT	103658-6134	AP012224	113.61	102-201558	P13045	00129905	01/25/2024

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	V010842		Vehicle Repair & Maintenance						
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	231.96	102-201609	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	19.78	102-202604	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	113.61	102-202740	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	203.52	12-5635729	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	732.70	12-5637956	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	69.63	12-5639146	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	135.81	12-5639211	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	227.40	12-5639828	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	28.42	12-5644766	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	58.64	12-5646236	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	816.26	12-5653237	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	62.15	12-5655258	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	72.80	12-5670207	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	754.02	12-5670973	P13045	00129905	01/25/2024

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MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	49.85	12-5675293	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	64.35	12-5675387	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	204.21	12-5675479	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	78.16	12-5677558	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	94.99	12-5677908	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	21.52	12-5679565	P13045	00129905	01/25/2024
MW OH	FACTORY MOTOR PARTS V010842	PARTS/SUPPLIES FOR VH MAINT	103658-6134 Vehicle Repair & Maintenance	AP012224	181.86	12-5706829	P13045	00129905	01/25/2024
				Check Total:	**4,798.44**				
MW OH	FAIRWAY FORD V000376	VEHICLE REPAIR -RADIATOR	103658-6134 Vehicle Repair & Maintenance	AP012224	342.20	284018		00129907	01/25/2024
				Check Total:	**342.20**				
MW OH	FIREMAN'S GRAPHIC'S V011955	HELMENT NAME STICKERS	103066-6361 Personal Protection Equipment	AP012224	41.73	102323		00129908	01/25/2024
				Check Total:	**41.73**				
MW OH	FRANCHISE TAX BOARD V000404	FTB PE 1/6 PD 1/24	0010-2196 Garnishments W/H	AP012224	7.73	PR2401001		00129909	01/25/2024
				Check Total:	**7.73**				
MW OH	GLASBY MAINT. SUPPLY CO V000445	JANITORIAL SUPPLIES	103654-6301 Special Department Expenses	AP012224	1,171.58	338528 A		00129910	01/25/2024
				Check Total:	**1,171.58**				
MW OH	GOLDEN BELL PRODUCTS	GRAFFITI REMOVER	103658-6301	AP012224	240.61	185557		00129911	01/25/2024

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	V005233		Special Department Expenses						
				Check Total:	**240.61**				
MW OH	GOLDEN STATE WATER V000928	DEC-JAN WATER CHARGES	109595-6335 Water	AP012224	5,870.85	011724		00129912	01/25/2024
MW OH	GOLDEN STATE WATER V000928	DEC-JAN WATER CHARGES	296561-6335 Water	AP012224	4,131.89	011724		00129912	01/25/2024
				Check Total:	**10,002.74**				
MW OH	GROOM AND BOARD V012189	BL REFUND - DUPLICATE PMT	100000-4101 Business License Fees	AP012224	112.20	11724		00129913	01/25/2024
MW OH	GROOM AND BOARD V012189	BL REFUND - DUPLICATE PMT	0044-2032 SB 1186 BL State Fee	AP012224	4.00	11724		00129913	01/25/2024
				Check Total:	**116.20**				
MW OH	GST GOLDEN STAR V009410	IT INFRASTRUCTURE/COMPUTER	796302-6364 / 241502-6364 Computer Hardware	AP012224	250,552.17	INV93694A		00129914	01/25/2024
MW OH	GST GOLDEN STAR V009410	IT INFRASTRUCTURE/COMPUTER	796302-6364 / 241502-6364 Computer Hardware	AP012224	17,754.11	INV94213A		00129914	01/25/2024
MW OH	GST GOLDEN STAR V009410	NOV MANAGED SERVICES	101523-6290 Dept. Contract Services	AP012224	20,475.00	INV952561A		00129914	01/25/2024
				Check Total:	**288,781.28**				
MW OH	H&S ENERGY LLC V010680	NOV CAR WASH SVS	103658-6142 Vehicle Detailing	AP012224	560.00	12.19.23	P13187	00129915	01/25/2024
				Check Total:	**560.00**				
MW OH	HALO CONFIDENTIAL V011712	JAN BACKGROUND SCREENING SVS	103040-6290 Dept. Contract Services	AP012224	867.00	0227	P12939	00129916	01/25/2024
				Check Total:	**867.00**				
MW OH	HASA INC V005203	DEC FOUNTAIN MAINT - LIBRARY	103654-6290 / 21008-6290 Dept. Contract Services	AP012224	291.20	934935	P13046	00129917	01/25/2024
MW OH	HASA INC	DEC FOUNTAIN MAINT.	103654-6290	AP012224	408.80	934935	P13046	00129917	01/25/2024

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	V005203		Dept. Contract Services						
				Check Total:	**700.00**				
MW OH	INGLIS IMPORTS INC V012485	K9 DOG FOOD	103041-6301 Special Department Expenses	AP012224	54.52	IPHS001022		00129918	01/25/2024
				Check Total:	**54.52**				
MW OH	INTERNATIONAL V011100	2024 IACP MEMBERSHIP - ANDERSO	103040-6255 Dues & Memberships	AP012224	190.00	0313690		00129919	01/25/2024
MW OH	INTERNATIONAL V011100	2024 IACP MEMBERSHIP - MILLSAP	103040-6255 Dues & Memberships	AP012224	190.00	0313692		00129919	01/25/2024
MW OH	INTERNATIONAL V011100	2024 IACP MEMBERSHIP - MCELHIN	103040-6255 Dues & Memberships	AP012224	190.00	0313850		00129919	01/25/2024
MW OH	INTERNATIONAL V011100	2024 IACP MEMBERSHIP - PERRY	103040-6255 Dues & Memberships	AP012224	190.00	0326795		00129919	01/25/2024
MW OH	INTERNATIONAL V011100	2024 IACP MEMBERSHIP - BUTTS	103040-6255 Dues & Memberships	AP012224	190.00	0326796		00129919	01/25/2024
				Check Total:	**950.00**				
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0048-2131 Employer PARS/ARS Payable	AP012224	54.63	PR2401001		00129920	01/25/2024
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0054-2131 Employer PARS/ARS Payable	AP012224	43.71	PR2401001		00129920	01/25/2024
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0054-2131 Employer PARS/ARS Payable	AP012224	4.91	PR2401001		00129920	01/25/2024
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0048-2131 Employer PARS/ARS Payable	AP012224	112.43	PR2401001		00129920	01/25/2024
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0010-2131 Employer PARS/ARS Payable	AP012224	675.91	PR2401001		00129920	01/25/2024
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0029-2131 Employer PARS/ARS Payable	AP012224	19.46	PR2401001		00129920	01/25/2024

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MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0037-2131 Employer PARS/ARS Payable	AP012224	236.73	PR2401001		00129920	01/25/2024
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0037-2131 Employer PARS/ARS Payable	AP012224	76.48	PR2401001		00129920	01/25/2024
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0010-2131 Employer PARS/ARS Payable	AP012224	848.64	PR2401001		00129920	01/25/2024
MW OH	JOHN HANCOCK USA-PARS V010625	PARS FT-ER PE 1/6 PD 1/12	0010-2131 Employer PARS/ARS Payable	AP012224	917.81	PR2401001		00129920	01/25/2024
				Check Total:	**2,990.71**				
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	4,148.12	119209		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES	101005-6005 Legal Services	AP012224	420.06	119210		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	146.50	119212		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES	101005-6005 Legal Services	AP012224	6,841.30	119213		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	3,675.54	119217		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES	101005-6005 Legal Services	AP012224	708.84	119218		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES	101005-6005 Legal Services	AP012224	761.36	119223		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	288.79	119224		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	78.76	119225		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	2,914.19	119226		00129921	01/25/2024

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MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	236.29	119227		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES	101005-6005 Legal Services	AP012224	16,461.25	119230		00129921	01/25/2024
MW OH	JONES & MAYER V009822	RETAINER	101005-6005 Legal Services	AP012224	22,833.35	119373		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	1,470.22	120115		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	210.03	120117		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES	101005-6005 Legal Services	AP012224	6,500.00	120118		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	88.12	120122		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES	101005-6005 Legal Services	AP012224	262.54	120123		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	1,181.40	120128		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	15.47	120129		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	315.05	120130		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	1,533.98	120131		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LITIGATION FEES	101005-6006 Litigation	AP012224	105.02	120132		00129921	01/25/2024
MW OH	JONES & MAYER V009822	LEGAL SERVICES	101005-6005 Legal Services	AP012224	14,456.77	120134		00129921	01/25/2024
MW OH	JONES & MAYER	LEGAL SERVICES	101005-6005	AP012224	5,558.41	120137		00129921	01/25/2024

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	V009822		Legal Services						
MW OH	JONES & MAYER V009822	RETAINER	101005-6005 Legal Services	AP012224	25,883.65	120371		00129921	01/25/2024
				Check Total:	**117,095.01**				
MW OH	KAPPE TERRACINA LLC V012436	JAN BALANCE -166 LA JOLLA	103043-6160 Facility Rental	AP012224	350.93	012224		00129922	01/25/2024
MW OH	KAPPE TERRACINA LLC V012436	FEB LEASE - 166 LA JOLLA	103043-6160 Facility Rental	AP012224	39,479.00	FEBRUARY 24		00129922	01/25/2024
				Check Total:	**39,829.93**				
MW OH	KOSMONT TRANSACTIONS V011935	DEC PORTFOLIO MGMT SVS	102020-6099 Professional Services	AP012224	2,052.43	2307.6-006	P13139	00129923	01/25/2024
				Check Total:	**2,052.43**				
MW OH	KRONOS SAASHR INC. V012554	DEC KRONOS SUBSCRIPTION	101512-6099 Professional Services	AP012224	6,349.69	12188121	P13211	00129924	01/25/2024
				Check Total:	**6,349.69**				
MW OH	LSA ASSOCIATES INC. V000604	DEC CEQA DOCUMENTATION - TOD	742531-6099 Professional Services	AP012224	23,543.88	191604	P13159	00129925	01/25/2024
				Check Total:	**23,543.88**				
MW OH	LYNCH EMS V011542	DEC FUEL COST	103658-6345 Gasoline & Diesel Fuel	AP012224	790.86	12/23 FUEL		00129926	01/25/2024
				Check Total:	**790.86**				
MW OH	MARIPOSA LANDSCAPES INC V000647	NOV CROWTHER MEDIAN & PKWY	800000-6115 Landscaping	AP012224	28.22	105684	P13264	00129927	01/25/2024
MW OH	MARIPOSA LANDSCAPES INC V000647	MEDIANS & PKWY MAINTENANCE	103655-6115 Landscaping	AP012224	590.82	105684	P13264	00129927	01/25/2024
MW OH	MARIPOSA LANDSCAPES INC V000647	NOV LIBRARY MAINTENANCE SVS	103655-6115 / 21008-6115 Landscaping	AP012224	321.16	105684	P13264	00129927	01/25/2024
MW OH	MARIPOSA LANDSCAPES INC	NOV CALTRANS SLOPE ON 57 FWY	103655-6115 / 243601-6115	AP012224	28.22	105684	P13264	00129927	01/25/2024

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	V000647		Landscaping						
MW OH	MARIPOSA LANDSCAPES INC V000647	MEDIANS & PKWY MAINTENANCE	173555-6115 Landscaping	AP012224	1,931.77	105684	P13264	00129927	01/25/2024
MW OH	MARIPOSA LANDSCAPES INC V000647	NOV LMD MAINTENANCE SVS	296561-6115 Landscaping	AP012224	1,212.20	105684	P13264	00129927	01/25/2024
				Check Total:	**4,112.39**				
MW OH	MCKESSON MEDICAL- V012321	EMERGENCY MEDICAL SUPPLIES	103066-6362 Emergency Medical Supples	AP012224	443.43	21588325		00129928	01/25/2024
				Check Total:	**443.43**				
MW OH	METROPOLITAN V011879	STREET SAVER - SUBSCRIPTION	103551-6365 Computer Software	AP012224	2,000.00	4926-AR13257		00129929	01/25/2024
				Check Total:	**2,000.00**				
MW OH	MINUTEMAN PRESS- V007449	CITY LOGO ENGRAVING - TUMBLERS	109595-6301 Special Department Expenses	AP012224	2,577.38	39446	P13281	00129930	01/25/2024
				Check Total:	**2,577.38**				
MW OH	MS CONSTRUCTION V012613	DEC CONSTRUCTION SVS	101206-6730 / 101206-6730 Improvements Othr Thn Bldgs	AP012224	82,650.00	PLS-03	P13003	00129931	01/25/2024
				Check Total:	**82,650.00**				
MW OH	ORANGE COUNTY V000699	OCEA PE 1/6 PD 1/12	0054-2176 PCEA/OCEA Assoc Dues	AP012224	0.38	PR2401001		00129932	01/25/2024
MW OH	ORANGE COUNTY V000699	OCEA PE 1/6 PD 1/12	0048-2176 PCEA/OCEA Assoc Dues	AP012224	10.97	PR2401001		00129932	01/25/2024
MW OH	ORANGE COUNTY V000699	OCEA PE 1/6 PD 1/12	0037-2176 PCEA/OCEA Assoc Dues	AP012224	16.14	PR2401001		00129932	01/25/2024
MW OH	ORANGE COUNTY V000699	OCEA PE 1/6 PD 1/12	0033-2176 PCEA/OCEA Assoc Dues	AP012224	12.51	PR2401001		00129932	01/25/2024
MW OH	ORANGE COUNTY V000699	OCEA PE 1/6 PD 1/12	0029-2176 PCEA/OCEA Assoc Dues	AP012224	9.00	PR2401001		00129932	01/25/2024

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MW OH	ORANGE COUNTY V000699	OCEA PE 1/6 PD 1/12	0010-2176 PCEA/OCEA Assoc Dues	AP012224	513.95	PR2401001		00129932	01/25/2024
				Check Total:	**562.95**				
MW OH	PCEA C/O NORTH ORANGE CO V000679	OCEA PE 1/6 PD 1/12	0037-2176 PCEA/OCEA Assoc Dues	AP012224	1.40	PR2401001		00129933	01/25/2024
MW OH	PCEA C/O NORTH ORANGE CO V000679	OCEA PE 1/6 PD 1/12	0033-2176 PCEA/OCEA Assoc Dues	AP012224	1.08	PR2401001		00129933	01/25/2024
MW OH	PCEA C/O NORTH ORANGE CO V000679	OCEA PE 1/6 PD 1/12	0029-2176 PCEA/OCEA Assoc Dues	AP012224	0.77	PR2401001		00129933	01/25/2024
MW OH	PCEA C/O NORTH ORANGE CO V000679	OCEA PE 1/6 PD 1/12	0010-2176 PCEA/OCEA Assoc Dues	AP012224	44.36	PR2401001		00129933	01/25/2024
MW OH	PCEA C/O NORTH ORANGE CO V000679	OCEA PE 1/6 PD 1/12	0054-2176 PCEA/OCEA Assoc Dues	AP012224	0.03	PR2401001		00129933	01/25/2024
MW OH	PCEA C/O NORTH ORANGE CO V000679	OCEA PE 1/6 PD 1/12	0048-2176 PCEA/OCEA Assoc Dues	AP012224	0.96	PR2401001		00129933	01/25/2024
				Check Total:	**48.60**				
MW OH	PETE'S ROAD SERVICE INC V000767	TIRES FOR FIRE TRUCK	103066-6134 Vehicle Repair & Maintenance	AP012224	1,732.84	23-0715823-00		00129934	01/25/2024
				Check Total:	**1,732.84**				
MW OH	PLACEWORKS V012423	DEC PROFESSIONAL SVS	509104-6017 / 509104-6017 Special Studies	AP012224	6,154.05	83080	P13054	00129935	01/25/2024
				Check Total:	**6,154.05**				
MW OH	PRUDENTIAL OVERALL V000836	12/06 UNIFORM CLEANING SVS	103650-6360 Uniforms	AP012224	163.29	62868545	P12973	00129936	01/25/2024
MW OH	PRUDENTIAL OVERALL V000836	12/13 UNIFORM CLEANING SVS	103650-6360 Uniforms	AP012224	163.29	62870581	P12973	00129936	01/25/2024
MW OH	PRUDENTIAL OVERALL V000836	12/20 UNIFORM CLEANING SVS	103650-6360 Uniforms	AP012224	165.05	62872362	P12973	00129936	01/25/2024

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MW OH	PRUDENTIAL OVERALL V000836	01/03 UNIFORM CLEANING SVS	103650-6360 Uniforms	AP012224	167.14	62876178	P12973	00129936	01/25/2024
MW OH	PRUDENTIAL OVERALL V000836	01/10 UNIFORM CLEANING SVS	103650-6360 Uniforms	AP012224	163.29	62878266	P12973	00129936	01/25/2024
				Check Total:	**822.06**				
MW OH	PVP COMMUNICATIONS V010610	PD MOTORCYCLE HELMET EMBLEMS	103047-6360 Uniforms	AP012224	269.38	133818		00129937	01/25/2024
				Check Total:	**269.38**				
MW OH	PYROCOP INC V012136	FIRE INVEST. - 1030 ECKENRODE	103066-6290 Dept. Contract Services	AP012224	1,788.94	2023-0081	P12989	00129938	01/25/2024
				Check Total:	**1,788.94**				
MW OH	RYDIN DECAL V005931	2024 PARKING PERMIT DECALS	103047-6230 Printing & Binding	AP012224	605.12	PS-INV114124		00129939	01/25/2024
				Check Total:	**605.12**				
MW OH	SAFETY-KLEEN SYSTEMS INC V011477	DETECTOR TUBES/PARTS WASHER	103658-6301 Special Department Expenses	AP012224	325.07	92399466		00129940	01/25/2024
				Check Total:	**325.07**				
MW OH	SANTA ANA COLLEGE V002875	WELLNESS PROGR - REG	103066-6250 Staff Training	AP012224	2,184.00	26855		00129941	01/25/2024
				Check Total:	**2,184.00**				
MW OH	SELBERT PERKINS DESIGN V012172	DEC WAYFINDING DESIGN SVS	709201-6770 / 709201-6770 Infrastructure - Major Studies	AP012224	400.00	20240034	P13083	00129942	01/25/2024
MW OH	SELBERT PERKINS DESIGN V012172	DEC WAYFINDING DESIGN SVS	729201-6770 / 729201-6770 Infrastructure - Major Studies	AP012224	400.00	20240034	P13083	00129942	01/25/2024
				Check Total:	**800.00**				
MW OH	SOUTHERN CALIFORNIA V000910	DEC-JAN ELECTRICAL CHARGES	109595-6330 Electricity	AP012224	23,777.98	011824		00129943	01/25/2024
MW OH	SOUTHERN CALIFORNIA	DEC-JAN ELECTRICAL CHARGES	109595-6330 / 21010-6330	AP012224	14.63	011824		00129943	01/25/2024

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	V000910		Electricity						
MW OH	SOUTHERN CALIFORNIA V000910	DEC-JAN ELECTRICAL CHARGES	109595-6330 / 21011-6330 Electricity	AP012224	190.75	011824		00129943	01/25/2024
MW OH	SOUTHERN CALIFORNIA V000910	DEC-JAN ELECTRICAL CHARGES	109595-6330 / 21009-6330 Electricity	AP012224	93.04	011824		00129943	01/25/2024
MW OH	SOUTHERN CALIFORNIA V000910	DEC-JAN ELECTRICAL CHARGES	296561-6330 Electricity	AP012224	162.66	011824		00129943	01/25/2024
MW OH	SOUTHERN CALIFORNIA V000910	DEC-JAN ELECTRICAL CHARGES	800000-6330 Electricity	AP012224	162.30	011824		00129943	01/25/2024
				Check Total:	**24,401.36**				
MW OH	STERICYCLE V000905	AUG SHREDDING SVS	374386-6299 Other Purchased Services	AP012224	186.24	8002315357BAL		00129944	01/25/2024
MW OH	STERICYCLE V000905	OCT SHREDDING SVS	374386-6299 Other Purchased Services	AP012224	1,751.26	8005234574		00129944	01/25/2024
				Check Total:	**1,937.50**				
MW OH	T-MOBILE V004339	11/21-12/20 HVAC CTRL INTERNET	109595-6215 Telephone/Internet	AP012224	591.09	DEC-23		00129945	01/25/2024
				Check Total:	**591.09**				
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1194- 50% REFUND	740000-4302 General Plan Update Fee	AP012224	54.00	B23-1194		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1194- 50% REFUND	102532-4164 Electrical Permits	AP012224	14.00	B23-1194		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1194- 50% REFUND	750000-4303 Technology Fee	AP012224	31.50	B23-1194		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1194- 50% REFUND	0044-2036 CBSC State Fee	AP012224	1.00	B23-1194		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1194- 50% REFUND	0044-2049 Health & Safety Collection	AP012224	2.50	B23-1194		00129946	01/25/2024

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MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1194- 50% REFUND	102532-4160 Building Permits	AP012224	146.00	B23-1194		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1194- 50% REFUND	0044-2030 Strong Motion Fees/Res.	AP012224	2.34	B23-1194		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1300- 50% REFUND	0044-2030 Strong Motion Fees/Res.	AP012224	2.73	B23-1300		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1300- 50% REFUND	0044-2049 Health & Safety Collection	AP012224	2.50	B23-1300		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1300- 50% REFUND	102532-4160 Building Permits	AP012224	146.00	B23-1300		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1300- 50% REFUND	0044-2036 CBSC State Fee	AP012224	1.00	B23-1300		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1300- 50% REFUND	750000-4303 Technology Fee	AP012224	36.75	B23-1300		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1300- 50% REFUND	740000-4302 General Plan Update Fee	AP012224	63.00	B23-1300		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1300- 50% REFUND	102532-4164 Electrical Permits	AP012224	52.00	B23-1300		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1480- 50% REFUND	750000-4303 Technology Fee	AP012224	30.63	B23-1480		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1480- 50% REFUND	102532-4164 Electrical Permits	AP012224	14.00	B23-1480		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1480- 50% REFUND	102532-4160 Building Permits	AP012224	146.00	B23-1480		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1480- 50% REFUND	740000-4302 General Plan Update Fee	AP012224	52.50	B23-1480		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1480- 50% REFUND	0044-2049 Health & Safety Collection	AP012224	2.50	B23-1480		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION	PERMIT B23-1480- 50% REFUND	0044-2030	AP012224	2.78	B23-1480		00129946	01/25/2024

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	V012749		Strong Motion Fees/Res.						
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-1480- 50% REFUND	0044-2036 CBSC State Fee	AP012224	1.00	B23-1480		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2065- 50% REFUND	0044-2036 CBSC State Fee	AP012224	1.00	B23-2065		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2065- 50% REFUND	0044-2030 Strong Motion Fees/Res.	AP012224	2.00	B23-2065		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2065- 50% REFUND	0044-2049 Health & Safety Collection	AP012224	2.50	B23-2065		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2065- 50% REFUND	102532-4160 Building Permits	AP012224	190.00	B23-2065		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2065- 50% REFUND	740000-4302 General Plan Update Fee	AP012224	4.50	B23-2065		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2065- 50% REFUND	750000-4303 Technology Fee	AP012224	25.00	B23-2065		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2382- 50% REFUND	750000-4303 Technology Fee	AP012224	25.00	B23-2382		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2382- 50% REFUND	740000-4302 General Plan Update Fee	AP012224	4.50	B23-2382		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2382- 50% REFUND	102532-4164 Electrical Permits	AP012224	53.50	B23-2382		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2382- 50% REFUND	102532-4160 Building Permits	AP012224	113.50	B23-2382		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2382- 50% REFUND	0044-2049 Health & Safety Collection	AP012224	2.50	B23-2382		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2382- 50% REFUND	0044-2036 CBSC State Fee	AP012224	1.00	B23-2382		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2382- 50% REFUND	0044-2030 Strong Motion Fees/Res.	AP012224	2.00	B23-2382		00129946	01/25/2024

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MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2850- 50% REFUND	0044-2030 Strong Motion Fees/Res.	AP012224	2.00	B23-2850		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2850- 50% REFUND	0044-2036 CBSC State Fee	AP012224	1.00	B23-2850		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2850- 50% REFUND	0044-2049 Health & Safety Collection	AP012224	2.50	B23-2850		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2850- 50% REFUND	102532-4160 Building Permits	AP012224	113.50	B23-2850		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2850- 50% REFUND	102532-4164 Electrical Permits	AP012224	53.50	B23-2850		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2850- 50% REFUND	740000-4302 General Plan Update Fee	AP012224	4.50	B23-2850		00129946	01/25/2024
MW OH	TESLA ENERGY OPERATION V012749	PERMIT B23-2850- 50% REFUND	750000-4303 Technology Fee	AP012224	25.00	B23-2850		00129946	01/25/2024
				Check Total:	**1,433.73**				
MW OH	THE BEE MAN V000117	BEE REMOVAL SVS - UNDERHILL DR	103654-6301 Special Department Expenses	AP012224	225.00	125233		00129947	01/25/2024
				Check Total:	**225.00**				
MW OH	THE TINT PROS V012751	DRAIN PUMP REPAIR	103066-6301 Special Department Expenses	AP012224	1,487.00	1472		00129948	01/25/2024
				Check Total:	**1,487.00**				
MW OH	THINKSUPPLIES.COM V007047	OFFICE SUPPLIES	103650-6315 Office Supplies	AP012224	80.52	70344		00129949	01/25/2024
MW OH	THINKSUPPLIES.COM V007047	PAPER	109595-6315 Office Supplies	AP012224	271.82	70390		00129949	01/25/2024
MW OH	THINKSUPPLIES.COM V007047	PAPER	109595-6315 Office Supplies	AP012224	217.46	70400		00129949	01/25/2024
				Check Total:	**569.80**				

City of Placentia
Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
MW OH	TRAFFIC MANAGEMENT V008463	PW SUPPLIES - ROADMAX PAINT	103652-6301 Special Department Expenses	AP012224	1,166.22	06-103827		00129950	01/25/2024
				Check Total:	**1,166.22**				
MW OH	TREJO, DANIELA V012221	DRONE TEST/LICENSE FEES	103041-6250 Staff Training	AP012224	175.00	TREJO11724		00129951	01/25/2024
				Check Total:	**175.00**				
MW OH	TRILLIUM CNG (1720) V007952	NOV CNG FUEL	103658-6345 Gasoline & Diesel Fuel	AP012224	253.57	231661731		00129952	01/25/2024
				Check Total:	**253.57**				
MW OH	TURBO DATA SYSTEMS INC V001238	PARKING CIT. ENVELOPES	103047-6290 Dept. Contract Services	AP012224	52.50	40466A		00129953	01/25/2024
MW OH	TURBO DATA SYSTEMS INC V001238	DEC PARKING CITATION SVS	103047-6290 Dept. Contract Services	AP012224	1,063.38	41868	P13052	00129953	01/25/2024
				Check Total:	**1,115.88**				
MW OH	UNIQUE PRINTING V010259	PD BUSINESS CARDS	103041-6230 Printing & Binding	AP012224	138.11	45609		00129954	01/25/2024
				Check Total:	**138.11**				
MW OH	US BANK PARS #6746022400 V008781	PARS PT EE/ER PE1/6 PD1/12	0010-2126 Employee PARS/ARS W/H	AP012224	744.63	PR2401001		00129955	01/25/2024
MW OH	US BANK PARS #6746022400 V008781	PARS PT EE/ER PE1/6 PD1/12	0010-2131 Employer PARS/ARS Payable	AP012224	744.63	PR2401001		00129955	01/25/2024
				Check Total:	**1,489.26**				
MW OH	WEST COAST ARBORISTS INC V001124	12/1-15 TREE TRIMMING SVS	103655-6116 Tree Maintenance	AP012224	980.00	209017	P13061	00129956	01/25/2024
MW OH	WEST COAST ARBORISTS INC V001124	12/1-15 TREE TRIMMING SVS	173555-6116 Tree Maintenance	AP012224	980.00	209017	P13061	00129956	01/25/2024
				Check Total:	**1,960.00**				
MW OH	YAZDANSHENAS, ALIYAR	MAY HEALTH & WELLNESS REIMB.	109595-6999	AP012224	140.06	011824		00129957	01/25/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	V012757		Other Expenditure						
				Check Total:	**140.06**				
MW OH	YORBA LINDA WATER V001148	NOV-DEC WATER CHARGES	109595-6335 Water	AP012224	261.17	011784		00129958	01/25/2024
				Check Total:	**261.17**				
MW OH	ZAVADIL, DANIEL V012752	EXPENSES REIMBURSEMENT	102532-6315 Office Supplies	AP012224	171.83	010924		00129959	01/25/2024
MW OH	ZAVADIL, DANIEL V012752	EXPENSES REIMBURSEMENT	101001-6245 Meetings & Conferences	AP012224	22.84	010924		00129959	01/25/2024
				Check Total:	**194.67**				
				Type Total:	**1,503,968.75**				
				Check Total:	**1,503,968.75**				

City of Placentia

ACH Check Register
For 02/06/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
				Grand Total:	274,855.98				

Check Totals by ID	
AP	274,855.98
EP	0.00
IP	0.00
OP	0.00

Void Total:	0.00
Check Total:	274,855.98

Fund Name	Check Totals by Fund
101-General Fund (0010)	201,499.21
208-Sccssr Agncy Ret Oblg (0054)	538.47
231-Placentia Reg Nav Cent(0078)	1,173.83
265-Landscape Maintenance (0029)	481.65
275-Sewer Maintenance (0048)	2,921.73
401-City Capital Projects (0033)	3,349.92
501-Refuse Administration (0037)	2,193.56
601-Employee Health & Wlfre (0039)	61,407.71
605-Risk Management (0040)	1,289.90
Check Total:	274,855.98

ACH Payroll Direct Deposit for 01/26/2024:	593,478.88
Electronic Disbursement Total:	868,334.86

Funds will be transferred from the Cash Basis Fund as needed to fund the warrants included on this warrant register

City of Placentia
Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
MW OH	PLACENTIA POLICE V000839	PPFMA PE 1/6 PD 1/12	0010-2180 Police Mgmt Assn Dues	ACH011724	0.00	PR2401001		00000000	01/18/2024
				Check Total:	**0.00**				
MW OH	PLACENTIA FIREFIGHTERS V011878	PFFA PE 1/6 PD 1/12	0010-2178 Placentia Police Assoc Dues	ACH011724	800.00	PR2401001		00018225	01/18/2024
				Check Total:	**800.00**				
MW OH	PLACENTIA POLICE V003519	PPOA PE 1/6 PD 1/12	0010-2178 Placentia Police Assoc Dues	ACH011724	3,246.09	PR2401001		00018226	01/18/2024
MW OH	PLACENTIA POLICE V003519	PPOA PE 1/6 PD 1/12	0078-2178 Placentia Police Assoc Dues	ACH011724	47.66	PR2401001		00018226	01/18/2024
				Check Total:	**3,293.75**				
MW OH	CALIFORNIA STATE V004813	CA GARN PE 1/6 PD 1/12	0010-2196 Garnishments W/H	ACH011824	1,272.91	PR2401001		00018227	01/18/2024
MW OH	CALIFORNIA STATE V004813	CA GARN PE 1/6 PD 1/12	0029-2196 Garnishments W/H	ACH011824	9.23	PR2401001		00018227	01/18/2024
MW OH	CALIFORNIA STATE V004813	CA GARN PE 1/6 PD 1/12	0037-2196 Garnishments W/H	ACH011824	69.23	PR2401001		00018227	01/18/2024
MW OH	CALIFORNIA STATE V004813	CA GARN PE 1/6 PD 1/12	0048-2196 Garnishments W/H	ACH011824	46.15	PR2401001		00018227	01/18/2024
				Check Total:	**1,397.52**				
MW OH	EMPLOYMENT V010052	PAYROLL PE 1/6 PD 1/12	0010-2135 Calif Income Tax W/H	ACH011824	37,810.88	PR2401001		00018228	01/18/2024
MW OH	EMPLOYMENT V010052	PAYROLL PE 1/6 PD 1/12	0029-2135 Calif Income Tax W/H	ACH011824	131.36	PR2401001		00018228	01/18/2024
MW OH	EMPLOYMENT V010052	PAYROLL PE 1/6 PD 1/12	0033-2135 Calif Income Tax W/H	ACH011824	783.31	PR2401001		00018228	01/18/2024
MW OH	EMPLOYMENT V010052	PAYROLL PE 1/6 PD 1/12	0040-2135 Calif Income Tax W/H	ACH011824	367.02	PR2401001		00018228	01/18/2024

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Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
MW OH	EMPLOYMENT V010052	PAYROLL PE 1/6 PD 1/12	0037-2135 Calif Income Tax W/H	ACH011824	430.51	PR2401001		00018228	01/18/2024
MW OH	EMPLOYMENT V010052	PAYROLL PE 1/6 PD 1/12	0054-2135 Calif Income Tax W/H	ACH011824	111.86	PR2401001		00018228	01/18/2024
MW OH	EMPLOYMENT V010052	PAYROLL PE 1/6 PD 1/12	0048-2135 Calif Income Tax W/H	ACH011824	476.83	PR2401001		00018228	01/18/2024
MW OH	EMPLOYMENT V010052	PAYROLL PE 1/6 PD 1/12	0078-2135 Calif Income Tax W/H	ACH011824	232.91	PR2401001		00018228	01/18/2024
				Check Total:	**40,344.68**				
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0078-2110 Federal Income Tax W/H	ACH011824	693.40	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0010-2110 Federal Income Tax W/H	ACH011824	88,458.36	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0029-2110 Federal Income Tax W/H	ACH011824	190.03	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0033-2110 Federal Income Tax W/H	ACH011824	2,066.46	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0037-2110 Federal Income Tax W/H	ACH011824	1,021.67	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0040-2110 Federal Income Tax W/H	ACH011824	458.70	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0048-2110 Federal Income Tax W/H	ACH011824	1,479.38	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0054-2110 Federal Income Tax W/H	ACH011824	252.11	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0054-2115 Employee Medicare W/H	ACH011824	37.11	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0078-2115 Employee Medicare W/H	ACH011824	62.43	PR2401001		00018229	01/18/2024

City of Placentia
Check Register
For 01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0040-2115 Employee Medicare W/H	ACH011824	82.09	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0048-2115 Employee Medicare W/H	ACH011824	179.21	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0037-2115 Employee Medicare W/H	ACH011824	133.96	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0033-2115 Employee Medicare W/H	ACH011824	195.71	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0029-2115 Employee Medicare W/H	ACH011824	50.09	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0010-2115 Employee Medicare W/H	ACH011824	11,968.77	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0010-2120 Employer Medicare Payable	ACH011824	11,968.77	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0029-2120 Employer Medicare Payable	ACH011824	50.09	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0037-2120 Employer Medicare Payable	ACH011824	133.96	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0048-2120 Employer Medicare Payable	ACH011824	179.21	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0040-2120 Employer Medicare Payable	ACH011824	82.09	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0033-2120 Employer Medicare Payable	ACH011824	195.71	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0078-2120 Employer Medicare Payable	ACH011824	62.43	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0054-2120 Employer Medicare Payable	ACH011824	37.11	PR2401001		00018229	01/18/2024
MW OH	INTERNAL REVENUE	FED TAX PE 1/6 PD 1/12	0010-2125	ACH011824	18.50	PR2401001		00018229	01/18/2024

City of Placentia
Check Register
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Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	V010054		Employee Social Sec W/H						
MW OH	INTERNAL REVENUE V010054	FED TAX PE 1/6 PD 1/12	0010-2130 Employer Soc Sec Payable	ACH011824	18.50	PR2401001		00018229	01/18/2024
				Check Total:	**120,075.85**				
MW OH	MISSION SQUARE 100091 V012393	401A PE 1/6 PD 1/12	0010-2170 Deferred Comp Payable - ICMA	ACH011824	10,316.25	PR2401001		00018230	01/18/2024
				Check Total:	**10,316.25**				
MW OH	MISSION SQUARE 301387 V012394	EE/ER CONTR PE 1/6 PD 1/12	0010-2170 Deferred Comp Payable - ICMA	ACH011824	33,303.81	301387-PY2401		00018231	01/18/2024
MW OH	MISSION SQUARE 301387 V012394	EE/ER CONTR PE 1/6 PD 1/12	0029-2170 Deferred Comp Payable - ICMA	ACH011824	50.85	301387-PY2401		00018231	01/18/2024
MW OH	MISSION SQUARE 301387 V012394	EE/ER CONTR PE 1/6 PD 1/12	0054-2170 Deferred Comp Payable - ICMA	ACH011824	100.28	301387-PY2401		00018231	01/18/2024
MW OH	MISSION SQUARE 301387 V012394	EE/ER CONTR PE 1/6 PD 1/12	0078-2170 Deferred Comp Payable - ICMA	ACH011824	75.00	301387-PY2401		00018231	01/18/2024
MW OH	MISSION SQUARE 301387 V012394	EE/ER CONTR PE 1/6 PD 1/12	0033-2170 Deferred Comp Payable - ICMA	ACH011824	108.73	301387-PY2401		00018231	01/18/2024
MW OH	MISSION SQUARE 301387 V012394	EE/ER CONTR PE 1/6 PD 1/12	0037-2170 Deferred Comp Payable - ICMA	ACH011824	404.23	301387-PY2401		00018231	01/18/2024
MW OH	MISSION SQUARE 301387 V012394	EE/ER CONTR PE 1/6 PD 1/12	0040-2170 Deferred Comp Payable - ICMA	ACH011824	300.00	301387-PY2401		00018231	01/18/2024
MW OH	MISSION SQUARE 301387 V012394	EE/ER CONTR PE 1/6 PD 1/12	0048-2170 Deferred Comp Payable - ICMA	ACH011824	560.95	301387-PY2401		00018231	01/18/2024
				Check Total:	**34,903.85**				
MW OH	WASHINGTON STATE V011597	WA GARN PE 1/6 PD 1/12	0010-2196 Garnishments W/H	ACH011824	823.09	PR2401001		00018232	01/18/2024
				Check Total:	**823.09**				
MW OH	PLACENTIA POLICE	PPFMA PE01/16 PD 01/12	0010-2180	ACH011924	1,493.28	PR2401001.		00018233	01/29/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	V000839		Police Mgmt Assn Dues						
				Check Total:	**1,493.28**				
MW OH	ALDWIR, MAMOUN E000113	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	870.44	FEB-24		00018234	01/30/2024
				Check Total:	**870.44**				
MW OH	ANDERSON, MARLA E000071	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	FEB-24		00018235	01/30/2024
				Check Total:	**527.78**				
MW OH	ARMSTRONG, JOHN T E000046	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,137.00	FEB-24		00018236	01/30/2024
				Check Total:	**1,137.00**				
MW OH	AUDISS, JAY SCOTT E000125	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	2,256.00	FEB-24		00018237	01/30/2024
				Check Total:	**2,256.00**				
MW OH	BABCOCK, CHARLES A E000015	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	308.00	FEB-24		00018238	01/30/2024
				Check Total:	**308.00**				
MW OH	BEALS, SHARLENE E000076	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	185.39	FEB-24		00018239	01/30/2024
				Check Total:	**185.39**				
MW OH	BERMUDEZ, ALBERT E000124	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	547.69	MAR-24		00018240	01/30/2024
				Check Total:	**547.69**				
MW OH	BUNNELL, DONALD E000062	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAR-24		00018241	01/30/2024
				Check Total:	**527.78**				
MW OH	BURGNER, ARTHUR	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	527.78	MAR-24		00018242	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000074		Health Insurance Premiums						
				Check Total:	**527.78**				
MW OH	BUSSE, MICHAEL E000131	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,612.85	MAR-24		00018243	01/30/2024
				Check Total:	**1,612.85**				
MW OH	CHANDLER, JOHN P E000109	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,879.80	MAR-24		00018244	01/30/2024
				Check Total:	**1,879.80**				
MW OH	CHANG, ROBERT E000107	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,282.00	MAR-24		00018245	01/30/2024
				Check Total:	**1,282.00**				
MW OH	COBBETT, GEOFFREY E000007	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAR-24		00018246	01/30/2024
				Check Total:	**527.78**				
MW OH	COOK, ARLENE M E000018	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAR-24		00018247	01/30/2024
				Check Total:	**527.78**				
MW OH	D'AMATO, ROBERT E000056	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	185.39	MAR-24		00018248	01/30/2024
				Check Total:	**185.39**				
MW OH	DAVID, PRESTON E000112	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAR-24		00018249	01/30/2024
				Check Total:	**527.78**				
MW OH	DAVIS, CAROLYN E000005	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAR-24		00018250	01/30/2024
				Check Total:	**527.78**				
MW OH	DEAN, ANDREW	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	1,815.00	MAR-24		00018251	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000135		Health Insurance Premiums						
				Check Total:	**1,815.00**				
MW OH	DELOS SANTOS, JAMIE E000045	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	229.55	MAR-24		00018252	01/30/2024
				Check Total:	**229.55**				
MW OH	DICKSON, ROBERTA JO E000011	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	185.39	MAR-24		00018253	01/30/2024
				Check Total:	**185.39**				
MW OH	DOWNEY, CAROL E000082	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAR-24		00018254	01/30/2024
				Check Total:	**527.78**				
MW OH	ECKENRODE, NORMAN E000029	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAR-24		00018255	01/30/2024
				Check Total:	**527.78**				
MW OH	ESCOBOSA, LILLIAN E000055	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	291.15	MAR-24		00018256	01/30/2024
				Check Total:	**291.15**				
MW OH	ESPINOZA, ROSALINDA E000016	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	565.00	MAR-24		00018257	01/30/2024
				Check Total:	**565.00**				
MW OH	FRICKE, JUERGEN E000075	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	873.00	MAR-24		00018258	01/30/2024
				Check Total:	**873.00**				
MW OH	FULLER, GLENN H E000081	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	873.00	MAR-24		00018259	01/30/2024
				Check Total:	**873.00**				
MW OH	GALLANT, KAREN	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	527.78	MAR-24		00018260	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000008		Health Insurance Premiums						
				Check Total:	**527.78**				
MW OH	GARNER, JO ANN E000047	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	185.39	MAR-24		00018261	01/30/2024
				Check Total:	**185.39**				
MW OH	GARNER, KITTY E000080	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	870.44	MAR-24		00018262	01/30/2024
				Check Total:	**870.44**				
MW OH	GRIMM, DENNIS L E000042	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	308.00	MAR-24		00018263	01/30/2024
				Check Total:	**308.00**				
MW OH	HOLTSCLAW, KATHERINE E000121	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	565.00	MAR-24		00018264	01/30/2024
				Check Total:	**565.00**				
MW OH	IRVINE, SUZETTE E000019	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAR-24		00018265	01/30/2024
				Check Total:	**527.78**				
MW OH	JENKINS, ROBERT E000084	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	739.30	MAR-24		00018266	01/30/2024
				Check Total:	**739.30**				
MW OH	JOHNSON, SHARON E000099	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	185.39	MAR-24		00018267	01/30/2024
				Check Total:	**185.39**				
MW OH	JONES, ROBERT E000053	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	184.72	MAR-24		00018268	01/30/2024
				Check Total:	**184.72**				
MW OH	JUAREZ, JANET	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	184.72	MAR-24		00018269	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000134		Health Insurance Premiums						
				Check Total:	**184.72**				
MW OH	JUDD, TERRELL E000115	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	870.44	MAR-24		00018270	01/30/2024
				Check Total:	**870.44**				
MW OH	KIRKLAND, RICHARD L E000110	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	184.72	APR-24		00018271	01/30/2024
				Check Total:	**184.72**				
MW OH	LITTLE, DIANE M E000098	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	291.15	APR-24		00018272	01/30/2024
				Check Total:	**291.15**				
MW OH	LOOMIS, CORINNE E000122	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	565.00	APR-24		00018273	01/30/2024
				Check Total:	**565.00**				
MW OH	LOWREY, B J E000041	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	308.00	APR-24		00018274	01/30/2024
				Check Total:	**308.00**				
MW OH	MAERTZWEILER, MICHAEL E E000032	EB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	APR-24		00018275	01/30/2024
				Check Total:	**527.78**				
MW OH	MILANO, JAMES E000054	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	APR-24		00018276	01/30/2024
				Check Total:	**527.78**				
MW OH	MILLER, RICHARD E000106	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,137.00	APR-24		00018277	01/30/2024
				Check Total:	**1,137.00**				
MW OH	NAJERA, JOSEPH D.	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	565.00	APR-24		00018278	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000136		Health Insurance Premiums						
				Check Total:	**565.00**				
MW OH	OLEA, ARLENE J E000014	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	APR-24		00018279	01/30/2024
				Check Total:	**527.78**				
MW OH	PALMER, GEORGE E000094	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	873.00	APR-24		00018280	01/30/2024
				Check Total:	**873.00**				
MW OH	PASCARELLA, RICHARD E000129	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	2,095.45	APR-24		00018281	01/30/2024
				Check Total:	**2,095.45**				
MW OH	PASCUA, RAYNALD E000114	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,720.00	APR-24		00018282	01/30/2024
				Check Total:	**1,720.00**				
MW OH	PASPALL, MIHAJLO E000085	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	526.44	APR-24		00018283	01/30/2024
				Check Total:	**526.44**				
MW OH	PEREZ, ROBERT E000111	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	184.72	APR-24		00018284	01/30/2024
				Check Total:	**184.72**				
MW OH	PICHON, WALTER E000103	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	291.15	APR-24		00018285	01/30/2024
				Check Total:	**291.15**				
MW OH	PINEDA, MATEO E000127	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	492.58	APR-24		00018286	01/30/2024
				Check Total:	**492.58**				
MW OH	PISCHEL, STEPHEN	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	870.44	APR-24		00018287	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000130		Health Insurance Premiums						
				Check Total:	**870.44**				
MW OH	POINT, ERIC E000133	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	2,256.00	APR-24		00018288	01/30/2024
				Check Total:	**2,256.00**				
MW OH	REDIFER, KIM R E000022	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	873.00	APR-24		00018289	01/30/2024
				Check Total:	**873.00**				
MW OH	RENDEN, BRIAN E000083	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	526.44	APR-24		00018290	01/30/2024
				Check Total:	**526.44**				
MW OH	REYES, ROGER T E000024	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	APR-24		00018291	01/30/2024
				Check Total:	**527.78**				
MW OH	REYNOLDS, MATTHEW E000132	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	565.00	APR-24		00018292	01/30/2024
				Check Total:	**565.00**				
MW OH	RICE, RUSSELL J E000059	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,385.00	APR-24		00018293	01/30/2024
				Check Total:	**1,385.00**				
MW OH	RIVERA, AIDA E000026	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	185.39	APR-24		00018294	01/30/2024
				Check Total:	**185.39**				
MW OH	ROACH, MICHAEL E000105	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,879.80	APR-24		00018295	01/30/2024
				Check Total:	**1,879.80**				
MW OH	ROBB, SANDRA	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	185.39	APR-24		00018296	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000043		Health Insurance Premiums						
				Check Total:	**185.39**				
MW OH	ROSE, RICHARD D E000050	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	870.44	APR-24		00018297	01/30/2024
				Check Total:	**870.44**				
MW OH	RUIZ, ARNULFO E000138	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,287.00	APR-24		00018298	01/30/2024
				Check Total:	**1,287.00**				
MW OH	SALE, LEE R E000031	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	APR-24		00018299	01/30/2024
				Check Total:	**527.78**				
MW OH	SANCHEZ, LAURA E000058	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	185.39	APR-24		00018300	01/30/2024
				Check Total:	**185.39**				
MW OH	SCHLIEDER, BEVERLY E000120	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	870.44	MAY-24		00018301	01/30/2024
				Check Total:	**870.44**				
MW OH	SMITH, WARD E000128	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	722.70	MAY-24		00018302	01/30/2024
				Check Total:	**722.70**				
MW OH	SOTO, PHILIP J E000052	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAY-24		00018303	01/30/2024
				Check Total:	**527.78**				
MW OH	SPRAGUE, GARY A E000064	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,679.00	MAY-24		00018304	01/30/2024
				Check Total:	**1,679.00**				
MW OH	STEPHEN, JEFFREY	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	870.44	MAY-24		00018305	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000119		Health Insurance Premiums						
				Check Total:	**870.44**				
MW OH	TAYLOR, DAVID M E000088	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	578.00	MAY-24		00018306	01/30/2024
				Check Total:	**578.00**				
MW OH	TAYLOR, LINDA E000126	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	565.00	MAY-24		00018307	01/30/2024
				Check Total:	**565.00**				
MW OH	THOMANN, DARYLL L E000101	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAY-24		00018308	01/30/2024
				Check Total:	**527.78**				
MW OH	TRIFOS, WILLIAM E000104	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	873.00	MAY-24		00018309	01/30/2024
				Check Total:	**873.00**				
MW OH	VALENTINE, THOMAS E000118	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,879.80	MAY-24		00018310	01/30/2024
				Check Total:	**1,879.80**				
MW OH	VERSTYNEN, WILLIAM E000092	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	184.72	MAY-24		00018311	01/30/2024
				Check Total:	**184.72**				
MW OH	WAHL, KATHLEEN A E000030	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	185.39	MAY-24		00018312	01/30/2024
				Check Total:	**185.39**				
MW OH	WIEST, STEPHEN E000079	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	527.78	MAY-24		00018313	01/30/2024
				Check Total:	**527.78**				
MW OH	WORDEN, LARRY M	FEB MEDICAL REIMBURSEMENT	395083-5161	RETFEB24	578.00	MAY-24		00018314	01/30/2024

Type	Vendor Name/ID	Description	Account/Description	Batch ID	Amount	Invoice#	PO #	Check #	Check Date
	E000116		Health Insurance Premiums						
				Check Total:	**578.00**				
MW OH	YAMAGUCHI, BRIAN E000123	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,612.85	MAY-24		00018315	01/30/2024
				Check Total:	**1,612.85**				
MW OH	ZINN, JOHN E000009	FEB MEDICAL REIMBURSEMENT	395083-5161 Health Insurance Premiums	RETFEB24	1,287.00	MAY-24		00018316	01/30/2024
				Check Total:	**1,287.00**				
				Type Total:	**274,855.98**				
				Check Total:	**274,855.98**				

Placentia City Council
AGENDA REPORT

TO: CITY COUNCIL

VIA: CITY ADMINISTRATOR

FROM: DEPUTY CITY ADMINISTRATOR / PUBLIC SERVICES & INFRASTRUCTURE

DATE: FEBRUARY 6, 2024

SUBJECT: **ACCEPTANCE OF CONSTRUCTION WORK AND NOTICE OF COMPLETION FOR THE 2022-2023 CONCRETE REPAIR PROJECT, CITY PROJECT NO. 1302**

FISCAL IMPACT: EXPENSE:

$ 97,500.00	CONSTRUCTION CONTRACT (GRIGOLLA)
$ 9,744.00	APPROVED CHANGE ORDER NO. 1
$ 2,665.50	BALANCING CHANGE ORDER NO. 2
$ 109,909.50	TOTAL CONSTRUCTION COST
$ 1,617.29	ARBORIST INSPECTIONS (DUDEK)
$ 7,740.00	TREE REMOVALS (WCA)
$119,266.79	TOTAL PROJECT COST

BUDGET:

$119,723.56	TOTAL FY 22-23 CIP BUDGET
$119,723.56	MEASURE U FUND (791302-6740)

SUMMARY:

On May 16, 2023, the City Council awarded a construction contract to Grigolla & Sons Construction Co. Inc, (Grigolla), in the amount of $97,500.00 to address damaged sidewalk along with curb and gutter repair in neighborhoods that are not scheduled in the City's current pavement rehabilitation and maintenance schedule. During the project, one Contract Change Order (CCO) No. 1 in the amount of $9,744.00 was approved by the City Administrator, which was under his authority limit, to cover additional quantity for sidewalk replacements on Rose Drive and Linda Vista Street that was originally listed as part of this contract but was removed and then added back due to a delay in tree removals by the Broadmoor HOA.

The final Balancing Contract Change Order No. 2 in the amount of $2,665.50 reflects additional concrete repair costs to complete the contract work and includes credits for removing concrete work that was not applicable on this project. The Balancing Contract Change Order No. 2 is included as Attachment 1.

The Project has been completed to the satisfaction of the City. This action concludes the Project and authorizes filing a Notice of Completion with the Orange County Clerk-Recorder's Office in the amount of $109,909.50.

1.c.
Feb 06, 2024

RECOMMENDATION:

It is recommended that City Council take the following actions:

1. Authorize the City Administrator to approve Balancing Contract Change Order No. 2 with Grigolla & Sons Construction Co. Inc, in the amount of $2,665.50; and

2. Accept the work performed by Grigolla & Sons Construction Co. Inc, for construction of the 2022-2023 Concrete Repairs Project, City Project No. 1302 for a grand total amount of $109,909.50; and

3. Authorize the City Administrator to file a Notice of Completion with the Orange County Clerk-Recorder's Office for the Project; and

4. Authorize the City Administrator to release retention funds in accordance with the terms of the contract.

STRATEGIC PLAN STATEMENT:

There is no specific Strategic Plan Goal or Objective associated with this agenda item.

DISCUSSION:

On May 16, 2023, the City Council awarded a construction contract to Grigolla & Sons Construction Co. Inc, (Grigolla), in the amount of $97,500.00 to address damaged sidewalk, curb, and gutter in neighborhoods that are not scheduled in the City's current pavement rehabilitation and maintenance schedule.

There was a delay in issuing the Notice to Proceed (NTP) for this project, as one major location for repair, Rose Drive, needed the Broadmoor HOA to remove trees that were uplifting sidewalk panels before the Contractor could begin removals. With no action by Broadmoor HOA after three months, the decision was made to remove that area from the project and replace it with some additional locations in need of repair and complete the remaining locations as part of this project. Before the Contractor had completed their contract obligation, Broadmoor HOA completed their tree removals, and as a result Contract Change Order (CCO) No. 1 in the amount of $9,744.00 was approved by the City Administrator, which was under his authority limit, to cover additional quantity for sidewalk replacements to add Rose Drive back into the project due to the severity of displacement at multiple locations along a heavily traveled pedestrian sidewalk.

During construction of this project, it was determined that one bid item was no longer applicable. There were also quantity adjustments for sidewalk, curb, and gutter adjacent to SIFI performed by the Contractor, as well as additional costs to increase the size of two tree wells near Tynes Elementary School. Balancing Contract Change Order No. 2 resulted in an additional $2,665.50.

FISCAL IMPACT:

The final construction contract cost amounts to $109,909.50. This cost consists of the bid amount submitted by Grigolla & Sons Construction Co. Inc, in the amount of $97,500.00, an additional $9,744.00 in a previously approved contract change order and $2,665.50 for the balancing change order. There were also costs incurred for tree inspections ($1,617.29) and tree removals ($7,740.00) as a part of this project. A total amount of $119,723.56 was available and budgeted within the Fiscal Year (FY) 2023-24 Capital Improvement Program Budget for this project. As such, sufficient funds exist for the recommended actions.

Prepared by:

Raquel Garcia, EIT
Associate Civil Engineer

Reviewed and approved:

Chris Tanio, PE
Deputy Director of Public Works/City Engineer

Reviewed and approved:

Jennifer Lampman
Director of Finance

Reviewed and approved:

Luis Estevez
Deputy City Administrator

Reviewed and approved:

Damien R. Arrula
City Administrator

Attachments:

1. Balancing Contract Change Order No. 2
2. Notice of Completion – Grigolla & Sons Construction Co. Inc for Project No. 1302

Contract Change Order No.2

Project Title: 2022-2023 Concrete Repair Project, City Project No. 1302

Owner: City of Placentia **Contractor:** Grigolla & Sons Construction Co Inc

You are hereby directed to make the herein described changes from the plans and specifications or to do the following described work not included in the plans and specifications on this contract:

Sidewalk Panel Removals, Additional Work required near ramp location and Balancing Quantities for Project Closeout.

1 This Change Order provides:

a) Extra work and credits identified in Exhibit A

$ 2,665.50

2 This Change Order came about from:

a) *Four raised sidewalk panels were removed to increase the size of two tree wells near Tynes School, there was additional man power required near a ramp location, and balancing bid item quantities based on bid quantity versus actual work perfomed.*

3 Action to be taken:

a) The Contractor was directed to provide a lump sum price for the panel removals and ramp work.

4 Compensation

a)	Adjustment of Line Items exceeding 25%	
b)	Extra work	$ 10,827.50
d)	Credits	$ 8,162.00
	Total	$ 2,665.50

5 Contract Time Extension

a) 0 days

In addition to work specified in the bid specifications, this change order includes all extra work, field adjustments and credits. This work is an Contractor initiated change and includes all labor, equipment, materials, and supervision and Adminstration.

CHANGE TO CONTRACT COST:

Contract Amount:	$	97,500.00
Previous CCOs:	$	9,744.00
Adjustment of Line Items Exceeding 25%		
Total Extra Work	$	10,827.50
Total Field Adjustments	$	-
Total Credits	$	8,162.00
Changes in Line Items:	$	2,665.50
Current Contract price:	$	109,909.50

CHANGE TO CONTRACT TIME:

Original Working Days:	25
Original Date of Completion:	11/29/2023
Previous CCOs Working Days:	12
Additional Working Days:	0
Adjusted Total of Working Days:	37
Adjusted Date of Completion:	12/15/2023

Prepared by: _____

Raquel Garcia, Project Manager, City of Placentia

Recommended: _____

Chris Tanio, City Engineer, City of Placentia

Recommended: _____

Luis Estevez, Deputy City Administrator, City of Placentia

Approved by: _____

Damien R. Arrula, City Administrrator, City of Placentia

We, the undersigned contractor, have given careful consideration to the change proposed and hereby agree, if this proposal, is approved, that we will provide all equipment, furnish all materials, except as may otherwise be noted above, and perform all services necessary for the work above specified, and will accept as full payment therefore the

Accepted: _____

If the Contractor does not sign acceptance of this order, his attention is directed to the requirements of the specifications as to proceeding with the ordered work and filing a written protest within the time therein specified.

CCO No. 2 Exhibit 'A'

Project Title: 2022-2023 Concrete Repair Project, City Project 1302

Owner: City of Placentia **Contractor: Grigolla & Sons Construction Co Inc**

No.	Description	Bid		Actual		$$	Comments	CREDIT	EXTRA
1	Sidewalk Panel Removals to Increase the Size of Two Tree Wells at Tynes School as well as Additional Work Required at Ramp Area on Melrose				LS	$2,420.00			$2,420.00
2	Adjustment to Contract Amount (Originial plus CCO1) for Bid Item #2 (Sidewalk) Actual Quantity	4696		4563	SF	$14.00		(1,862.00)	$0.00
3	Adjustment to Contract Amount for Bid Item #3 (Curb & Gutter - no SIFI) Actual Quantity	70		0	LF	$90.00		(6,300.00)	$0.00
4	Adjustment to Contract Amount for Bid Item #4 (Curb & Gutter adjacent to SIFI) Actual Quantity	250		338.5	LF	$95.00			$8,407.50
5								-	$0.00
6									$0.00
7								-	$0.00
8								-	$0.00
9								-	$0.00
10								-	$0.00
11								-	$0.00
12									$0.00
								-	
								-	
							Sum of Line Item Adjustments	$ (8,162.00)	$10,827.50
							Cost of Line Item adjustments	$ 2,665.50	
							Change in Contract Cost	$2,665.50	

Das

RECORDING REQUESTED BY

AND WHEN RECORDED MAIL TO

Name / Street Address / City & State

City Clerk
City of Placentia
401 E. Chapman Ave.
Placentia, CA 92870

City Council Approval: February 6, 2024

SPACE ABOVE THIS LINE FOR RECORDER'S USE

Free Recording Per Government Code Section 27383 & 6103.

Deputy City Clerk

NOTICE OF COMPLETION

Notice pursuant to Civil Code Section 3093, must be filed within 10 days after completion. (See reverse side for Complete requirements.)

Notice is hereby given that:

1. The undersigned is owner or corporate officer of the owner of the interest or estate stated below in the property hereinafter described:
2. The full name of the owner is City of Placentia
3. The full address of the owner is 401 East Chapman Avenue
   Placentia, CA 92870
4. The nature of the interest or estate of the owner is: In fee.
   N/A
   (If other than fee, strike "In fee" and insert, for example, 'purchaser under contract of purchase," or "lessee")
5. The full names and full addresses of all persons, if any, who hold title with the undersigned as joint tenants or as tenants in common are: NAMES ADDRESSES
   N/A
6. A work of improvement on the property hereinafter described was completed on December 16, 2023. The work done was:
   2022-2023 Concrete Repairs, City Project #1302. This work included removal and replacement of concrete sidewalk, curb and gutter in various locations in the City.

The name of the contractor, if any, for such work of improvement was Grigolla & Sons Construction Co. Inc.

7. 627 W. Allen Avenue, San Dimas, CA 91773 5/16/2023
   (If no contractor for work of improvement as a whole, insert "none".) (Date of Contract)
8. The property on which said work of improvement was completed is in the city of Placentia
   County of Orange, State of California, and is described as follows: 2022-2023 Concrete Repairs, City Project #1302.
9. The street address of said property is none.
   (If no street address has been officially assigned. insert "none".)

CITY OF PLACENTIA

Dated: February 6, 2024
Verification for Individual Owner

Signature of owner or corporate officer of owner named in paragraph 2 or his agent

VERIFICATION

I, the undersigned, say: I am the City Administrator, Damien R. Arrula the declarant of the foregoing
("President of", "Manager of", "Owner of", etc.)

Notice of completion; I have read said notice of completion and know the contents thereof; the same is true of my own knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 6 (Date of Signature.), 2024, at Placentia (City where signed.), California.

(Personal signature of the individual who is swearing that the contents of the notice of completion are true.)-

NOTICE OF COMPLETION – WOLCOTTS FORM 1114 – REV. 6-74

8 pt. type or larger

ATTACHMENT 2

Placentia City Council
AGENDA REPORT

TO: CITY COUNCIL

VIA: CITY ADMINISTRATOR

FROM: DEPUTY CITY ADMINISTRATOR / PUBLIC SERVICES & INFRASTRUCTURE

DATE: FEBRUARY 6, 2024

SUBJECT: **APPROVE AMENDMENT NO. 3 TO PROFESSIONAL SERVICES AGREEMENT WITH TOTUM CORPORATION FOR CONSTRUCTION MANAGEMENT AND INSPECTION SERVICES FOR THE PLACENTIA PUBLIC SAFETY CENTER PROJECT**

FISCAL IMPACT:

EXPENSE:	$ 470,000	TOTAL CONSTRUCTION MANAGEMENT & INSPECTION CONTRACT AMOUNT
AVAILABLE BUDGET:	$ 1,832,148	FISCAL YEAR 2023-24 CIP BUDGET (105213-6850 JL# 229999-6850)

SUMMARY:

The Placentia Public Safety Center project has been phased to allow the construction of the steel Butler Building, which will house the Police Department's property and evidence collection operations. This portion of the project is being constructed first due to the lease on the City's rental facility being set to expire on March 30, 2024. Phase 2 of the project includes the main building construction, which will include the shooting range and the new Emergency Operations Center. Both projects are currently under construction with the Butler Building scheduled to be completed and occupied before the lease on the City's rented facility expires. The main building is anticipated to be completed in August 2024.

On January 10, 2023, the City Council approved Amendment No. 2 to Totum Corporation's (Totum) existing on-call professional services agreement for an amount not to exceed $338,000 to provide construction management (CM) and inspection services for the Public Safety Center project. The proposed Amendment No. 3 to this agreement is presented to the City Council for its consideration to provide added hours and fees because of the extended project duration and added special deputy inspections. The added hours and fee were anticipated prior to the project breaking ground and were incorporated into the project budget. The fee and work scope covers both project phases. Totum is overseeing and coordinating with multiple contractors and vendors to ensure the building is built per plan, providing coordination between the design and construction teams, and acting as the City's representative on the job site.

1.d.
Feb 06, 2024

RECOMMENDATION:

It is recommended that the City Council take the following actions:

1. Approve Amendment No. 3 to a professional services agreement with Totum Corp for project construction management and inspection services for a new total not-to-exceed amount of $470,000 and extend the Agreement term an additional two-years to May 18, 2026; and

2. Authorize the City Administrator to approve the agreement in a form approved by the City Attorney.

STRATEGIC PLAN STATEMENT:

This item conforms to Strategic Plan Goal 5, Implement Public Infrastructure to Meet Community Needs, and Objective 5.4, Construct the Placentia Public Safety Center.

DISCUSSION:

On March 1, 2022, the City Council selected a preferred project alternative for the Placentia Public Safety Center and directed Staff to finalize the construction drawings and bid documents to construct the facility. The new 18,000+ square foot facility will primarily house the Police Department's evidence and property storage operations and shooting range as well as a new emergency communications center and emergency operations and training center. The City currently leases a light industrial/commercial building for property and evidence storage.

Since the City's lease for its existing property and evidence building is set to expire on March 30, 2024, the project was phased to allow the construction of the Butler Building to proceed first so that it can be completed prior to the expiration of the City's current lease. Phase 1 construction of the project entails demolition, grading, subsurface utility work, and the footings and slab for the Butler Building, along with the new building itself, and extensive interior tenant improvements which are scheduled to be completed by the end of February. Phase II construction entails the construction of the main building under a separate construction contract and is scheduled to be completed in August 2024.

The City has maintained an on-call construction management (CM) and inspection services contract with Totum Corp as part of a bench list of CM/inspection consultants. The City previously worked with Totum on delivering a renovation project of the Backs Community Center lobby and restrooms, extensive renovations to the Police Station lobby, restrooms and men's locker room as well as designing and delivering the Placentia Navigation Center. On January 10, 2023, the City Council approved Amendment No. 2 to Totum's professional services agreement for an amount not to exceed $338,000 for construction management and inspection services for the Public Safety Center project. However, it was determined that prior to breaking ground on this project the phasing elements would extend the project duration time, thus requiring additional hours and fees for CM and inspection services. As such, that additional fee was built into the final project budget previously approved by the City Council. Amendment No. 2 provided sufficient

hours and fee to allow Totum to provide these services through 2023. Amendment No. 3 to the City's existing agreement with Totum for construction management and inspection services is presented to the City Council for its consideration to provide added work scope, fee, and extend the contract term to provide for full time construction management and inspection services on this project. The fee and work scope covers both project phases. Totum is managing the work provided by multiple contractors and vendors to ensure that the building is built per plan, providing coordination between the design and construction teams, and acting as the owner's representative. In addition, special deputy inspection services have also been provided to ensure welds, CMU block grout and epoxy applications have been completed per code and product performance specifications. The term of the proposed agreement amendment is also being extended through May 2026 to ensure that Totum is kept under contract during the project warranty period should any warranty-related repairs and coordination be needed.

Totum has provided pre-construction services on this project by providing constructability reviews on the various construction plans and technical specifications as well as led the contractor pre-qualification process and has functioned as the owner's representative by coordinating final design and construction elements with the City's design team and facility end-users. An amendment to the City's existing agreement with Totum is presented for City Council consideration and approval. The work scope and fee under this amendment covers both project construction phases.

FISCAL IMPACT:

The construction management and inspection costs of the Public Safety Center Project amount to $470,000 which includes $338,000 previously approved and an additional $132,000 needed to carry out the project to final completion. A total of $5,007,150 is available within the project budget to cover this added expense, which was anticipated before the project broke ground and included within the overall project budget. Accordingly, sufficient funds exist for the recommended actions.

Prepared by:

Chris Tanio, P.E.
Deputy Director of Public Works/City Engineer

Reviewed and approved:

Jennifer Lampman

Jennifer Lampman
Director of Finance

Reviewed and approved:

Luis Estevez
Deputy City Administrator

Reviewed and approved:

Damien R. Arrula
City Administrator

Attachment:
1. Amendment No. 3 with Totum Corp

AMENDMENT NO. 3 TO
PROFESSIONAL SERVICES AGREEMENT
PROVISION OF CONSTRUCTION MANAGEMENT SERVICES WITH TOTUM CORPORATION

This Amendment No. 3 ("Amendment") to Professional Services Agreement is made and entered into effective the 6th day of February 2024, by and between the CITY OF PLACENTIA, a Charter City and Municipal Corporation ("CITY"), and Totum Corporation a California corporation (hereinafter "CONSULTANT"). CITY and CONSULTANT are sometimes hereinafter individually referred to as "Party" and or collectively referred to as the "Parties."

A. Recitals.

(i). CITY and CONSULTANT entered into a Professional Services Agreement ("Agreement") effective May 18th, 2021 through which CONSULTANT has been providing professional services as more fully explained in the Scope of Services attached to the Agreement as Exhibit "A."

(ii). The Parties now seek to amend the Agreement to increase the cumulative not-to-exceed amount by $470,000 for additional construction management and inspection services in support of the Public Safety Center Project pursuant to the work scope and fee proposal attached hereto an incorporated by reference as Attachment 1.

(iii). All legal prerequisites to the making of this Amendment have occurred.

NOW, THEREFORE, in consideration of the mutual covenants and conditions set forth herein, the Parties agree as follows:

B. Amendment to Agreement.

1. Section 2.1 of the Agreement is hereby amended to read as follows:

2.1 Compensation. Consultant shall be paid hourly in accordance with the fee schedule set forth in Attachment 1. Consultant's total compensation under this agreement shall not exceed One Million and Ninety Thousand Dollars ($1,090,000).

2. Except as specifically modified herein, all of the terms, conditions and provisions of the Agreement shall remain in full force and effect.

3. The Agreement, all amendments together with this Amendment No. 3 and all Exhibits attached thereto, constitutes the entire Agreement between the Parties and supersedes all prior negotiations, arrangements, representations, and understandings, if any, made by or between the Parties with respect to the subject matter hereof. No amendment or other modification of the Agreement, as modified by this Amendment No. 3 shall be binding unless executed in writing by both Parties hereto, or their respective successors, assigns, or grantees.

4. Section 4.1 of the Agreement is hereby amended to read as follows:

4.1. Term. This Agreement shall commence on the Effective Date and continue for a period of an additional 24 months, ending on May 18th, 2026, unless previously terminated as provided herein or as otherwise agreed to in writing by the parties. The Agreement may be extended for an additional two-year extension at the discretion of the City and contractor performance.

5. Each of the undersigned represents and warrants that he or she is duly authorized to execute and deliver this Amendment No. 3 and that such execution is binding upon the entity for which he or she is executing this document.

IN WITNESS WHEREOF, the Parties have caused Amendment No. 3 to the Consulting Services Agreement are to be executed as of the day and year first above written.

CONSULTANT

By: _____
Danny Kaye, Totum Corporation

CITY OF PLACENTIA

By: _____
Damien R. Arrula
City Administrator

ATTEST:

By: _____
Robert S. McKinnell, City Clerk

APPROVED AS TO FORM:

By:_____
Christian L. Bettenhausen, City Attorney

Placentia City Council

AGENDA REPORT

TO: CITY COUNCIL

VIA: CITY ADMINISTRATOR

FROM: DIRECTOR OF HUMAN RESOURCES

DATE: FEBRUARY 6, 2024

SUBJECT: **REVISE THE DEFINED CONTRIBUTION PLAN FOR DESIGNATED MISCELLANEOUS EMPLOYEES PARTICIPATING IN THE 2.0% AT 60 OR 2.0% AT 62 RETIREMENT FORMULA UNDER CALPERS**

FISCAL IMPACT: $35,000 in one lump sum. Ongoing Annual increase of $14,000 for the entire program.

SUMMARY:

Over the past several years the City has worked with the City Council and employees to control various long-term liabilities, including pension costs. In an effort to proactively control future pension costs for new employees in the miscellaneous category (non-sworn personnel), in April 2012 the City Council approved a second retirement tier for new employees ("2nd Tier"). The purpose of this new tier was to lower the retirement benefit for new employees who had not previously worked for a CalPERS agency ("New Employees") from 2%@55 to 2%@60, thereby reducing the City's long-term pension costs. In addition, the intent behind the 2nd Tier was to not affect the retirement benefit for employees being hired by Placentia from another CalPERS member agency ("Classic Employees") at the 2%@55 formula.

Shortly thereafter the Public Employees' Pension Reform Act was implemented which created a new tier for new CalPERS members and a tier for current CalPERS members being hired from another CalPERS agency (collectively "PEPRA"). The City and CalPERS did not agree on the interpretation of the City's retirement formulas after PEPRA implementation. CalPERS has held that the City's retirement formulas are as follows: 1) Classic Employees hired before April of 2012 fall under the Classic formula of 2%@55; 2) CalPERS members hired by the City after April 2012 fall under the 2nd Tier formula of 2%@60; 3) New Employees who are new members under CalPERS fall under PEPRA, which is 2%@62. Based upon said interpretation, the City has had to adjust its Classic Employees formula for those hired after April 2012 to the 2nd Tier formula of 2%@60 thus lowering the retirement that had originally been advertised and agreed to by the City and employees. In addition, the immediate unintended impact of this interpretation was the ability to recruit quality, experienced Public Agency employees who now fall under the 2nd Tier, rather than the Classic formula.

In 2016, the City entered into an agreement with Public Agency Retirement Services (PARS) to provide a defined contribution plan for those designated miscellaneous employees participating in the City's second tier retirement formula of 2.0% at 60 who were hired under the promise of the

classic 2%@55 formula. The purpose of the initial implementation was to offset the effects of the Public Employees' Pension Reform Act and bridge the difference between the two formulas for those employees that were hired under this scenario. Later, the plan was revised to also include this retirement defined contribution to include positions that were difficult to fill due to the 2nd Tier formula. Lastly, in 2019 the City revised this plan to include a Tier for PEPRA Executive Directors who were being treated differently than other Executive Directors who were receiving a lesser pension contribution than their counterparts in the Tier II or Tier I formulas.

Since the City previously worked with Shuster Advisory Group, LLC (Shuster) to review fees and investment options for the City's other defined contribution plans like Mission Square 457(b) deferred compensation and the 401(a) Fire retirement plans, Staff retained their services to also review this program and recommended transfer from PARS to Mission Square. The City Council has already approved the termination of PARS and transfer to Mission Square on November 21, 2023, Resolution R-2023-89. Staff has taken the opportunity to review the plan's agreement, intent, and eligibility.

RECOMMENDATION:

It is recommended that the City Council take the following action:

Approve a revised Defined Contribution Plan administered by Mission Square Retirement Solutions (Mission Square).

STRATEGIC PLAN STATEMENT:

This item is consistent with the City Council approved 5-Year Strategic Goal #7 to Enhance Employee Development, under Objective #1, which is bolster ranks of city employees. This is a benefit, and recruitment and retention tool to keep stability in our Executive Director ranks.

DISCUSSION:

In 2022, the City hired the consultant Shuster Advisory Group, LLC (Shuster) to review all the City's investment plans including our 115 Trust, 457(b) deferred compensation, and the 401(a) Fire retirement plans. As a part of the consultant's review, one of the recommendations was an overall consolidation of our administration of these plans to achieve lower plan fees, competitive earnings, and ease of administration of these programs. Moving this plan from PARS to Mission Square meets this goal.

As we transitioned the plan to Mission Square, the City reviewed the plan's intent, eligible participants and cleaned up the language to meet the intent of the plan.

The program has three defined tiers:

- Tier I – employees who were hired for positions that were mistakenly advertised under the City's classic retirement formula of 2.0%@55. An annual actuarial review of the plan's performance is required to ensure plan goals. Annually, a lump sum will be deposited into each participant's account under this tier. No new members will be eligible for this plan.

- Tier II – employees who were hired into difficult to recruit for positions who fell into the City's 2nd Tier 2.0%@60 formula to attract and retain. Active members will be grandfathered in at the agreed contribution rate of 7.0% of base pay and clean up language defining eligible participants and decrease new participant contribution rate to 4.0% of base pay. Deposits are made bi-weekly through payroll.

- Tier III – Executive Directors hired under the PEPRA 2.0%@62 formula to create equity among the Executive Team regarding retirement contributions. Clean up language defining eligible participants and increase contribution rate from 2.72% of base pay to 4.0% of base pay. Deposits are made bi-weekly through payroll.

- Future eligibility of this plan will only include executive miscellaneous employees.

As a part of the cleanup of the program, Staff will work with the City Attorney's Office to incorporate this program into a new or amended employment agreement for those affected participants.

FISCAL IMPACT:

The initial lump sum adjustment totals approximately $35,000 which would be paid through a contribution to Mission Square. Total annual increased costs for this program is approximately $14,000.

Prepared by:

Alice Burnett
Director of Human Resources

Reviewed and approved:

Jennifer Lampman

Jennifer Lampman
Director of Finance

Reviewed and approved:

Rosanna Ramirez
Deputy City Administrator

Reviewed and approved:

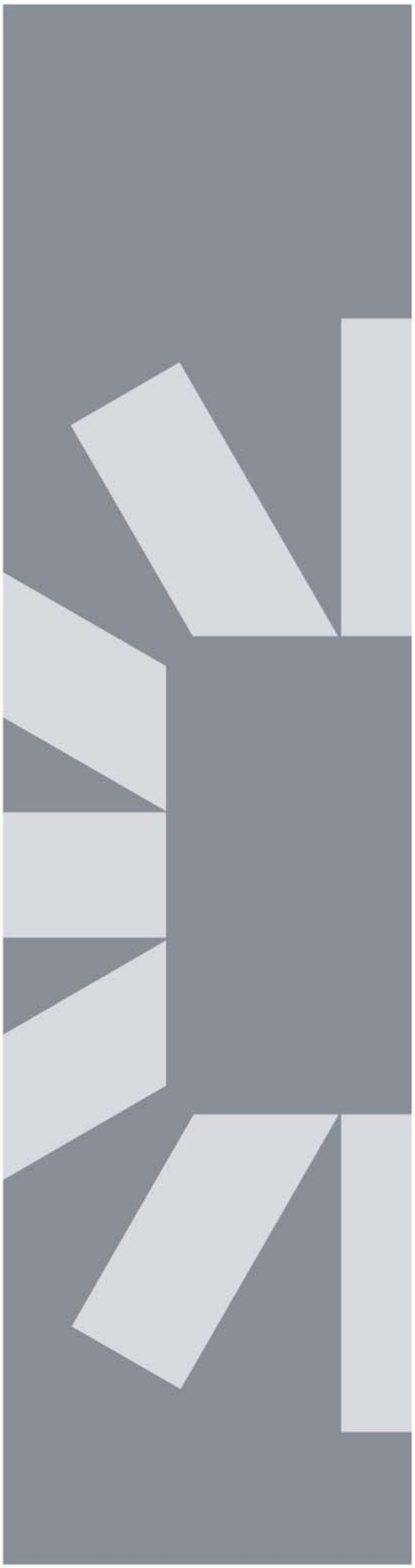
Damien R. Arrula
City Administrator

Attachment:
1. Agreement

ICMA Retirement Corporation
doing business as

MissionSquare Retirement Governmental Money Purchase Plan Adoption Agreement

MissionSquare
RETIREMENT



MissionSquare Retirement
Governmental Money Purchase Plan Adoption Agreement

Plan Number 10-0417

The Employer hereby establishes a Money Purchase Plan to be known as:
City of Placentia 401(a) Plan

(the "Plan") in the form of the MissionSquare Retirement Governmental Money Purchase Plan.

New Plan or Amendment and Restatement *(Check One)*:

☑ **Amendment and Restatement**

This Plan is an amendment and restatement of an existing defined contribution money purchase plan. Please specify the name of the defined contribution money purchase plan which this Plan hereby amends and restates:

City of Placentia PARS Defined Contribution Plan (orig. eff. date: October 1,2016)

Effective Date of Restatement. The effective date of the Plan shall be:

February 28, 2024

*(**Note:** The effective date can be no earlier than the first day of the Plan Year in which this restatement is adopted. If no date is provided, by default, the effective date will be the first day of the Plan Year in which the restatement is adopted.)*

☐ **New Plan**

Effective Date of New Plan. The effective date of the Plan shall be the first day of the Plan Year during which the Employer adopts the Plan, unless an alternate effective date is hereby specified:

_____

***(Note:** An alternate effective date can be no earlier than the first day of the Plan Year in which the Plan is adopted.)*

I. EMPLOYER: City of Placentia

(The Employer must be a governmental entity under Internal Revenue Code § 414(d))

II. SPECIAL EFFECTIVE DATES

Please note here any elections in the Adoption Agreement with an effective date that is different from that noted above.

_____

_____

*(**Note:** provision and effective date.)*

III. PLAN YEAR

The Plan Year will be:

☐ January 1 – December 31 ***(Default)***

☑ The 12-month period ending: June (*Month*) 30 (*Day*)

IV. Normal Retirement Age shall be age 55 (not less than 55 nor in excess of 65).

Important Note to Employers: Normal Retirement Age is significant for determining the earliest date at which the Plan may allow for in-service distributions. Normal Retirement Age also defines the latest date at which a Participant must have a fully vested right to his/her Account. There are IRS rules that limit the age that may be specified as the Plan's Normal Retirement Age. The Normal Retirement Age cannot be earlier than what is reasonably representative of the typical retirement age for the industry in which the covered workforce is employed.

In 2016, the Internal Revenue Service proposed regulations that would provide rules for determining whether a governmental pension plan's normal retirement age satisfies the Internal Revenue Code's qualification requirements. A normal retirement age that is age 62 or later is deemed to be not earlier than the earliest age that is reasonably representative of the typical retirement age for the industry in which the covered workforce is employed. Whether an age below 62 satisfies this requirement depends on the facts and circumstances, but an Employer's good faith, reasonable determination will generally be given deference. A special rule, however, says that a normal retirement age that is age 50 or later is deemed to be not earlier than the earliest age that is reasonably representative of the typical retirement age for the industry in which the covered workforce is employed if the participants to which this normal retirement age applies are qualified public safety employees (within the meaning of section 72(t)(10)(B)). These regulations are proposed to be effective for employees hired during plan years beginning on or after the later of: (1) January 1, 2017; or (2) the close of the first regular legislative session of the legislative body with the authority to amend the plan that begins on or after the date that is 3 months after the final regulations are published in the Federal Register. In the meantime, however, governmental plan sponsors may rely on these proposed regulations.

In lieu of age-based Normal Retirement Age, the Plan shall use the following age and service-based Normal Retirement Age_____

Important Note to Employers: *Before using a Normal Retirement Age based on age and service, a plan sponsor should review the proposed regulations (81 Fed. Reg. 4599 (Jan. 27, 2016)) and consult counsel.*

V. COVERED EMPLOYMENT CLASSIFICATIONS

1. The following group or groups of Employees are eligible to participate in the plan:

   ☐ All Employees
   ☐ All Full Time Employees
   ☐ Salaried Employees
   ☐ Non-union Employees
   ☐ Management Employees
   ☐ Public Safety Employees
   ☐ General Employees
   ☑ Other Employees (Specify the group(s) of eligible Employees below. Do not specify Employees by name. Specific positions are acceptable.) See addendum

   The group specified must correspond to a group of the same designation that is defined in the statutes, ordinances, rules, regulations, personnel manuals, or other material in effect in the state or locality of the Employer. The eligibility requirements cannot be such that an Employee becomes eligible only in the Plan Year in which the Employee terminates employment.

   Note: As stated in Sections 4.08 and 4.09, the Plan may, however, provide that Final Pay Contributions or Accrued Leave Contributions are the only contributions made under the Plan.

2. Period of Service required for participation

   ☑ N/A – The Employer hereby waives the requirement of a Period of Service for participation. Employees are eligible to participate upon employment. ***("N/A" is the default provision under the Plan if no selection is made.)***

   ☐ Yes. The required Period of Service shall be _____ months (not to exceed 12 months.)

   The Period of Service selected by the Employer shall apply to all Employees within the Covered Employment Classification.

3. Minimum Age (Select One) – A minimum age requirement is hereby specified for eligibility to participate.

   ☐ Yes. Age _____(not to exceed age 21.)

   ☑ N/A – No minimum age applies ***("N/A" is the default provision under the Plan if no selection is made.)***

VI. CONTRIBUTION PROVISIONS

1. The Employer shall contribute as follows: (Choose all that apply, but at least one of Options A or B. If Option A is not selected, Employer must pick up Mandatory Participant Contributions under Option B.)

Fixed Employer Contributions With or Without Mandatory Participant Contributions. (If Option B is chosen, please complete section C.)

☑ A. Fixed Employer Contributions. The Employer shall contribute on behalf of each Participant

addendum % of Earnings or $_____ for the Plan Year (subject to the limitations of Article V of the Plan).

Mandatory Participant Contributions

☐ are required ☑ are not required

to be eligible for this Employer Contribution.

☐ B. Mandatory Participant Contributions for Plan Participation.

Required Mandatory Contributions. A Participant is required to contribute (subject to the limitations of Article V of the Plan) the specified amounts designated in items (i) through (iii) of the Contribution Schedule below:

☐ Yes ☐ No

Employee Opt-In Mandatory Contributions. To the extent that Mandatory Participant Contributions are not required by the Plan, each Employee eligible to participate in the Plan shall be given the opportunity when first eligible to participate in the Plan or any other plan or arrangement of the Employer described in Code section 219(g)(5)(A), to irrevocably elect to contribute Mandatory Participant Contributions by electing to contribute the specified amounts designated in items (i) through (iii) of the Contribution Schedule below for each Plan Year (subject to the limitations of Article V of the Plan):

☐ Yes ☐ No

Contribution Schedule. (Any percentage or dollar amount entered below must be greater than 0% or $0.)

i. _____% of Earnings,

ii. $_____, or

iii. a whole percentage of Earnings between the range of _____ *(insert range of percentages between 1% and 20% inclusive (e.g., 3%, 6%, or 20%; 5% to 7%))*, as designated by the Employee in accordance with guide- lines and procedures established by the Employer for the Plan Year as a condition of participation in the Plan. A Participant must pick a single percentage and shall not have the right to discontinue or vary the rate of such contributions after becoming a Plan Participant.

Employer "Pick up". The Employer hereby elects to "pick up" the Mandatory Participant Contributions[1] (pick up is required if Option A is not selected).

☐ Yes ☐ No

("Yes" is the default provision under the Plan if no selection is made.)

☐ C. Election Window (Complete if Option B is selected:)

Newly eligible Employees shall be provided an election window of ____ days (no more than 60 calendar-days) from the date of initial eligibility during which they may make the election to participate in the Mandatory Participant Contribution portion of the Plan. Participation in the Mandatory Participant Contribution portion of the Plan shall begin the first of the month following the end of the election window.

An Employee's election is irrevocable and shall remain in force until the Employee terminates employment or ceases to be eligible to participate in the Plan. In the event of re-employment to an eligible position, the Employee's original election will resume. In no event does the Employee have the option of receiving the pick- up contribution amount directly.

2. The Employer may also elect to make Employer Matching Contributions as follows:

☐ **Fixed Employer Match of After-Tax Voluntary Participant Contributions.** (Do not complete this section unless the Plan permits after-tax Voluntary Participant Contributions under Section VI.3 of the Adoption Agreement.).

The Employer shall contribute on behalf of each Participant_____% of Earnings for the Plan Year (subject to the limitations of Article V of the Plan) for each Plan Year that such Participant has contributed_____% of Earnings or $_____. Under this option, there is a single, fixed rate of Employer Contributions, but a Participant may decline to make the Voluntary Participant Contributions in any Plan Year, in which case no Employer Contribution will be made on the Participant's behalf in that Plan Year.

[1] *Neither an IRS opinion letter nor a determination letter issued to an adopting Employer is a ruling by the Internal Revenue Service that Participant contributionsthat are "picked up" by the Employer are not includable in the Participant's gross income for federal income tax purposes. Pick-up contributions are not mandated to receive private letter rulings; however, if an adopting Employer wishes to receive a ruling on pick-up contributions, they may request one in accordance with Revenue Procedure 2012-4 (or subsequent guidance).*

☐ **Variable Employer Match of After-Tax Voluntary Participant Contributions.** (Do not complete this section unless the Plan permits after-tax Voluntary Participant Contributions under section VI.3 of the Adoption Agreement.)

The Employer shall contribute on behalf of each Participant an amount determined as follows (subject to the limitations of Article V of the Plan):

_____% of the Voluntary Participant Contributions made by the Participant for the Plan Year (not including Voluntary Participant Contributions exceeding _____% of Earnings or $_____);

PLUS_____% of the contributions made by the Participant for the Plan Year in excess of those included in the above paragraph (but not including Voluntary Participant Contributions exceeding in the aggregate_____% of Earnings or $_____).

Employer Matching Contributions on behalf of a Participant for a Plan Year shall not exceed

$_____ or_____% of Earnings, whichever is ☐ more or ☐ less

☐ **Fixed Employer Match of Participant 457(b) Plan Deferrals.** The Employer shall contribute on behalf of each Participant _____% of Earnings for the Plan Year (subject to the limitations of Article V of the Plan) for each Plan Year that such Participant has deferred _____% of Earnings or $_____to the Employer's 457(b) deferred compensation plan. Under this option, there is a single, fixed rate of Employer Contributions, but a Participant may decline to make the required 457(b) deferrals in any Plan Year, in which case no Employer Contribution will be made on the Participant's behalf in that Plan Year.

☐ **Variable Employer Match of Participant 457(b) Plan Deferrals.**

The Employer shall contribute on behalf of each Participant an amount determined as follows (subject to the limitations of Article V of the Plan):

_____% of the elective deferrals made by the Participant to the Employer's 457(b) plan for the Plan Year (not including Participant contributions exceeding _____% of Earnings or $_____);

PLUS_____% of the elective deferrals made by the Participant to the Employer's 457(b) plan for the Plan Year in excess of those included in the above paragraph (but not including elective deferrals made by a Participant to the Employer's 457(b) plan exceeding in the aggregate_____% of Earnings or $_____).

Employer Matching Contributions on behalf of a Participant for a Plan Year shall not exceed $_____ or _____% of Earnings, whichever is ☐ more or ☐ less

3. Each Participant may make a Voluntary Participant Contribution, subject to the limitations of Section 4.06 and Article V of the Plan:

☐ Yes ☑ No ***("No" is the default provision under the Plan if no selection is made.)***

4. Employer contributions for a Plan Year shall be contributed to the Trust in accordance with the following payment schedule (no later than the 15th day of the tenth calendar month following the end of the calendar year or fiscal year (as applicable depending on the basis on which the Employer keeps its books) with or within which the particular Limitation Year ends, or in accordance with applicable law):

☐ Weekly ☑ Biweekly ☐ Monthly ☐ Annually in: _____
Specify Month

5. Participant contributions for a Plan Year shall be contributed to the Trust in accordance with the following payment schedule (no later than the 15th day of the tenth calendar month following the end of the calendar year or fiscal year (as applicable depending on the basis on which the Employer keeps its books) with or within which the particular Limitation Year ends, or in accordance with applicable law):

☐ Weekly ☐ Biweekly ☐ Monthly ☐ Annually in: _____
Specify Month

6. In the case of a Participant performing qualified military service (as defined in Code section 414(u)) with respect to the Employer:

   A. Plan contributions will be made based on differential wage payments:

   ☑ Yes ☐ No ***("Yes" is the default provision under the Plan if no selection is made.)***

   B. Participants who die or become disabled will receive Plan contributions with respect to such service:

   ☐ Yes ☑ No ***("No" is the default provision under the Plan if no selection is made.)***

VII. EARNINGS

Earnings, as defined under Section 2.09 of the Plan, shall include:

1. Overtime

   ☑ Yes ☐ No ***("No" is the default provision under the Plan if no selection is made.)***

2. Bonuses

   ☑ Yes ☐ No ***("No" is the default provision under the Plan if no selection is made.)***

3. Other Pay (specifically describe any other types of pay to be included below)

_____

_____

VIII. ROLLOVER PROVISIONS

1. The Employer will permit Rollover Contributions in accordance with Section 4.13 of the Plan:

   ☑ Yes ☐ No ***("Yes" is the default provision under the Plan if no selection is made.)***

IX. LIMITATION ON ALLOCATIONS

If the Employer maintains or ever maintained another qualified plan in which any Participant in this Plan is (or was) a participant or could possibly become a participant, the Employer hereby agrees to limit contributions to all such plans as provided herein, if necessary in order to avoid excess contributions (as described in Section 5.02 of the Plan).

1. If the Participant is covered under another qualified defined contribution plan maintained by the Employer, the provisions of Section 5.02(a) through (e) of the Plan will apply unless another method has been indicated below.

   ☐ Other Method. (Provide the method under which the plans will limit total Annual Additions to the Maximum Permissible Amount, and will properly reduce any Excess Amounts, in a manner that precludes Employer discretion.)

   _____

2. The Limitation Year is the following 12 consecutive month period: _____

X. VESTING PROVISIONS

The Employer hereby specifies the following vesting schedule, subject to (1) the Code's vesting requirements in effect on September 1, 1974 and (2) the concurrence of the Plan Administrator. (For the blanks below, enter the applicable percentage – from 0 to 100 (with no entry after the year in which 100% is entered), in ascending order.)

The following vesting schedule may apply to a Participant's interest in his/her Employer Contribution Account. The vesting schedule does not apply to Mandatory Participant Contributions, Rollover Contributions, Voluntary Participant Contributions, Deductible Employee Contributions, Employee Designated Final Pay Contributions, and Employee Designated Accrued Leave Contributions, and the earnings thereon.

Period of Service Completed	**Percent Vested**
Zero	100 %
One	_____ %
Two	_____ %
Three	_____ %
Four	_____ %
Five	_____ %
Six	_____ %
Seven	_____ %
Eight	_____ %
Nine	_____ %
Ten	_____ %

XI. WITHDRAWALS AND LOANS

1. In-service distributions are permitted under the Plan after a Participant attains (select one of the below options):

   ☑ Normal Retirement Age

   ☐ Age 70½ ("70½" is the default provision under the Plan if no selection is made.)

   ☐ Alternate age (after Normal Retirement Age): _____

   ☐ Not permitted at any age

2. A Participant shall be deemed to have a severance from employment solely for purposes of eligibility to receive distributions from the Plan during any period the individual is performing service in the uniformed services for more than 30 days.

   ☑ Yes ☐ No ***("Yes" is the default provision under the Plan if no selection is made.)***

3. Tax-free distributions of up to $3,000 for the direct payment of Qualified Health Insurance Premiums for Eligible Retired Public Safety Officers are available under the Plan.

   ☐ Yes ☑ No ***("No" is the default provision under the Plan if no selection is made.)***

4. In-service distributions of the Rollover Account are permitted under the Plan, as provided in Section 9.07.

   ☑ Yes ☐ No ***("No" is the default provision under the Plan if no selection is made.)***

5. Loans are permitted under the Plan, as provided in Article XIII of the Plan:

   ☑ Yes ☐ No ***("No" is the default provision under the Plan if no selection is made.)***

XII. SPOUSAL PROTECTION

The Plan will provide the following level of spousal protection (select one):

☐ 1. Participant Directed Election. The normal form of payment of benefits under the Plan is a lump sum. The Participant can name any person(s) as the Beneficiary of the Plan, with no spousal consent required.

☑ 2. Beneficiary Spousal Consent Election (Article XII of the Plan will apply if option 2 is selected). The normal form of payment of benefits under the Plan is a lump sum. Up-on death, the surviving spouse is the Beneficiary, unless he or she consents to the Participant's naming another Beneficiary. ***("Beneficiary Spousal Consent Election" is the default provision under the Plan if no selection is made.)***

☐ 3. QJSA Election (Article XVII). The normal form of payment of benefits under the Plan is a 50% qualified joint and survivor annuity with the spouse (or life annuity, if single). In the event of the Participant's death prior to commencing payments, the spouse will receive an annuity for his or her lifetime. (If option 3 is selected, the spousal consent requirements in Article XII of the Plan also will apply.)

XIII. FINAL PAY CONTRIBUTIONS

(Under the Plan's definitions, Earnings automatically include leave cashouts paid by the later of 2½ months after severance from employment or the end of the calendar year. If the Plan will provide additional contributions based on the Participant's final paycheck attributable to Accrued Leave, please provide instructions in this section. Otherwise, leave this section blank.)

The Plan will provide for Final Pay Contributions if either 1 or 2 below is selected. The following group of Employees shall be eligible for Final Pay Contributions:

☑ 1. Employees within the Covered Employment Classification identified in section V of the Adoption Agreement.

☐ 2. Other. _____

(This must be a subset of the Covered Employment Classification identified in section V of the Adoption Agreement.)

Final Pay shall be defined as (select one):

☐ A. Accrued unpaid vacation

☑ B. Accrued unpaid sick leave

☐ C. Accrued unpaid vacation and sick leave

☐ D. Other (insert definition of Final Pay – must be leave that Employee would have been able to use if employment had continued and must be bona fide vacation and/or sick leave):

_____

☐ **1. Employer Final Pay Contribution.** The Employer shall contribute on behalf of each Participant _____% of their Final Pay to the Plan (subject to the limitations of Article V of the Plan).

☑ **2. Employee Designated Final Pay Contribution**. Each Employee eligible to participate in the Plan shall be given the opportunity at enrollment to irrevocably elect to contribute _____ % (insert fixed percentage of Final Pay to be contributed) or up to 100 % (insert maximum percentage of Final Pay to be contributed) of Final Pay to the Plan (subject to the limitations of Article V of the Plan).

Once elected, an Employee's election shall remain in force and may not be revised or revoked.

XIV. ACCRUED LEAVE CONTRIBUTIONS

The Plan will provide for unpaid Accrued Leave Contributions annually if either 1 or 2 is selected below. The following group of Employees shall be eligible for Accrued Leave Contributions:

☐ 1. Employees within the Covered Employment Classification identified in section V of the Adoption Agreement.

☐ 2. Other. _____

(This must be a subset of the Covered Employment Classification identified in section V of the Adoption Agreement.)

Accrued Leave shall be defined as (select one):

☐ A. Accrued unpaid vacation

☐ B. Accrued unpaid sick leave

☐ C. Accrued unpaid vacation and sick leave

☐ D. Other (insert definition of Accrued Leave that is bona fide vacation and/or sick leave):

_____

☐ 1. **Employer Accrued Leave Contribution.** The Employer shall contribute as follows (choose one of the following options):

☐ For each Plan Year, the Employer shall contribute on behalf of each eligible Participant the unused Accrued Leave in excess of _____ (insert number of ☐ hours ☐ days ☐ weeks (check one)) to the Plan (subject to the limitations of Article V of the Plan).

☐ For each Plan Year, the Employer shall contribute on behalf of each eligible Participant _____ % of unused Accrued Leave to the Plan (subject to the limitations of Article V of the Plan).

☐ 2. **Employee Designated Accrued Leave Contribution.**

Each eligible Participant shall be given the opportunity at enrollment to irrevocably elect to annually contribute _____% (insert fixed percentage of unpaid Accrued Leave to be contributed) or up to _____% (insert maximum percentage of unpaid Accrued Leave to be contributed) of Accrued Leave to the Plan (subject to the limitations of Article V of the Plan). Once elected, an Employee's election shall remain in force and may not be revised or revoked.

XV. The Employer hereby attests that it is a unit of state or local government or an agency or instrumentality of one or more units of state or local government.

XVI. The Employer understands that this Adoption Agreement is to be used with only the MissionSquare Retirement Governmental Money Purchase Plan. This MissionSquare Retirement Governmental Money Purchase Plan is a restatement of a previous plan, which was submitted to the Internal Revenue Service for approval on December 31, 2018 and received approval on June 30, 2020.

The Plan Administrator will inform the Employer of any amendments to the Plan made pursuant to Section 14.05 of the Plan or of the discontinuance or abandonment of the Plan. The Employer understands that an amendment(s) made pursuant to Section 14.05 of the Plan will become effective within 30 days of notice of the amendment(s) unless the Employer

notifies the Plan Administrator, in writing, that it disapproves of the amendment(s). If the Employer so disapproves, the Plan Administrator will be under no obligation to act as Administrator under the Plan.

XVII. The Employer hereby appoints the ICMA Retirement Corporation, doing business as MissionSquare Retirement, as the Plan Administrator pursuant to the terms and conditions of the MISSIONSQUARE RETIREMENT GOVERNMENTAL MONEY PURCHASE PLAN.

The Employer hereby agrees to the provisions of the Plan.

XVIII. The Employer understands that it must complete a new Adoption Agreement upon first adoption of the Plan. Additionally, upon any modifications to a prior election, making of new elections, or restatements of the Plan, a new Adoption Agreement must be completed. The Employer hereby acknowledges it understands that failure to properly fill out this Adoption Agreement may result in disqualification of the Plan.

XIX. An adopting Employer may rely on an Opinion Letter issued by the Internal Revenue Service as evidence that the Plan is qualified under section 401 of the Internal Revenue Code only to the extent provided in Rev. Proc. 2017-41. The Employer may not rely on the Opinion Letter in certain other circumstances or with respect to certain qualification requirements, which are specified in the Opinion Letter issued with respect to the Plan and in Rev. Proc. 2017-41.

In Witness Whereof, the Employer hereby causes this Money Purchase Plan Adoption Agreement to be executed.

EMPLOYER SIGNATURE & DATE

Signature of Authorized Plan Representative: _____

Print Name: ROSANNA RAMERIZ

Title: DEPUTY CITY ADMINISTRATOR

Attest: ALICE BURNETT, DIRECTOR OF HUMAN RESOURCES

Date: 02 / 06 / 2024.
Month Day Year

For inquiries regarding adoption of the plan, the meaning of plan provisions, or the effect of the Opinion Letter, contact:

MissionSquare Retirement
777 N. Capitol St. NE Suite 600
Washington, DC 20002
800-326-7272

52582-0621-W1303

The People are the City

Mayor
JEREMY B. YAMAGUCHI

Mayor Pro Tem
KEVIN KIRWIN

Councilmembers:
RHONDA SHADER
WARD L. SMITH
CHAD P. WANKE

City Clerk:
ROBERT S. MCKINNELL

City Treasurer
KEVIN A. LARSON

City Administrator
DAMIEN R. ARRULA

401 East Chapman Avenue – Placentia, California 92870

Addendum to the MissionSquare Retirement Money Purchase Plan City of Placentia 401(a) Plan, Plan Number 100417

Section V. Covered Employee Classifications:

1. The following group or groups of Employees are eligible to participate in the plan:

Tier I: *(Note: Tier I is closed to any new entrants)*

i. Police Services Officer
ii. City Administrator

Tier II:

i. Any active employee currently participating in Tier II as of 12/31/23 is "grandfathered"
ii. Miscellaneous Executive Director Employee
iii. Placentia Miscellaneous 2nd Tier participating in the 2% at 60 CalPERS
iv. is not eligible to participate under Tier I

Tier III:

i. Miscellaneous Executive Director Employee
ii. CalPERS Miscellaneous PEPRA and participates in the 2% at 62 CalPERS

Section VI. Contribution Provisions

A. Fixed Employer Contributions.

Tier I: - Annually indexed

i. Police Services Officer – 7% of comp
ii. City Administrator – 9.23% of comp

Tier II:

i. "Grandfathered" participants – 7% of comp
ii. "Non-Grandfathered" – 4% of comp

Tier III:

i. 2.72% of comp prior to January 31, 2024
ii. 4.00% of comp effective February 1, 2024

Name ROSANNA RAMERIZ

Signature _____

Title DEPUTY CITY ADMINISTRATOR

Date FEBRUARY 6, 2024

MissionSquare Retirement
Governmental Money Purchase Plan
Trust Agreement

The Employer hereby adopts and designates this Trust ("the Trust") to receive and hold the assets of the MissionSquare Retirement Governmental Money Purchase Plan ("the Plan"). The Trust is adopted and designated in accordance with Section 2.22 of the Plan. The Trust shall hold all of the assets of the Plan derived from Employer and Employee contributions under the Plan, plus any income and gains thereon, less any losses, expenses and distributions to Participants and Beneficiaries. All capitalized terms in this instrument shall be interpreted consistent with Article II of the Plan.

I. **Trust.** A trust is hereby created to hold all of the assets of the Plan for the exclusive benefit of Participants and Beneficiaries, except that taxes and expenses may be paid from the Trust as provided in Section III below. The trustee shall be the Employer or such other person which agrees to act in that capacity hereunder.

II. **Investment Powers.** The trustee or the Plan Administrator, acting as agent for the trustee, shall have the powers listed in this Section II with respect to investment of the Trust assets, except to the extent that the investment of the Trust assets is controlled by Participants, pursuant to Sections 6.01 and 13.03 of the Plan.

(a) To invest and reinvest the Trust without distinction between principal and income in common or preferred stocks, shares of regulated investment companies and other mutual funds, bonds, notes, debentures, mortgages, certificates of deposit, contracts with insurance companies including but not limited to insurance, individual or group annuity, deposit administration, guaranteed interest contracts, and deposits at reasonable rates of interest at banking institutions including but not limited to savings accounts and certificates of deposit. Assets of the Trust may be invested in securities that involve a higher degree of risk than investments that have demonstrated their investment performance over an extended period of time.

(b) To invest and reinvest all or any part of the assets of the Trust in any common, collective or commingled trust fund that is maintained by a bank or other institution and that is available to employee plans qualified under section 401 of the Code, or any successor provisions thereto, and during the period of time that an investment through any such medium shall exist, to the extent of participation of the Plan, the declaration of trust of such common, collective, or commingled trust fund shall constitute a part of the Plan.

(c) To invest and reinvest all or any part of the assets of the Trust in any group annuity, deposit administration or guaranteed interest contract issued by an insurance company or other financial institution on a commingled or collective basis with the assets of any other plan or trust qualified under section 401(a) of the Code or any other plan described in section 401(a)(24) of the Code, and such contract may be held or issued in the name of the Plan Administrator, or such custodian as the Plan Administrator may appoint, as agent and nominee for the Employer. During the period that an investment through any such contract shall exist, to the extent of participation of the Plan, the terms and conditions of such contract shall constitute a part of the Plan.

(d) To hold cash awaiting investment and to keep such portion of the Trust in cash or cash balances, without liability for interest, in such amounts as may from time to time be deemed to be reasonable and necessary to meet obligations under the Plan or otherwise to be in the best interests of the Plan.

(e) To hold, to authorize the holding of, and to register any investment to the Trust in the name of the Plan, the Employer, or any nominee or agent of any of the foregoing, including the Plan Administrator, or in bearer form, to deposit or arrange for the deposit of securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by any other person, and to organize corporations or trusts under the laws of any jurisdiction for the purpose of acquiring or holding title to any property for the Trust, all with or without the addition of words or other action to indicate that property is held in a fiduciary or representative capacity but the books and records of the Plan shall at all times show that all such investments are part of the Trust.

(f) Upon such terms as may be deemed advisable by the Employer or the Plan Administrator, as the case maybe, for the protection of the interests of the Plan or for the preservation of the value of an investment, to exercise and enforce by suit for legal or equitable remedies or by other action, or to waive any right or claim on behalf of the Plan or any default in any obligation owing to the Plan, to renew, extend the time for payment of, agree to a reduction in the rate of interest on, or agree to any other modification or change in the terms of any obligation owing to the Plan, to settle, compromise, adjust, or submit to arbitration any claim or right in favor of or against the Plan, to exercise and enforce any and all rights of foreclosure, bid for property in foreclosure, and take a deed in lieu of foreclosure with or without paying consideration therefor, to commence or defend suits or other legal proceedings whenever any interest of the Plan requires it, and to represent the Plan in all suits or legal proceedings in any court of law or equity or before any body or tribunal.

(g) To employ suitable consultants, depositories, agents, and legal counsel on behalf of the Plan.

(h) To open and maintain any bank account or accounts in the name of the Plan, the Employer, or any nominee or agent of the foregoing, including the Plan Administrator, in any bank or banks.

(i) To do any and all other acts that may be deemed necessary to carry out any of the powers set forth herein.

III. Taxes and Expenses. All taxes of any and all kinds whatsoever that may be levied or assessed under existing or future laws upon, or in respect to the Trust, or the income thereof, and all commissions or acquisitions or dispositions of securities and similar expenses of investment and reinvestment of the Trust, shall be paid from the Trust. Such reasonable compensation of the Plan Administrator, as may be agreed upon from time to time by the Employer and the Plan Administrator, and reimbursement for reasonable expenses incurred by the Plan Administrator in performance of its duties hereunder (including but not limited to fees for legal, accounting, investment and custodial services) shall also be paid from the Trust. However, no person who is a fiduciary within the meaning of section 3(21)(A) of ERISA and regulations promulgated thereunder, and who receives full-time pay from the Employer may receive compensation from the Trust, except for expenses properly and actually incurred.

IV. Payment of Benefits. The payment of benefits from the Trust in accordance with the terms of the Plan may be made by the Plan Administrator, or by any custodian or other person so authorized by the Employer to make such disbursement. Benefits under the Plan shall be paid only if the Plan Administrator, custodian or other person, or the Employer if directing such person, decides in his/her discretion that the applicant is entitled to them. The Plan Administrator, custodian or other person shall not be liable with respect to any distribution of Trust assets made at the direction of the Employer.

V. Valuation of Accounts. As of each Accounting Date, the Plan assets held in each investment fund offered shall be valued at fair market value and the investment income and gains or losses for each fund shall be determined. Such investment income and gains or losses shall be allocated proportionately among all Account balances on a fund-by-fund basis. The allocation shall be in the proportion that each such Account balance as of the immediately preceding Accounting Date bears to the total of all such Account balances, as of that Accounting Date. For purposes of this Trust, all Account balances include the Account balances of all Participants and Beneficiaries.

VI. Participant Loan Accounts. Participant Loan Accounts shall be invested in accordance with Section 13.03 of the Plan. Such Accounts shall not share in any investment income and gains or losses of the investment funds described in Section 6.01.

SIGNATURE & DATE

Employer & Trustee: City of Placentia ("the Employer")

Signature of Authorized Plan Representative: _____

Print Name: _____

Title: DEPUTY CITY ADMINISTRATOR

Attest: ALICE BURNETT, DIRECTOR OF HUMAN RESOU8RCES

Date: 02 / 06 / 2024
(M) (D) (Y)

MissionSquare RETIREMENT

SECURE ACT 2.0 and 1.0 Election Form | Page 1 of 2

Use this form to adopt any of the provisions made available by The Setting Every Community Up for Retirement Enhancement Act of 2019 (SECURE 1.0), SECURE 2.0 Act of 2022, and related legislation. If you would like to add these provisions to more than one plan, please complete one form per plan.

I. SECURE 2.0 Provisions

A. ROTH Provisions

While not technically a SECURE 2.0 provision, 401(k), 457(b), and 403(b) plans must adopt the Roth Contribution Provision to continue to permit age-50 catch-up contributions starting in 2024. Roth is not available in 401(a) Profit sharing plans without the 401(k) feature, and is not available in 401(a) Money Purchase plans.

If your plan does not offer Roth Contributions, check here to add this provision: ☐

The plan will permit in-plan Roth Conversions.

☐ Yes ☐ No

The Roth account will be an available source for loans.

☐ Yes ☐ No

Note: to adopt the Roth features, 401(k) plans will need to also review an Adoption Agreement and 457(b) plans will need to review an Optional Provision Election Form. Our plan design team will reach out to you with prepopulated versions of the applicable materials upon receipt of this form.

B. Eliminate the "first date of the month" rule for 457(b) deferral changes. The plan will permit all deferral initiation and change requests to transpire as soon as administratively feasible, but no later than on the earliest date the deferrals can reasonably be segregated from the employer's general assets, rather than the first pay period of the following month.

☐ Yes ☐ No ***("No" is the default provision under the Plan if no selection is made.)***

II. SECURE 1.0 and Related Legislation Provisions

C. In-Service Distributions at Age 59.5 (Available in 457(b), 403(b), and 401(a) Money Purchase Plans)

The Plan will permit in-service withdrawals at age 59.5 *(NOTE: Not applicable to 401(a) Profit Sharing Plans, as this provision is already available in your plan*. You can change the in-service distribution age by submitting a revised Adoption Agreement.)

☐ Yes ☒ No ***("No" is the default provision under the Plan if no selection is made.)***

D. Qualified Birth and Adoption (Available in 457(b), 403(b), 401(a) Money Purchase, 401(a) Profit Sharing Plans)

The plan will permit participants to receive, upon written request, a distribution of up to $5,000 per qualifying birth or adoption (not to exceed $5,000 across all retirement accounts of the participant. (Note to 401(a) Money Purchase Plan Sponsors: such a withdrawal can only be undertaken if the participant meets the plan's existing in-service withdrawal criteria.)

Such a distribution is exempt from the 10% early distribution tax penalty and is exempt from the mandatory 20% withholding; and can be repaid into the account within 3 years without regard to the usual 60-day time limit for rollovers if elected. A qualified adoption distribution would be limited to the adoption of children who are under age 18 or who are physically or mentally incapable of self-support.

☒ Yes ☐ No ***("No" is the default provision under the Plan if no selection is made.)***

Note: If you elect to offer this provision, your plan may need to offer the ability for participants to roll assets into the plan.

E. MissionSquare Retirement IncomeAdvantage In-Service Distribution (NOTE: only applicable to 457(b), 401(a) Money Purchase, 401(a) Profit Sharing Plans that have the MissionSquare Retirement IncomeAdvantage as an available investment option).

In the event the MissionSquare Retirement IncomeAdvantage Fund is no longer an investment option under the plan, a Participant shall, upon written request, be permitted to roll these assets to another plan. Such a distribution can be undertaken regardless of the participants eligibility pertaining to in-service distributions.

☐ Yes ☒ No ***("No" is the default provision under the Plan if no selection is made.)***

By signing below, we intend to amend the plan to allow these provisions as of the date below or as soon as administratively feasible. **Please submit one form per plan number.**

Employer Plan Number: 100417 Employer Plan Name: City of Placentia

Signature of Authorized Plan Representative: _____

Print Name: ROSANNA RAMIREZ Title: DEPUTY CITY ADMINISTRATOR Date: 02 / 06 / 2024 *(MM/DD/YYY)*

Email Address: RRAMIREZ@PLACENTIA.ORG Phone Number: 714-993-8171

This form can be returned by secure message, fax, or mail using the information below.	
Online: Submit through secure messaging to: www.employers.msqplanservices.org *Fax to:* MissionSquare Plan Services (844) 677-3297	*Mail to:* MissionSquare Plan Services P.O. Box 219320 Kansas City, MO 64121-9320

MissionSquare RETIREMENT

457(b) | 401(a) | 403(b) Plan Sponsors

Loan Implementation Package

TABLE OF CONTENTS

Introduction and Summary Instructions 2

Basic information and instructions for implementing your plan's loan program.

Loan Guidelines Agreement Instructions 3

Important information and instructions for completing the Loan Guidelines Agreement

Loan Guidelines Agreement 7

Complete this agreement to establish the guidelines for your plan's loan program.

Maximum Loan Amount Worksheet 13

Use this worksheet to calculate the maximum loan amount that a participant is eligible to receive.

Suggested Resolution 14

For use by plans whose governing body requires that a resolution be passed.

457(b) Plan Loan Administration Agreement 15

457(b) Plans Only. If you have multiple 457(b) plan providers, you must complete and return this document to MissionSquare Retirement.

Loan Amendment – *401(a) Plans Only* 16

401(a) Plans Only. If you are amending your existing plan to add a loan program, you must complete and return this document to MissionSquare.

Loan Amendment – *403(b) Plans Only* 17

403(b) Plans Only. If you are amending your existing plan to add a loan program, you must complete and return this document to MissionSquare.

INTRODUCTION AND SUMMARY INSTRUCTIONS FOR 457(b), 401(a), AND 403(b) PLAN SPONSORS

Making a loan program available in your retirement plan will provide eligible plan participants with the ability to borrow money from their accounts. As the administrator of your loan program, MissionSquare Retirement will attempt to minimize the amount of resources you need to devote to the program. However, there are administrative and fiduciary responsibilities associated with offering loans which, as a practical matter, cannot be delegated to MissionSquare.

Please review all of the information in this packet carefully prior to submitting the applicable forms to implement the loan program in your plan.

The below instructions provide you with easy-to-follow steps to implement a loan program in your MissionSquare 457(b) or 401(a) plan.

STEP 1: Review the Loan Guidelines Agreement Instructions carefully prior to returning the required forms to implement your plan's loan program.

STEP 2: Complete the *Loan Guidelines Agreement.*

STEP 3: Determine whether any formal action is required by your legislative body and/or plan administrative committee to implement a loan program. If formal action is required, you may want to use the suggested resolution in this packet.

STEP 4: Complete the following documents (if applicable)

- **457(b) Plan Loan Administration Agreement** – If you have multiple 457(b) plan providers, you must complete and return this document to MissionSquare.
- **Loan Amendment [401(a)/403(b) Plans Only]** – If you are amending your existing 401(a)/403(b) plan to add loan provisions, you must complete and return this document to MissionSquare.

STEP 5: Return copies of the following documents to MissionSquare (please be sure to submit all pages and retain the originals for your records):

- *Loan Guidelines Agreement*
- *Loan Amendment to the 401(a) Plan Adoption Agreement (if applicable)*
- *457(b) Plan Loan Administration Agreement (if applicable)*
- Suggested Resolution *(if applicable)*

Fax: MissionSquare Plan Services
(844) 677-3297

Mail: MissionSquare Plan Services
P.O. Box 219320
Kansas City, MO 64121-9320

Online: Submit through secure messaging to:
www.employers.msqplanservices.org

STEP 6: Please allow 5–7 business days for MissionSquare to establish your plan's loan program.

Please retain original copies of any documents you return to MissionSquare for your records.

If you have any questions relating to the adoption process, please contact your MissionSquare PlanServices team at 800-326-7272.

Loan Guidelines Agreement Instructions

The information in this packet is intended to assist you with implementing a loan program within your MissionSquare Retirement 457(b), 401(a), or 403(b) plan(s). The packet provides an overview of the issues and complexities of establishing and maintaining a loan program under the most common types of retirement plan arrangements. It is not intended to be all inclusive. Special situations and/or solutions not discussed in this document will need to be reviewed on a case-by-case basis.

The instructions contain information that will help you understand the decisions you will need to make when you establish your loan program and help you complete the *Loan Guidelines Agreement.* Please carefully review the information in this section and complete all applicable sections of the *Loan Guidelines Agreement.*

Here are a few of the elections that you will need to make:

- Will loans be available for all purposes or only in other purposes designated by you, The Employer?
- How many loans will participants be allowed to have outstanding at one time? *(up to five)*
- How long will participants have to repay a loan used to purchase a new primary residence? *(up to 30 years)*
- How will participants repay their loans? *(payroll deduction, ACH payments from their bank accounts, or both)*

In order to offer loans within your retirement plan, the Internal Revenue Code requires that you establish written guidelines that govern the Plan's loan program. You may elect to use the *Loan Guidelines Agreement* to serve this purpose for your Plan.

If you have any questions relating to the process of implementing a loan program, please contact your MissionSquare Plan Services team at 800-326-7272.

Section 1: Employer Plan Information

Enter the name of your employer plan. Also specify the plan type and your MissionSquare plan number.

Section 2: Eligibility & Loan Source

Loans are available to all active employees, except those with an existing loan in default.

Loan Source – Use this section to specify the sources that will be available for participant loans.

Section 3: Loan Purpose

Specify whether loans may be taken for (A) All Purposes or (B) Other Purposes *(You will be responsible for approval of all loan requests.)*.

(A) All Purposes

(B) Other Purposes

Employers have the ability to make their plan's loan program more restrictive under both of the above options.

Section 4: Application Process

No action is required in this section. The application process available to participants will vary depending on the option you select in Section III (Loan Purpose).

Section 5: Maximum Number of Loans

Specify whether participants may have only one (1) or up to five (5) loans outstanding at one time. The option you choose in this section will have a significant impact on the number of loans made from your plan. Regardless of your election, a participant may receive a maximum of one (1) loan per calendar year.

Note: *If you select Payroll Deduction as a repayment option for your participants in Section VIII, each loan repayment for each pay period must be accounted for separately. As such, repayments of multiple loans are a much larger burden on your payroll system (and personnel) than a repayment of a single loan.*

Section 6: Loan Amount

No action is required in this section. The Maximum Loan Amount Worksheet includes instructions you can use to calculate the maximum loan amount for a participant. The loan modeling option on MissionSquare's Account Access website can also be used to calculate a participant's maximum loan amount.

Section 7: Length of Loan

Loans must be repaid in substantially equal installments of principal and interest over a period that does not exceed five (5) years. However, if the participant will be using the loan to purchase a principal residence, the five (5) year time limit may not apply. In this section of the form, you specify the maximum repayment period for principal residence loans, with 30 years being the maximum term.

In determining the maximum repayment period for residential loans, you should be mindful that the loan term may extend beyond the period the participant is employed by you. If you allow employees to continue to pay their loans after they separate from service (see the Acceleration section), repayments would continue by the participant, through you, for the entire term of the loan (e.g., 30 years). Every payroll period, the participant (former employee) will be required to give you a check for the periodic loan repayment amount. You then include this amount with your next contribution submittal to MissionSquare. Loan repayments may not be made directly to MissionSquare by the participant, unless you choose ACH debit as a repayment option in Section VIII.

Section 8: Loan Repayment Process

Specify the repayment method(s) and repayment frequency your plan will use.

Repayment Method – You can allow repayments to be made via payroll deduction and/or ACH payments from a participant's bank account.

(1) **Payroll Deduction** – With this option, you will include the loan repayment detail when you remit contribution detail to MissionSquare via the EZLink website.

Initiating Payroll Deduction
Payroll deduction should begin within two payroll cycles following the date the loan is processed by MissionSquare. Employees using this method must notify the Employer immediately so that repayments will begin as soon as practicable, on a date determined by the Employer's payroll cycle. Failure to begin payroll deduction in a timely manner could lead to the employee's loan entering delinquency status.

(2) **Automated Clearing House (ACH)** – With this option, participants authorize MissionSquare to debit loan repayments directly from the participant's bank account via ACH. This feature frees you of the burden of establishing and monitoring loan repayments via payroll deduction. The ACH repayment options are bi-weekly and monthly.

Additional Loan Repayments and Early Pay-Off
A participant may pay off all of the principal and interest early without penalty or additional fee. If a loan is paid in full prior to the end of the term of the loan, no further interest will accrue. Please note that no payment date may be "skipped" even if the employee has made a large payment or submitted multiple payments.

Section 9: Loan Interest Rate

No action is required in this section. It simply describes the interest rate that will be used for participant loans.

Section 10: Security/Collateral

No action is required in this section. It simply describes the amount that will be used as collateral for participant loans.

Section 11: Acceleration

Specify whether participants who have separated from service will be able to continue loan repayments until they have withdrawn their entire account balance from the plan, or if outstanding loans will be due and payable at the time participants separate from service.

You should consider the options in this section carefully, since your election will impact when outstanding loans become taxable to participants. If a participant does not repay the outstanding loan amount at the time it is due, the loan is "foreclosed," and the outstanding loan amount must be reported by MissionSquare as a taxable distribution in the year of the foreclosure.

Given the burdens associated with collecting loan repayments from former employees, you may not wish to maintain a potentially long term "relationship" with former employees (especially in the case of residential loans).

Section 12: Reamortization

No action is required in this section. It simply provides information related to the reamortization of participant loans.

Section 13: Refinance

No action is required in this section. It simply provides information related to the refinancing of participant loans.

Section 14: Reduction of Loan

No action is required in this section. It simply describes how outstanding loans will be handled in the event of a participant's death.

Section 15: Deemed Distributions

No action is required in this section. However you should familiarize yourself with this information and note that loan repayments must be made in accordance with the plan document, plan loan guidelines, and as reflected in the promissory note signed by the participant. Failure to make loan repayments according to the loan terms will result in the outstanding loan balance being deemed distributed and taxable to the participant.

Timing
A loan will be deemed distributed when a scheduled payment is still unpaid at the end of the calendar quarter following the calendar quarter in which the payment was due. For example, if a participant does not make a loan payment that was scheduled to be made on February 1, the maximum cure period for the repayment is June 30. If the total amount of all delinquent payments is not received by the end of the cure period, the loan is deemed distributed.

Consequences of Deemed Distributed Loans (Employers)
Employers who do not ensure proper loan repayment practices in their retirement loan programs risk not only having individual participant loans being deemed distributed, but also potentially jeopardize the tax-favored status of the entire plan. In the extreme, plans with mismanaged loan programs – a high occurrence of deemed distributed loans, and/or program participants in default, for example – may be disqualified (in the case of 401(a)/403(b) plans) or classified as ineligible (for 457(b) plans) by the IRS. Disqualification results in the loss of tax-deferred status for all contributions and a possible increase in the taxable income for participating employees.

It is a plan sponsor's fiduciary obligation to properly manage the retirement plan and its benefits. Mismanagement of a loan program may be considered failure to meet this fiduciary obligation and may expose a plan sponsor to litigation, in addition to being in violation of applicable laws and regulations.

Employers, as plan sponsors and fiduciaries, have an obligation to comply with plan document and loan guideline requirements applicable to participant loans. In this regard, loan payments must be made in accordance with the plan document, plan loan guidelines, and as reflected in the promissory note signed by the participant. Employers retain this obligation if there is a loan program associated with their retirement plan, regardless of the provisions governing the loan program.

Consequences of Deemed Distributed Loans (Participants)
The principal balance, in addition to any accrued interest, is reported as a distribution to the IRS. However, the taxable distribution is not the only event in conjunction with a deemed distribution. The following negative consequences occur as a result of deemed distribution.

- The deemed distribution is a taxable event. However, it is not an actual distribution and therefore remains an asset of the participant's account. The outstanding loan balance and accrued interest continue to be reported on the participant's account statements.
- Repayment of a deemed distribution will not change or reverse the taxable event.
- The loan continues to be considered outstanding until it is repaid or "offset" using the participant's account balance. An offset can occur only if the participant is eligible to receive a distribution from the plan as outlined in your plan document.
- Participants are required to repay any outstanding deemed distributed loan before they can become eligible for a new loan. The deemed distributed loan and any interest accrued since the date it became a taxable event is taken into account when determining the maximum amount available for a new loan.
- A participant who has had a prior deemed distribution must make repayments to a new loan through payroll deduction, or provide proof of adequate security.

Section 16: Fees

No action is required in this section. It simply provides that fees may be charged for various services associated with the application for and issuance of loans. Participants should review the Annual Service and Fee Disclosure notice(s) for your plan for more information on the applicable fees.

Section 17: Signatures

Please have an authorized plan representative sign and date this section of the agreement.

SPECIAL CIRCUMSTANCES

Emergency Withdrawals | *457(b) Plans Only*

457(b) Plans: Loans must be coordinated with unforeseeable emergency withdrawals. The emergency withdrawal regulations under Section 457(b) of the Code require that an emergency withdrawal be a resource of the "last resort." If the participant is able to take a loan or refinance a current loan from your MissionSquare 457(b) plan or any other plan you sponsor, the participant has resources available to meet, or partially meet, the financial need. Therefore, a participant will be required to take or refinance a loan before taking an emergency withdrawal.

Many emergency withdrawals are not approved because the financial need, while serious, may not meet the conditions itemized in the 457(b) regulations. The ability to take a loan allows participants to have access to money that is not otherwise available. And the repayment process for loans ensures that participants replenish their accounts, thereby preserving their retirement savings.

Qualified Joint and Survivor Annuity | *Applies to Some 401(a)/403(b) Plans Only*

If your plan uses the Qualified Joint and Survivor Annuity as the default form of payment, married participants must obtain spousal consent prior to obtaining a loan. The employee's spouse must consent, in writing, to the loan and the consent must be witnessed by a plan representative or notary public. Such consent must be received in writing by MissionSquare no more than ninety (90) days before the loan request is submitted through Account Access. In the case of the Direct Loan Application, spousal consent should be sent along with the application.

Please be advised, that some states recognize a status, such as a civil union or registered domestic partnership, to carry the same rights and obligations as marriage under state law.

Multiple Plans/Providers

If you have more than one retirement plan which offers loans, including "co-administered" or "co-provider" plans, MissionSquare will administer your loan program in your plan(s) with MissionSquare, but you will have to perform some loan verification activities. You will need to perform these activities if loans are available to your employees from several like retirement plans, such as two separate qualified plans, or if you have different types of retirement plans (e.g. Section 457(b) deferred compensation, 403(b) and section 401(a) qualified plan). The degree of your involvement will depend on your situation.

1. Multiple Plans
The Code sets a maximum on the aggregate of all loans from all retirement plans in which the employee participates. If you offer retirement plans through multiple plan providers, no provider will be able to calculate, by itself, the maximum amount that a participant may borrow at any point in time. Since only you, the employer, can determine the current outstanding loan balance and the highest outstanding loan balance in the past 12 months from all loans from any retirement plans, you will have to calculate the maximum amount that may be borrowed. This will involve obtaining all loan amounts currently outstanding and repaid in the last 12 months. Please refer to the Maximum Loan Amount Worksheet for instructions you can use to calculate the maximum loan amount for a participant.

Participants are asked to input all outstanding loan balances in their online worksheet so that the program can properly calculate the maximum amount. Participants are on the "honor system" when they enter other loan amounts; MissionSquare is unable to verify any loan amounts associated with plans administered by other providers. However, if there are any outstanding loans in other plans administered by MissionSquare, our online program will take them into account.

2. Single Retirement Plan/Multiple Providers

If you have adopted a single retirement plan with one master plan document under which MissionSquare and your other administrator(s) must operate, then you may ultimately have to self-administer your loan program, unless you require:

- that the maximum that may be borrowed from any provider is 50 percent of the balance with that provider and
- that the loan must be repaid only to the provider from which the loan was made.

3. Multiple Types of Retirement Plans/Multiple Providers

If you make loans available to your employees from all of your retirement plans (e.g. Section 457(b) deferred compensation plan, 403(b) and Section 401(a) qualified plan), no administrator will be able to calculate, by itself, the maximum amount that a participant may borrow at any point in time. This is because the Code sets a maximum on the aggregate of all loans from all 401(a), 403(b), and 457(b) plans in which the participant participates. Since only you, the employer, can determine the current outstanding loan balance and the highest outstanding loan balance in the past 12 months from all loans from any 401(a), 403(b), or 457(b) plans, you will have to calculate the maximum amount that may be borrowed. This will involve obtaining all loan amounts currently outstanding and repaid in the last 12 months. Please refer to the Maximum Loan Amount Worksheet for instructions you can use to calculate the maximum loan amount for a participant.

Loan Guidelines Agreement

- The purpose of this agreement is to establish the terms and conditions under which the Employer will grant loans to participants. You should consider each option carefully before making your selections because your selections will apply to all loans made while the selection is in effect. If you later change any provision, the changes will apply only to loans made after the change is adopted. Loans in existence at the time of any future changes will continue to operate under the guidelines that were in effect at the time the loan was originally made.
- Please read the instructions and carefully complete all sections of this agreement.

■ New Loan Program ***OR*** ☐ Amendment to Loan Program City of Placentia

1 EMPLOYER PLAN INFORMATION

Name of Plan *(Enter the complete Employer name, including state)*: City of Placentia, California

Plan Type: ☐ 457(b) Deferred Compensation Plan ■ 401(a) Money Purchase Plan ☐ 401(a) Profit-Sharing Plan ☐ 403(b) Retirement Plan

MissionSquare Plan Number(s): 100417

2 ELIGIBILITY & LOAN SOURCE

Loans are available to all active employees, except those with an existing loan in default.

401(a)/403(b) Plans – If your 401(a)/403(b) plan is funded by a combination of Employer and Employee contributions, you must specify whether one or both of the following can be used as a source for participant loans. *(Select one or both options below)*

■ Employer Contribution Account *(vested balances only)*

■ Participant Contribution Accounts *(pre- and post-tax, if applicable, including Employee Mandatory, Employee Voluntary, Employer Roll-In, and Portable Benefits Accounts, but excluding the Deductible Employee Contribution/Qualified Voluntary Employee Contribution Account)*

Roth Assets *(if applicable)* – If your 457(b), 403(b), or 401(a)(k) plan allows Roth contributions, a participant's Designated Roth Account balance will be included when calculating the amount a participant is eligible to borrow. However, you must specify whether or not a participant's Designated Roth Account can be used as a source for participant loans. *(Select one option below)*

☐ A participant's Designated Roth Account will not be available as a source for loans under the plan *(default option)*

☐ A participant's Designated Roth Account will be available as a source for loans under the Plan.

Note: *If Roth assets are available as a source for loans, a loan that is deemed distributed will not satisfy the requirements for a qualified (tax-free) distribution of Roth assets. This may result in participants paying taxes on assets that would otherwise be available tax-free.*

3 LOAN PURPOSE

Loans are available for the following purposes and must be requested in the corresponding method *(select one)*:

■ **All Purposes** – With this option, participants can request a loan for any reason. Participants will be able to request new loans or refinance existing loans using the Online Loans option.

☐ **Other Purposes** – With this option, loans shall only be granted for reasons that are defined and approved by the plan. Participants will be able to request new loans or refinance existing loans using the Online Loans option. Please define purposes below and attach additional pages if needed.

4 APPLICATION PROCESS

The loan application process will vary depending on the option you selected in Section 3 above (Loan Purpose).

(A) All Purposes

- Participants can request a new loan or to refinance an existing loan using the MissionSquare website at: www.icmarc.org
- The participant agrees to the terms of the loan during the online loan request process.
- MissionSquare sends the loan documents and the loan proceeds (via check or ACH) to the participant.

(B) Other Purposes

- Participants can request a new loan or to refinance an existing loan using the MissionSquare website at: www.icmarc.org
- The participant agrees to the terms of the loan during the online loan request process.
- The Employer must review and approve the loan via EZLink.
- If approved, MissionSquare sends the loan documents and the loan proceeds (via check or ACH) to the participant.

The loan amount will generally be redeemed from the employee's account on the same day as either MissionSquare receipt of a loan request/application (complete and in good order), if it is submitted prior to market close on a business day. If not, the loan amount will be redeemed on the next business day following submission. The loan proceeds for an all purpose loan is generally issued on the next business day following redemption, and will be sent to the participant based on their option during the loan application process.

5 MAXIMUM NUMBER OF LOANS *(SELECT ONE)*

Participants may receive one loan per time period defined in the plan document *(e.g., calender or plan year)*. Please specify whether participants may have only one (1) or up to five (5) loans outstanding at one time. Maximum number of loans is one (1) by default. If you want to allow a different amount, enter a value of 1 through 5 in the Other Section.

- ■ **One (1).** Participants may have only one (1) outstanding loan at a time *(default)*.
- ☐ **Other.** Participants may have up to _____ *(enter 2, 3, 4, or 5)* loans outstanding at one time.
- ☐ **Other 403(b) ONLY.** Participants with outstanding legacy loans may have one outstanding loan other than the legacy loans.

6 LOAN AMOUNT

Maximum: The maximum amount of all loans to a participant from the Plan and all other plans of the Employer that are either eligible deferred compensation plans described in section 457(b)(b) of the Code or qualified employer plans under Section 72(p)(4) of the Code (e.g., 401(a)/403(b) plans) shall not exceed the lesser of:

1) $50,000 reduced by the highest outstanding balance over the last 12 months (if any)
2) One half of the value of the nonforfeitable account balance reduced by any outstanding loan balance.

Minimum: The minimum loan amount is $1,000.

A loan cannot be issued for more than the maximum amount. The participant's requested loan amount is subject to downward adjustment without notice due to market fluctuation between the time of application and the time the loan is issued.

Loan amounts will be taken pro-rata from all of a participant's investments.

7 LENGTH OF LOAN

Loans must be repaid in substantially equal installments of principal and interest over a period that does not exceed five (5) years.

Principal Residence Loans

If the participant will be using the loan to purchase a principal residence, the five (5) year time limit may not apply. Participants can repay a principal residence loan over a period of up to 30 years. Please specify the maximum repayment period for principal residence loans from your plan below.

Maximum repayment period for principal residence loans = 30 *(Enter a number of years, up to 30)*

8 LOAN REPAYMENT PROCESS

Specify the repayment method(s) and repayment frequency your plan will use. Note that loan amounts plus interest, minus applicable fees paid to MissionSquare, are repaid to participant accounts and not to MissionSquare. You can allow repayments to be made via payroll deduction or ACH payments from a participant's bank account. Loan repayments must be made at least monthly [457(b)] or quarterly [401(a)/403(b)].

Repayment Method *(Select One)*:

For 457(b) and 401(a) or (k) plans: ■ ACH ***OR*** ☐ Payroll Deduction

403(b) plans loan repayments can only be paid by ACH.*

**ACH Payment Rejected Fee – If a loan repayment scheduled to be paid via ACH debit is rejected due to insufficient funds, invalid bank account information, or account closure, a fee will be charged to the participant's account. The fee is $20 for the first occurrence and $50 for each subsequent occurrence.*

Repayment Frequency:

For Payroll Deduction: Repayments through payroll deduction will be sent via check, wire or ACH debit by the Employer to MissionSquare on the following cycle *(Select One)*:

☐ Weekly *(52 per year)* ☐ Bi-weekly *(26 per year)* ☐ Semi-monthly *(24 per year)* ☐ Monthly *(12 per year)*

☐ Quarterly *(4 per year) – Available to 401(a) only.*

For ACH *(Select One)*: ■ Monthly *(12 per year)* ☐ Bi-weekly *(26 per year)*

Next two payroll dates: *MM/DD/YYYY* 03/08/2024 and *MM/DD/YYYY* 03/22/2024

Initiating Repayments: ACH debits from the employee's designated bank account will begin approximately one month following the date the loan is processed by MissionSquare.

Payroll deduction should begin within two payroll cycles following the date the loan is processed by MissionSquare. Employees using this method must notify the Employer immediately so that repayments will begin as soon as practicable, on a date determined by the Employer's payroll cycle. Failure to begin payroll deduction in a timely manner could lead to the employee's loan entering delinquency status.

Investment of Loan Repayments: All loan repayments are invested according to the instructions the participant has on file for the investment of contributions to his/her account.

Additional Loan Repayments and Early Pay-Off: A participant may pay off all of the principal and interest early without penalty or additional fee. If a loan is paid in full prior to the end of the term of the loan, no further interest will accrue. Please note that no payment date may be "skipped" even if the employee has made a large payment or submitted multiple payments.

Loans in Default: Participants using the ACH repayment option may default on their loans for lack of repayment more frequently than those using the payroll deduction method. For this reason, you may choose to require that certain participants use the payroll deduction repayment method.

Multiple Loans: If a participant has multiple loans outstanding from the plan, each loan repayment must be separately reported to MissionSquare.

8 LOAN REPAYMENT PROCESS *(CONTINUED)*

Former Employees and Leave of Absence: Former employees and employees on a leave of absence must repay their loans on the same schedule that would have applied had they continued employment.

Your plan may allow terminated employees to continue to repay their loans either through ACH, or by giving/sending you a check each repayment period (see the Acceleration section). If you allow terminated employees to repay loans by giving/sending you a check, you will include the repayment amounts in your next regular employee contribution remittance to MissionSquare.

In certain situations, employers may suspend loan repayments for a period of time for employees on a leave of absence or military leave. Please refer to Treasury Regulation section 1.72(p)-1, Q&A-9 for more information.

Repayments Must Continue: In implementing a loan program you should be aware that some employers have had to contend with the inability of some participants to repay their loan(s). You should be aware that you may not stop taking loan repayments from the employee's paycheck – even if the employee asks that repayments be stopped. Failure to payroll-deduct loan repayments on schedule could both jeopardize the eligibility or qualification of the entire plan as well as create a taxable event for the participant. Likewise, if an employee is repaying the loan through ACH debit of his/her bank account, and the employee fails to make payments, this could jeopardize the eligibility of your retirement plan. Employers are ultimately responsible for ensuring that loans are repaid according to the loan terms.

MissionSquare will notify both you and the employee if a payment has not been received.

9 LOAN INTEREST RATE

The loan interest rate is set for all loans at the prime rate plus 0.5%. The interest rate for new loans will change when the prime rate changes.

When a new loan is approved, the interest rate is locked in and remains constant throughout the life of the loan.

10 SECURITY/COLLATERAL

At the time a loan is taken, 50 percent of the participant's account balance or the amount of the loan, whichever is less, will be used as collateral for the loan.

11 ACCELERATION *(SELECT ONE)*

Please specify whether participants who have separated from service will be able to continue loan repayments until they have withdrawn their entire account balance from the plan, or if outstanding loans will be due and payable at the time the participant separates from service.

All outstanding loans shall be due and payable by a participant upon:

- ☐ **Separation from service.** All loan repayments must stop following an employee separating from service.
- ■ **Distribution of his/her entire account balance.** Employees can continue making loan repayments until they have withdrawn their entire account balance.

Outstanding loan balances that are not repaid will be reported as distributions to the participant. See the Deemed Distributions section for additional information.

12 REAMORTIZATION

Reamortization changes the terms of an outstanding loan *(e.g., repayment period, interest rate, frequency of repayments)*. Any outstanding loan may be reamortized.

Reamortization cannot extend the repayment period beyond five (5) years from the date the loan was originally issued. Or, in the case of Principal Residence Loans, beyond *(the number of years specified in Section 7)* years from the date the loan was originally issued.

Participants can use a loan reamortization form to request that an outstanding loan be reamortized. Upon processing the request, a new disclosure statement will be sent to the employer for endorsement by the participant and approval by the employer. The executed disclosure statement must be returned to the plan administrator within 10 calendar days from the date it is signed. The new disclosure statement is considered an amendment to the original promissory note; therefore a new promissory note will not be required.

Note: *A loan reamortization will not be considered a new loan for purposes of calculating the number of loans outstanding or the one loan per calendar year limit.*

13 REFINANCE

Refinancing involves a new loan replacing an employee's outstanding loan. The refinanced loan must be repaid over a period that does not exceed five (5) years from the date when the original loan was issued.

Actively employed participants may elect to refinance an outstanding loan for an additional amount, subject to the loan amount limitations outlined in Section 6, provided that the participant has not yet taken out a loan during the calendar year. Participants no longer employed are not eligible to refinance an existing loan.

Note: *Principal residence loans are not eligible for refinance.*

14 REDUCTION OF LOAN

If a participant dies prior to full repayment of the outstanding loan(s), the outstanding loan balance(s) will be deducted from the account prior to distribution to the beneficiary(ies). The unpaid loan amount is a taxable distribution and may be subject to early withdrawal penalties. The participant's estate is responsible for taxes and penalties on the unpaid loan amount, if any. A beneficiary is responsible for taxes due on the amount he or she receives. A Form 1099 will be issued to both the beneficiary and the estate for tax reporting purposes.

15 DEEMED DISTRIBUTIONS

A loan will be deemed distributed when a scheduled payment is still unpaid at the end of the calendar quarter following the calendar quarter in which the payment was due. When a loan is deemed distributed, the principal balance and any accrued interest is reported to the IRS as a taxable distribution. However, since the participant received the loan amount previously, no money is actually paid to the participant as part of a deemed distribution.

The loan is deemed distributed for tax purposes, but it is not an actual distribution and therefore remains an asset of the participant's account. Interest continues to accrue. The outstanding loan balance and accrued interest are reported on the participant's account statements.

Repayment of a deemed distribution will not change or reverse the taxable event.

The loan continues to be outstanding, and to accrue interest, until it is repaid or offset using the participant's account balance. An offset can occur only if the participant is eligible to receive a distribution from the plan as outlined in the plan document. Participants are required to repay any outstanding loan which has been deemed distributed before they can be eligible for a new loan. The deemed distribution and any interest accrued since the date it became a taxable event is taken into account when determining the maximum amount available for a new loan. New loans must be repaid through payroll deduction.

Important Note: *The employer is obligated by federal regulation to comply with the loan guideline requirements applicable to participant loans, and to ensure against deemed distribution by monitoring loan repayments, regardless of the method of repayment, and by advising employees if loans are in danger of being deemed distributed. The tax-qualified status or eligibility of the entire plan may be revoked in cases of frequent repayment delinquency or deemed distribution.*

To assist plan sponsors whose plan options include loans, MissionSquare will provide reports of participants with payments delinquent by 30 to 89 days, 90 or more days but not yet deemed, and those whose loans have been deemed distributed. MissionSquare is committed to supporting employers who request assistance with their loan programs in order to reduce the number of delinquent loans and decrease the occurrence of deemed distributions.

16 FEES

Fees may be charged for various services associated with the application for and issuance of loans. All applicable fees will be debited from the participant's account balance and/or from the participant's loan repayments prior to crediting the repayment of principal and interest to the participant's account.

17 SIGNATURES

The Employer has the right to set other terms and conditions as it deems necessary for loans from the plan in order to comply with any legal requirements. Employer certifies that all terms and conditions will be administered in a uniform and non-discriminatory manner.

In Witness Whereof, the employer hereby caused these Guidelines to be executed this *(Day of the Month)* 6TH day of *(Month)* FEBRUARY, 20 24 *(Year)*.

EMPLOYER

By: ROSANNA RAMIREZ

Title: DEPUTY CITY ADMINISTRATOR

Attest: ALICE BURNETT, HR DIRECTOR

Placentia City Council
AGENDA REPORT

TO: CITY COUNCIL

VIA: CITY ADMINISTRATOR

FROM: DIRECTOR OF DEVELOPMENT SERVICES

DATE: FEBRUARY 6, 2024

SUBJECT: **PUBLIC HEARING REGARDING GENERAL PLAN AMENDMENT NO. GPA 2021-02, 2021-2029 HOUSING ELEMENT UPDATE (AMENDMENT TO THE ADOPTED 2021-2029 HOUSING ELEMENT TO ADDRESS ADDITIONAL CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (HCD) COMMENTS)**

FISCAL IMPACT: None

SUMMARY:

The City of Placentia General Plan was comprehensively updated in October 2019, with the exception of the Housing Element which was adopted in 2014. State planning law mandates that jurisdictions review and update their Housing Elements every eight years in order to remain relevant and useful, and to reflect the community's changing housing needs via their Regional Housing Needs Assessment (RHNA). The 2021-2029 Housing Element will be the "Sixth Cycle" Housing Element addressing the planning period from October 2021 to October 2029. On October 19, 2021, the City Council reviewed the draft Housing Element for the Sixth Cycle and directed Staff to transmit the draft Element to the California Department of Housing and Community Development (HCD) for review. Staff obtained comments from the HCD, and on January 18, 2022, this item was heard by City Council and direction was given to Staff regarding strategies for creating additional housing capacity to accommodate the RHNA over the next eight years. The item was continued to March 15, 2022, and at that time, the Housing Element was adopted. On May 16, 2022, HCD issued a findings letter stating that revisions were still necessary to comply with State Housing Element Law. Staff resubmitted several versions of revised Housing Elements in August 2023, November 2023 and in January 2024. Staff anticipates receiving a finding of substantial compliance from HCD regarding the Housing Element within the next few weeks to meet the February 29, 2024 HCD deadline to avoid jeopardizing emergency shelter (Navigation Center) funds. However, prior to State certification, Staff recommends City Council adopt the latest version of the Housing Element,

RECOMMENDATION:

It is recommended that the City Council take the following actions:

1. Open the public hearing concerning General Plan Amendment No. GPA 2021-02; and

2. Receive the staff report and Staff presentation, and consider all public testimony and Planning Commission recommendations; and

3. Adopt Resolution R-2024-06, a Resolution of the City Council of the City of Placentia, California, finding that adoption of the Housing Element is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Section 15061(b)(3) and approving and adopting General Plan Amendment No. GPA 2021-02, an amendment to the City of Placentia General Plan Housing Element, including any additional revisions required by the California Department of Housing and Community Development (HCD); and

4. Authorize the Director of Development Services or designee to file all documents with the California Department of Housing and Community Development (HCD) on behalf of the City.

STRATEGIC PLAN STATEMENT:

This item is consistent with the City Council approved 5-Year Strategic Goal to achieve:

Implementation of Housing Element Strategies, Objective Number 3.10. This agenda item will specifically create opportunities for the development of more housing in the City, including a mix of housing at various price points.

BACKGROUND:

Every 8 years, each city within the Southern California Association of Governments ("SCAG") region is required to prepare an update to the Housing Element of the City's General Plan. The current update is referred to as the "6th planning cycle" which spans the 2021-2029 period. The City commenced the 6th cycle Housing Element update effort in 2021, and the following public meetings have been conducted to review Housing Element requirements and issues in Placentia:

- June 8, 2021 Planning Commission meeting
- August 24, 2021 Public workshop
- September 14, 2021 Planning Commission meeting
- September 16, 2021 Public workshop
- September 21, 2021 City Council meeting
- October 12, 2021 Planning Commission meeting
- October 19, 2021 City Council meeting
- January 11, 2022 Planning Commission public hearing
- January 18, 2022 City Council public hearing
- March 8, 2022 Planning Commission public hearing
- March 15, 2022 City Council public hearing
- January 23, 2024 Planning Commission public hearing
- February 6, 2024 City Council public hearing

An important difference between the Housing Element and other elements of the General Plan is the extent of State oversight. Under California law, land use and development are generally within

the authority of cities through the adoption of policies and regulations in General Plans and municipal codes. However, State law establishes many specific limitations and requirements on city land use authority with regard to housing.
The State legislature has also declared an adequate supply of housing to be a matter of statewide importance and has delegated authority to the California Department of Housing and Community Development ("HCD") to review local government Housing Elements and issue opinions regarding their compliance with State law. Cities must submit Housing Elements to HCD for review both prior to and after final adoption by the City Council. A finding of Housing Element compliance by HCD is referred to as "certification" of the Housing Element. Certification is important to enhance cities' eligibility for grant funds and also to support local land use authority. Recent amendments to State law allow HCD and the California Attorney General to file litigation against cities on the grounds of Housing Element non-compliance, and courts are also authorized to impose fines on non-compliant cities and order land use changes or limit the issuance of building permits.

HCD COMMENTS AND PROPOSED RESPONSES TO HCD

On October 21, 2021 the City's draft Housing Element was submitted to HCD for review, and on December 20, 2021 HCD issued its findings letter finding that the draft element addressed many statutory requirements; however, HCD indicated revisions were still necessary to comply with State Housing Element Law.

In January 2022, the Planning Commission and City Council conducted duly noticed public hearings to review HCD's findings, receive public testimony, and discuss potential strategies to address HCD's findings. The focus of those meetings were to identify appropriate land use strategies for creating additional capacity for housing development to accommodate the City's assigned share of regional housing need. Staff completed a revised draft Housing Element incorporating Planning Commission comments and City Council direction. The City Council adopted a revised version of the City of Placentia 2021-2029 Housing Element Update on March 15, 2022 and resubmitted to HCD for review on March 17, 2022. On May 16, 2022, HCD issued its findings letter (Attachment 3) finding that the draft Housing Element addressed many statutory requirements; however, revisions were still necessary to comply with State Housing Element Law.

The City revised the 2021-2029 Housing Element Update and resubmitted to HCD for review on August 29, 2023. On October 27, 2023, HCD issued its review letter (Attachment 4) finding that the draft Housing Element addressed most statutory requirements; however, revisions were still necessary to comply with State Housing Element Law.

The City revised the 2021-2029 Housing Element Update and resubmitted to HCD for review on November 28, 2023. HCD provided informal feedback on November 29, 2023. The City submitted a revised draft with supplemental revisions on January 19, 2024 (Attachment 2). The supplemental draft was posted on the City's website on January 19, 2024 and was made available for public review as required.

Subsequent to the latest draft Element being submitted for HCD review, the City received a findings letter on January 26, 2024 (Attachment 5). This correspondence mostly includes

comments that Staff and the City's consultant had already anticipated (in working closely with HCD) and had incorporated into the latest draft Element. Prior to and as late as January 30, 2024, Staff and the consultant have been coordinating closely with HCD to finalize any outstanding items and we continue to meet with HCD to finalize any outstanding items and we continue to meet with HCD to achieve State certification no later than February 29, 2024. Findings have been inserted into the Staff recommendation and to the approving Resolution (Attachment 1) to authorize the Director of Development Services to make any additional revisions required by HCD and to file all necessary documents with HCD on behalf of the City to achieve State certification.

Latest Responses To HCD

During recent HCD formal and informal reviews, a variety of issues have been addressed, including:

- Clarifications on methodology for identifying adequate sites
- Additional justification for the use of infill parcels

HCD has indicated they can make a finding of substantial compliance and provide a final certification letter once the 2021-2029 Housing Element and TOD Zone expansion are formally adopted by the City Council.

The revised draft Housing Element shows changes to the draft that was submitted to HCD in ~~strikeout~~/underline (or redline) format (Attachment 2).

Many of HCD's comments required only clerical or technical revisions to the data and analysis in the Housing Element, while other comments involve more substantive policy issues. Some of the most significant comments from HCD involve how the City will accommodate future housing needs as assigned through the RHNA process. Because of the exceptionally high RHNA allocations in this Housing Element cycle, many Orange County cities including Placentia do not currently have sufficient land zoned for housing to fully accommodate the RHNA. As noted in previous meetings, Placentia's 6th cycle RHNA allocation is 4,398 units compared to 492 units in the prior cycle. Under State law, if a city's land use plans and zoning do not demonstrate adequate capacity to accommodate the RHNA, zoning must be amended to create additional capacity.

LAND USE POLICY OPTIONS

The revised draft Housing Element (see Table B-1, below) estimates that there is currently a shortfall of approximately 1,137 potential housing units as compared to the RHNA based upon current zoning. The Housing Element must identify land use strategies and potential sites that could be rezoned to bridge this shortfall.

Table B-1: Residential Sites Summary

Income Category	Very Low	Low	Moderate	Above Moderate	Total
Approved Projects (Table B-2)	-	252	-	774	1,026
Vacant Sites (Table B-3)	-	-	394	65	459
Underutilized Sites (Table B-4)	698	404	371	247	1,720
ADUs	14	24	17	1	56
Total Capacity	712	680	782	1,087	3,196
RHNA	1,243	680	782	1,693	4,398
Surplus (Shortfall)	(531)	-	-	(606)	(1,137)

Source: City of Placentia, 2021

A key policy question considered by the Planning Commission and City Council at previous meetings was the most appropriate land use strategies for increasing potential housing capacity. Based on that discussion, the draft Housing Element has been revised to include the following rezoning strategies:

Strategy	Description
1. TOD Zone Expansion	The TOD zoning district currently allows up to 95 units/acre in some subareas. This strategy would expand the boundaries of the TOD district.
2. Increase R-3 density	The current R-3 maximum density is 25 units/acre. Under State law, a density of 30 units/acre is considered sufficient to accommodate lower-income housing. Increasing the allowable density from 25 to at least 30 units/acre would accomplish 2 things: 1) create additional housing capacity; and 2) allow R3 properties to accommodate lower-income housing for RHNA purposes.

Strategy 2 above has already been implemented as the allowable R-3 density has been increased in late 2022 when City Council adopted a Zoning Code Amendment and General Plan Amendment. Strategy 1 is in process and is anticipated to be completed no later than February 29, 2024. In addition to these land use amendments, the following Zoning Code amendments are necessary to address HCD comments and comply with changes in State law:

Emergency Shelters: Program 1.4 has been revised to include an amendment to emergency shelter parking requirements consistent with AB 139 (Government Code Sec 65583(a)(4)(A)).

Employee housing: Program 1.4 has been revised to include a Code amendment consistent with current law regarding agricultural employee housing.

Permanent supportive housing: Program 1.4 has been revised to demonstrate consistency with Government Code section 65651 regarding supportive housing.

Off-street parking: Program 1.17 has been revised to include a Code amendment to reduce required parking for studio and 1-bedroom units in the R-3 district to 1 space in either a garage or a carport.

PLANNING COMMISSION RECOMMENDATION:

On January 23, 2024, the Planning Commission conducted a public hearing concerning General Plan Amendment No. GPA 2021-02. The Planning Commission concluded the public hearing and unanimously adopted Resolution PC 2024-02 recommending that City Council find that adoption of the Housing Element update is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Section 15061(b)(3) and recommending that City Council approve an amendment to the previously adopted City of Placentia 2021-2029 Housing Element.

CEQA COMPLIANCE:

Adoption of the Housing Element update would not approve any development project, zoning amendment, or any other physical change to the environment; therefore, it is covered by the "common sense" exemption (CEQA Guidelines Sec. 15061(b)(3)) which provides that CEQA applies only to projects that have the potential for causing a significant effect upon the environment. Subsequent to adoption of the Housing Element, amendments to the Zoning Ordinance will be necessary in order to implement Housing Element programs, and appropriate CEQA analysis will be prepared in connection with those amendments.

NEXT STEPS:

HCD has indicated they can make a finding of substantial compliance and provide a final certification letter once the 2021-2029 Housing Element and remaining TOD Zone expansion (re-zoning action) are formally adopted by the City Council. Both of these actions are scheduled to be completed no later than February 20, 2024.

Prepared by:

Joseph M. Lambert
Director of Development Services

Reviewed and approved:

Damien R. Arrula
City Administrator

Attachments:

1. Resolution R-2024-06 – Adopting Housing Element
2. Latest Revised Draft 2021-2029 Housing Element January 2024
3. HCD review letter dated May 16, 2022
4. HCD review letter dated October 27, 2023
5. HCD review letter dated January 26, 2024

RESOLUTION NO. R-2024-06

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PLACENTIA, CALIFORNIA, FINDING THAT ADOPTION OF THE HOUSING ELEMENT IS EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CEQA SECTION 15061(B)(3) AND APPROVING AND ADOPTING GENERAL PLAN AMENDMENT NO. GPA 2021-02, AN AMENDMENT TO THE CITY OF PLACENTIA GENERAL PLAN HOUSING ELEMENT, INCLUDING ANY ADDITIONAL REVISIONS REQUIRED BY THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (HCD)

A. Recitals.

Whereas, every 8 years, each city within the Southern California Association of Governments ("SCAG") region is required to prepare an update to the Housing Element of the City's General Plan. The current update is referred to as the "6th planning cycle" which spans the 2021-2029 period. The City of Placentia ("City") has undertaken a review and update of the City's Housing Element of the General Plan as part of the "6th planning cycle" which spans the 2021-2029 period; and

Whereas, on January 23, 2024, the Planning Commission of the City of Placentia conducted, and concluded, a duly noticed public hearing, as required by law, to review and make a recommendation to the City Council regarding General Plan Amendment (GPA 2021-02): an update to the City of Placentia General Plan to adopt the amended 2021-2029 General Plan Housing Element Update; and

Whereas, on February 6, 2024, the City Council of the City of Placentia conducted, and concluded, a duly noticed public hearing, as required by law, to review and take action on General Plan Amendment (GPA 2021-02): an update to the City of Placentia General Plan to adopt the 2021-2029 General Plan Housing Element Update; and

Whereas, on December 20, 2021, May 16, 2022, October 27, 2023, and January 26, 2024 HCD provided written correspondence indicating that the draft Element addressed many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Government Code); and

Whereas, the Draft Housing Element has been revised to address HCD's comments from correspondence dated December 20, 2021 as described in the City Council staff reports dated January 18, 2022, March 15, 2022, and February 6, 2024 in compliance with State law; and

Whereas, the City as Lead Agency determined that the proposed General Plan Amendment (Housing Element update) is covered by the common sense CEQA exemption (CEQA Guidelines Sec. 15061(b)(3)) which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there

is no possibility that Housing Element adoption may have a significant effect on the environment, and therefore is not subject to CEQA; and

Whereas, City staff is recommending changes to the General Plan as a result of the public input and comments that were received; and

Whereas, the Planning Commission is responsible for reviewing updates to the General Plan and forwarding a recommendation to the City Council on the adoption; and

Whereas, the Planning Commission and City Council have reviewed and considered information from a variety of sources, including, but not limited to, City staff, outside agencies, and the recommendations of the and members of the public; and

Whereas, the City of Placentia provided notice of public hearing in accordance with California Government Code Section 65090 and the City of Placentia Municipal Code by ad publication in a local newspaper at least 10 days prior to the public hearing; and

Whereas, the City Council authorizes City of Placentia Staff to make subsequent revisions or modifications to the draft 2021-2029 Housing Element to comply with State law as requested by the California Department of Housing and Community Development (HCD); and

Whereas, all other legal prerequisites to the adoption of this Ordinance have occurred.

B. Resolution.

NOW, THEREFORE, the City Council of the City of Placentia does hereby find, determine, and resolve as follows:

SECTION 1. In all respects, as set forth in the Recitals, Part A, of this Resolution.

SECTION 2. The City Council finds that the proposed General Plan Amendment (Housing Element update, GPA 2021-02) is exempt from CEQA pursuant to the common sense CEQA exemption (CEQA Guidelines Sec. 15061(b)(3)) which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment, and therefore is not subject to CEQA.

SECTION 3. The City Council hereby approves and adopts an amendment to the City of Placentia General Plan Housing Element (GPA 2021-02) as described in Exhibit "A" of this Resolution, and also described as Attachment 2 to the City Council Staff Report dated February 6, 2024 and by this reference incorporated as though fully set forth herein, which contains a thorough and adequate treatment of housing and all required components of a State compliant Housing Element.

SECTION 4. Based upon the evidence presented, the City Council makes the following findings of fact for the 2021-2029 Housing Element as described in Exhibit "A" of this Resolution, and also described as Attachment 2 to the City Council Staff Report dated February 6, 2024, which updates and replaces the 2013-2021 Housing Element:

a. The proposed amendment is internally consistent with the General Plan. The 2021-2029 Housing Element complies with the policies of the City of Placentia General Plan and is internally consistent with the Land Use Element and other Elements of the Placentia General Plan.

b. The proposed amendment would not be detrimental to the public interest, health, safety, convenience, or welfare of the City. The 2021-2029 Housing Element will not be detrimental to the public interest, health, safety, convenience, or welfare of the City.

c. The subject properties have been substantially evaluated and are physically suitable for the requested zoning designation(s) and the anticipated land use development(s). The 2021-2029 Housing Element substantially complies with Housing Element Law, as evidenced in the technical analysis conducted in the document and does not involve the development of any specific property. The 2021-2029 Housing Element reflects the latest requirements of State law for Housing Elements and is consistent with sound planning principles in that the proposed policies and proposed implementing regulation are compatible and ensures that the goals and policies of the General Plan can be adequately implemented to achieve the community's vision.

d. The proposed General Plan amendment ensures development of desirable character which will be compatible with existing and proposed development. The 2021-2029 Housing Element substantially complies with Housing Element Law and does not involve the development of any specific property. The 2021-2029 Housing Element reflects the latest requirements of State law for housing elements and is consistent with sound planning principles in that the proposed policies and proposed implementing regulation are compatible and ensures that the goals and policies of the General Plan can be adequately implemented to achieve the community's vision.

SECTION 5. The City Council finds, pursuant to Government Code Section 65583.2(g)(2) and based on substantial evidence set forth in Appendix B of the 2021-2029 Housing Element, that any existing uses on sites identified to accommodate affordable housing are likely to and assumed to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the 2021-2029 Housing Element. Any sites identified to accommodate 2021-2029 RHNA need that have existing structures, improvements and/or activities demonstrate a likelihood for redevelopment during the 2021-2029 planning period. Parcels with existing uses or activities that were not likely to be discontinued during the planning period were generally removed if they had conditions suggesting continued use or activity during the planning period.

SECTION 6. The City Council finds, recognizes, and agrees that, Government Code §65583.2(h) requires jurisdictions to permit owner-occupied and rental multifamily

residential uses by-right for developments in which at least 20 percent of the units are affordable to lower-income households. The City Council hereby directs City Staff to adhere to and apply all requirements related to Government Code §65583.2(h) for any development in which at least 20 percent of the units are affordable to lower-income households.

SECTION 7. The City Council finds, pursuant to Government Code §65583.2 that sites identified in prior planning periods shall comply with all requirements related to Government Code §65583.2, including all non-vacant sites identified in Appendix B of the 2021-2029 Housing Element that are also listed in the previous Housing Element's sites inventory, or vacant sites that were listed in two previous consecutive sites inventories. In these cases, residential development are allowed by-right when a housing project provides at least 20 percent of the units affordable to lower-income households in compliance with Government Code §65583.2.

SECTION 8. The proposed General Plan Amendment has been prepared in accordance with the California Government Code, and in accordance with the provisions of the California Environmental Quality Act.

SECTION 9. If any section, subsection, sentence, clause, or phrase of this resolution and/or the documents in support of this resolution is/are for any reason held to be invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this resolution.

SECTION 10. Prior to taking this action, the City Council reviewed, considered and has exercised its independent judgment based on substantial evidence regarding this decision and all of the information and data in the administrative record, all oral and written testimony received and finds that the proposed General Plan Amendment (Housing Element update, GPA 2021-02) is exempt from CEQA pursuant to the common sense CEQA exemption (CEQA Guidelines Sec. 15061(b)(3)), and therefore, GPA 2021-02 is in full compliance with the California Environmental Quality Act.

SECTION 11. If any section, subsection, sentence, clause, or phrase of this resolution and/or the documents in support of this resolution is/are for any reason held to be invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this resolution.

SECTION 12. The City Clerk shall certify to the adoption of this Resolution.

PASSED, ADOPTED AND APPROVED this 6th day of February 2024.

_____
Jeremy Yamaguchi, Mayor

Attest:

_____
Robert S. McKinnell, City Clerk

STATE OF CALIFORNIA
COUNTY OF ORANGE

I, Robert S. McKinnell, City Clerk of the City of Placentia, do hereby certify that the foregoing Resolution was adopted at a regular meeting of the City Council of the City of Placentia, held on the 6th day of February 2024 by the following vote:

AYES: Councilmember:
NOES: Councilmember:
ABSENT: Councilmember:
ABSTAIN: Councilmember:

_____
Robert S. McKinnell, City Clerk

APPROVED AS TO FORM:

_____
Christian L. Bettenhausen, City Attorney

Exhibit A:
2021-2029 GENERAL PLAN HOUSING ELEMENT UPDATE

EXHIBIT A

GPA 2021-02, 2021-2029 amended Housing Element Update:

https://www.placentia.org/DocumentCenter/View/11226/City-of-Placentia---Housing-Element-2021-2029

City of Placentia Housing Element 2021-2029

PLACENTIA
Rich Heritage, Bright Future

November 2023

City Council Resolution No. R-2022-16

Chapter 1: Introduction

This 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 2021-2029 planning period.

1.1 Purpose and Content

The City of Placentia's Housing Element addresses adequate housing opportunities for present and future residents through 2029 and provides the primary policy guidance for local decision-making related to housing.

California Government Code §65583 requires a jurisdiction's Housing Element include the following components:

- A review of the previous Element's goals, policies, objectives and programs to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element;
- An assessment of housing need and an inventory of resources and constraints related to meeting these needs;
- A statement of goals, policies and quantified objectives related to the maintenance, preservation, improvement and development of housing; and
- A policy program that provides a schedule of actions that the City is undertaking or intends to undertake implementing the policies set forth in the Housing Element.

1.2 Housing Element Update Process

The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the state's main housing goal. Recognizing the important part that local planning programs play in pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of their comprehensive General Plans (*California Government Code* §65302(c)).

This Housing Element update covers the planning period from October 2021 to October 2029. State planning law mandates that jurisdictions review and update their Housing Elements every 8 years in order to remain relevant and useful and reflect the community's changing housing needs.

1.3 State Law and Local Planning

Consistency with State Law

The Housing Element is one of the seven General Plan elements required by the State of California, as articulated in §65580 to §65589.8 of the *California Government Code*. It is the only General Plan Element that requires review by the State of California. State law requires that each jurisdiction's Housing Element consist of "an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled program actions for the preservation, improvement, and development of housing." The Housing Element plans for the provision of housing for all segments of the population.

Section 65583 of the *Government Code* sets forth specific requirements regarding the scope and content of each Housing Element. Table 1-1 summarizes these requirements and identifies the applicable sections in the Housing Element where these requirements are addressed.

Table 1-1 – State Housing Element Requirements

Required Housing Element Component	Reference
A. Housing Needs Assessment	
1. Analysis of population trends in Placentia in relation to countywide trends	Chapter 2
2. Analysis of employment trends in Placentia in relation to regional trends	Chapter 2
3. Projections and quantification of Placentia's existing and projected housing needs for all income groups	Chapter 2
4. Analysis and documentation of the city's housing characteristics, including:	
a. Level of housing cost compared to ability to pay	Chapter 2
b. Overcrowding	Chapter 2
c. Housing stock condition	Chapter 2
5. An inventory of land suitable for residential development including vacant sites and having redevelopment potential and an analysis of the relationship of zoning, public facilities and services to these sites	Appendix B
6. Analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels	Chapter 3
7. Analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels	Chapter 3
8. Analysis of special housing need: elderly, persons with disabilities, large families, farm workers, and families with female heads of household	Chapter 2
9. Analysis of housing needs for families and persons in need of emergency shelter	Chapter 2
10. Analysis of opportunities for energy conservation with respect to residential development	Chapter 3
11. Analysis of assisted housing developments that are eligible to convert from lower-income housing to market rate housing during the next 10 years	Chapter 2
B. Goals and Policies	
12. Identification of goals, quantified objectives and policies relative to maintenance, improvement and development of housing	Chapter 4
C. Implementation Program	

Table 1-1 – State Housing Element Requirements	
Required Housing Element Component	Reference
13. Identify adequate sites which will be made available through appropriate action with required public services and facilities for a variety of housing types for all income levels	Appendix B
14. Programs to assist in the development of adequate housing to meet the needs of Extremely Low, Very Low, Low and Moderate-Income households.	Chapter 4
15. Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing	Chapter 4
16. Remove constraints to or provide reasonable accommodations for housing for persons with disabilities	Chapter 4
17. Conserve and improve the condition of the existing affordable housing stock in Placentia	Chapter 4
18. Promote housing opportunities for all persons	Chapter 4
19. Identify programs to address the potential conversion of assisted housing development to market-rate housing	Chapter 4
20. Program actions to identify zones where emergency shelters are permitted without a conditional use or other discretionary permit and with the capacity to meet the needs of individuals and persons needing emergency shelter.	Chapter 4

General Plan Consistency

The *California Government Code* requires internal consistency among the various elements of a General Plan. Section 65300.5 of the *Government Code* states that the General Plan's various Elements shall provide an integrated and internally consistent and compatible statement of policy. The City has reviewed the other elements of the General Plan and has determined that this Housing Element provides consistency with the other Elements of the General Plan. The City will maintain this consistency as future General Plan amendments are processed by evaluating proposed amendments for consistency with all elements of the General Plan.

Relationship to Other Plans and Programs

The Housing Element identifies goals, objectives, policies, and action programs for the next eight years that directly address the housing needs of Placentia. Other City plans and programs that work to implement the goals and policies of the Housing Element include the City's Municipal Code, Specific Plans, Capital Improvement Program and the annual budget process.

1.4 Housing Element Organization

The Housing Element is organized into four sections:

- Chapter 1: Introduction describes the purpose, organization and requirements of the Housing Element;
- Chapter 2: Housing Profile analyzes the demographic, economic and housing trends in Placentia and describes the housing needs of the city;

- Chapter 3: Resources and Constraints Analysis analyzes the governmental and non-governmental constraints to and resources for housing; and,
- Chapter 4: Housing Policy Program provides goals and policy actions for the construction, conservation, rehabilitation, and preservation of housing in Placentia.

Supporting background material is included in the following appendices:

- Appendix A: Community Outreach
- Appendix B: Residential Land Inventory
- Appendix C: Review of Housing Element
- Appendix D: Affirmatively Furthering Fair Housing
- Appendix E: Glossary

1.5 Citizen Participation

This Housing Element was developed through the combined efforts of City staff, the Planning Commission, the City Council, and the City's residents and stakeholders. Citizen input was received through website postings, public workshops and public hearings conducted by City staff, the Planning Commission and City Council. The notices for these workshops and hearings were sent directly to a list of interested parties, published in a local newspaper, on the City's website and prominently posted at City Hall and other public facilities. Throughout the process, organizations that represent the interests of lower-income and special needs households, or are otherwise involved in the development of housing, were invited to participate in the preparation and review of the Housing Element. The list of stakeholders who were invited to participate in the Housing Element update process is provided in Appendix A.

Comments received through the City's outreach activities have been considered in the development of the Housing Policy Program provided in **Chapter 4** of this Housing Element. Additional information regarding the public participation process is provided in **Appendix A.**

Chapter 2: Housing Needs Assessment

2.1 Introduction

When preparing the Housing Element, jurisdictions must evaluate existing and future housing needs for all income groups.

This section analyzes demographic and housing characteristics that influence the demand for and availability of housing. The analyses form a foundation for establishing programs and policies that seek to address identified housing needs. Housing needs are identified according to income, tenure, and special needs groups. Finally, the City's projected housing growth needs based on the 2021-2029 Regional Housing Needs Assessment (RHNA) are examined.

Primary data sources include the U.S. Census, the California Department of Finance, the Southern California Association of Governments, and other relevant data sources. These data sources are the most reliable for assessing existing conditions and provide a basis for comparison with historical trends.

It is important to note that different data may appear inconsistent for a variety of reasons. Some data reflect a "snapshot in time" while other such as Census American Community Survey ("ACS") estimates are based on a sample survey conducted over a period of several years. Also, many data sources are based on self-reporting, which can lead to variations. Because of these factors, statistics reported in this chapter should be viewed as estimates rather than precise counts.

2.2 Community Profile

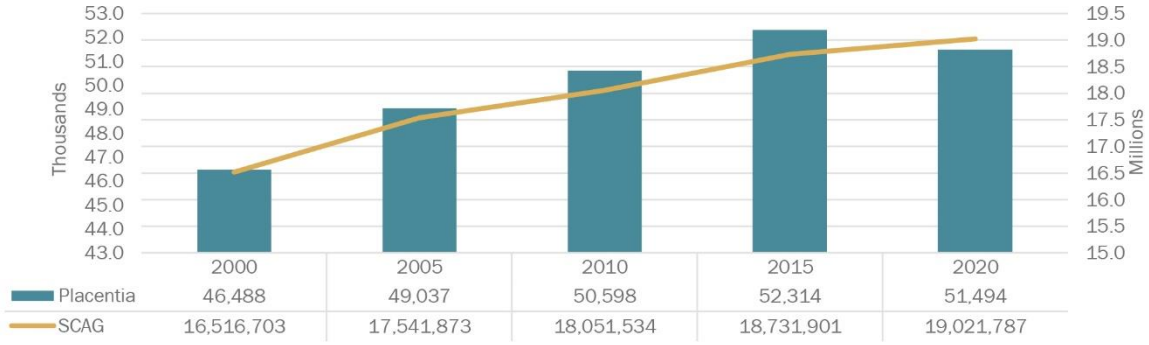
Population Trends and Characteristics

Housing needs are generally influenced by population and employment trends. This section provides a summary of population characteristics in Placentia.

Historical, Existing and Forecast Growth

The City of Placentia is one of the 34 cities within Orange County. Placentia had an estimated 2020 total population of 51,494 including 337 living in group quarters according to the California Department of Finance (DOF). Figure 2-1 shows population trends in Placentia from 2000 to 2020. Over this period Placentia had an annual growth rate of about 0.5% compared to 0.7% for the region.

Figure 2-1 – Population Growth– 2000-2020, Placentia vs. SCAG Region

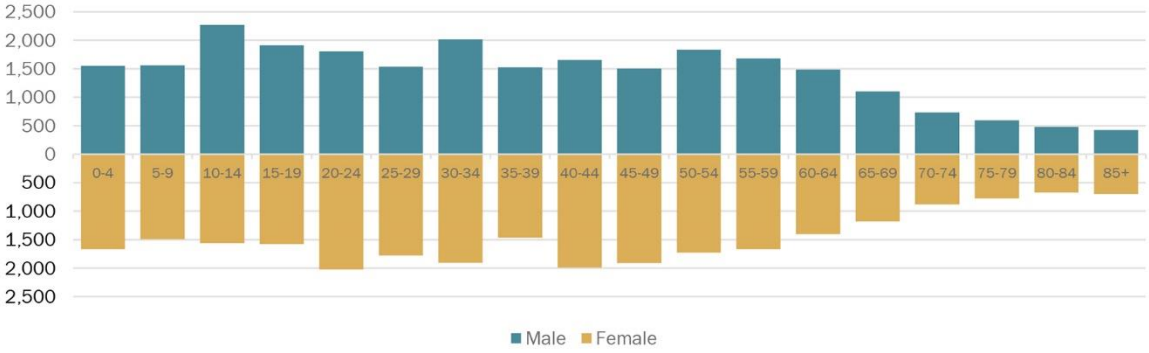


CA DOF E-5 Population and Housing Unit Estimates

Age Composition

Housing needs are influenced by the age characteristics of the population. Different age groups require different accommodations based on lifestyle, family type, income level, and housing preference. According to recent Census estimates the population of Placentia is approximately 49.3% male and 50.7% female (Figure 2-2). The share of the population of Placentia under 18 years of age is 23.7%, which is higher than the regional share of 23.4%. Placentia's seniors (65 and above) make up 14.5% of the population, which is higher than the regional share of 13%.

Figure 2-2 – Population by Age and Gender, Placentia

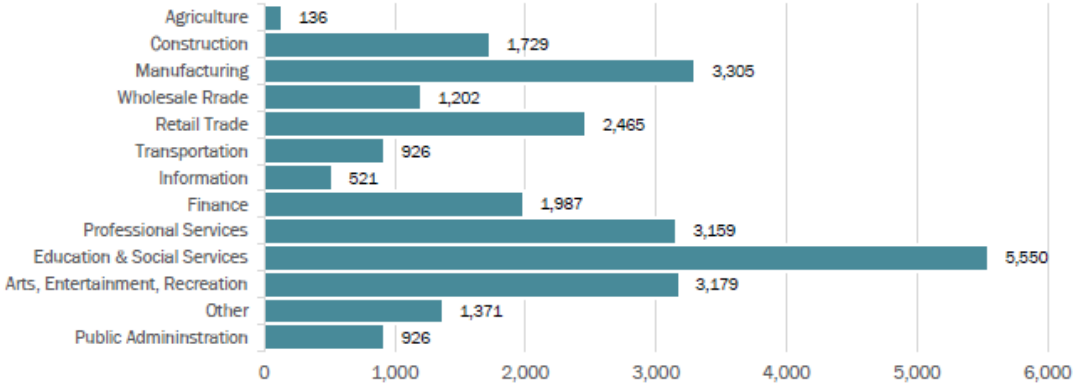


American Community Survey 2014-2018 5-year estimates

Employment Trends

Current employment and projected job growth have a significant influence on housing needs during this planning period. Recent employment estimates reported that Placentia has 26,456 workers living within its borders who work across 13 major industrial sectors (Figure 2-3). The most prevalent industry is Education & Social Services with 5,550 employees (21% of total) and the second most prevalent industry is Manufacturing with 3,305 employees (12.5% of total).

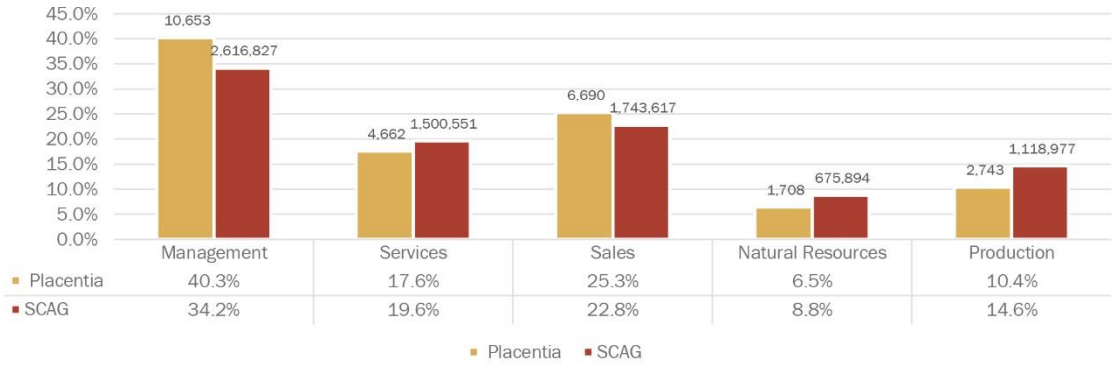
Figure 2-3 – Employment by Industry, Placentia



American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes.

The most prevalent occupational category in Placentia is Management, in which 10,653 (40.3% of total) employees work. The second-most prevalent type of work is in Sales, which employs 6,690 (25.3% of total) in Placentia (Figure 2-4).

Figure 2-4 – Employment by Occupation, Placentia



American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

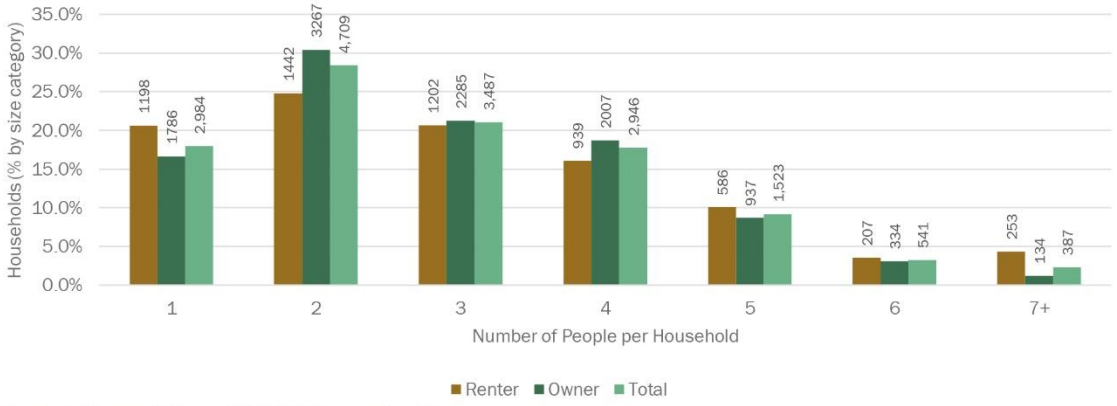
Household Characteristics

This section describes Placentia's household characteristics, which are important indicators of the type and size of housing needed in the city. The U.S. Census Bureau defines a "household" as all persons living in a single housing unit, whether or not they are related. One person living alone is considered a household, as is a group of unrelated people living in a single housing unit. Persons in group quarters, such as dormitories, retirement or convalescent homes, or other group living situations are included in population totals but are not considered households. The U.S. Census Bureau defines a family as "a group of two people or more (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family."

Household Size and Overcrowding

Figure 2-5 shows recent estimates of household size for Placentia. The most commonly occurring household size is two people (28.4%) and the second-most commonly occurring household is three people (21%). Placentia has a lower share of single-person households than the SCAG region overall (18% vs. 23.4%) and a lower share of 7+ person households than the SCAG region overall (2.3% vs. 3.1%). The special needs of large families are discussed in the Special Needs section later in this chapter).

Figure 2-5 – Household Size, Placentia



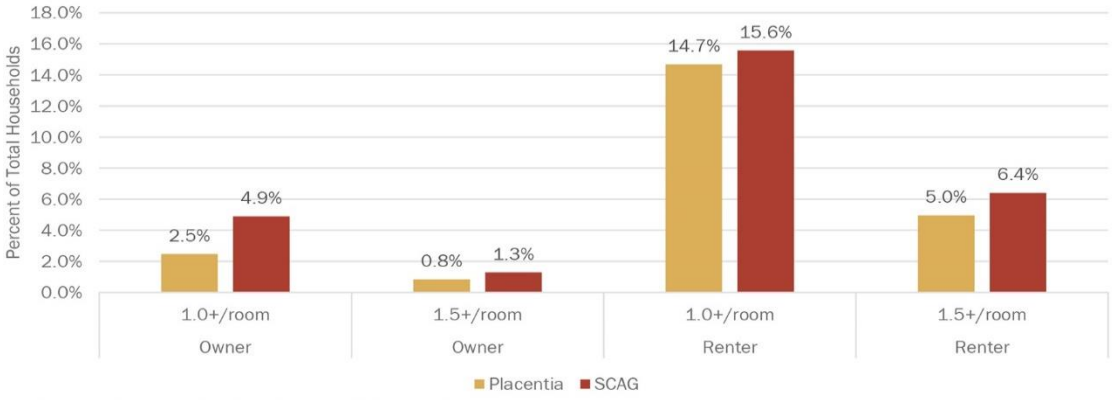
American Community Survey 2014-2018 5-year estimates.

Overcrowding is defined as households having more than one person per room, excluding bathrooms and kitchens, with severe overcrowding when there are more than 1.5 occupants per room. Overcrowding can affect the health and well-being of residents, reduce the quality of the physical environment and contribute to physical deterioration of housing units.

Figure 2-6 summarizes recent Census estimates of overcrowding in Placentia compared to the SCAG region as a whole. In Placentia, 266 owner-occupied and 855 renter-occupied households had more than 1.0 occupants per room, while 90 owner-occupied households and 289 renter-occupied households had more than 1.5 occupants per room.

The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Program 1.3: Pursue County, State, and Federal Housing Funds, Program 1.8: Adequate Sites for Housing Development, Program 1.10: Encourage Development of Housing for Extremely-Low-Income Households, Program 1.11: Density Bonus Ordinance, Program 1.13: Development of Housing for Larger Families, Program 2.2: Section 8 Rental Assistance, Program 2.4: Comprehensive Housing Resource Directory, Program 3.5: Monitor and Preserve At-Risk Units, Program 4.1: Partnerships with the Housing Industry).

Figure 2-6 – Overcrowding, Placentia vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

Overpayment

Housing cost burden, or overpayment, is most commonly measured as the percentage of gross income spent on housing, with 30% a usual threshold for 'cost burden' and 50% the threshold for "severe cost burden." However, a lower-income household spending the same percent of income on housing as a higher-income household will likely experience more true "cost burden." Figure 2-7 shows HUD estimates of the number of households in Placentia by tenure, income category and share of income spent on housing. This data shows that households in the lower income categories, especially renters, typically spend a higher portion of their incomes for housing.

The problems of overpayment are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Program 1.3: Pursue County, State, and Federal Housing Funds, Program 1.8: Adequate Sites for Housing Development, Program 1.10: Encourage Development of Housing for Extremely-Low-Income Households, Program 1.11: Density Bonus Ordinance, Program 1.13: Development of Housing for Larger Families, Program 2.2: Section 8 Rental Assistance, Program 2.4: Comprehensive Housing Resource Directory, Program 3.5: Monitor and Preserve At-Risk Units, Program 4.1: Partnerships with the Housing Industry).

Figure 2-7 – Overpayment by Income Category and Tenure, Placentia

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	845	785	1,015
Household Income >30% to less-than or= 50% HAMFI	850	465	1,015
Household Income >50% to less-than or= 80% HAMFI	870	195	1,360
Household Income >80% to less-than or= 100% HAMFI	295		855
Household Income >100% HAMFI	80		1,575
Total	2,940	1,445	5,825
Income by Cost Burden (Owners only)	**Cost burden > 30%**	**Cost burden > 50%**	**Total**
Household Income less-than or= 30% HAMFI	605	400	865
Household Income >30% to less-than or= 50% HAMFI	345	170	695
Household Income >50% to less-than or= 80% HAMFI	870	345	1,750
Household Income >80% to less-than or= 100% HAMFI	465	65	1,115
Household Income >100% HAMFI	975	30	6,320
Total	3,260	1,010	10,750

Extremely-Low-Income Households

Extremely-low-income (ELI) households are defined as households with incomes less than 30 percent of median family income (MFI). State law requires quantification and analysis of existing and projected housing needs of ELI households. As noted in Figure 2-7 above, recent Census data estimated that approximately 1,965 Placentia households were within the ELI category. As noted in Figure 2-8 below, approximately 19 percent of renters were ELI and about 8 percent of owners were ELI. The race/ethnicity with the highest share of extremely-low-income households in Placentia is Hispanic (19.7% compared to 12.1% of total population). ELI households often have other housing problems such as overcrowding due to insufficient incomes to afford large enough dwellings. As seen in Figure 2-7, 845 ELI renter households and 605 ELI owner households were paying more than 30% of income for housing. In addition, 785 ELI renter households and 400 ELI owner households were paying over 50% of income for housing.

Figure 2-8 – Extremely-Low-Income Households by Race and Tenure, Placentia

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	8,870	830	9.4%
Black, non-Hispanic	169	30	17.8%
Asian and other, non-Hispanic	2,978	260	8.7%
Hispanic	4,435	875	19.7%
TOTAL	**16,452**	**1,995**	**12.1%**
Renter-occupied	5,680	1,100	19.4%
Owner-occupied	10,780	905	8.4%
TOTAL	**16,460**	**2,005**	**12.2%**

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

The projected needs of ELI households are discussed below as part of the Future Housing Needs analysis.

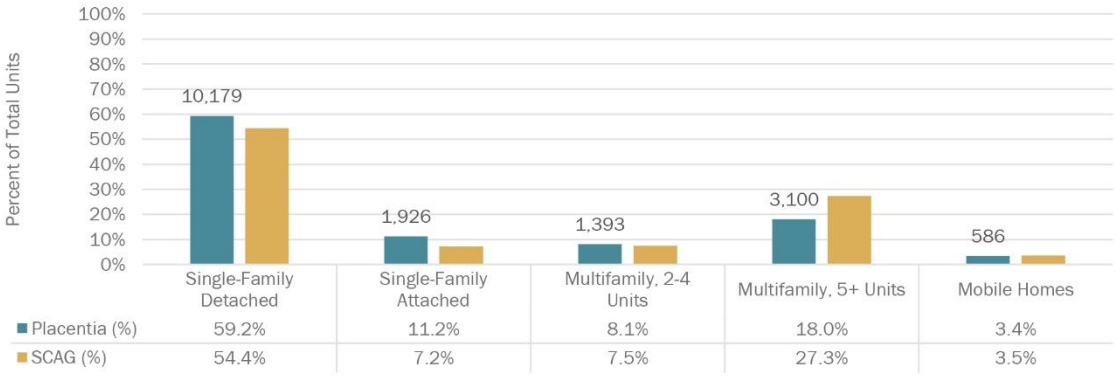
Housing Inventory and Market Conditions

This section describes the housing stock and market conditions in the City of Placentia.

Housing Stock Profile

Figure 2-9 provides recent estimates of the housing stock in Placentia, which has a total of approximately 17,184 housing units. The most prevalent housing type in Placentia is single-family detached with about 59% of all units. The share of all single-family units, including condos, in Placentia is 70.4%, which is higher than the 61.7% share in the SCAG region. The estimated total vacancy rate in the city is 2.8% while the average household size (as expressed by the population to housing unit ratio) is about 3.1 persons.

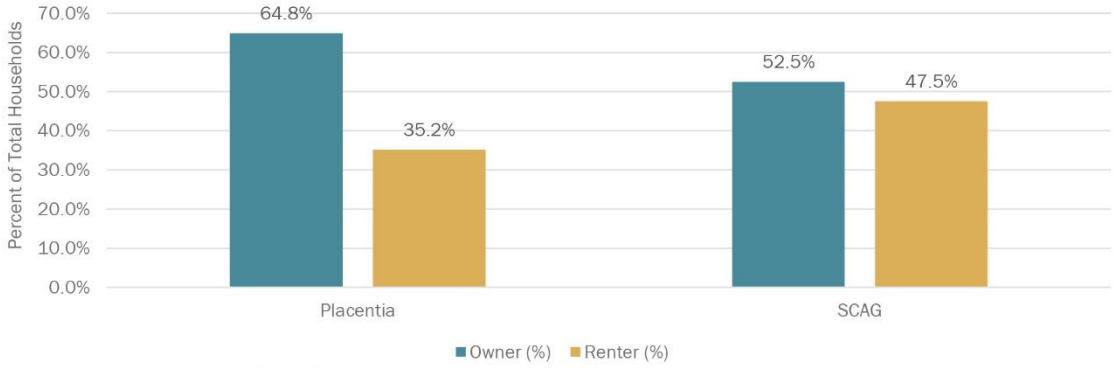
Figure 2-9 – Housing by Type, Placentia vs. SCAG Region



CA DOF E-5 Population and Housing Unit Estimates

Approximately 65 percent of Placentia's housing units were owner-occupied and 35 percent of the units were renter-occupied. As shown in Figure 2-10, the percentage of owner-occupied units in Placentia is higher than in the SCAG region as a whole.

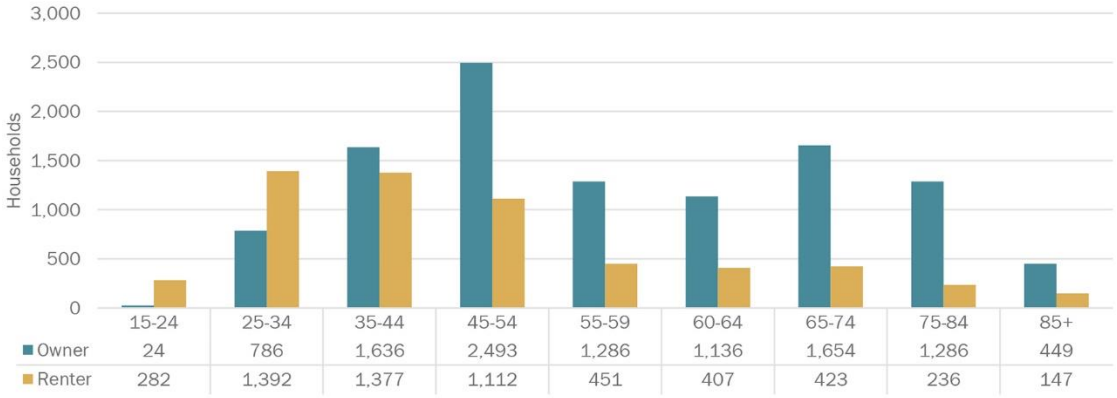
Figure 2-10 – Housing by Tenure, Placentia vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

As shown in Figure 2-11, Placentia residents under age 35 are more likely to be renters than those in older age groups.

Figure 2-11– Housing Tenure by Age of Householder, Placentia



	15-24	25-34	35-44	45-54	55-59	60-64	65-74	75-84	85+
Owner	24	786	1,636	2,493	1,286	1,136	1,654	1,286	449
Renter	282	1,392	1,377	1,112	451	407	423	236	147

American Community Survey 2014-2018 5-year estimates.

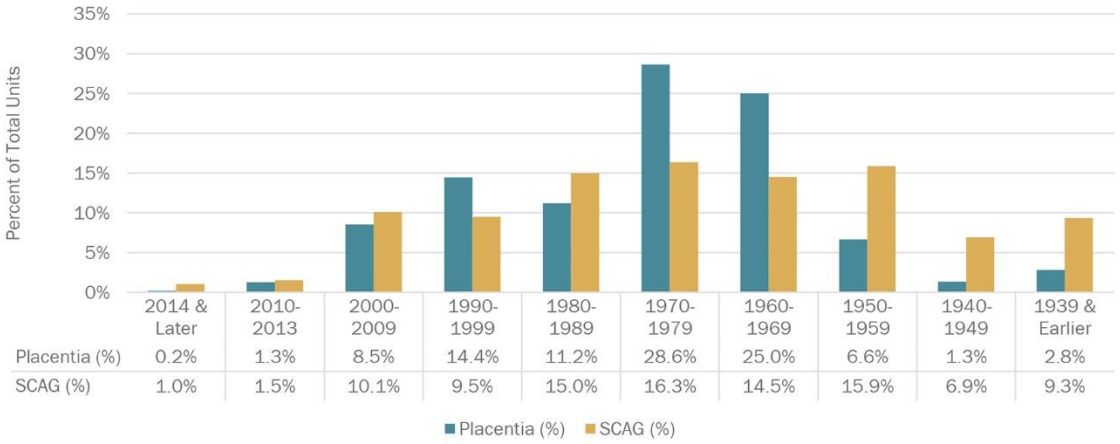
Housing Age and Conditions

The age of a housing unit is often an indicator of housing conditions. Housing units without proper maintenance can deteriorate over time. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls or is pulverized by windows and doors opening and closing.

Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs. Additionally, older units may not be built to current building standards for fire and earthquake safety.

The age of housing units in Placentia compared to the SCAG region as a whole is shown in Figure 2-12. Nearly two-thirds of Placentia's housing units were constructed prior to 1980 and are now more than 40 years old. These findings suggest that there may be a substantial need for maintenance and rehabilitation, including remediation of lead-based paint. Based upon field observations of City building inspectors and code enforcement staff, it is estimated there are more than 200 substandard housing units currently in the City, which are primarily concentrated in the La Jolla and Santa Fe areas. Less than 5% of those (10 units) may have structural problems that are not feasible to repair and therefore are in need of total replacement. Housing programs to assist lower-income households with needed repairs are described in Chapter 4.

Figure 2-12 – Housing by Year Built, Placentia vs. SCAG Region



	2014 & Later	2010-2013	2000-2009	1990-1999	1980-1989	1970-1979	1960-1969	1950-1959	1940-1949	1939 & Earlier
Placentia (%)	0.2%	1.3%	8.5%	14.4%	11.2%	28.6%	25.0%	6.6%	1.3%	2.8%
SCAG (%)	1.0%	1.5%	10.1%	9.5%	15.0%	16.3%	14.5%	15.9%	6.9%	9.3%

American Community Survey 2014-2018 5-year estimates.

Housing Costs and Affordability

This section evaluates housing cost and affordability in Placentia.

1. Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the area (i.e., county) median income (AMI): extremely-low (30% or less of AMI), very-low (31%-50% of AMI), low (51%-80% of AMI), moderate (81-120% of AMI) and above moderate (over 120% of AMI). Housing affordability is based on the relationship between household income and housing expenses. According to HUD and the California Department of Housing and Community Development[1], housing is considered "affordable" if the monthly payment is no more than 30% of a household's gross income. In some areas, such as Orange County, these income limits may be increased to adjust for high housing costs.

Table 2-1 shows affordable rent levels and estimated affordable purchase prices for housing in all areas of Orange County[2] by income category. Based on State standards, the maximum affordable monthly rent (including utilities) for extremely-low-income households is $1,009, while the maximum affordable rent for very-low-income households is $1,681. The maximum affordable rent for low-income households is $2,689, while the maximum for moderate-income households is $3,201.

Maximum purchase prices are more difficult to determine due to variations in factors such as mortgage interest rates, qualifying procedures, down payments, special tax assessments, homeowner association fees, and property insurance rates. With this caveat, the maximum home purchase prices by income category shown in Table 2-1 have been estimated based on typical conditions.

[1] HCD memo of 2/1/2012 (http://www.hcd.ca.gov/hpd/hrc/rep/state/incNote.html)
[2] Affordable rent and purchase prices are based on county median income.

Table 2-1 – Income Categories and Affordable Housing Costs, 2021 – Orange County

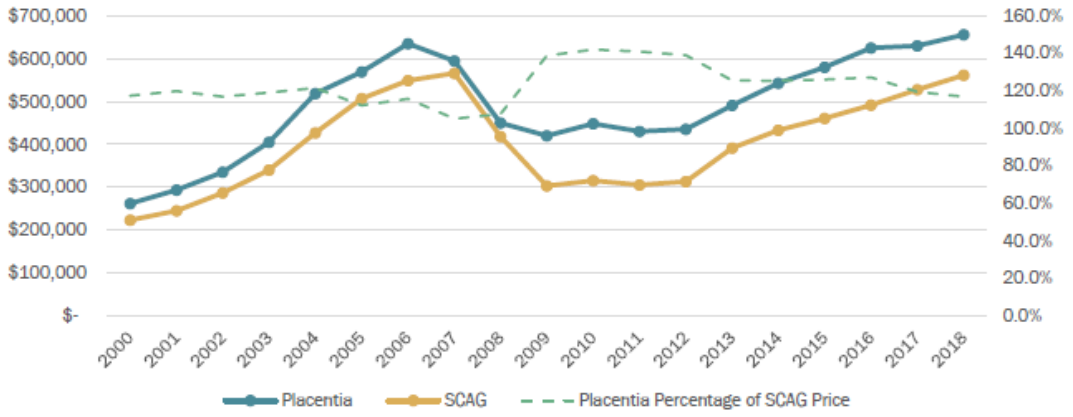
Income Category	Maximum Income	Affordable Rent	Affordable Price (est.)
Extremely Low	$40,350	$1,009	*
Very Low	$67,250	$1,681	*
Low	$107,550	$2,689	*
Moderate	$128,050	$3,201	$500,000
Above moderate	Over $128,050	Over $3,201	Over $500,000

Assumptions: Based on a family of 4 and 2021 State income limits; 30% of gross income for rent or principal, interest, taxes & insurance; 5% down payment, 4% interest, 1.25% taxes & insurance, $350 HOA dues
*For-sale affordable housing is typically at the moderate income level
Source: Cal. HCD; JHD Planning LLC

2. Home Price Trends

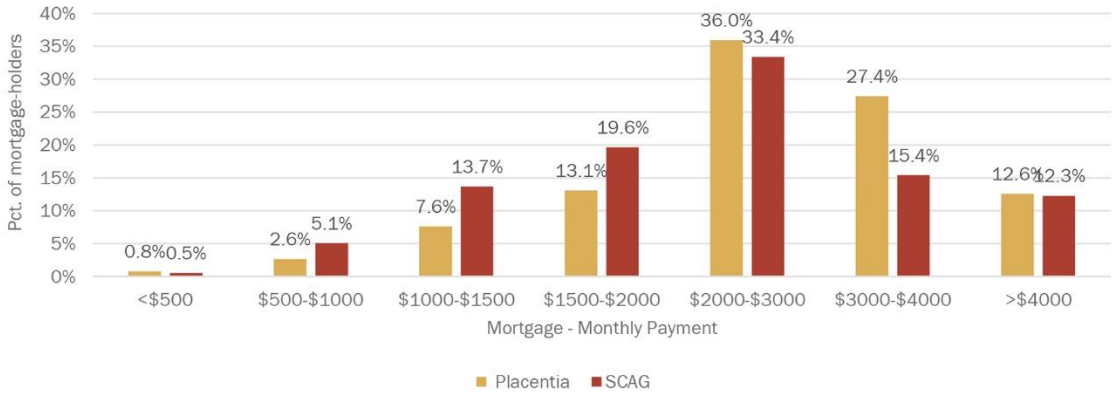
Between 2000 and 2018, median home sales prices in Placentia increased 150% while prices in the SCAG region increased 151%. 2018 median home sales prices in Placentia were $655,500 and the highest experienced since 2000 was $655,500 in 2018. Prices in Placentia have ranged from a low of 105.1% of the SCAG region median in 2007 and a high of 141.9% in 2010 (Figure 2-13). The most common monthly cost for homeowners in Placentia is $2,000-3,000 (Figure 2-14).

Figure 2-13– Median Sale Price for Existing Homes, Placentia vs. SCAG Region



SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians.

Figure 2-14– Monthly Owner Cost for Mortgage Holders, Placentia vs. SCAG Region

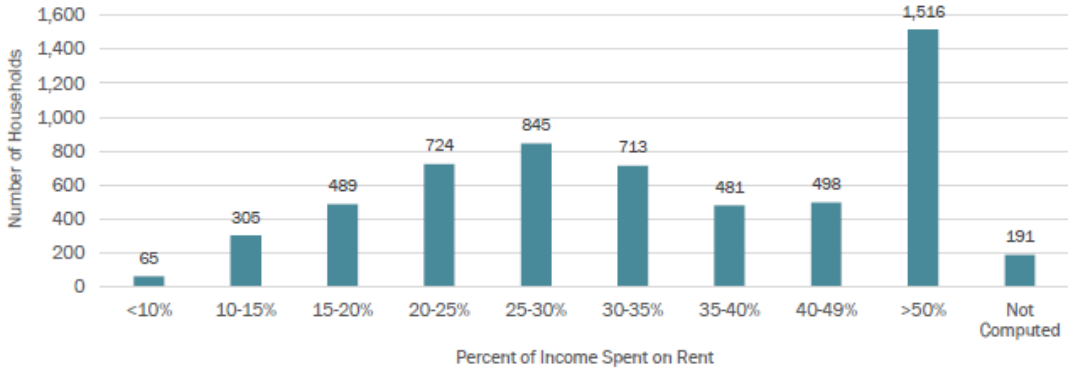


American Community Survey 2014-2018 5-year estimates.

3. Rental Cost

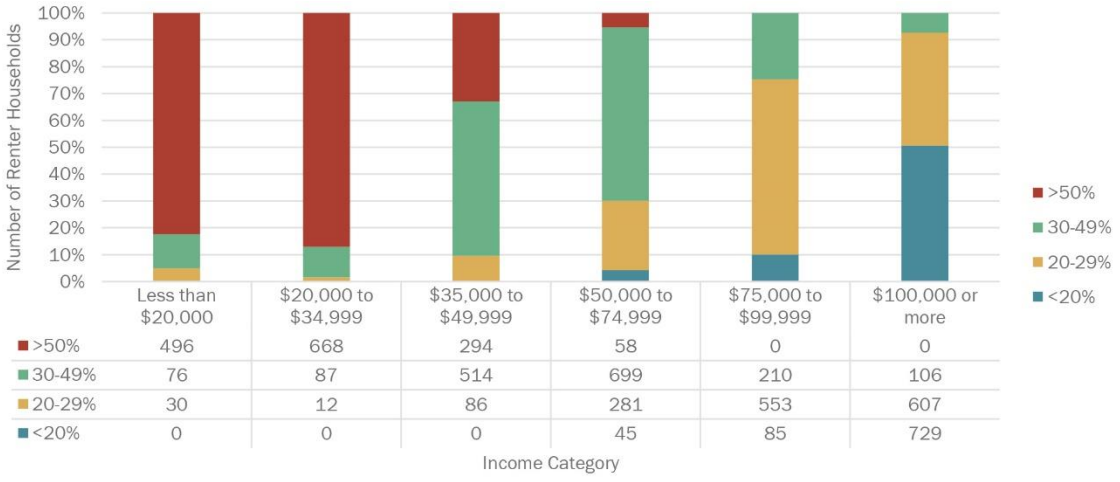
About 55% of Placentia renters spend 30% or more of gross income on housing, which is similar to the SCAG region as a whole (Figure 2-15). About 26% of renter households in Placentia spend 50% percent or more of gross income on housing, compared to 29% in the SCAG region as a whole. According to recent Census estimates the median rent in Placentia is approximately $1,792 per month.

Figure 2-15– Rental Cost, Placentia



(Figure 2-16) shows that renters in the lower income categories typically spend a much higher percentage of their incomes on housing expenses compared to those with higher incomes.

Figure 2-16 – Rental Cost by Income Category, Placentia



	Less than $20,000	$20,000 to $34,999	$35,000 to $49,999	$50,000 to $74,999	$75,000 to $99,999	$100,000 or more
>50%	496	668	294	58	0	0
30-49%	76	87	514	699	210	106
20-29%	30	12	86	281	553	607
<20%	0	0	0	45	85	729

American Community Survey 2014-2018 5-year estimates.

Special Needs Groups

Certain segments of the population may have more difficulty in finding affordable and suitable housing due to special needs. This section identifies the needs for elderly persons, large households, female-headed households, persons with disabilities, persons who are homeless, and farmworkers.

Elderly Persons

Elderly persons are considered a special needs group because they are more likely to have fixed incomes and often have special needs related to housing location and construction. Because of limited mobility, elderly persons may need convenient access to services (e.g., medical and shopping) and public transit. Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over. Recent Census estimates (Figure 2-17) reported that about 19% of elderly households in Placentia have incomes less than 30% of median, (compared to 24% in the SCAG region as a whole), while about 36% of Placentia's senior households earn less than 50% of the median income (compared to 31% in the region).

While sometimes viewed as a homogeneous group, seniors have a wide variety of circumstances and needs. For example, senior homeowners often have more financial resources and stable housing expenses than renters. Younger seniors under age 75 generally have fewer disability issues than those who are older and may require residential care or supportive housing options. As homeowners age, many may have difficulty maintaining their homes.

As shown in Figure 2-21, among seniors 65 and older the most common disability was ambulatory, experienced by about 18% of Placentia's seniors (and 23% of seniors in the entire SCAG region). The installation of grab bars and other features may be necessary to address mobility issues.

The California Community Care Licensing Division identifies 48 licensed residential care homes for the elderly with a total of 940 beds in Placentia. Most of these are small facilities for up to 6 persons, although there are five larger facilities.

As discussed in Chapter 3, City regulations encourage a range of housing options to address the diverse needs of the growing senior population, including the residential care facilities, supportive housing, accessory dwelling units and reasonable accommodation for persons with disabilities. Program 1.12 in the Housing Plan also includes efforts to encourage development of additional senior housing.

Figure 2-17 – Elderly Households by Income and Tenure, Placentia

		Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:	< 30% HAMFI	435	380	815	19.0%
	30-50% HAMFI	540	190	730	17.1%
	50-80% HAMFI	910	155	1,065	24.9%
	80-100% HAMFI	355	105	460	10.7%
	> 100% HAMFI	1,145	65	1,210	28.3%
TOTAL		3,385	895	4,280	

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

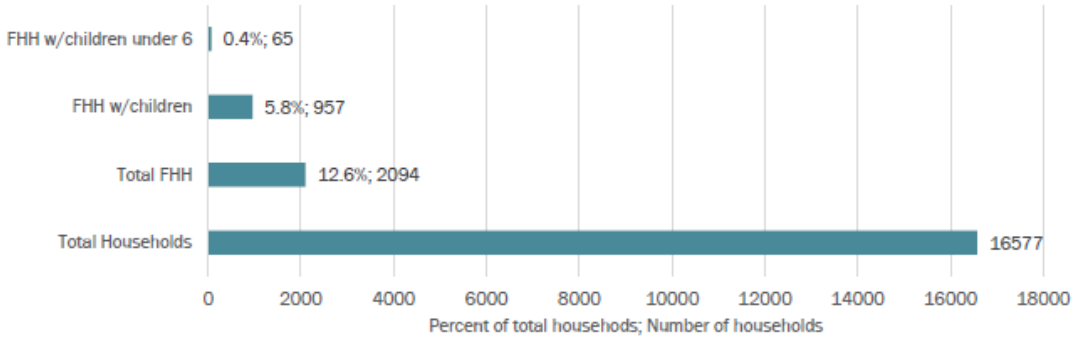
Large Households

Large households are defined as having five or more persons living within the same housing unit. Large households are considered a special needs group because they require more space and more bedrooms. Large households are vulnerable to overcrowding, particularly among renters, due to the relatively small percentage of apartments with 3 or more bedrooms. As noted previously in the analysis of household size (Figure 2-5) about 1,046 renter households (18%) and 1,405 owner households (13%) in Placentia had at least five persons – a total of 2,451 households. According to recent Census estimates there are approximately 11,000 housing units with 3+ bedrooms (65%) and of those, about 5,957 (35%) had at least 4 bedrooms). In terms of the total housing stock, there appears to be a sufficient number of larger homes to meet the needs of large households, but many of those households may not have sufficient financial resources to afford a large enough home to avoid overcrowding. The needs of large households are addressed through City efforts (see Program 1.13 in the Housing Plan) to facilitate production of housing with 3 or more bedrooms as well as through State and Federal programs such as Section 8 and affordable housing subsidies such as Low Income Housing Tax Credits.

Female-Headed Households

Female-headed households are a special needs group due to comparatively low rates of homeownership, lower incomes, and higher poverty rates experienced by this group. According to recent Census data (Figure 2-18), 12.6% of Placentia households are female-headed (compared to 14.3% in the SCAG region), 5.8% are female-headed and with children (compared to 6.6% in the SCAG region), and 0.4% are female-headed and with children under 6 (compared to 1.0% in the SCAG region).

Figure 2-18– Female Headed Households, Placentia

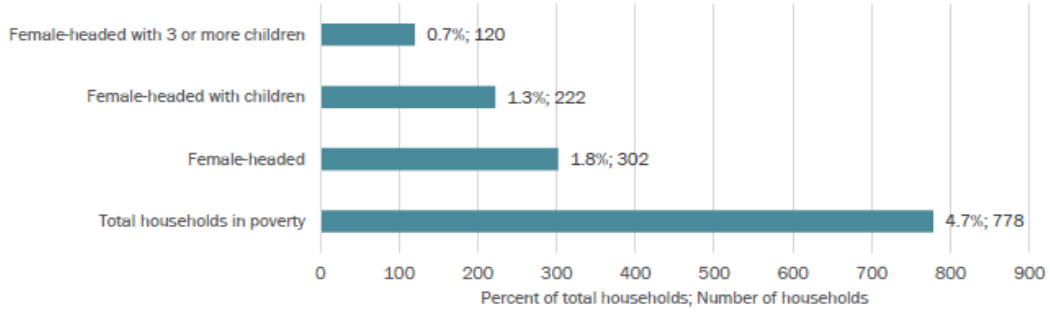


American Community Survey 2014-2018 5-year estimates.

Approximately 5% of Placentia's households are experiencing poverty, compared to 8% in the SCAG region as a whole. Poverty thresholds vary by household type. In 2018, a single individual under 65 was considered in poverty with an income below $13,064/year while the threshold for a family consisting of 2 adults and 2 children was $25,465/year. Figure 2-19 shows recent estimates of poverty status for female-headed households in Placentia.

The needs of female-headed households are addressed through City programs to facilitate affordable housing development as well as through State and Federal programs such as Section 8 and affordable housing subsidies such as Low Income Housing Tax Credits.

Figure 2-19– Households by Poverty Status, Placentia



American Community Survey 2014-2018 5-year estimates.

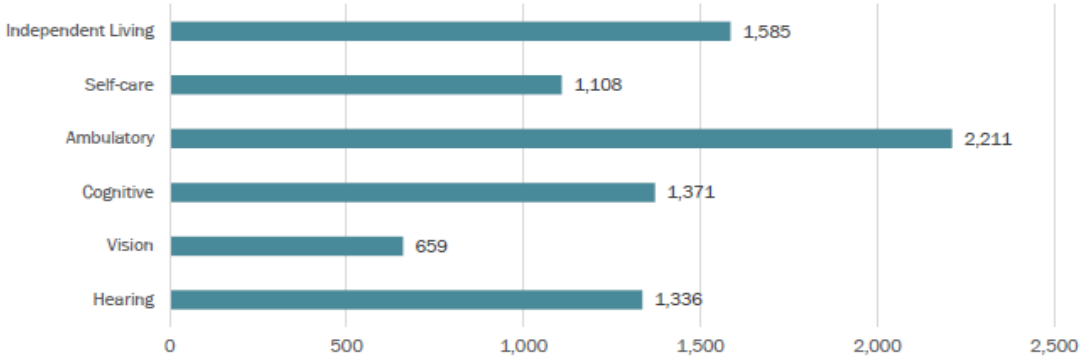
Persons with Disabilities

A disability is defined as a long-lasting condition that impairs an individual's mobility, ability to work, or ability to care for them self. Persons with disabilities include those with physical, mental, or emotional disabilities. Access and affordability are the two major housing needs for persons with disabilities. This often requires specially designed dwelling units typically not found in market-rate housing, or supportive housing that also provides personal services and assistance with daily activities. Additionally, locating near public facilities and public transit is important for this special needs group.

According to recent ACS estimates (Figure 2-20), the most commonly occurring disabilities for Placentia residents are ambulatory and independent living. Among seniors 65 and older the most common disability was ambulatory, experienced by about 18% of Placentia's seniors (and 23% of seniors in the entire SCAG region).

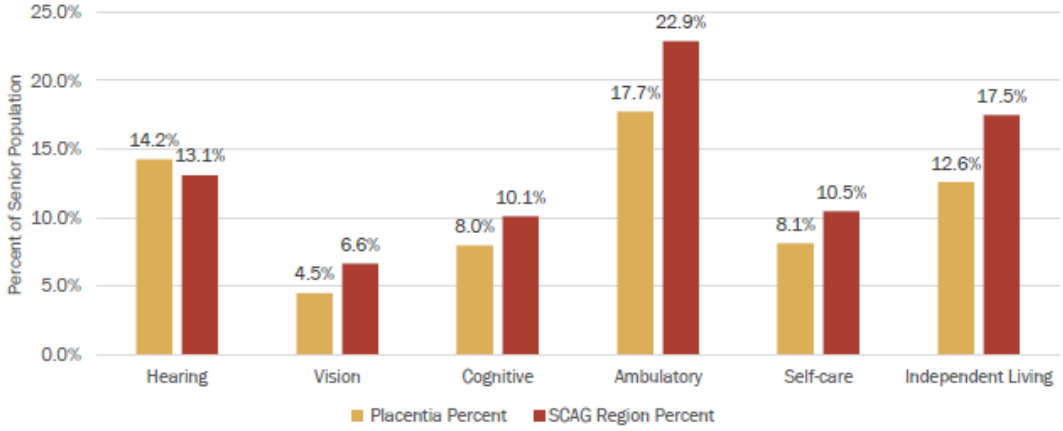
To assist persons with disabilities the City has adopted reasonable accommodation procedures to allow modifications to regulations to accommodate the needs of persons with disabilities (see Program 2.3 in the Housing Plan). The City also continues to expand accessible housing options to persons living with disabilities by including accessibility features in new developments, and Program 1.4 includes amendments to City regulations for supportive housing.

Figure 2-20– Disabilities by Type, Placentia



American Community Survey 2014-2018 5-year estimates.

Figure 2-21– Disabilities by Type for Seniors 65+, Placentia vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

Developmental Disabilities

As defined by federal law, "developmental disability" means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency;
- Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other

forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The California Department of Developmental Services (DDS) currently provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. The Regional Center of Orange County (RCOC) is one of 21 regional centers in the State of California that provides point of entry to services for people with developmental disabilities. The RCOC is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

Any resident of Orange County who has a developmental disability that originated before age 18 is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans and may include: Adult day programs; advocacy; assessment/consultation; behavior management programs; diagnosis and evaluation; independent living services; infant development programs; information and referrals; mobility training; prenatal diagnosis; residential care; respite care; physical and occupational therapy; transportation; consumer, family vendor training; and vocational training. RCOC also coordinates the state-mandated Early Start program, which provides services for children under age three who have or are at substantial risk of having a developmental disability. Figure 2-22 shows recent DDS data for persons with developmental disabilities in Placentia.

Figure 2-22 – Developmental Disabilities, Placentia

		Placentia
By Residence:	Home of Parent/Family/Guardian	349
	Independent/Supported Living	5
	Community Care Facility	5
	Intermediate Care Facility	17
	Foster/Family Home	11
	Other	5
By Age:	0 - 17 Years	392
	18+ Years	224
TOTAL		1008

CA DDS consumer count by CA ZIP, age group and residence type for the end of June 2019. Data available in 161/197 SCAG jurisdictions.

The mission of the Dayle McIntosh Center is to advance the empowerment, equality, integration and full participation of people with disabilities in the community. The Center is not a residential program, but instead promotes the full integration of disabled persons into the community. Dayle McIntosh Center is a consumer-driven organization serving all disabilities. Its staff and board are composed of over 50% of people with disabilities. Its two offices service over 500,000 people in Orange County and surrounding areas with disabilities. The Center's main office is located in Garden Grove, approximately 7 miles south of Placentia.

Homeless Population and Transitional Housing

The Orange County homeless population includes many working families and individuals who live in cars, parks, under bridges, in motels and in homeless shelters trying to maintain their dignity while they struggle to survive. As a result, most homeless remain hidden. The most recent available Orange County Point-in-Time Count and Survey report of the Homeless (2019) reported 55 unsheltered and 108 sheltered homeless persons in Placentia.

Regional strategies to combat homelessness are developed through Orange County's Continuum of Care System. The goal of the Continuum of Care Strategic Plan is to work toward a seamless system of care through advocacy, homeless prevention, outreach and assessment, emergency shelter, transitional shelter and permanent affordable housing.

Persons threatened with homelessness are often those with incomes at 30% of area median income or below who are paying more than 30% of their income for rent.

The nonprofit 2-1-1 Orange County organization is a 24-hours-a-day, 7 days-a-week, toll-free number that people in need of assistance can call to obtain comprehensive information and referrals to health and human services. Available services include food, shelter, government assistance programs, urgent care, substance abuse and treatment programs, and workforce development.

In early 2019 the North Orange County Service Planning Area for Homelessness Outreach Efforts had reached an important milestone. A regional partnership of 13 cities located in northern Orange County (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park and Yorba Linda) came together to share intelligence and resources to address regional homelessness. Their concept was to promote greater regional coordination on homeless issues while reducing the span of control regarding working with the County of Orange and others.

After months of extensive discussions, negotiations and assessments, two locations within the North Orange County Service Planning Area were identified for the development of "navigation centers" based on a number of factors including zoning, proximity to related services and site availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to a shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in the city of Anaheim that accommodated 325 new beds.

Funding for the Navigation Centers was secured through application and governmental meetings with state, regional, county and local officials resulting in the $12 million in State of California Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of these Navigation Centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing operation of the Navigation Centers. A Memorandum of Understanding was prepared and presented to the City Councils of all thirteen city governments for execution in May 2019. Construction began in 2019 and the opening of the first 100-bed Navigation Center in Placentia occurred on March 31, 2020. This groundbreaking success story was born of the regional need and public official desire to come together to address homelessness and pioneer the way to create and operate a multi-jurisdictional homelessness facility. Programs 1,4, 1.14 and 2.3 identify actions the City is taking to address homelessness.

Farm Workers

Farm workers are defined as persons whose primary incomes are earned through seasonal agricultural work. Recent Census data (Figure 2-23) estimated that there were approximately 136 total jobs in the farming, fishing and forestry occupations in Placentia and 80 full-time year-round jobs in those occupations.

According to SCAG's dataset, just 0.2 percent of jobs in all of Orange County are in agriculture and the USDA estimates there were just 340 migrant farmworkers in the County in 2017. Given that Placentia has no remaining land in commercial agriculture, the City has not identified a need for farmworker housing beyond general programs to support housing affordability.

Figure 2-23 – Agricultural Employment, Placentia

Farmworkers by Occupation:

Placentia	Percent of total Placentia workers:	SCAG Total	
136	0.51%	57,741	Total jobs: Farming, fishing, and forestry occupations
80	0.44%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations

Employment in the Agricultural Industry:

Placentia	Percent of total Placentia workers:	SCAG Total	
136	0.51%	73,778	Total in agriculture, forestry, fishing, and hunting
80	0.44%	44,979	Full-time, year-round in agriculture, forestry, fishing, and hunting

American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

2.3 Assisted Units "At-Risk" of Conversion

Jurisdictions are required to analyze government-assisted low-income rental housing that is eligible to convert to market rate housing over the next 10 years. State law identifies housing assistance as a rental subsidy, mortgage subsidy, or mortgage insurance to an assisted housing development. Government assisted housing might convert to market rate housing for a number of reasons including expiring subsidies, mortgage repayments or expiration of affordability restrictions.

This section addresses:

- An inventory of assisted housing units that are at-risk of converting to market rate housing during 2021-2031;
- An analysis of the costs of preserving and/or replacing these units;
- Resources that can be used to preserve at-risk units;
- Program efforts for preservation of at-risk housing units; and
- Quantified objectives for the number of at-risk units to be preserved during the Housing Element planning period

Inventory of At-Risk Units

Three projects with lower-income rental units are located in Placentia (Table 2-2). According to the California Housing Partnership Corporation (CPHC), the Imperial Villas project could convert to market rate within the next 10 years and is therefore considered to be "at-risk." Program HE 3.5 describes actions the City will take to encourage the preservation of this project.

Table 2-2 – Lower-Income Rental Units

Project	Address	Program	Earliest Conversion Date	Total Units	Assisted Units
Imperial Villas	1050 E. Imperial Hwy.	HUD	2022	58	58
Veterans Village	1924 Orangeview Ave	LIHTC	2072	50	49
Villa La Jolla	734 W. La Jolla St.	LIHTC, HUD	2055	55	54
			Total	**113**	**113**

Source: California Housing Partnership Corporation, 2021

Preservation Versus Replacement

According to CPHC, preservation of existing affordable housing has significant advantages over new construction, including:

- It generally costs half as much and takes half the time than building it new.
- On average it serves much lower income households than new construction.
- New construction alone cannot produce enough affordable housing to meet demand in most markets in California.

Preservation Strategies

There are several options for preserving affordable units, including providing local subsidies to offset the difference between the affordable and market rent, acquisition/rehabilitation by a non-profit or public agency, or construction of new affordable housing to replace units lost.

Local Rental Subsidy. One strategy for preserving the units at-risk is to provide a local rental subsidy to residents if their affordable units convert to market rate. Assuming an average rent subsidy of $1,500 per month per unit, the total subsidy that would be needed to extend affordability for the 58-unit Imperial Villas project would be approximately $1,044,000 per year.

Acquisition/Rehabilitation. Acquisition/rehabilitation costs – depends on size, location, current sales figures. Assuming an average cost of $350,000 per unit, acquisition/rehabilitation of 58 low-income units would cost approximately $20 million.

Replacement Through New Construction. Affordable units lost to conversion can be replaced through new construction. Construction cost would depend on many factors including site acquisition, site preparation, construction and a variety of "soft" costs such as architecture, permit processing, financing and administration. Based on an average cost of $500,000 per unit, the total cost of replacing 58 affordable units would be approximately $29 million.

Resources for Preservation

A variety of programs exist to assist cities in acquiring, replacing or subsidizing at-risk affordable housing units. The following summarizes the available financial resources.

- Community Development Block Grant (CDBG) – CDBG funds are awarded to entitlement communities (entitlement cities and urban counties) on a formula basis for housing activities. Placentia is a participating city in the County of Orange's Urban County. Funding is awarded on a competitive basis to each participating city. Activities eligible for CDBG funding include acquisition, rehabilitation, economic development, and public services.
- HOME Investment Partnership – HOME funds are awarded on a formula basis for housing activities. The flexible grant program takes into account local market conditions, inadequate housing, poverty, and housing production costs. HOME funding is provided to jurisdictions to assist rental housing or homeownership through acquisition, construction, reconstruction, and/or rehabilitation of affordable housing. The County of Orange allocates funds to participating cities on a competitive basis.
- Section 8 Rental Assistance Program – The Section 8 Rental Assistance Program provides rental assistance payments to owners of private, market rate units on behalf of very-low income tenants. Rental assistance is provided through the Orange County Housing Authority.
- California Housing Finance Agency (CalHFA) Multifamily Programs- CalHFA's Multifamily Programs provide permanent financing for the acquisition, rehabilitation, and preservation or new construction of rental housing that includes affordable rents for low and moderate-income families and individuals. One of the programs is the Preservation Acquisition Finance Program which is designed to facilitate the acquisition of at-risk affordable housing developments provide low-cost funding to preserve affordability.
- Low-Income Housing Tax Credit (LIHTC)- This program provides tax credits to individuals and corporations that invest in low-income rental housing. Tax credits are sold to those with high liability and proceeds are used to create housing. Eligible activities include new construction, rehabilitation and acquisition of properties.
- California Community Reinvestment Corporation (CCRC)- The California Community Reinvestment Corporation is a multifamily affordable housing lender whose mission is to increase the availability of affordable housing for low-income families, seniors and residents with special needs by facilitating private capital flow from its investors for debt and equity to developers of affordable housing. Eligible activities include new construction, rehabilitation and acquisition of properties.

Qualified Entities to Develop or Operate Affordable Housing

A number of non-profit corporations currently working in Orange County have the experience and capacity to assist in preserving at-risk units. These non-profits include:

- BRIDGE Housing Corporation (San Francisco)
- Civic Center Barrio Housing Corporation (Santa Ana)
- Jamboree Housing Corporation (Irvine)
- Mercy Housing Corporation (San Francisco)

Future Housing Needs

The Regional Housing Needs Assessment (RHNA) is a key requirement for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for the 6th Housing Element projection period extending from July 2021 to October 2029. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

The RHNA for the 6th cycle was adopted by the Southern California Association of Governments (SCAG) in March 2021. The need for housing is determined by the forecasted growth in households as well as existing need due to overcrowding and overpayment. The housing need for new households is adjusted to maintain a desirable level of vacancy to promote housing choice and mobility. An adjustment is also made to account for units lost due to demolition, natural disaster, or conversion to non-housing uses. Total housing need is then distributed among four income categories on the basis of the county's income distribution, with adjustments to avoid an over-concentration of lower-income households in any community. More information about the RHNA process may be found on SCAG's website at https://scag.ca.gov/rhna.

The total assigned housing need for the City of Placentia during the 2021-2029 planning period is 4,374 units, which is distributed by income category as shown in Table 2-3. Chapter 3 includes a discussion of how the City will accommodate this need for additional housing during the planning period.

Table 2-3– Regional Housing Needs Assessment, 2021-2029

	Extremely Low-Income [1]	Very Low-Income	Low Income	Moderate-Income	Above Moderate-Income	Total
RHNA allocation [2]	622	621	680	782	1,693	4,398

[1] Extremely low-income need is a subset of the very-low-income (VLI) category and is assumed to be 50% of VLI need
[2] The RHNA projection period covers the period 6/30/2021 – 10/15/2029
Source: Regional Housing Needs Allocation, SCAG 7/1/2021

It should be noted that SCAG did not identify growth needs for the extremely-low-income category in the adopted RHNA. As provided in Assembly Bill (AB) 2634 of

2006, jurisdictions may determine their extremely-low-income need as one-half the need in the very-low category.

Chapter 3: Resources and Constraints

3.1 Resources and Opportunities

A variety of resources are available for the development, rehabilitation, and preservation of housing in the City of Placentia. This chapter provides a description of the land resources to address the City's regional housing needs for the 2021-2029 planning period (see discussion of Future Housing Needs in Chapter 2), as well as financial and administrative resources available to support the provision of affordable housing. Additionally, this chapter discusses opportunities for energy conservation that can lower utility costs and increase housing affordability.

Land Resources

Section 65583(a)(3) of the *Government Code* requires Housing Elements to contain an "inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites." A detailed inventory of potential sites for residential development is provided in **Appendix B**. The results of this analysis are summarized in Table 3-1 below. The table shows that the City's land inventory for potential residential development is not currently sufficient to accommodate the RHNA in the low- and above-moderate income categories for this planning period. Program HE-1.8 in the Housing Plan (Chapter 4) describes the specific actions the City will take to address this requirement.

Table 3-1 – Residential Sites vs. Regional Housing Need 2021-2029

Income Category	Very Low	Low	Moderate	Above Moderate	Total
Approved Projects (Table B-2)	-	252	-	774	1,026
Vacant Sites (Table B-4)	-	-	~~394~~ 415	65	~~459~~ 480
Underutilized Sites (Table B-5)	698	~~404~~ 315	~~371~~ 369	~~247~~ 0	~~1,720~~ 1,380
ADUs	14	24	17	1	56
Total Capacity	712	~~680~~ 591	~~782~~ 974	~~1,087~~ 840	~~3,196~~ 2,942
RHNA	1,243	680	782	1,693	4,398
Surplus (Shortfall)	(531)	(89)	19	(~~606~~ 853)	(~~1,137~~ 1,473)

Source: City of Placentia, 2021

A discussion of public facilities and infrastructure needed to serve future development is contained in Section 3.3, Non-Governmental Constraints. There are currently no known service limitations that would preclude the level of development described in the RHNA, although developers will be required to pay fees or construct public improvements to serve new developments.

Financial and Administrative Resources

Community Development Block Grant and HOME Programs

Placentia participates in a consortium with the County of Orange and 12 other cities known as the Orange County Urban County Program. The Urban County consortium receives Community Development Block Grant (CDBG) and HOME funding on a formula basis from the Federal government. Funds are distributed by the County of Orange to individual jurisdictions on a competitive basis. During the 2006/07 through 2010/11 Fiscal Years, the City received $150,000 annually in CDBG funds for housing rehabilitation but this amount declined to $135,000 per year in FY 2012/13 and 2013/14. This City also was awarded grants for public improvements for pedestrian accessibility, Edwin T. Powell Community Center, neighborhood facilities, streets and neighborhood parks. The City has not received HOME funds in recent years but will pursue them in the future when eligible projects are identified.

CDBG funds can be used for the following activities:

- Acquisition
- Rehabilitation
- Home Buyer Assistance
- Economic Development
- Homeless Assistance
- Public Services
- Public Improvements
- Rent Subsidies

HOME funds can be used for the following activities:

- New Construction
- Acquisition
- Rehabilitation
- Home Buyer Assistance
- Rental Assistance

Former Redevelopment Agency and the Successor Agency

As of February 1, 2012 the Redevelopment Agency (RDA) of the City of Placentia was dissolved by Governor Jerry Brown and the State Legislature. As part of the Dissolution Act, the City of Placentia designated itself as both the Successor Agency and successor housing agency to the former redevelopment agency to wind down its operations and continue local control over the former assets of the agency. The Successor Agency is able to pay for those items found to be enforceable obligations by the State Department of Finance until such time as the obligation ceases. The Successor Agency does not have any affordable housing obligations as all properties or loan receivables were transferred to the City as the housing successor agency.

Energy Conservation Opportunities

In order to reduce the consumption of water in a landscaped area the City of Placentia has adopted a xeriscape ordinance within the Zoning Code. Primary techniques to reduce water consumption are the use of water-conserving plants, minimizing the amount of grass area, grouping plants in accordance to their watering needs, and providing an irrigation system designed to meet the needs of the plants in the landscape. All new developments are required to submit plans that comply with the ordinance.

In 1982, the City adopted an ordinance that encourages the development of energy efficient residential dwellings in order to reduce the reliance of the City's residents in commercial energy sources.

Southern California Edison, which provides electricity service in Placentia, offers public information and technical assistance to developers and homeowners regarding energy conservation. Southern California Edison also provides incentives for energy-efficient new construction and home improvements. Owners of existing homes can receive monetary incentives for purchasing Energy-star appliances or making other energy-saving improvements such as installing a whole-house attic fan.

Another strategy for building energy-efficient homes is the U.S. Green Building Council's guidelines for LEED Certification. LEED-certified buildings demonstrate energy and water savings, reduced maintenance costs and improved occupant satisfaction. The LEED for New Construction program has been applied to numerous multi-family residential projects nationwide. The LEED for Homes pilot program was launched in 2005 and includes standards for new single-family and multi-family home construction.

The City Council has authorized participation in the Home Energy Renovation Program (HERO) as provided for through the Western Riverside Council of Governments. The HERO program is financed through property assessments where the improvements are made and is not a City program, but simply a means to provide property assessed financing to eligible property owners in the City for various energy and water conservation improvements.

3.2 Constraints

In planning for the provision of housing, constraints to the development, maintenance and improvement of housing must be recognized, and jurisdictions must take appropriate steps to mitigate them where feasible. Local government cannot control many of these constraints, such as those related to general economic and market conditions, and constraints imposed by other governmental entities. Potential governmental and non-governmental constraints along with City efforts to reduce these constraints are discussed below.

Governmental Constraints

Potential governmental constraints include policies, standards, requirements, and actions imposed by various levels of government on housing development. These constraints may include land use controls, building codes, growth management measures, development fees, processing and permit procedures, and site improvement standards. State and federal agencies may also play a role in the imposition of governmental constraints; however, these agencies are beyond the influence of local government and are therefore not addressed in this analysis.

Land Use Controls

Land use controls include General Plan policies, zoning regulations (and the resulting use restrictions, development standards and permit processing requirements) and development fees.

1. General Plan

Every city in California must have a General Plan, which establishes policy guidelines for all development within the city. The General Plan is the foundation of all land use controls in a jurisdiction. Placentia's General Plan was comprehensively updated in 2019. The Land Use Element of the General Plan identifies the location, distribution, and density of the land uses within the City. General Plan residential densities are expressed in dwelling units per acre. The Placentia General Plan identifies three residential land use designations, a Planned Community designation and a Specific Plan designation. Table 3-2 summarizes the residential land use designations and their associated acreages and density ranges.

Table 3-2 – General Plan, Residential Land Use Designations

Designation	Description	Density
Low Density Residential	Single family residences on individual parcels.	6 du/ac maximum
Medium Density Residential	Single-family and multi-family developments including attached and detached housing. Can include clustering and planned unit development approaches	15 du/ac maximum
High Density Residential	Multifamily residences such as apartments	25 du/ac maximum
Old Town	Mix of housing, retail, office, and/or other similar uses within a half-mile of quality public transportation	30-65 du/ac
Transit Oriented Development	Mix of high-density housing, office, retail and/or other amenities	65-95 du/ac
Mixed Use	Combination of non-residential and residential uses in the same structure or on the same site	
Residential Planned Community	Allows a variety of housing types and related commercial uses through a development plan	7.1 du/ac maximum mean
Specific Plan	Specific Plans, programs, regulations, and conditions that are unique for an area and are pertinent to maintain compatibility with surrounding areas.	Established individually for each Specific Plan

Source: City of Placentia, 2021

2. Zoning Code

The Zoning Code is the primary tool for implementing the Land Use Element of the General Plan. It is designed to protect and promote public health, safety, and welfare. Placentia's residential zoning designations control both the use and development standards of specific sites and influence the development of housing. Table 3-3 summarizes the single-family residential zoning designations and their requirements. Table 3-4 summarizes the multi-family residential designations and requirements. Based on residential units approved and constructed complying with these standards, the City has determined the development standards do not unreasonably impact the cost and supply of housing nor the ability of projects to achieve maximum densities.

The Transit Oriented Development (TOD) zone was recently added to the land use categories and provides significant opportunities for high-density multi-family development.

Table 3-3 – Summary of Single-Family Residential Zoning Requirements

Zone	Minimum Lot Area (Sq. Ft.)	Maximum Lot Coverage	Minimum Floor Area (Sq. Ft.)	Maximum Building Height	Minimum Front Yard	Minimum Interior Side Yard	Minimum Street Side Yard	Minimum Rear Yard
R-A	20,000	40%	N/A	30'	25'	6' one side, 12' other side; corner lot line, 11'		Corner and interior lot, 5'
R-1	Interior lots 7,000; corner lots 7,500	50%	1,300	30'; accessory buildings 20'	20'-25'	6' on one side and 10' opposite side; corner lot 12'		20'
PUD	N/A	60%	N/A	35'; 30' when located adjacent to properties zoned "R-A" or "R-l," may be modified pursuant to §23.15.090	10'	None required; except there shall be a minimum 10-foot separation between buildings	5' or less, or 18' or more	10'

Source: City of Placentia Municipal Code, Chapter 23

Table 3-4 – Summary of Multiple Family Residential Zoning Requirements

Zone	Minimum Lot Area (Sq. Ft.)	Maximum Lot Coverage	Maximum Building Height	Minimum Front Yard	Minimum Interior Side Yard	Minimum Street Side Yard	Minimum Rear Yard
R-2	Interior lots 7,000; corner lots 8,000;	50%	35'; 30' when located adjacent to properties zoned "R-A" or "R-l," may be modified pursuant to §23.15.040	20'-25'	5'	Subject to §23.15.110	10'
R-G	Interior lots 8,000; corner lots 9,000	60%	35'; 30' when located adjacent to properties zoned "R-A" or "R-l," may be modified pursuant to §23.18.040	20'	0'-10'	Subject to §23.81.130	0'-10'
R-3	Interior lots 8,000; corner lots 9,000	60%	35'; 30' when located adjacent to properties zoned "R-A" or "R-l," may be modified pursuant to §23.21.040	15'	0'-5'	10'-15'	0'-10'
MHP	15 acres	Subject to Title 25 of the Calif. Admin. Code	2 stories or 35'	10'		25'	

Source: City of Placentia Municipal Code, Chapter 23

Analysis of Building Heights

Maximum building heights are set and defined in the City's Zoning Code to maintain symmetry and compatibility between existing and proposed developments. Setting limits to the height of buildings establishes appropriate scaled new development with surrounding uses and minimizes potential nuisances on neighboring properties relating to privacy and/or sunlight and shade. This requirement also ensures a compatibility and similar aesthetic amongst uses, but in certain conditions may cause a constraint to the development of housing – particularly as it relates to multi-family housing developments.

The City's building height requirements do not prohibit residential developments from reaching the maximum density on varying sites, it therefore is not considered a constraint to the development of housing, specifically housing affordable to low and very low-income households.

The City's Density Bonus program provides additional incentives for the development of affordable housing, including a reduction in the site development standards (e.g., site coverage, setbacks, increased height up to the maximum allowed, reduced lot sizes, and/or parking requirements.

Multifamily residential developments in the TOD, R-2, R-G and R-3 zones are able to meet the maximum density limit while complying with the height limits and the remaining development standards shown in Table 3-4. For example, a proposed 2-story multi-family development on a one-acre lot in the R3 zone can meet the setback and lot coverage requirements and be able to build approximately 30 units each measuring 1,000 square feet; as the maximum density is 30 dwelling units per acre, the maximum building height limits do not impede the development of multi-family developments.

Based on past projects and current application of the code, the height limit is not known to constrain residential developments from reaching the maximum permitted density and is not considered a constraint to housing development, however, the City acknowledges that height restrictions may prevent multifamily developments from reaching three stories. To ensure height limits are not a constraint, the City has added Program HE-1.20: Annual Review of Site Requirements to amend height requirements for developments in zones that allow multifamily housing to at least 36 feet, with no exceptions.The single-family residential zones are R-A and R-1. As shown in **Chapter 3**, single-family units are permitted by-right in R-A, R-1, R-2, RPC, PUD, SP-6, SP-7, and SP-8. Single-family units are approved administratively without a public hearing, although subdivisions require a discretionary review process pursuant to the Subdivision Map Act.

The multi-family residential zones are R-2, R-G, R-3, and MHP. Multi-family dwellings are permitted subject only to Development Plan Review (DPR) by the Planning Commission in the R-2, R-G, R-3, SP-3, SP-4, SP-7 and SP-9 zones. The DPR process (Municipal Code Chapter 23.75) ensures that projects are consistent with applicable policies and standards. Multi-family developments are subject to a conditional use permit in the RPC (Residential Planned Community) zone.

Table 3-5– Summary of Permitted Uses

Residential Zone	Single-family	Multi-family	Mobile home Parks
R-A	Permitted	Prohibited	Permitted
R-1	Permitted	Prohibited	Permitted With CUP
R-2	Permitted	Permitted	Permitted With CUP
R-G	Prohibited	Permitted	Permitted With CUP
R-3	Prohibited	Permitted	Permitted With CUP
RPC	Permitted	Permitted With CUP	Permitted With CUP
MHP	Prohibited	Prohibited	Permitted With CUP
PUD	Permitted	Prohibited	Permitted With CUP
SP-3	Prohibited	Permitted[1]	Prohibited
SP-4	Prohibited	Permitted[2]	Prohibited
SP-6	Permitted	Prohibited	Prohibited
SP-7	Permitted	Permitted	Permitted With CUP
SP-8	Permitted	Prohibited	Prohibited
SP-9	Prohibited	Permitted	Prohibited

[1]Apartment projects for persons 55 years of age or older.
[2]Apartments of medium density residential setting reserved for lower-income families for a minimum of 30 years.
Source: City of Placentia Municipal Code Chapter 23

Transit Oriented Development (TOD) Zone

In 2017 the City adopted Municipal Code Chapter 23.111 Transit Oriented Development Packing House District Development Standards, which encompasses a former manufacturing area located south of downtown and immediately adjacent to a Metrolink commuter rail station[1] currently under construction. The TOD zone is approximately 110 acres in size and runs south from the Burlington Northern Rail line to Orangethorpe Avenue, and east from State Route 57. The TOD area provides for residential densities up to 95 dwelling units per acre, mixed-use residential-commercial, and increased amenities to encourage use of the commuter rail station. Additional development standards in the TOD zone are shown in Table 3-6.

Since adoption of the TOD zone in 2017, several high-density residential projects have been approved at densities ranging from 73 to 89 units/acre, or up to 93% of the allowable density, indicating that the development standards do not pose a constraint to development (see Table B-2 in Appendix B).

Old Town Placentia Revitalization Plan Regulations

In 2017 the City adopted Municipal Code Chapter 23.112 Old Town Placentia Revitalization Plan Development Standards, which covers the Old Town area immediately north of the TOD zone and the Metrolink commuter rail line. The purpose of the Old Town regulations is to facilitate the enhancement of the city's historic core, characterized by its small-scaled village atmosphere, shopfront architecture, mix of uses and inviting streetscapes.

1 https://www.placentia.org/705/Metrolink-Station-and-Parking-Structure

The Old Town district is divided into five subareas and one overlay zone as shown in Figure 3-1:

- Main Street (MS)
- Village (V)
- Mixed-Use (MU)
- High-Density Residential (HDR)
- Public Facilities (PF)
- R-2 Overlay Zone

Multi-family residential development, either stand-alone or mixed-use, is allowed in the HDR subarea and residential is allowed on the upper floors in all subareas except Public Facilities. Maximum densities are 25 units/acre in the Main Street subarea, 35 units/acre in the Village subarea, 55 units/acre in the Mixed-Use subarea, and 65 units/acre in the High-Density Residential subarea. Allowable building heights range between 2 and 4 stories depending on location (Table 3-7).

Table 3-6– TOD Development Standards

	Standard	Notes
Architectural Review	High quality, 360 degree, architectural and urban design is required. All new projects will require architectural review by a third party architectural expert, selected by the city.	Third party review costs are the responsibility of the applicant.
Building Placement Regulations		
1. **Density**	65 dwelling unit/acre minimum and 95 dwelling units/acre maximum	Density shall be calculated using gross lot size, prior to any required right-of-way dedications. Dedications shall be required along Crowther Avenue.
2. **Block Length and Lot Size Requirements.** Each project along Crowther Avenue shall create an active and inviting environment for pedestrians.		
a. Maximum Building Length without Breaks in Building Massing	350 ft.	Breaks in building massing mean courtyards, plazas, outdoor dining, etc. These should be open from ground to sky and constitute a true break in the building massing.
b. Lot Depth	No minimum lot depth	Integrated developments and lot consolidations are encouraged with lot orientation fronting on Crowther Avenue, and where possible, with parcels extending from Crowther to the railroad right-of-way.
c. Minimum Lot Size	20,000 square feet	
3. **Setbacks**. Minimum setbacks required and, where noted, maximum setbacks established, except where a frontage type standard allows exceptions or establishes different requirements. Setbacks are measured from property line after any required dedications. Fire department requirements supersede any setback listed below.		
a. Setback From Railroad Track	0 feet	10 ft. from rear ROW preferred by BNSF for above ground structures. Applicants should consider access to rear portion of new development.
b. Front Yard Setback	3 ft. min./15 ft. max.	

Table 3-6– TOD Development Standards

	Standard	Notes
c. Side Yard Setback	0 feet, or 10 ft. when adjacent to a property containing residential uses.	
d. Rear Yard Setback	10 ft.	
e. Street Side Yard Setback	5 ft. min./15 ft. max.	
4. **Projections**		
a. **Allowable Setback Projections.**		
i. Ground Floor:		
• Awnings and canopies over windows: 60 inches;		
• Sun shade structures: 15 feet;		
• Bay windows: 60 inches (not wider than 10 feet);		
• Cornices, belt courses, and similar architectural features: 12 inches;		
• Eaves, roof overhangs: 30 inches; and		
• Uncovered porches, decks and landings (may be covered by arbors or trellises): 10 feet.		
ii. Above Ground Floor. Awnings, galleries, balconies, bay windows: 48 inches.		
iii. Art, as determined by the approval of the public art component of the project.		
iv. For signs, see Sign Regulations, § 23.110.050.		
v. All projections must maintain a minimum of 8 feet vertical height from ground.		
b. **Public right-of-way encroachments require approval of an encroachment permit.**		
5. **Building Height, Rooftop Amenities, Frontages, and Ground Floor**		

Table 3-6– TOD Development Standards

	Standard	Notes
a. Building Height	3 stories minimum, 35 ft. minimum, 5 stories maximum, not to exceed 68 ft.	
b. Frontage Requirements. In order to support the pedestrian environment, building frontages onto streets and open spaces shall be maximized. No visible parking is permitted along frontages. A minimum of 75% of the site frontage shall be occupied as building frontage. A section of blank wall shall not exceed 20 linear feet without being interrupted by a window or entry or other façade treatment.		
c. Where commercial uses are required on ground floors, those commercial uses shall have a minimum 15 ft. floor to ceiling height.		
6. **Provision of Common Open Space (Residential Portion Only)**		
a. Amount per residential use	50 sf/unit for residential units; 50 sf/unit for 5 or more live work units.	Up to 75% of this requirement can be fulfilled by providing a public plaza in lieu of private common open space.
b. Types of Common Open Space Permitted	• Common open space can be active or passive but must be accessible to all non-residential tenants (i.e., employees and employers) and residential residents.	
	• Required setbacks may not be counted as common open space, except that rear yards counted as meeting the requirement for live/work units.	
	• Common open space shall be fully landscaped and requires an approved landscape plan.	
	• Examples may include: courtyards, clubhouses with accompanying landscaped areas, swimming pools, plazas, greens, parks, playgrounds, picnic areas, outdoor seating.	
c. Rooftop Amenities	• Rooftop amenities are permitted if they provide additional recreational or common open space activities for the residents of the building.	

Table 3-6– TOD Development Standards

	Standard	Notes
	• 50% of the rooftop amenities (structures and active recreation amenities) may count towards the square footage requirement for either private or common open space.	
	• Rooftop amenities, such as and not limited to, clubhouses, swimming pools, tennis courts, open space areas, fitness centers, are permitted to project 16 ft. above the maximum height limit if integrated into the overall design of the project and the maximum rooftop building coverage is limited to 30% of the rooftop floor area.	
	• Roof top amenities shall be set back from the building edge such that no more than 20% of the rooftop structure can be visible from the primary public right-of-way at centerline of the street.	
	• Rooftop amenities are intended for the use of building residents.	
d. Courtyard Common Open Space Requirements	• Courtyards shall be designed as a central courtyard or as partial, multiple, separated or interconnected courtyards.	
	• Minimum courtyard dimension shall be 40 ft. when the long axis of the courtyard is oriented EW and 30 ft. for a NS orientation. The courtyard proportion is 1:1 between its width and height for at least 2/3 of the court's perimeter. As long as total open space requirement is met, this ratio could be modified by up to 10%.	
	• When there are 2 or more courtyards, they shall be connected to each other.	
	• The area required for first level patios shall not be deducted from the overall courtyard area.	

Table 3-6– TOD Development Standards

	Standard	Notes
7. **Provision of Private Open Space (Residential Portion Only)**		
a. Live Work	64 sf/unit	6 ft. min. in any direction; the total of 64 sf must be provided as 1 private open space area, not broken up into smaller sizes.
b. Residential-Attached & Multifamily	64 sf/unit	6 ft. min. in any direction; the total of 64 sf must be provided as 1 private open space area, not broken up into smaller sizes.
8. **Parking**	**Standards**	**Applicable Land Uses**
a. Retail – spaces per 1,000 sf	2 min./4 max.	Accessory retail, antique, artisan, general retail, grocery, retail complex, personal services
b. Eating and Drinking Establishments – spaces per 1,000 sf	5 min./10 max.	Bar/tavern, restaurant, brewery, etc.
c. Outdoor Dining on Private Property	0	• Outdoor dining is encouraged and shall be incorporated as part of the overall design of the building or project.
		• Outdoor dining may project into required setbacks.
		• No parking is required for outdoor dining unless the total outdoor dining square footage is greater than the total interior dining area. In this circumstance, project must provide parking for the amount over the interior square footage.

Table 3-6– TOD Development Standards

	Standard	Notes
		• Acceptable barriers for defining outdoor dining areas shall include fences, railings, and planter boxes.
d. Specialty Goods & Foods– spaces per 1,000 sf	2 min./4 max.	
e. Entertainment & Recreation – spaces per 1,000 sf	6 min./10 max.	Health/fitness, playgrounds, studios, theatres cannot be stand alone.
f. Commercial Goods – spaces per 1,000 sf	2 min./4 max.	
g. Civic & Cultural, including Libraries and Museums – spaces per 1,000 sf	3 min./no max.	
h. Office Professional – spaces per 1,000 sf	2 min./4 max.	
i. Personal Services	3 min./no max.	
j. Live Work	1 min./1.5 max.	
k. ATM	0	
l. Lodging – B&B	1 per sleeping room.	No assembly space permitted.
m. Lodging – Hotel	1 per sleeping room, plus 1 space for every 75 sf of assembly area.	
Residential		
n. Spaces per studio unit	1 min./1 max.	
o. Spaces per 1 bed unit	1 min./1.5 max.	
p. Spaces per 2 bed unit	1.5 min./2 max.	
q. Spaces per 3 bed unit	2 min./2.5 max.	

Table 3-6– TOD Development Standards

	Standard	Notes
r. Guest spaces per 10 units	2 min./3 max.	
s. Mixed Use	Parking shall meet the requirements for individual land uses. Residential parking shall be separated from non-residential parking and easily accessible through a controlled mechanism.	Reduced parking may be permitted through a parking study.
Other		
t. Bike Parking – Short-Term	Residential: 1 resident bicycle parking space for every 5 residential units, or portion thereof; Nonresidential: 1 bicycle parking space for every 5,000 sf, or portion thereof, of nonresidential floor area.	
u. Bike Parking – Long-Term	Residential: 2 bicycle storage units for every 5 dwelling units for the first 20, and 1 for every 5 additional units, or portion thereof; Nonresidential: Any establishment with a parking structure and a minimum of 10,000 sf of non-residential space shall provide long-term bicycle parking at a minimum ratio of 1 space per 20 vehicle spaces.	
v. Electric Vehicle Charging Stations.	Minimum 10% of project's parking spaces must provide EV Level 2 charging stations. Alternatively, 5% of total spaces if installing DC fast charging stations.	
w. Transit Station or Terminal.	As per director of development services in coordination with transportation authority.	
x. Telecommunication Facility	1 space to service facility.	
y. Surface Parking.	Surface parking is permitted as long as not visible from public street and is fully landscaped and screened from public view.	
z. Parking Structure.	Structure parking permitted only if integrated into overall design of building and "wrapped" with the building, such that the	

Table 3-6– TOD Development Standards

	Standard	Notes
	parking area is not visible from any portion of the front, sides, rear or interior courtyards of the project.	
aa. Podium Parking.	Permitted if fully integrated into a development with a "wrapped" parking structure.	
bb. Underground Parking.	Permitted if fully integrated into the design of the development.	
cc. Parking Reduction.	Applicants may apply for parking reduction before the planning commission for residential and mixed use projects up to a maximum reduction of 25% through a parking demand study or shared parking analysis. One such incentive could include a Zip car or shared car plan.	

Table 3-7– Old Town Placentia Revitalization Plan Development Standards

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
Residential Density						
1. Density (max du/ac)	25	35	55	65	NA	Density shall be calculated using gross lot size, prior to any required right-of-way dedications.
Setbacks. Minimum setbacks required and, where noted, maximum setbacks established, except where a frontage type standard allows exceptions or establishes different requirements. Setbacks are measured from property line after any required dedications. Fire department requirements supersede any setback listed below.						
1. Setback from Railroad Track	NA	NA	NA	0 ft.	0 ft.	10′ from rear ROW preferred by BNSF for above ground structures. Applicants should consider access to rear portion of new development.
2. Front Yard Setback (min-max)	0 ft.	0-5 ft.	5-15 ft.	5-15 ft.	NA	All setback areas facing a street or alley not devoted to walkways and driveways shall be properly landscaped and maintained in compliance with PMC Ch. 23.77. In the R-2 overlay zone, the front yard setback shall be 15′.
3. Front Yard Setback for “through lots” and cross-alley developments in the R-2 overlay, fronting Alta and Main. See definitions section.	15 ft.	15 ft.	15 ft.	NA	NA	

Table 3-7– Old Town Placentia Revitalization Plan Development Standards

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
4. Side Yard Setback	0 ft.	0 ft.	0 ft.	0 ft.	NA	
5. Side Yard Setback for "through lots" and cross-alley developments in the R-2 overlay, fronting Alta and Main. See definitions section.	0-5 ft.*	0-5 ft.*	NA	0 ft.	NA	*Less than 5′ setback adjoining an R-2 use requires approval from adjoining property owner of said R-2 use.
6. Rear Yard Setback (min-max)	0-15 ft.	0-15 ft.	0-15 ft.	0 ft.	NA	
7. Street Side Yard Setback (min-max)	0 ft.	0-5 ft.	5* ft.	5-15 ft.	NA	*Refers to Chapman Avenue setback.
Projections and Encroachments						
1. Allowable Setback Projections	a. Ground Floor: i. Awnings and canopies over windows: 60″; ii. Barriers for defining outdoor dining areas such as fences, railings, planter boxes: as needed to encompass outdoor dining area; iii. Sun shade structures: 15′; iv. Bay windows: 60″ (not wider than 10′); v. Cornices, belt courses, and similar architectural features: 12″; vi. Eaves, roof overhangs: 30″; and vii. Uncovered porches, decks and landings (may be covered by arbors or trellises): 10′. b. Above Ground Floor. Awnings, galleries, balconies, bay windows: 48″ c. Art, as determined by the approval of the public art component of the project.					

Table 3-7– Old Town Placentia Revitalization Plan Development Standards

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
	d. For signs, see sign regulations, § 23.112.070. e. All projections must maintain a minimum of 8′ vertical clearance from ground.					
2. Public Right-of-Way Encroachments (all require approval of an encroachment permit)	a. Art, as determined by the approval of the public art component of the project. b. For signs, see sign regulations, § 23.111.070. c. Outdoor dining is allowed by approval of the director of development services and director of public works or their designees and may require Alcoholic Beverage Control Board (ABC) approval. Approval is pursuant to the outdoor dining permit and guidelines.					
Heights, Rooftop Amenities, Frontages, Lot Sizes						
1. Building Height	2-Story Area: 2 stories, 30′ 3-Story Area: 3 stories, 40′ 4-Story Area: 4 stories, 55′	2 min/3 max stories, 40′	3 min/4 max stories, 60′	3 min/4 max stories, 55′	5 stories, 65′	See "Old Town zoning map" for height subareas. New stories built on top of existing buildings shall be fully integrated into the design of the existing building.
2. Minimum Lot Size required for a development at or over 3 stories.	0	8,000 sf*	10,000 sf	10,000 sf	0	*Developments on lots smaller than 8,000 sf can be considered if they are contiguous to parcels with proposed or approved new developments and are developed with a zero lot line scenario or similar concept. The development on the smaller lot must complement and enhance the contiguous development

Table 3-7– Old Town Placentia Revitalization Plan Development Standards

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
						and further the goals of this chapter.
3. Ground Floor Height measured from finished floor to ceiling (min)	15 ft.	15 ft.	15 ft.	NA	NA	
4. Frontage Requirements	In order to support the pedestrian environment, building frontages onto streets and open spaces shall be maximized. No visible parking is permitted along frontages. A minimum of 75% of the site frontage shall be occupied as building frontage. A section of blank wall shall not exceed 20 linear feet without being interrupted by a window or entry or other façade treatment.					
5. Rooftop Amenities	In multifamily residential and mixed-use residential projects, rooftop amenities, such as and not limited to, clubhouses, swimming pools, tennis courts, open space areas, fitness centers, are permitted to project 16′ above the maximum height limit if integrated into the overall design of the project and the maximum rooftop building coverage is limited to 30% of the rooftop floor area. Rooftop amenities shall be set back from the building edge such that no more than 20% of the rooftop structure can be visible from the primary public right-of-way at centerline of the street. Rooftop amenities are intended for the use of building residents. Rooftop amenities do not count as a “story” or “floor.”					
6. Height Exceptions	Non-habitable building features such as chimneys (up to 6′ in width), cupolas, flagpoles, monuments, steeples, roof screens, equipment, and similar structures, covering no more than 10% of the top floor roof area to which they are accessory, may exceed maximum permitted height standards by up to 8′.					
7. Building Orientation	New commercial or mixed use construction must orient the principal façade onto Bradford, Santa Fe or Chapman Avenue or Walnut Avenue. In the mixed use subarea, new buildings must be oriented toward Bradford and Chapman.			NA	NA	
8. Building Façade for building located at 102 S. Bradford Avenue (at Chapman)	The building façade of this building shall be preserved and integrated into the new design of any new development proposed on this site. This includes the façade along Bradford Ave (including the tower and the front section containing the large round window opening) and up to and including					

Table 3-7– Old Town Placentia Revitalization Plan Development Standards

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
	the façade (containing the stained glass windows) along Chapman Avenue. The Chapman Avenue façade preservation can end at the point where the planes of the two sections of that façade meet (where the east/west oriented portion of the building meets the north/south oriented portion of the building). The preservation does not necessarily have to include the small vestibule. The proposed architectural design of any new development shall be reviewed by a preservation architect; the selection of such preservation expert shall be approved by the city.					
Provision of Common Open Space (Residential Only)						
1. Amount per Residential Use	a. 50 sf/unit for residential units; b. 50 sf/unit for 5 or more live work units.					
2. Types of Common Open Space Permitted	a. Common open space can be active or passive but must be accessible to all nonresidential tenants (i.e., employees and employers) and residential residents. b. Required setbacks may not be counted as common open space. c. Common open space shall be fully landscaped and requires an approved landscape plan. d. Examples may include: courtyards, clubhouses with accompanying landscaped areas, swimming pools, plazas, greens, parks, playgrounds, picnic areas, outdoor seating.					
3. Rooftop Amenities	1. Rooftop amenities are permitted if they provide additional recreational or common open space activities. 2. Amenities, such as and not limited to, clubhouses, swimming pools, tennis courts, open space areas, fitness centers, are permitted to project 16' above the maximum height limit if integrated into the overall design of the project and the maximum rooftop building coverage is limited to 30% of the rooftop floor area. Roof top amenities shall be set back from the building edge such that no more than 20% of the rooftop structure can be visible from the primary public right-of-way at centerline of the street. Rooftop amenities are intended for the use of building residents.					

Table 3-7– Old Town Placentia Revitalization Plan Development Standards

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
	3. 50% of the rooftop amenities (structures and active recreation amenities) may count towards the square footage requirement for either private or common open space. 4. Rooftop buildings supporting recreational activities may cover a maximum of 30% of the rooftop area and may project above the maximum height limit by 16′.					
4. Courtyard and Common Open Space Requirements	1. Courtyards shall be designed as a central courtyard or as partial, multiple, separated or interconnected courtyards. 2. Minimum courtyard dimension shall be 40′ when the long axis of the courtyard is oriented EW and 30′ for a NS orientation. The courtyard proportion is 1:1 between its width and height for at least 2/3 of the court's perimeter. As long as total open space requirement is met, this ratio could be modified by up to 10%. 3. When there are 2 or more courtyards, they shall be connected to each other.					
Provision of Private Open Space (Residential and Live/Work Only)						
Amount per Residential Unit	64 sf/unit					6′ min. in any direction; the total of 64 sf must be provided as one private open space area, not broken up into smaller sizes.
Shopfronts						

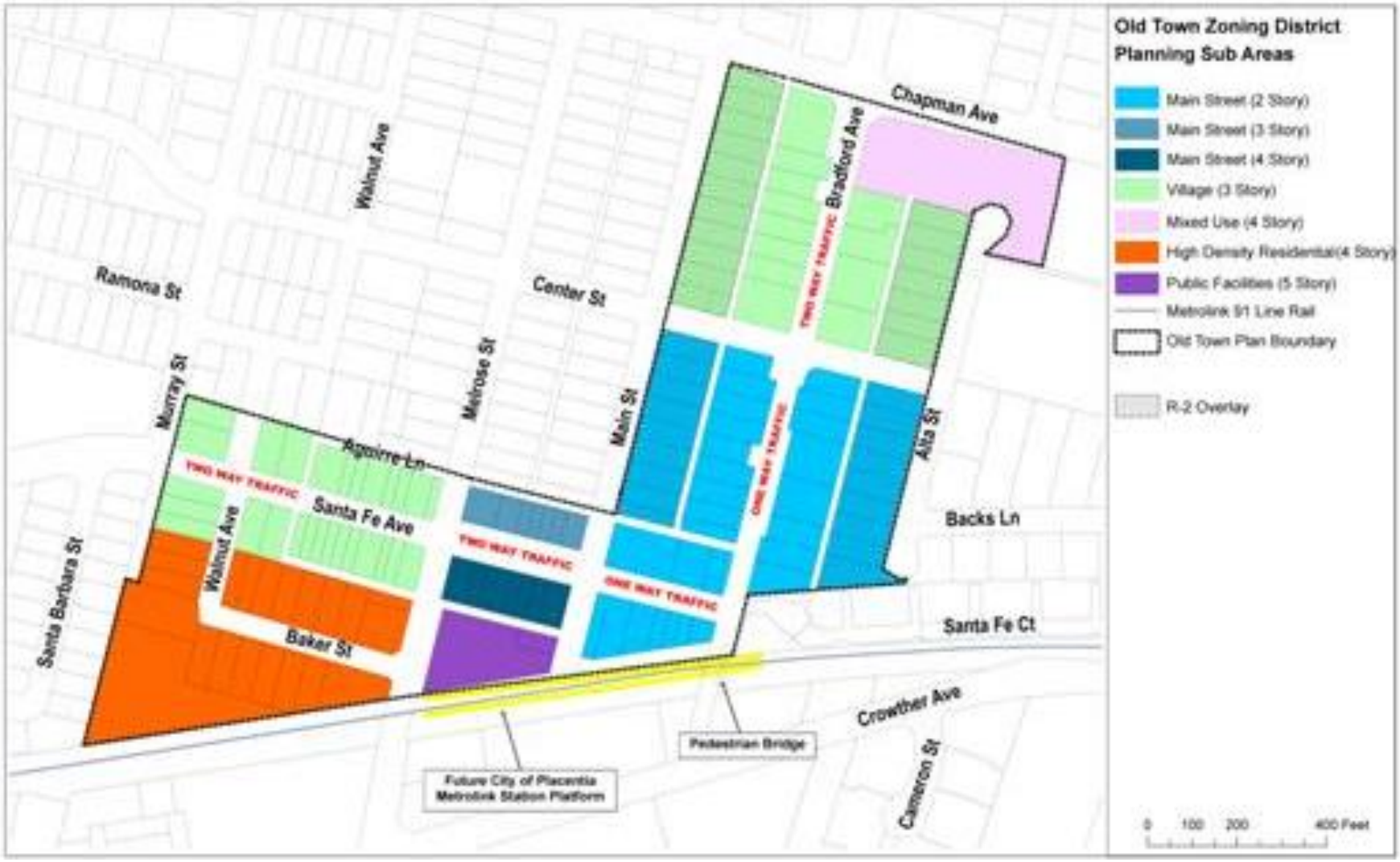
Table 3-7– Old Town Placentia Revitalization Plan Development Standards

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
The following are specific guidelines for shopfronts in the Old Town area: 1. 12′ to 16′ tall, as measured from the adjacent sidewalk. 2. The corresponding storefront(s) opening(s) along the primary frontage shall comprise 65% of the 1st floor wall area facing the street and not have opaque, stucco or reflective glazing. 3. Storefronts may be recessed from the frontage line by up to 10′. 4. "Bulkheads," which are a segment of wall that transitions between the window opening(s) and the adjacent grade, are also encouraged. The bulkhead shall be between 24″ and 36″ tall (aluminum storefront or spandrel panel may not substitute for a bulkhead).						
Architectural Styles						
1. Main Street Commercial Multi-story façades are typically divided into base, body and top with the ground floor taller than the shorter upper floor which is finished by a significant parapet. The ground floor has recessed entries and any expansive glass is interrupted by structural columns with transoms to allow light to penetrate deep into the interior. Upper floor windows are smaller with vertical windows directly relating to the ground floor openings.						Style of architecture required in Main Street subareas

Table 3-7– Old Town Placentia Revitalization Plan Development Standards

Development Standard	Planning Subareas					Notes and Additional Requirements
	Main Street	Village	Mixed-Use	High-Density Residential	Public Facility	
2. Mission Revival Prominent features of the style include red clay tile roofs, use of balconies, smooth-stuccoed exterior walls usually painted white, arched openings, colorful tile work and elaborate landscaping. The buildings frequently have courtyards.						Choices of architecture for the following: • Village subarea • Mixed use subarea • High density residential subarea
3. Spanish Colonial Typical features include a low-pitched roof with little or no eave overhang, a red-tiled roof, perhaps a prominent rounded arch over a door, window or porch, a stucco wall surface, and usually an asymmetrical façade. The features elaborate molded ornament around doors and windows, polychrome tile at ingresses and wrought iron grilles and balconies.						This style of architecture permitted only in high density residential subarea

Figure 3-1 – Old Town Zoning District Planning Subareas



Parking Requirements

Residential off-street parking standards are regulated by Chapter 23.78 of the Municipal Code and are summarized in Table 3-8. While these requirements are typical of other jurisdictions in the area, they can pose a constraint on the development of housing by increasing development cost and reducing achievable densities. In particular, the current requirement of two parking spaces for each unit in the R-3 (High Density Multi-family) district can act as a constraint on small units. To address this constraint, Program 1.17 in the Housing Plan includes a Code amendment to reduce the parking requirement for studio and 1-bedroom units in the R-3 district to one space.

Table 3-8 – Residential Parking Requirements

Type of Residential Development	Required Parking Spaces (Off Street)
R-A and R-1 (4 or fewer bedrooms)	2 (2 in garage) per unit
R-A and R-1 (5 or more bedrooms)	3 (3 in garage) per unit
R-G	2 (1 in garage) per unit; plus 10% of said total for guest parking; carports allowed for multiple dwellings
R-3	2 (1 in garage) per unit; plus 15% of said total for guest parking; carports allowed for multiple dwellings
PUD (bachelor and 1 bedroom)	2 (1 in garage) per unit
PUD (2 or more bedrooms)	3 (2 in garage) per unit; 1 recreational vehicle space, for each 10 units
Mobile Home Parks	2 spaces per mobile home lot (may be in tandem), plus 1 additional space per every 5 mobile home lots provided as guest parking. In addition, there shall be provided 1 boat or travel trailer space for every 5 mobile home lots
Boardinghouses, fraternities, and group living quarters	1 space per resident
Rest Homes	1 space for each 4 beds, plus 1½ spaces per employee
Second Residential Units	1 space in addition to that required for the primary unit; shall not be located within the required front yard setback and may be open

Source: City of Placentia Municipal Code Title 23, Sect. 78.030 et. seq.

There are no specific criteria for allowing carports in multi-family housing. When carports are utilized, the required dimensions of a carport space shall be measured from the interior of the carport. The carport shall cover the entire length of the space and shall be separated from open parking spaces by a landscaped buffer.

The off-street parking requirements for multi-family housing are the same regardless of unit size. To ensure that the City's parking requirements do not pose future constraints on development of smaller units, the Housing Plan (Chapter 4) includes Program 1.17 to review and revise parking requirements to mitigate any identified constraints.

Density Bonus

In order to encourage the construction of affordable housing, State law established requirements for cities to allow increased density and other incentives when projects include affordable units. The City of Placentia has adopted a Density Bonus Ordinance (Chapter 23.23 of the Municipal Code) describing standards and procedures for providing density bonus upon request from the applicant. Recent

State legislation has modified density bonus requirements; therefore, Program 1.11 in the Housing Plan (Chapter 4) includes a commitment to process an amendment to City regulations for density bonus and incentives consistent with State law.

Housing for Persons with Disabilities

The U.S. Census Bureau defines persons with disabilities as those with a long-lasting physical, mental or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

Residential care facilities. Municipal Code Sec. 23.81.040 allows residential care facilities for 6 or fewer persons by-right in any single-family residence in an R-A, R-1 or R-2 zone. Residential care facilities provide 24-hour supervised non-medical care.

Group dwellings including residential care facilities for 7+ persons, nursing homes, rest homes, and other special needs facilities are permitted in residential and commercial districts subject to approval of a use permit.

Program HE-2.3 has been added to amend the Zoning Code to minimize constraints on housing for persons with disabilities by removing the use permit requirements for group dwellings including residential care facilities for 7+ persons in residential districts.

Placentia's Zoning Code allows group housing and residential care facilities for 7 or more persons, including nursing homes, intermediate care facilities and assisted care facilities, in the C-2 zone with a conditional use permit, senior housing and facilities in Specific Plan 3 area as a permitted use, and independent living facilities, assisted living facilities, and skilled nursing facilities in Specific Plan 9 area as a permitted use. One large residential care facility was proposed in recent years and received approval of a use permit.

Specific Plan 3 area developments are subject to the requirements found in Chapter 23.103 (Specific Plan 3) of Placentia Municipal Code. Specific Plan 3 area contains requirements for board and care facilities for persons 62 years of age or older, with private bathrooms, central kitchen facilities and services which include transportation, activities programs, housekeeping, linen and laundry service and full-time staff supervision; and apartment projects for persons 55 years of age or older, which contain a private entry and individual kitchen, but are no larger than two bedrooms, where two bedroom units do not exceed 50 percent of the total number of units.

Specific Plan 9 area developments are subject to the requirements found in Chapter 23.109 (Specific Plan 9) of Placentia Municipal Code. A deed restriction for this area requires that for the life of the structures at least one resident of each independent living unit shall meet the minimum age requirement of 55 years.

Definition of *Family*. The Municipal Code defines *family* as "an individual or two or more persons related by blood, marriage or adoption, or a group of not more than six persons, excluding servants, who are not related by blood, marriage or adoption, living together as a single housekeeping unit in a dwelling unit." The Housing Plan (Chapter 4) includes Program 2.3 to process a Municipal Code amendment to revise this definition consistent with current law.

Separation requirements. To further accommodate housing for persons with disabilities, there are no maximum separation or concentration requirements for residential care facilities. The City considers parking requirements for residential care facilities on a case-by-case basis.

Program 2.3 in the Housing Plan includes a commitment to update City regulations related to persons with disabilities consistent with State law.

Reasonable Accommodation Procedures

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning and other land use regulations when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling.

Zoning Code Chapter 23.59 establishes the process by which persons with disabilities may request a reasonable accommodation and provides for administrative review and approval by the Director of Development Services. Any person with a disability may submit an application for reasonable accommodation to the director describing the accommodation requested, the provision of the Zoning Code, policy or procedure from which modification is being requested, the basis for the claim that the applicant is considered disabled under the Federal Fair Housing Amendments Act of 1988 or the California Fair Employment Housing Act; and an explanation of why the accommodation is reasonable and why the accommodation is necessary to afford the applicant an equal opportunity to use and enjoy a specific dwelling in the city. No fee is charged by the City for a reasonable accommodation application.

In the event that there is no approval sought other than the request for reasonable accommodation, notice of the reasonable accommodation application is mailed to the owners of adjacent properties. If the reasonable accommodation request is made in conjunction with some other approval, permit or entitlement, the notice is provided along with the notice of the other proceeding.

Within 5 days of submittal the director determines whether the application of complete and notifies the applicant if additional information is needed.

In making a determination about the reasonableness of a requested accommodation, the following factors are considered by the director:

- Whether the accommodation is reasonable considering the nature of the applicant's disability, the surrounding land uses, and the rule, standard, policy, or practice from which relief is sought;
- Whether the accommodation is necessary to afford the applicant equal opportunity to enjoy and use a specific dwelling;
- Whether the accommodation will have only incidental economic or monetary benefits to the applicant, and whether the primary purpose of the accommodation is to assist with real estate speculation or excess profit-taking;
- Whether the accommodation will create a substantial adverse impact on surrounding land uses, or a public nuisance, that cannot be reasonably mitigated The City of Placentia Municipal Code defines a public nuisance as, "any violation of the Placentia Municipal Code;"
- Whether the accommodation is reasonably feasible considering the physical attributes of the property and structures;
- Whether there are alternative accommodations which may provide an equivalent level of benefit to the applicant, while minimizing adverse impacts on surrounding land uses and lessening the financial and/or administrative burden on the city;
- Whether the requested accommodation would impose an undue financial or administrative burden on the city; and
- Whether the requested accommodation would constitute a fundamental alteration of the zoning or building laws, policies or procedures of the city.

Within 30 days of receiving a complete application the director must issue a decision on the application. Notice of the Director's decision is provided in the same manner as for the original application and any person may make a request for a director's hearing of the decision within 10 days of mailing of the notice of decision.

A decision regarding reasonable accommodation is subject to appeal to the Planning Commission or City Council. Program HE-2.3 has been added to the Housing Plan to remove appeal processes for Reasonable Accommodation requests that are approved, and limit denial appeals to only the applicant. The City Council shall make its own determination as to whether the proposed development meets the standards outlined in Section 23.75.040 of the Zoning Code and may approve, modify or disapprove the decision of the planning commission. Section 23.75.040 of the Zoning Code states that the Planning Commission shall approve a reasonable accommodation request if the following objective findings are met:

- It meets or exceeds the criteria established in Section 23.75.020 (Objective Development Standards); and
- 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;
- The proposed development will be consistent with the latest adopted general plan; and
- Conditions necessary to secure the purposes of this section, including guarantees and evidence of compliance with conditions, are made part of the development approval.

The Zoning Code outlines the review and decision process for requests for reasonable accommodation with clear requirements. The requirements for approval are objective and do not allow for subjective comments or design requirements as a condition of approval.

In making a determination about the reasonableness of a requested accommodation, the following consideration factors may allow for subjectivity:

- Whether the accommodation will create a substantial adverse impact on surrounding land uses; and
- Whether the accommodation will have only incidental economic or monetary benefits to the applicant, and whether the primary purpose of the accommodation is to assist with real estate speculation or excess profit-taking.

Because "adverse impact" is not defined, this finding may be considered subjective, which could be a constraint on persons with disabilities. Additionally, requiring findings based on real estate speculation can also be subjective. While no known constraint has been created in the past, Program HE-2.3 has been added to amend the Zoning Code in order to minimize constraints on housing for persons with disabilities. Besides these findings, the reasonable accommodation process is consistent with State law and assists persons with disabilities in improving their access to housing.

Emergency Shelters

Pursuant to State law, jurisdictions with an unmet need for emergency shelters are required to identify a zone(s) where emergency shelters are allowed as a permitted use without a conditional use permit or other discretionary permit. The identified zone must have sufficient capacity to accommodate the shelter need, and at a minimum provide capacity for at least one year-round shelter. Permit processing, development and management standards for emergency shelters must be objective and facilitate the development of, or conversion to, emergency shelters.

As discussed in the analysis of homelessness in Chapter 2, in 2019 a 100-bed emergency shelter/navigation center opened in Placentia.

Municipal Code Section 23.47.130 allows emergency shelters by-right (i.e., without discretionary action) in the M – Manufacturing District subject to the following standards:

(1) The facility shall conform to all property development standards of Chapter 23.47 "M" – Manufacturing District.

(2) Maximum number of beds or persons to be served per night by a single shelter shall not exceed 30 persons at any one time.

(3) The facility shall operate on a first-come, first serve basis with clients only permitted on-site between 5:00 p.m. and 8:00 a.m. A curfew of 10:00 p.m. or earlier shall be established and strictly enforced, and clients shall not be admitted after curfew. Clients shall vacate the facility by 8:00 a.m. and have no guaranteed bed for the next night.

(4) The maximum stay at the facility shall not exceed 45 days within a 120-day period.

(5) Emergency shelters shall be located at least 300 feet from any residential use or residentially-zoned property, public or private park, or public or private kindergarten through 12th grade curriculum school, as measured from the closest property line. In addition, homeless shelters shall be located at least 300 feet from any other homeless shelter, as measured from the closest property line.

(6) A minimum of one staff member per 15 beds shall be awake and on duty when the facility is open and a minimum of 2 staff members shall be on-site when the facility is open.

(7) Exterior lighting shall be provided for the entire outdoor and parking area of the property. The lighting shall be stationary, directed away from adjacent properties and public rights-of-way.

(8) A waiting area shall be provided, which contains a minimum of 10 square feet per bed provided at the facility. The waiting area shall be in a location not adjacent to the public right-of-way, shall be visually separated from public view by a minimum 6-foot-tall, visually screening mature landscaping, or a minimum 6-foot-tall decorative masonry wall, and shall provide consideration for shade/rain provisions.

(9) All facility improvements shall comply with the city of Placentia Municipal Code, and the most current adopted Building and Safety Codes.

(10) A security and safety plan shall be provided for the review and approval of the city administrator or designee. The plan may be required to address additional security and safety needs, as identified by the city administrator or designee. The approved security and safety plan shall remain active throughout

the life of the facility. The plan shall contain provisions addressing the topical areas outlined below:

(A) Sleeping areas addressing the separation of male/female sleeping areas, as well as any family areas within the facility.

(B) Loitering control with specific measures regarding off-site controls to minimize the congregation of clients in the vicinity of the facility during hours that clients are not allowed on-site.

(C) Management of outdoor areas, including a system for daily admittance and discharge procedures and monitoring of waiting areas with goals to minimize disruption to nearby land uses.

(D) Alcohol and illegal drugs addressing how the operator(s) will control and regulate alcohol and illegal drug use by clients on the premises.

(E) The operator(s) shall provide the city with the most current contact information for the operator(s) of the facility during the normal daytime office business hours, and the nighttime contact information for the "person on duty" when the emergency shelter is operating.

(F) The operator(s) shall ensure proper compliance with all state laws pertaining to client residency and occupancy.

(G) Staff and Training. The plan shall describe the staffing plan and required staff training programs. Facility staff shall be trained in operating procedures, safety plans, and assisting clients with referral services. The facility shall not employ staff who have been convicted of a felony or who are required to register as a sex registrant under California Penal Code Section 290. The plan shall describe procedures for ensuring shelter staff meet these requirements.

(H) Facilities shall be maintained in good working order. Indoor and outdoor use areas shall be clean and orderly. Litter shall be removed in and around the facility in a timely manner and graffiti shall be removed within forty-eight (48) hours.

(I) A "good neighbor policy" shall be established whereby clients are instructed to be considerate of neighbors and refrain from behavior that is disruptive to the surrounding community. The operational plan shall include a written protocol for ongoing communications with the city and the surrounding neighborhood and businesses, and for responding to neighborhood complaints.

(11) The facility may provide the following services in designated areas separate from sleeping areas:

(A) A recreation area either inside or outside of the facility.

(B) A counseling center for job placement, education, health care, legal, or mental health services.

(C) Laundry facilities to serve the number of clients at the facility.

(D) Kitchen for the preparation of meals.

(E) Dining hall.

(F) Client storage area (i.e., for the overnight storage of bicycles and personal items).

(G) Counseling programs to be provided with referrals to outside assistance agencies and provide an annual report to the city.

(H) Or similar services geared to homeless clients.

(12) An emergency shelter facility shall provide off-street parking at a ratio of one (1) space per four (4) beds, and/or one-half (0.5) per bedroom designed as a family unit with children, plus one (1) per staff member, or shall submit a parking study, subject to the approval of the city administrator or designee, demonstrating the required parking demand justifies a reduced amount of off-street parking. Each facility is also encouraged to provide bike racks for clients in a secured area.

The current emergency shelter development standards and conditions are not fully compliant with Chapter 654, Statues of 2022 (AB 2339) and will be amended to comply with State law.

Chapter 654, Statues of 2022 (AB 2339), now includes new requirements on how cities must plan for emergency shelters and ensure sufficient capacity for shelters. AB 2339 requires that zoning designations identified to allow emergency shelters as a permitted use without a conditional use or other discretionary permit must allow other residential uses. This could include zones that allow mixed uses that permit residential. The M zones does not currently allow other residential uses. Program 1.4 in the Housing Program provides for an amendment to the City's Zoning Code to ensure compliance with all provisions of AB 2339.

The 2022 Orange County Point-In-Time homeless count estimates that there are approximately 198 individuals experiencing homelessness in Placentia. Of the total, 31 are unsheltered and 167 are sheltered. Unsheltered individuals lived in places not meant for human habitation, such parks, sidewalks, abandoned buildings, or makeshift shelters. Sheltered individuals lived in shelters such as cars, RVs, emergency shelters, supportive or transitional housing, and similar accommodations. With the existing 100-bed emergency shelter, the City estimates that the remaining emergency shelter need is approximately 50 to 150 beds, depending on the season.

The M District includes approximately 200 parcels encompassing several hundred acres and provides ample opportunities for additional shelters. Many of these parcels have existing buildings that could be adapted for shelter use. Typical parcel sizes are between 1 and 2 acres in size.

Section 65583 (B)(v) of the Government Code allows jurisdictions to adopt proximity standards, provided that emergency shelters are not required to be more than 300 feet apart. The City's current Zoning Code prohibits emergency shelters on parcels within 300 feet from any residential use or residentially-zoned property, public or private park, or public or private kindergarten through 12th grade curriculum school, as measured from the closest property line. In addition, homeless shelters shall be located at least 300 feet from any other homeless shelter, as measured from the closest property line. Program 1.4 in the Housing Program provides for an amendment to the City's Zoning Code to ensure compliance with all proximity provisions of AB 2339.

To ensure that emergency shelter regulations comply with current State law, the City will amend the Zoning Code to ensure compliance with all provisions of AB 139 and 2339, including parking standards, updated definitions, zoning and all development standards, including spacing requirements. Program 1.4 includes annual review of current laws, including allowable separation requirements, and Code amendments will be processed as necessary. ~~In addition, AB 139 (2019) modified the allowable parking standards for emergency shelters; therefore, Program 1.4 includes a commitment to update City parking standards for emergency shelters consistent with State law.~~

Low Barrier Navigation Centers

In 2019 the State Legislature adopted AB 101 establishing requirements for local regulation of low barrier navigation centers, which are defined as "Housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low barrier navigation centers meeting specified standards must be allowed by-right in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. Program 1.4 in the Housing Plan includes an amendment to City regulations consistent with this requirement.

Transitional Housing and Supportive Housing

California Government Code §65582 establishes the following definitions for transitional and supportive housing:

> *Transitional housing* means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.
>
> *Supportive housing* means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and,

when possible, work in the community. "Target population" means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

The Zoning Code does not identify allowable locations, development standards or review procedures for transitional or supportive housing. State law requires that transitional and supportive housing be permitted as residential uses that are subject only to those regulations that apply to other residential uses of the same type in the same zone. In addition, AB 2162 of 2018 (Government Code §65583(c)(3)) further requires that supportive housing development projects meeting specific criteria must be allowed by-right in all zones allowing multi-family development, including mixed-use and nonresidential zones. Program 1.4 is included in the Housing Plan (Chapter 4) to update City regulations for transitional and supportive housing consistent with State law.

H.I.S. House currently operates a transitional living facility in Placentia. The facility, which consists of a single-family residence, was sold by the City as the successor housing agency to the non-profit and is deed restricted as affordable housing for a period of 55 years.

Agricultural Employee Housing

The Employee Housing Act (Health and Safety Code, §17021.5 and 17021.6) requires agricultural employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone, and requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. The City Zoning Code does not include a definition of agricultural employee housing or regulations for agricultural employee housing. Program 1.4 is included in the Housing Plan to update City regulations for agricultural employee housing consistent with current law.

Single Room Occupancy (SRO) Units

Single Room Occupancy (SRO) residences are small, one-room units occupied by a single individual, and may either have a shared or private kitchen and bathroom facilities. SROs are rented on a monthly basis typically without a rental deposit, and can provide an entry point into the housing market for Extremely Low-Income individuals, formerly homeless, and disabled persons.

The Zoning Code allows SROs with up to 30 units as a permitted use by-right in the R-3 (High Density Multiple Family) District. Larger SRO developments with more than 30 units require approval of a conditional use permit. SROs are also permitted in the C-2 (Community Commercial) District as part of a mixed-use development subject to a conditional use permit.

Manufactured Housing

City regulations for manufactured housing are established in Chapter 23.58 of the Municipal Code. "Manufactured home" or "manufactured housing" refers to housing units built in a factory in one or more sections and transported over the highways to a permanent occupancy site. Manufactured housing is permitted in any district where single-family homes are permitted subject only to site development approval, consistent with State law. Standards for manufactured housing include the following:

- Each manufactured home shall be certified under the National Mobilehome Construction and Safety Standard Act of 1974.
- Each manufactured home shall be placed on a foundation system approved by the director of development services and the chief building official.
- The exterior shall be of a material similar to that utilized in conventionally built single-family dwellings.
- The roof shall be of a material similar to that utilized in conventionally built single-family dwellings, have an eave and gable overhang of not less than 12 inches measured from the vertical side of the manufactured home and have a pitch not less than that required for conventionally built single-family homes.
- An enclosed garage shall be provided which is similar to that provided for single-family dwellings and the exterior siding and roof materials shall be the same as the manufactured home.

Such homes require a Certificate of Compatibility from the Zoning Enforcement Official. The Zoning Code notes that this determination may only consider the roof overhang, roofing material, siding material, and roof design.

Accessory Dwelling Units

Accessory dwelling units (ADUs) provide additional opportunities for affordable housing for people of all ages and economic levels, while preserving the integrity and character of residential neighborhoods.

City ADU regulations are set forth in Municipal Code Chapter 23.73 and were last amended in 2020 to address recent legislation. ADUs are permitted in any zone where residential uses are allowed consistent with State law. Program 1.19 is included in the Housing Plan (Chapter 4) to monitor ADU legislation and update City

regulations as necessary to ensure conformance with State law. The program also identifies actions the City will take to encourage production of ADUs.

The Orange County Council of Governments (OCCOG) is currently preparing an "ADU Toolkit" that will be available to all jurisdictions in the county. As noted in Program 1.19 in the Housing Plan, the City will utilize the ADU toolkit, which is expected to include standard plan examples, and other ADU resources to encourage ADU production.

Other Local Ordinances

Growth management. The City has no growth management requirements restricting the number of housing units that may be built.

Inclusionary housing. The City has no inclusionary housing requirements.

Short-term rentals. Municipal Code Chapter 6.45 establishes regulations regarding the short-term (i.e., less than 30 days) rental of residential property. Short-term rentals are permitted in all residential zones subject to obtaining a short-term rental permit and business license from the City.

Building Codes and Enforcement

Building and safety codes are adopted to preserve public health and safety, and ensure the construction of safe and decent housing. These codes and standards also have the potential to increase the cost of housing construction or maintenance.

Building Codes

In December, 2022, the City of Placentia adopted the current (2022) California Building Codes, which establish construction standards for all residential buildings, and repealed all previous amendments. There are currently no local amendments of the adopted 2022 California Building Code. The codes are designed to protect the public health, safety and welfare of Placentia's residents. Code enforcement in the City is performed on a complaint basis.

Building codes are enforced through building permit plan check and inspection during construction.

Zoning Code Enforcement

Contained within the City's Police Department and staffed by Police Services Officers, the City's Zoning Code Enforcement key objective is maintaining and preserving value and appearance in residential, commercial and industrial properties throughout the City. The City's Code Enforcement representatives enforce the following items:

- Substandard housing;
- Garage conversions;
- Property maintenance;
- Recreation vehicle parking on private property;
- Trash container placement, time and location;
- Illegal business activity;
- Inoperable vehicles on private property; and
- Garage sales and signage.

Code enforcement efforts are focused on property maintenance practices and standards so as to avoid conditions, which can be detrimental to the public health, safety, or general welfare. Identification of violations is primarily complaint-based.

The Health, Wellness and Environmental Justice Element of the General Plan also addresses the issue of Code enforcement through the following policies:

HW/EJ 8.2. Focus code enforcement efforts in disadvantaged communities, to improve unsafe and unsanitary conditions, focusing on trash and dumping, overcrowding, illegal home businesses, illegal garage conversions, graffiti, unpermitted plumbing and electrical, and lack of building and yard maintenance. At a minimum, conduct bi-monthly inspections and distribute information about protecting tenant rights, so they are not penalized for reporting or living in a dwelling unit that does not meet health and safety standards. Written outreach efforts should be translated into Spanish.

Policy HW/EJ 13.8. Continue to implement the City's Green Building Code and update as appropriate. Require newly-constructed or renovated City-owned and private buildings and structures to comply with the Green Building Ordinance. Encourage LEEDS certification for commercial, industrial and public projects.

Policy HW/EJ 15.6. Conduct City Council visits to disadvantaged neighborhoods to encourage discussion on items that affect the residents and businesses. Have Council accompanied by representatives from Police, Code Enforcement, Development and Community Services, and other departments. Host an annual community walk with the Mayor and other Council members.

Planning and Development Fees

Various development and permit fees are charged by the City and other agencies to cover administrative processing costs associated with development. These fees are necessary ensure that development complies with applicable regulations and that adequate services and infrastructure are available to serve the development. Often times, development fees are passed through to renters and homeowners in the price/rent of housing, thus affecting the affordability of housing; however, the City only charges fees that are required to ensure compliance with laws and regulations and protect public health and safety.

The City of Placentia charges the majority of environmental, planning and engineering fees on a fixed fee basis, with some fees deposit-based and ultimately charged on a time and materials basis. The City annually reviews its fees and used a third-party consultant in 2018 to conduct a cost allocation plan and fee study. An update to the fee study is currently (2022) underway. The development fees are a result of actual costs of providing the services and are reviewed annually based on staffing resources and related expenditures to provide services. Table 3-9 summarizes the total typical development fees for single-family and multi-family developments, based on projects recently constructed in the City.

In addition to impact fees for schools, parks, libraries and wastewater, the City requires an affordable housing impact fee for developments of five or more units. The fee ranges from approximately $2,625 to $5,250 per market-rate unit depending on project size.

Table 3-9– Typical Planning and Development Fee Comparison, Single Family and Multi-Family

Development Fee	Single-Family[1]	Multi-Family[2]
Site/Development Plan Review (SPR/DPR)	$1,896	$511
Use permit (condo only)	$7,215	n.a.
Tentative parcel map	$5,511	n.a.
Tentative tract map	$7,086	n.a.
Placentia-Linda School District fee	$6,400	$3,200
Park in-lieu fee (City)	$4,978	$3,628
County Sanitation District fee	$4,081	$2,399
County Library Fee	$1,820	$1,120
Affordable housing impact fee (City)	$2,625 - $5,250	$2,625 - $5,250
Total per unit	**$21,800-24,425**	**$13,483-16,108**

[1] Based on a 2,000-sq.ft. single-family house.
[2] Based on a 1,000-sq.ft. apartment in a 20-unit project.
Source: City of Placentia, 2021

The development fees associated with each project is dependent on the housing type, density, intensity of use, and location. In addition to these direct fees, the total cost of development is contingent on the project meeting the City's policies and standards, as well as the project applicant submitting necessary documents and plans in a timely manner.

The estimated total development and impact fees for a typical 2,000 square foot single-family home on a 9,000 square foot lot can range from $21,800 to $24,425. The estimated total development and impact fees for a typical multi-unit residential project with 20 units averaging 1,000 square feet a unit can range from $269,660 to $322,160.

These estimates are illustrative in nature and actual costs are contingent upon unique circumstances of individual development project applications. Considering the cost of land in Placentia, and the International Code Council (ICC) estimates for cost of labor and materials, the combined costs of permits and fees range from approximately 5.7 percent to 6.9 percent of the direct cost of development for a

single-family residential project and 3.2 percent to 3.6 percent for a multi-family residential project. Direct costs do not include, landscaping, connection fees, on/off-site improvements, shell construction or amenities, therefore the percentage of development and impact fees charged by the City may be smaller if all direct and indirect costs are included.

An estimate of planning and development fees for typical single and multi-family developments in nearby jurisdictions are provided below for reference:

1. Anaheim: Single-family unit ($30,527 to $32,887), Multi-family ($13,735 to $13,888 per unit)
2. Brea: Single-family unit ($29,679), Multi-family ($16,446 per unit)
3. Fullerton: Single-family unit ($29,739), Multi-family ($19,945 per unit)

Based on industry standards, the City's 2022 fee study, and a comparative analysis with other jurisdictions in the region, the City has determined that planning and development fees are standard, necessary, and do not pose a constraint on the development of housing at any income level.

Local Processing and Permit Procedures

Considerable holding costs can be associated with delays in processing development applications and plans. Three levels of decision-making bodies govern the review process in Placentia: The Zoning Administrator, the Planning Commission and the City Council.

The single-family residential zones are R-A and R-1. As shown in **Chapter 3**, individual single-family units are permitted by-right in R-A, R-1, R-2, RPC, PUD, SP-6, SP-7, and SP-8.

Development Plan Review (DPR) Requirements

Multi-family developments of 5 or more units are subject to Development Plan Review (DPR) approval by the Planning Commission in the R-2, R-G, R-3, SP-3, SP-4, SP-7 and SP-9 zones, and are subject to Planning Commission approval of a conditional use permit in the RPC zone.

Minimum standards for DPR approval are the following:

> (1) That the development, buildings or structures will conserve property values, promote the direction of building development according to this title, and will not be detrimental to the character of the zone in which the development is proposed, or to suitability of the zone for the particular uses proposed, nor to the character of buildings already erected in the district;
>
> (2) That the proposed development indicates adequate consideration for the other existing or contemplated uses of land in the general area and for the orderly development of the general area;

(3) That the design, functional plan and exterior architecture of the proposed structure will not be at variance with either the design, functional plan or exterior architecture of the structures already constructed or being constructed in the zone district and the immediate neighborhood of the proposed site as to cause a substantial depreciation of property values in the neighborhood;

(4) That the plans indicate the manner in which adjacent structures are protected against noise, vibration and other factors which tend to make the environment less desirable and that such methods are reasonably efficient and satisfactory;

(5) That all of the provisions of this title are complied with;

(6) That the following are so arranged that traffic congestion is avoided, pedestrian and vehicular safety and welfare are protected, and there will be no adverse effect on surrounding property:

(A) Building, structures and improvements,

(B) Vehicular, ingress and egress and internal circulation,

(C) Setbacks,

(D) Height of buildings,

(E) Location of service facilities,

(F) Walls and fences,

(G) Landscaping,

(H) Police and fire protection;

(7) That the proposed lighting is arranged so as to reflect the light away from adjoining properties;

(8) That proposed signs or outdoor advertising structures will not, by size, location, color or lighting, interfere with traffic or limit visibility or depreciate the value of adjoining property or the neighborhood and shall conform to the sign regulations, contained in Chapter 23.90;

(9) That the proposed landscaping shall be designed to enhance the visual and physical use of the property, screen deleterious uses, and in applicable development projects, will incorporate xeriscape principles in accordance with the provisions of Chapter 23.77;

(10) That a solid masonry wall shall be provided around the perimeter of all sites proposed for development. Additionally, all residential lots shall be provided with a solid masonry wall along the rear and side property lines. All walls shall conform to the height regulations contained in Section 23.81.100. Wall requirements may be specified or waived in part or total by a majority vote of the total membership of the planning commission or city council;

(11) That off-street parking facilities shall be provided in conformance to the requirements of Chapter 23.78, and shall be designed in such a manner as to provide convenient access to all buildings;

(12) That there shall be a 10-foot landscape buffer containing evergreen trees wherever a commercial or industrial zone abuts a residentially zoned district. The evergreen trees shall be of a low-water consuming variety in accordance with the provisions of Chapter 23.77;

(13) That there shall be provisions for trash collection areas within 100 feet of each building. Said trash collection areas shall be constructed in accordance with the standard plans on file in the office of the chief building official.

Analysis of Development Review Procedures (DPR) Requirements

DPR requirements were analyzed to determine if potential constraints exist. Analysis of the minimum standards (1) one through (4) four do not provide objective metrics and could be considered as subjective standards. This could have the effect of reducing approval certainty and introduce a constraint to the development of housing.

To increase project approval certainty and mitigate potential constraints that may be introduced by standards (1) one through (4) four of the Development Review Procedures minimum standards, the City has added Program 1.6 (Development Processing System Review) to the Housing Plan. This Program is intended to introduce more objective requirements.

DRP applications are reviewed by the Planning Commission at a public hearing. Notice of the hearing is mailed or delivered at least ten days prior to the hearing to the owner of the subject real property or the owner's duly authorized agent, the project applicant, each local agency that provides facilities and services whose ability to provide those services may be significantly affected, and all owners of real property as shown on the latest equalized assessment roll that are within 300 feet of the exterior boundaries of the proposed project.

The planning commission shall approve the development application only if all of the following findings are made:

(1) The project meets or exceeds the minimum standards listed above; and

(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.

The decision of the Planning Commission may be appealed to the City Council by the project applicant, any interested person, or any City Council member within 10

calendar days. While the City Council has not disapproved a project due to an appeal from interested parties, the City acknowledges that this may delay the DPR. The City Council can only deviate from the Planning Commission's decision if they make a determination that the proposed development meets the standards outlined above.

The City has added Program 1.6 (Development Processing System Review) to the Housing Plan to establish an objective review procedures and findings. Once the amendments to the DPR minimum standards are adopted, interested persons or City Council members will not be able to appeal based on the existing subjective standards. These amendments will mitigate any potential constraints that appeals may pose to the development of housing. The time required to process a project varies depending on the given project's size and complexity and the number of actions and/or approvals required to complete the process. Both single-family residential and multi-family residential developments typically take between 2 and 4 months for total entitlement and permit processing. Table 3-10 provides a summary of the most common steps in the entitlement process. Not every project is required to follow all the steps outlined in the table. In addition, some of the approval procedures can run concurrently.

The amount of time between a project's approval and submittal of an application for building permits varies, depending upon a variety of factors and is controlled by a project applicant. While the City makes every effort to streamline permitting processes, an applicant's individual circumstances. The factors may include:

- Funding and Financing
- Seasonal factors
- Size of project
- Type of Construction
- Lease, Contractual considerations
- Engineering
- Design and Architectural considerations

Typical timelines range from a few days to a few weeks. If a project is small and uncomplicated, timelines will average a few days. For larger-scale, highly specialized construction, timelines between entitlements and building permits can range from a few weeks to one year for more complex projects.

Overall, the average time between entitlements and building permit submittal ranges from one week to two months. The City views the longer time period as typical for larger, more complex projects. The City does not see these average timelines as a hinderance to the construction of housing. In most all cases, the timeline from receiving approval to submitting for building permits is solely dictated by the project applicant and not constrained by any requirements placed upon the applicant by the City.

While these development review requirements and procedures have not had a significant adverse impact on the cost and supply of housing in Placentia, Program 1.6

in the Housing Plan includes ongoing review of existing procedures to determine if they create an unwarranted constraint to housing development, particularly for affordable housing. Pursuant to this program, in 2017 the City adopted Old Town Development Standards including a sub-area allowing high-density housing by-right without a public hearing, reducing development processing timeframes, allowing housing at a density up to 65 dwelling units per acre. The City will continue to monitor processing procedures and timelines and modify them as necessary to encourage affordable housing development.

Table 3-10– Approximate Development Timelines

Procedure		Processing Time
Initial Contact	Check Requirements: Zoning, General Plan, Use Permit, Variance Tentative Map, Development Plan Review, CEQA	1-3 days
Preliminary Review	Conceptual Plan Submitted: Circulation, Traffic, Parking, Street Improvements, Building Elevations, Signs, Landscaping, CEQA requirements	1-2 weeks
Formal Submittal	Planning Commission Package: Filing Fee, CEQA (Exemption, Negative Declaration, EIR), Site Plan, Preliminary grading plan, Conceptual landscape plan, building elevations, floor plan	4 weeks
Planning Commission Hearing	Input from staff, applicant and public. (Decisions include condition of approval and standard development requirements	1 day
City Council Hearing (if required)	Same package as submitted to the Planning Commission	3 weeks
Submittal of Working Plans (First Check)	All drawings are reviewed for compliance with city design standards and policies, conditions of approval, specific details not included in conceptual plans. Drawings Submitted include engineering plans (Grading and street improvements, sewer, storm drains and utility plans and details) and Building Plans (Structural, electrical, plumbing, heating and ventilation, and air conditioning plans; soil test and reports; structural and energy calculations; landscape and irrigation plans; fence and wall plans; sign plans; and lighting plans).	2-4 weeks
Submittal of Working Plans (Second Check)	All resubmitted plans are reviewed to ensure corrections are completed and all plans consent with each other.	2-4 weeks
Issuance of Permits	Permits are issued after final map is approved and bonds are posted, grading permit issued.	1 day

Source: City of Placentia, 2021

Environmental and Infrastructure Constraints

Environmental Constraints

Environmental hazards affecting housing units include geologic and seismic conditions, which provide the greatest threat to the built environment. While the following hazards may impact future development of residential units in the city, they do not preclude development commensurate with the City's assigned share of regional housing needs.

1. Seismic Hazards

Similar to most southern California cities, Placentia is located within an area considered to be seismically active. No faults have been identified within the City limits. There are six faults within close proximity to Placentia: Whittier-

Elsinore, Norwalk, Newport-Inglewood, Sierra Madre, Palos Verdes and San Gabriel. The Whittier-Elsinore fault is located approximately 1,000 feet to the north of Placentia and is able to produce a seismic event of magnitude 6.0 or greater. The impact of earthquakes on Placentia depends on several factors: the particular fault, fault location, distance from the City, and magnitude of the earthquake. Some areas of the City may experience liquefaction and ground failure during extreme shaking. As part of the City's development review process, future residential projects would be required to prepare geotechnical studies to abate and potential hazards.

2. Flooding

Portions of the City are located within 100-year flood zones. Inundation is projected to be most significant in the southwest portion of Placentia. Flooding within Placentia as a result of a 100-year flood would be expected to reach an average depth of only one foot and only at specific locations.

Prado Dam is a flood control and water conservation project constructed and operated by the U.S. Army Corps of Engineers, Los Angeles District. The dam is located approximately 11 miles east of Placentia, on the Santa Ana River, west of the City of Corona. In the event of dam failure, the flood wave would reach Placentia in approximately 40 to 45 minutes with possible surge wave depths ranging from nine to twenty-three feet.

Carbon Canyon Dam provides flood control in and around the drainage basin. The dam is located approximately one-mile north of Placentia. In the event of the dam's failure at maximum capacity, water would reach the northerly City limits in approximately two minutes with depths ranging from 10 to 30 feet. In the event of a dam failure at either the Prado or Carbon Canyon Dams, the City's emergency evacuation plan would be implemented and emergency service personnel would respond to any hazards.

3. Toxic and Hazardous Wastes

Although definitions of hazardous materials vary, federal, state, and county agencies have generally recognized toxic substances as chemicals or mixtures whose manufacture, process, distribution, use or disposal may present an unreasonable risk to human health or the environment. The OCFA's Hazardous Materials Area Plan provides a detailed hazard analysis of chemical hazards within Orange County.

4. Transportation of Hazardous Materials

Transportation routes through and around the City are used to transport hazardous materials from suppliers to users. Major transportation routes within Placentia include surface streets and railroads. Additionally, the SR-57 and SR-91 freeways are located adjacent to the city. Transportation accidents involving hazardous materials could occur on any of the routes, potentially

resulting in explosions, physical contact by emergency response personnel, environmental degradation, and exposure to the public via airborne exposure.

The Federal Department of Transportation (DOT) is the primary regulatory authority for the interstate transport of hazardous materials. The DOT establishes regulations for safe handling procedures (i.e., packaging, marking, labeling and routing). The California Highway Patrol (CHP) enforces the intrastate transport of hazardous materials and hazardous waste.

5. Hazardous Waste Management

The *Orange County Hazardous Waste Management Plan* provides policy direction and action programs to address current and future hazardous waste management issues that require local responsibility and involvement in Orange County. The Plan discusses hazardous waste issues and analyzes current and future hazardous waste generation in the County. The Integrated Waste Management Department (IWMD) of Orange County owns and operates three active landfills, four household hazardous waste collection centers (HHWCC) and monitors ten closed landfills.

The *California Health and Safety Code* (H&SC) establishes regulations requiring businesses within the city to complete a chemical inventory to disclose hazardous materials stored, used, or handled on site. The disclosure information is intended to assist emergency responders in planning for and handling emergencies involving hazardous materials. The main program objective is to safeguard the lives of emergency responders, the public, and to minimize property loss. The H&SC also requires a Business Emergency Plan (BEP) to assist in mitigating a release or threatened release of a hazardous material, and to minimize any potential harm or damage to human health or the environment. Disclosure of hazardous materials is updated annually. The Fire Prevention Department of the OCFA is responsible for the distribution and handling of disclosure forms. Additionally, the OCFA maintains the files of all chemical inventory information and business plans, which are made available for public inspection.

6. Fire Hazards

The City of Placentia is highly urbanized with no wildlands adjacent to areas zoned for residential use. There is minimal potential for fire related to brush or other natural materials. Fire hazards within the City may be associated with industrial uses, hazardous materials, and arson. The Placentia Fire and Life Safety Department provides fire protection services to Placentia. There are two fire stations located within the City limits.

7. Noise

Residential land uses are generally considered to be the most sensitive to loud noises. The principal noise sources in Placentia are the transportation systems. Roadways are the primary source of transportation-generated noise. The

Burlington North Santa Fe Railroad also runs through the city along the Orangethorpe Corridor. The Placentia Quiet Zone went into effect in 2007. Along the quiet zone, all trains are prohibited from using horns unless an engineer feels an emergency exists that threatens human or animal injury or property damage. The Orange County Transportation Authority also constructed several grade separation projects within the City, which further diminish the noise impacts of train traffic.

8. Other Known Environmental Factors

All candidate sites were analyzed for environmental constraints analyzed above as well as any known conditions that preclude or significantly impact development in the planning period. Examples of other known conditions include shape, size, access, property conditions, easements, contamination, and airport compatibility. The only factor that may impact the development of sites identified for moderate and above-moderate income households is parcel size. To address and mitigate this issue, the City has added **Program HE-1.18: Encourage and Facilitate Lot Consolidation** to encourage and facilitate lot consolidations of vacant and underutilized lots to create larger building sites for residential development.

Based on this analysis, the City determined that all candidate sites can feasibly develop housing due to the numerous commitments the City has made in the Housing Plan and do not experience any other known environmental constraints.

Infrastructure

Upon adoption of the Housing Element, the City distributed a copy to its water service providers. Both the Yorba Linda Water District and the Golden State Water Company have granted priority for service allocations to proposed developments that include housing units affordable to lower-income households in the City of Placentia. The City maintains and operates the local sanitary sewer collection system and per State law, Placentia complies with the requirement under Government Code Section 65589.7 granting priority for service allocations to proposed developments that include housing units affordable to lower-income households in the City.

1. Sewer

The City maintains and operates the local sanitary sewer collection system, which includes gravity sewers and lift stations. The Orange County Sanitation District (OCSD) collects, treats, and disposes of the wastewater from central and northwestern Orange County, including Placentia. Wastewater generated by the City is transported through trunk lines to OCSD's Plant No. 1 (located at 10844 Ellis Avenue, Fountain Valley) and Plant No. 2 (located at 22212 Brookhurst Street, Huntington Beach) where it receives primary and secondary treatment. The City's future housing needs would generate increased

wastewater flows, placing greater demands on wastewater treatment and collection. The City requires individual assessments of potential impacts to wastewater facilities to ensure future development does not impact the ability to serve future needs Current and projected infrastructure capacity is adequate to serve projected housing development during the planning period.

2. Water

The City of Placentia is served by the Yorba Linda Water District and the Golden State Water Company. According to Urban Water Management Plans, water supply is expected to be sufficient to accommodate projected housing development during the planning period.

3. Dry Utilities

Residential utilities such as electricity, telephone and internet service are available in all residential areas of the city. Current and projected infrastructure capacity is adequate to serve projected housing development during the planning period.

On- and Off-Site Improvements

On- and off-site improvements may be required in conjunction with future housing development based on the location of the project and existing infrastructure. Dedication and construction of streets, alleys and other public easements and improvements may be required to maintain public safety and convenience. Table 3-11 summarizes the City's standards for roadway and right-of-way widths.

Table 3-11 – Street Widths

Streets	Right-of-Way Width (in feet)	Pavement Width Curb Face to Curb Face (in feet)	Median Island Width (in feet)
Major street	120	104	14
Primary or modified major street	100	84	14
Secondary or modified primary street	80	64	N/A
Modified secondary street	64	52	N/A
Local industrial street	60	44	N/A
Local residential/ commercial street	60	40	N/A
Minor residential street - 500 feet or less in length	56	36	N/A
Minor residential street - looped 800 feet or less	56	36	N/A
Minor residential street - cul-de-sac, 500 feet or less serving 12 lots or less	56	36	N/A
Cul-de-sacs residential/commercial	50 radius	40 radius	N/A
Cul-de-sacs industrial	50 radius	44 radius	N/A

Source: City of Placentia, Municipal Code

Minimum sidewalk widths are as follows:

- Residential district- 4.5 feet
- Commercial district- Minimum 7.5 feet
- Industrial district- Minimum 5.5 feet

New subdivisions may be required to dedicate land for public facilities such as schools, parks, libraries, fire stations or other public uses based on the land requirements for such facilities in the adopted General Plan. Tree well easements are required on major, primary, and secondary streets in accordance with the City's Municipal Code. Trees are installed by the developer in accordance with the master plan of street trees and City standards.

The on- and off-site improvements required by the City are necessary to adequately provide the infrastructure and public facilities that support housing development. These requirements ensure public safety and health; and are not jeopardized by increased development and do not unduly hinder housing development.

3.3 Non-Governmental Constraints

Land Prices

Land costs influence the cost of housing. Prices are determined by a number of factors, most important of which are land availability and permitted development density. As land becomes less available, the price of land increases. The price of land also increases as the number of units permitted on each lot increases. In Orange County, undeveloped land is limited and combined with a rapidly growing population land prices have increased. Prices for vacant residential land in Placentia are estimated to be $35 to $50 per square foot.

Construction Costs

Construction cost is affected by the price of materials, labor, development standards and general market conditions. The City has no influence over materials and labor costs, and the building codes and development standards in Placentia are not substantially different than most other cities in Orange County. Construction costs for materials and labor have increased at a higher pace than the general rate of inflation recently according to the Construction Industry Research Board. Typical residential construction cost is estimated to be $150 per square foot or more depending on quality and building type.

Financing

Mortgage interest rates have a large influence over the affordability of housing. Higher interest rates increase a homebuyer's monthly payment and decrease the range of housing that a household can afford. Lower interest rates result in a lower cost and lower monthly payments for the homebuyer.

The City is not aware of any local constraints to the availability or cost of residential financing. While mortgage underwriting standards appear to have become stricter in the wake of the mortgage crisis during the Great Recession, interest rates are at historic low levels resulting in lower mortgage costs for well-qualified borrowers.

Numerous lending institutions are active in the northern Orange County area where Placentia is located. While interest rates are very low, the significant increase in housing prices in the past few years poses a major barrier to low- and moderate-income homebuyers.

Other Non-Governmental Constraints

Some neighborhoods in the city are located within a homeowners' association and are subject to conditions, covenants and restrictions ("CC&Rs") that could add time and complexity to the residential development process, such as through private design review requirements.

In recent years there have been no requests to develop residential projects at significantly lower densities lower than allowed by zoning regulations, and no significant delays between the approval of entitlements and building permit applications have been noted.

Chapter 4: Housing Plan

This section describes Placentia's goals, policies, programs, and objectives for the 2021-2029 Planning Period related to the preservation, improvement and development of housing in the City. These policies and actions address current and future housing needs, meet the requirements specified by state law and consider the input by residents and stakeholders. While the plan provides a comprehensive approach to address housing issues throughout the City, the emphasis is on actions enabling the City to increase and maintain housing opportunities affordable to extremely-low-, very-low-, low- and moderate-income households.

4.1 Housing Goals and Programs

Placentia's housing goals focus on four policy priority areas. Goals are provided to address each of these areas and programs are developed to support and implement each goal. The four priorities are:

1. Developing and Maintaining Housing Supply and Variety
2. Promoting Equal Housing Opportunity
3. Promoting Housing and Neighborhood Preservation and Conservation
4. Encouraging Housing Cooperation and Coordination

Goal HE-1: Housing Supply and Variety

Develop and maintain an adequate supply of housing that varies sufficiently in cost, size, type, and tenure to meet the economic and social needs of existing and future residents within the constraints of available land.

Program HE-1.1: Manufactured Housing and Mobile Homes

The City of Placentia recognizes the importance of existing manufactured housing and mobile homes as a source of affordable housing for the City's residents. The City shall continue to support the maintenance and improvement of the City's existing mobile home parks through rehabilitation grants, if available. In addition, mobile home parks are zoned "MHP" and a zone change would be required to convert these parks to other uses, which incentivizes their preservation.

Objective:	Preserve existing mobile home parks and manufactured housing
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Annually Monitor funding opportunities for rehabilitation grants on an annual basis and apply for funding as opportunities arise. In 2022, staff reviewed the use of manufactured housing and continues to encourage manufactured housing use through contacting distributors for information and meeting with manufacturers and developers who specialize in this housing.

Program HE-1.2: Locate Housing Near Transportation, Employment and Services

To increase livability within new housing developments, the City shall encourage and coordinate the location of major housing developments, particularly affordable housing and multi-family units, near transportation options, major employment centers and services. The City will conduct annual outreach with developers to identify development opportunities, with an emphasis on sites near transportation, employment and services. The City, through a sustainability grant provided by the Southern California Association of Governments, adopted a transit-oriented development (TOD) zone south of the future Metrolink station which allows densities up to 95 du/acre. The TOD provides for residential uses in proximity to the transit station as well as entertainment, retail and office spaces. The development regulations for the TOD area encourage and facilitate multi-family residential development and live-work units. The City will also encourage housing near transportation, employment, and services through Program HE-1.15: Transit-Oriented Development. The City will further expand opportunities for housing near high-quality public transportation by expanding the TOD zone (see Program 1.8).

Objective:	Encourage new housing in proximity to transportation, employment and services
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	The City will conduct annual outreach with developers to identify development opportunities, with an emphasis on sites near transportation, employment and services.

Program HE-1.3: Pursue County, State, and Federal Housing Funds

Monitor availability of county, state, and federal housing programs and pursue available funds on an annual basis. The City shall encourage and coordinate with housing developers and service organizations to obtain funds for affordable housing projects, initially through pre-application meetings and throughout project development. The City shall also make funding information available to all proposed developers in the City through informational materials distributed through the City's website and at pre-application meetings. The City will conduct annual outreach and consultation with developers to identify development opportunities.

Objective:	Increase use of county, state and federal funds
Responsible Agency:	Development Services
Funding Source:	County, state and federal programs
Implementation Schedule:	Monitor funding opportunities on an annual basis and apply for funding as opportunities arise. The City will conduct annual outreach with developers to identify development opportunities.

Program HE-1.4: Emergency Shelters, Low Barrier Navigation Centers, Transitional and Supportive Housing and Agricultural Employee Housing

Emergency shelters. To address the needs of homeless persons, the City purchased a property at 731 S. Melrose Street and constructed a 100-bed homeless shelter, which opened in March 2020. The City will continue to encourage these types of housing opportunities. To ensure compliance with recent changes to State law (AB 2339), ~~a~~ Code amendments will be processed by June 2024 to revise emergency shelter standards. ~~Separation requirements for emergency shelters will also be modified consistent with current law.~~

Chapter 654, Statues of 2022 (AB 2339), now includes new requirements on how cities must plan for emergency shelters and ensure sufficient capacity for low-income housing. AB 2339 requires that zoning designations identified to allow emergency shelters as a permitted use without a conditional use or other discretionary permit must allow other residential uses. This could include zones that allow mixed uses that permit residential. The City will amend the Zoning Code to allow other residential uses in the Manufacturing (M) District.

With the existing 100-bed emergency shelter, the City estimates that the remaining emergency shelter need is approximately 50 to 150 beds, depending on the season. The M District includes approximately 200 parcels encompassing several hundred acres and provides ample opportunities for additional shelters. Many of these parcels have existing

buildings that could be adapted for shelter use. Typical parcel sizes are between 1 and 2 acres in size.

AB 2339 allows jurisdictions to adopt proximity standards, provided that emergency shelters are not required to be more than 300 feet apart. The City's current Zoning Code prohibits emergency shelters on parcels within 300 feet from any residential use or residentially-zoned property, public or private park, or public or private kindergarten through 12th grade curriculum school, as measured from the closest property line. In addition, homeless shelters shall be located at least 300 feet from any other homeless shelter, as measured from the closest property line. Program 1.4 in the Housing Program provides for an amendment to the City's Zoning Code to ensure compliance with all proximity provisions of AB 2339.

The current emergency shelter development standards and conditions are not fully compliant with Chapter 654, Statues of 2022 (AB 2339) and will be amended to comply with State law.

The City will amend the Zoning Code to ensure compliance with all provisions of AB 2339, including definitions, parking standards, zoning and all development standards, including spacing requirements.

Low barrier navigation centers. In 2019 the State Legislature adopted AB 101 establishing requirements for local regulation of *low barrier navigation centers*, which are defined as "Housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low barrier navigation centers meeting specified standards must be allowed by-right in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. A Code amendment will be processed by June 2024 to update City regulations consistent with this requirement.

Transitional and supportive housing. California Government Code Sec. 65582 establishes the following definitions for transitional and supportive housing:

> *Transitional housing* means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.
>
> *Supportive housing* means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining

the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. "Target population" means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500)of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

State law requires that transitional and supportive housing be permitted as residential uses that are subject only to those regulations that apply to other residential uses of the same type in the same zone. In addition, AB 2162 of 2018 (Government Code §65583(c)(3)) further requires that supportive housing development projects meeting specific criteria must be allowed by-right in all zones allowing multi-family development, including mixed-use and nonresidential zones. The City will update regulations for transitional and supportive housing consistent with State law by June 2024.

Agricultural employee housing. California Health & Safety Code Sec. 17021.5 requires agricultural employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone, and requires agricultural employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. The City will amend zoning regulations for agricultural employee housing by June 2024 consistent with these provisions of State law.

Objective:	Encourage the provision of emergency shelters, low barrier navigation centers, transitional and supportive housing and agricultural employee housing consistent with State law
Responsible Agency:	Development Services
Funding Source:	General Fund (including funds from County, State and Federal governments)
Implementation Schedule:	Code amendments by June 2024

Program HE-1.5: Infrastructure Provision

To ensure that requirements for infrastructure provision are not considered an undue constraint to residential development, the City shall review infrastructure provision costs and procedures on an annual basis.

Based on its findings, the City shall work with housing developers to reduce costs and streamline infrastructure-financing programs. In partnership with SCAG, the City Council recently approved formation of an EIFD in the Old Town Zoning District that will result in $8.2 million in funding for infrastructure related to transit-oriented development. The City will review available infrastructure grant funding annually and apply for grants when the City is eligible.

Objective:	Reduce constraints associated with infrastructure
Responsible Agency:	Development Services/Public Works/ Engineering
Funding Source:	General Fund, CDBG, Capital Improvements Program
Implementation Schedule:	Annual review, revisions as appropriate

Program HE-1.6: Development Processing System Review

The City shall continue to review existing procedures for project review, processing and building plan check to determine if the procedures are a constraint to housing development. Based on these findings, the City shall develop programs and procedures to minimize processing timelines and mitigate subjective findings for extremely-low-, very-low-, low- and moderate-income housing developments. In 2017 the City adopted Old Town Development Standards including a sub-area allowing high-density housing by-right without a public hearing, reducing development processing timeframes, allowing housing at a density up to 65 dwelling units per acre. The City shall monitor processing timelines and modify as needed to further encourage affordable housing development.

The City will also prepare written SB 35 review procedures and objective standards to minimize constraints on housing supply and affordability for eligible projects. Consistent with new transparency laws, zoning, development standards and fees will continue to be posted on the City website.

Objective:	Minimize development review/processing time
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Prepare SB 35 procedures and amend the Municipal Code to mitigate subjective findings in the DPR by October 2024. Continue to post zoning, development standards and fees on the City website. Ongoing, Annual Review

Program HE-1.7: Vacant and Underutilized Land Inventory

To provide additional areas for housing development and maximize the potential for a variety of housing types, the City will identify vacant and underutilized sites for development of residential units. Additionally, the City will maintain and update an inventory of these sites on an annual basis. The City will provide information about these sites to housing developers through printed materials available at City Hall and electronically on the City's website.

Objective:	Inventory of vacant and underutilized land
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Annual and ongoing update of inventory

Program HE-1.8: Adequate Sites for Housing Development

Through the Regional Housing Needs Assessment (RHNA) process, the City has been assigned a total housing need of 4,398 dwelling units during the 2021-2029 timeframe. The sites analysis (Appendix B) determined that there is currently a shortfall of potential lower-income and above moderate-income housing capacity compared to the City's identified need.

To ensure the availability of adequate sites to accommodate this assigned need, the City shall identify and rezone at least 14 acres and potentially up to 28 acres of land with allowable densities from 30 to 95 units/acre to accommodate the shortfall of lower-income and above moderate-income sites compared to the RHNA allocation as identified in Appendix B.

The existing TOD area is proposed to be expanded to the west, creating capacity for more than 1,100 multi-family units. This area is currently zoned Manufacturing and encompasses approximately 14 acres. The potential capacity for this TOD expansion area assumes an allowable density of 95 units/acre and an average yield of 82 units/acre based on recently approved projects in the existing TOD area.

The R-3 zoning district previously allowed a maximum density of 25 units/acre but was amended in December 2022 to allow a maximum density of 30 units/acre. While all properties in the R-3 district allow up to 30 du/acre, only the most likely sites for development are listed in Table B-5. With a conservative 10% reduction from the proposed allowable density of 30 units/acre, these parcels would have a total capacity of approximately 363 units, an increase of 61 potential units compared to the estimated capacity under current regulations.

Rezoned sites shall comply with the requirements of Government Code §65583.2(h) and (i).

The City shall encourage the development of housing through financial incentives (such as land write-downs; assistance with on- or off-site infrastructure costs, fee waivers, or deferrals to the extent feasible); expedited entitlement review; in-kind technical assistance; and other regulatory concessions or incentives. The City will conduct annual outreach and consultation with developers to identify development opportunities. The City will also provide incentives for lot consolidation (see Program HE 1.18).

For any non-vacant sites identified in Appendix B that were listed in a previous Housing Element sites inventory, or vacant sites that were listed in two previous consecutive inventories, residential development will be allowed by-right when a housing project provides at least 20 percent of the units affordable to lower-income households in compliance with Government Code §65583.2(c),

Development on any site listed in Appendix B that proposes to demolish existing housing units shall be subject to a policy requiring the replacement of affordable units as a condition of any development on the site pursuant to Government Code §65583.2(g)(3). Replacement requirements shall be consistent with those set forth in §65915(c)(3).

To facilitate housing development, zoning regulations, development standards and fees will be posted on the City website, and the City will establish written procedures for streamlined review consistent with Government Code §65913.4.

Objective:	Rezone sufficient land with appropriate densities to accommodate the RHNA allocation
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Rezoning adequate sites by December 2023

Program HE-1.9: Monitoring of Constructed Units Based on Income-Level

To effectively track performance during the planning period, the City will track the income levels of units constructed by including an estimate sales/rental value at the time of unit occupancy. This value will be included as part of the building permit application to reflect the assumed market value of the home constructed.

Objective:	Tracking performance by income level.
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Completed. Forms have been developed to gain the information at the time a building permit is issued.

Program HE-1.10: Encourage Development of Housing for Extremely-Low-Income Households

The City will encourage the development of housing units for households earning 30 percent or less of the Area Median Income for Orange County. The City shall work with non-profit developers and service providers with the specific emphasis on providing family housing and non-traditional housing types such as single-room-occupancy units, transitional housing and units serving temporary needs by providing in-kind technical assistance and support in seeking funding. The City shall encourage housing for extremely-low-income households through incentives and activities such as technical assistance, expedited processing and flexibility in development standards. The completion and occupancy of 49 very-low-income units in 2020 (the Veteran's Village development) was an example of the successful implementation of this program in the previous planning period. The City will continue to review other incentive programs and pursue partnerships with non-profit developers regarding affordable housing opportunities. The elimination of redevelopment set aside funds severely restricts this effort.

Objective:	616 ELI units
Responsible Agency:	Development Services
Funding Source:	General Fund//HOME/CDBG/LIHTC
Implementation Schedule:	Annual consultation with affordable housing developers, or as development opportunities arise

Program HE-1.11: Density Bonus Ordinance

The City of Placentia provides for a density bonus, incentives and concessions to facilitate and encourage the development of lower-income housing units through its Density Bonus Ordinance. To ensure that City regulations are consistent with recent changes to State law, the City will process an amendment to the ordinance in 2022. The City will inform housing developers of the Density Bonus Ordinance through informational materials distributed at City Hall, on the City's website and during pre-application meetings.

Objective:	Update the Density Bonus Ordinance consistent with State law
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Code amendment by December 2023

Program HE-1.12: Development of Senior Housing

The City recognizes the unique character of the senior population. Seniors typically have specialized housing needs and fixed incomes that may require housing units not generally included in market rate housing. In 2020 the City Council approved entitlements for a 64-unit affordable senior housing development at 1314 N. Angelina Drive. The City shall continue to encourage the development of a wide range of housing choices for seniors through incentives (e.g., financial assistance, parking reductions, regulatory waivers). These may include independent living communities and assisted living facilities with on-site services and access to health care, nutrition, transportation and other appropriate services.

Objective:	Senior Housing Development
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing, The City will conduct annual outreach with developers to identify development opportunities for housing for senior households through activities such as technical assistance, assistance in seeking funding annually, expedited processing and flexibility in development standards.

Program HE-1.13: Development of Housing for Larger Families

The City recognizes that providing appropriately-sized housing units for large families is important to improving livability, reducing instances of overcrowding and minimizing deferred maintenance issues. The City shall encourage incorporation of units with 3 or more bedrooms in for-sale and rental housing developments to accommodate the needs of larger families through activities such as technical assistance, expedited processing, and flexibility in development standards.

Objective:	Housing units with 3+ bedrooms
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing, The City will conduct annual outreach with developers to identify development opportunities for housing for large family households through activities such as technical

	assistance, assistance in seeking funding annually, expedited processing and flexibility in development standards.

Program HE-1.14: Housing for Persons with Special Needs

Housing to accommodate persons and families with special needs is a high priority for Placentia. In 2018 the City approved the Veteran's Village development with 49 very-low-income units for veterans who are homeless or at risk of homelessness. The project also provides services such as vocational training, mental health counseling, job placement, etc. The City shall continue to work with non-profit housing developers, service providers and the County of Orange to encourage and support the development of housing for special needs households, including persons with developmental disabilities, through activities such as technical assistance, assistance in seeking funding annually, expedited processing and flexibility in development standards. The City will conduct annual outreach and consultation with developers to identify development opportunities.

Objective:	Increased availability of housing units for households with special needs
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Monitor funding opportunities annually; ongoing. The City will conduct annual outreach with developers to identify development opportunities for housing for special needs households, including persons with developmental disabilities, through activities such as technical assistance, assistance in seeking funding annually, expedited processing and flexibility in development standards.

Program HE-1.15: Transit-Oriented Development

Transit-Oriented Development (TOD) is a compact mixed-use or commercial area designed to maximize access to public transport, and often incorporates features to encourage transit ridership. Consistent with federal, state and regional policies focusing on concentrated growth around transit, in 2017 the City Council adopted the TOD Packing House zoning district, which allows densities up to 95 du/acre near the future Metrolink Station. Since then, 633 multi-family units have been entitled in the TOD District. Also in 2017, the Old Town Zoning District was adopted,

which includes a sub-area allowing high-density housing by-right up to 65 units per acre. The City continues to work with developers on TOD opportunities connected with the forthcoming Placentia Metrolink Station. Incentives include the utilization of City-owned property as well as reduced parking requirements and densities up to 95 dwelling units per acre for the TOD Zone and up to 65 dwelling units per acre for the Old Town Zone. The City shall encourage Transit-Oriented Developments through incentives that may include financial assistance, density bonus, and regulatory waivers. (see also Programs 1.2 and 1.8). To expand housing opportunities, an amendment to the TOD zone will processed to extend the district as described in Program 1.8 and Appendix B. As candidate and non-candidate sites develop, the City will continue to monitor development trends and if residential development is not occurring as anticipated, the City will adjust development assumptions or propose residential requirements in all Old Town subareas, similar to the TOD Zone.

Objective:	Encourage transit-oriented development
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing; expand TOD zone boundaries by December 2023

Program HE-1.16: Single-Room Occupancy (SROs)

Single-room-occupancy developments (SROs) provide housing opportunities for lower-income individuals, persons with disabilities, and the elderly. State law requires that jurisdictions identify zoning districts available to encourage and facilitate a variety of housing types, including SROs. The Zoning Code allows SRO developments in the R-3 and C-2 districts. The City will continue to encourage development of SROs through a variety of methods including financial assistance, density bonus, and regulatory concessions.

Objective:	Facilitate development of SROs
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing, The City will conduct annual outreach with developers to identify development opportunities for SROs through activities such as financial assistance, density bonus, regulatory concessions, expedited processing and flexibility in development standards.

Program HE-1.17: Residential Parking Requirements

The City's greatest potential for affordable housing development exists in the area near the Metrolink station. As part of the new TOD zone for this area, the City adopted parking standards based on the realistic demand and opportunities for shared parking in TOD and mixed-use developments, especially new housing units affordable to lower- and moderate-income households. The City will also initiate an amendment to the Code to reduce multi-family parking standards for small (i.e., studio or 1-bedroom) units in the R-3 district to one covered space per unit (garage or carport) to reduce this potential constraint.

Objective:	Revise existing multi-family parking standards in the R-3 district
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Code amendment by October 2023

Program HE-1.18: Encourage and Facilitate Lot Consolidation

The City will encourage and facilitate consolidation of vacant and underutilized lots to create larger building sites for residential development through a lot consolidation density incentive that allows a 5% density increase when parcels totaling at least 0.5 acre are consolidated, and a 10% density increase when parcels totaling at least 1.0 acre are consolidated. This incentive program will be publicized to developers and other interested parties through printed materials available at City Hall and electronically on the City's website.

Objective:	Encourage/facilitate lot consolidation
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Code amendment by December 2023

Program HE-1.19: Accessory Dwelling Units

Accessory dwelling units (also known as ADUs, second units or granny flats) can help to address a portion of the city's housing needs, particularly for small lower-income households. City ADU regulations were updated in 2020 consistent with State law. The City will continue to monitor legislation and revise regulations as necessary to ensure conformance with current law.

The Orange County Council of Governments (OCCOG) is currently preparing an "ADU Toolkit" that will be available to all jurisdictions in the county. The City will utilize the ADU toolkit, which is expected to include standard plan examples, and other ADU resources to encourage ADU production. In addition, the City will explore and pursue ADU funding annually, modify development standards and reduce fees beyond the

minimum requirements of State law, prepare pre-approved plans, and provide homeowner/applicant assistance tools.

The City will establish and maintain an ADU monitoring program during the planning period that tracks ADU development every other year, including affordability levels and deed-restricted affordable units. The City will also conduct reviews of ADU development during the 2021-2029 planning period to evaluate if production of ADU's in the City is trending to achieve production estimates, beginning in January 2025. Should ADU development not occur at a rate consistent with assumptions of the 2021-2029 Housing Element, the City will, within six months, review and identify implementable programs to further encourage ADU production. The City may conduct additional rezoning activity, as deemed appropriate, if evaluations determine rezones will encourage increased ADU production.

Objective:	Encourage ADU production
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Monitor and pursue ADU funding opportunities annually; review and update ADU regulations annually; Evaluate if the City is achieving its production estimates, beginning in January 2025, should ADU development not occur at a rate consistent with assumptions of the 2021-2029 Housing Element, the City will, within six months.

Program HE-1.20: Annual Review of Site Requirements

The City reviewed development standards such as yard requirements, lot coverage and size, lot size, and building height limits and found that they have not to constrained developments in the City. However, in order to identify potential constraints to development, the City will review its Building and Planning site requirements annually to identify potential constraints to development and make necessary changes if constraints are identified that preclude property owners from developing at the maximum stories and density permitted in their respective zoning.

The City will amend height requirements for developments in zones that allow multifamily housing to at least 36 feet, with no exceptions by June 2025.

Objective:	Mitigate potential constraints caused by development standard requirements
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	The City will amend height requirements for developments in zones that allow multifamily housing to at least 36 feet, with no exceptions by June 2025.

Goal HE-2: Equal Housing Opportunity

Promote equal housing opportunities for all persons without discrimination regardless of race, religion, ethnicity, sex, age, disability, marital status or household composition.

Program HE-2.1: Support Regional and Local Fair Housing Efforts

The City will continue to disseminate information regarding fair housing in a variety of locations including City Hall, the City website and the library, and conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings. The City will continue to seek funding to support the Fair Housing Council of Orange County (FHCOC), which provides community education, individual counseling, mediation, and low-cost advocacy with the expressed goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire. The City will invite FHCOC to conduct annual fair housing outreach targeted to Placentia residents and landlords.

Objective:	Affirmatively further fair housing activities
Responsible Agency:	Development Services
Funding Source:	General Fund; grants if available
Implementation Schedule:	Annual fair housing outreach; Ongoing; The City will conduct continuous annual outreach with to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

Program HE-2.2: Section 8 Rental Assistance

The City will continue to provide referral services and information to residents regarding the Section 8 Rental Housing Assistance Program administered by the Orange County Housing Authority.

Objective:	Provide information regarding housing assistance
Responsible Agency:	Orange County Housing Authority
Funding Source:	HUD
Implementation Schedule:	Ongoing

Program HE-2.3: Minimize Constraints on Housing for Persons with Disabilities

The City will continue to implement the Reasonable Accommodation Ordinance, which provides relief from local regulations and permitting procedures that may have a discriminatory effect on housing for persons with disabilities. The City will review and revise its Municipal Code to be compliant with State law regarding reasonable accommodation procedures and group homes. Specifically, the City will revise their code to address the existing approval findings that reasonable accommodation requests will not, "create substantial adverse impact on surrounding land uses," and "Whether the accommodation will have only incidental economic or monetary benefits to the applicant, and whether the primary purpose of the accommodation is to assist with real estate speculation or excess profit-taking," as potential constraints to persons with disabilities. The City will also remove appeal processes for Reasonable Accommodation requests that are approved, and limit denial appeals to only the applicant. Revisions will establish objective requirements for reasonable accommodation to promote approval certainty. The City will revise their code to address the existing CUP requirement as constraint to permit group homes for seven or more persons. Revisions will establish objective requirements for group homes of seven or more people to promote approval certainty. The City will also provide information online and at City Hall on reasonable accommodations with respect to zoning, permit processing, and building laws .In addition, a Zoning Ordinance amendment will be processed in 2022 to update the definition of "family" consistent with State law.

Objective:	Minimize regulatory constraints on housing for persons with disabilities
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Code amendments by December 2023

Program HE-2.4: Comprehensive Housing Resource Directory

The City of Placentia will continue to coordinate with the County of Orange to publicize the County's Comprehensive Housing Resource Directory, which will be made available on the City's website and in print form at City Hall, the library and other public buildings.

Objective:	Housing Resource Directory
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing

Program HE-2.5: Equal Housing Opportunities and Affirmatively Furthering Fair Housing

The City of Placentia will advocate against discrimination in the sale, rental, or financing of housing based on race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability. Information and referrals regarding fair housing laws and rights will be posted on the City's website and in City Hall and other public buildings.

Pursuant to Government Code §8899.50(b), the City will continue to administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing and will take no action that is materially inconsistent with its obligation to affirmatively further fair housing. In addition, the City will:

- Ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application's compliance with all entitlement requirements.
- Accommodate persons with disabilities who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the applicable development regulations.
- Work with the County of Orange and the Fair Housing Council of Orange County to seek additional funding to implement the regional Analysis of Impediments to Fair Housing Choice and HUD Consolidated Plan, with the goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire.
- Facilitate public education and outreach by posting informational flyers on fair housing at public counters, libraries, and on the City's website, and support the FHCOC in providing fair housing information to residents and training to landlords on requirements under fair housing law, such as the acceptance of Housing Choice Vouchers.
- Conduct public meetings at suitable times, accessible to persons with disabilities, and near public transit. Resources will be invested to provide interpretation and translation services when requested at public meetings when feasible.
- Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

Additionally, the City will commit to the following actions:

- Review future policies and programs for potential restrictive practices that would limit diversity in the RCAAs.
- Affirmative marketing to increase diversity within the RCAAs.
- Establish specific incentives for the development of affordable units in RCAAs and high opportunity areas (including, but not limited to, permit streamlining and reduced fees).
- Aspire to integrate 50 households into existing RCAAs. Prevent non-RCAA areas from becoming RCAAs.

Objective:	Affirmatively Furthering Fair Housing
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing; Establish AFFH marketing program by June 2024.

Program HE-2.6: Affirmatively Further Fair Housing

Pursuant to AB 686, the City will affirmatively further fair housing by taking meaningful actions during the planning period in addition to resisting discrimination, that overcomes patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected classes, as defined by State law. Appendix D of the Housing Element contains the City's complete AFFH analysis. Concrete actions to address fair housing issues are contained throughout the City's policy program but Program HE-2.6 aims to capture all of these policies and actions.

Contributing Factors and Actions

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
Housing Mobility			
Availability of Affordable Housing	Disseminate information on the City's website and conduct community outreach meeting with local stakeholders and affordable housing developers to promote affordable housing development throughout the city and discuss other City-incentives to create affordable housing.	City-wide with emphasis on development in highest resource/ opportunity areas, higher income areas, and RCAAs	**Medium** Conduct workshop with development community every 12 months beginning in August 2024 with Mid-Cycle review of progress; if changes are deemed necessary, implement within 12 months of review. Metrics: First workshop by October 2024, mid-cycle

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
			review by October 2025, and revisions, if necessary, by October 2026. Reach at least 20 developers and target 100 residents during the planning period.
	Conduct marketing to increase to increase participation with the Housing Choice Voucher Program.	City-wide with emphasis on highest resource/ opportunity areas, higher income areas, and RCAAs	**Medium** Continue to refer residents to the OC Housing Authority which awards vouchers to eligible applicants on an ongoing basis Metrics: Continue to coordinate with the OC Housing Authority. Target voucher participation in highest resource/opportunity areas, higher income areas, and RCAAs. Aim to increase vouchers awarded by 10% during the planning period, as funding and capacity allows. Target 20% of new vouchers in highest opportunity or resource areas. Recruit at least 5 landlords to become a participating voucher property within the planning period
	Collaborate with developers to develop a mechanism to develop affordable housing in highest-opportunity areas.	Highest-opportunity areas Figure D-15 indicates that the eastern parts and northern borders of the City, including	**High** Maintain and update candidate sites list and annually provide opportunities to relevant agencies and organizations. Offer

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
		Racially Concentrated Areas of Affluence (RCAAs), are least affordable. The City will place priority on these areas while also addressing affordability issues throughout the City.	collaboration and assistance. Metrics: Update candidate sites list annually at time of APR Assist or provide information to at least 5 developers annually Facilitate the development of affordable units and ADUs in RCAAs.
Housing Choices and Affordability in Areas of Opportunity			
Racially Concentrated Areas of Affluence	Figure 3-16 indicates that the eastern parts of the City are designated as Racially Concentrated Areas of Affluence (RCAAs). RCAAs may represent a public policy issue to the extent that they have been created and maintained through exclusionary and discriminatory land use and development practices To address access to opportunity, the City will conduct the following specific actions: • Annually review existing policies and programs for potential restrictive practices that would limit diversity within the RCAAs. • Conduct marketing to increase to increase participation with the Housing Choice	RCAA census tracts and highest-opportunity areas	**Medium Priority** To address access to opportunity, the City will conduct the following specific actions: • If restrictive practices are identified, address prior to adoption of the new policies and programs or within 6 months for existing policies and programs. •Conduct marketing to increase diversity within the RCAAs every 24 months beginning in August 2024. Metrics: Annually review existing policies and programs for potential restrictive practices that would limit diversity within the RCAAs and highest-opportunity areas and if restrictive practices are identified, address within 6 months, as necessary

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
	Voucher Program.		In partnership with the Fair Housing Council of OC, distribute materials targeting RCAAs and highest resource areas. Continue to evaluate effectiveness of policies and update as necessary. Reach at least 100 residents during the planning period. Facilitate the development of affordable units in RCAAs.
Housing Choice	Review zoning, permit streamlining, fees, incentives and other approaches to increase housing choices and affordability (e.g., duplex, triplex, multifamily, ADU, transitional and supportive housing, group homes) in high opportunity areas.	Highest resource/opportunity areas, higher income areas, and RCAAs	**High** On-going, with annual review and adjustment within 12 months, if adjustments are required and applicable Metrics: Update candidate sites list annually at time of APR Continue to improve and streamline ADU procedures to reduce cost and time – review annually and update as necessary to comply with updates to state law – if ADU production is not 12.5% of total assumption yearly, City will provide additional incentives to further encourage ADU development Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
			underrepresented groups to participate in City meetings.
Access to Opportunity	Ensure equal access to housing for persons with Protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness; Expand access to opportunity for protected classes. The City will seek to improve access to opportunity for lower-income households and other protected classes by providing adequate sites for affordable housing development, encouraging the production of ADUs, and facilitating the production of housing for persons with special needs.	City-wide with emphasis on lower income and lower resource areas	**High** On-going, with annual review and adjustment within 12 months, if adjustments are required and applicable Metrics: Update candidate sites list annually at time of APR Continue to improve and streamline ADU procedures to reduce cost and time – review annually and update as necessary to comply with updates to state law Provide technical assistance to developers proposing affordable housing – at least 10 developers during the 6th Cycle. Conduct ongoing, proactive outreach to engage members of all socio-economic groups Facilitate the development of 25 ADUs in highest resource/opportunity areas, higher income areas, and RCAAs.
Housing Discrimination	In partnership the city's fair housing provider, conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies.	City-wide with emphasis on lower income and lower resource areas	**Medium** Conduct community workshop every 12 months beginning in August 2024 with Mid-Cycle review of progress; if changes are deemed necessary,

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
	Methods of outreach should include workshops, informational booths, presentations to civic leaders and community groups, staff trainings, and distribution of multi-lingual fair housing literature. Provide general counseling and referrals to address tenant-landlord issues, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations. Include testing/audits within the scope of work for each city's fair housing provider. Support enforcement activity and publicize outcomes of fair housing litigation. Provide general counseling and referrals to address tenant-landlord issues, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations.		implement within 12 months of review. Metrics: Refer landlords and residents to fair housing counseling, as needed, during the 6th Cycle. One meeting per year with fair housing services provider to identify and rectify fair housing issues. Provide technical assistance to developers proposing affordable housing and housing for persons with special needs – at least 10 developers during the 6th Cycle. Review reasonable accommodation standards and procedures annually and update within 6 months of annual review if not compliant with state or federal law. If not compliant, the City will process reasonable accommodations in compliance with state or federal law in the interim. Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.
Opportunities for Persons with Disabilities	Increase community integration for persons with disabilities.	City-wide with emphasis on lower income and lower resource areas	**High** On-going, with annual review and adjustment

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
	Continue to assist in the development of housing projects for special needs households by providing technical assistance with tax credit applications, tax-exempt bond financing and other public funds, including, ESG, CDBG, and HOME. The City shall continue to monitor to ensure the effectiveness of reasonable accommodation standards and procedures.	Increase access in highest-opportunity and resource areas and areas with less diversity	within 12 months of review, if adjustments are required and applicable Metrics: Provide technical assistance to developers proposing affordable housing and housing for persons with special needs – at least 10 developers during the 6th Cycle. Review reasonable accommodation standards and procedures annually and update within 6 months of annual review if not compliant with state or federal law. If not compliant, the City will process reasonable accommodations in compliance with state or federal law in the interim. Conduct ongoing, proactive outreach to engage members of all socio-economic groups and reach at least 100 residents.
Community Conservation and Revitalization			
Housing Choice	Enhance the proactive code enforcement program that targets areas of concentrated rehabilitation needs, resulting in repairs and mitigating potential costs, displacement and relocation impacts on residents.	City-wide with emphasis on lower income and lower resource and higher need areas	**High** On-going, with annual review and adjustment within 12 months, if adjustments are required and applicable Metrics: Review the proactive code enforcement program annually and adjust as needed.

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
			Refer households in need to assistance such as rehabilitation loans – assist at least 3 households per year.
	The City shall develop a program to collaborate with non-profit housing providers and develop a preservation strategy. The preservation strategy will allow the City to act quickly if, and when, it receives notice of conversion. As part of the strategy, the City shall ensure compliance with noticing requirements; conduct tenant education and pursue funding to preserve the units.	Affordable units "At-Risk" of converting to market rate	**High** On-going, with annual review and adjustment within 12 months, if adjustments are required and applicable Metrics: Develop preservation strategy by December 2024. Goal of preserving 100 percent of units at-risk of converting to market rate (Imperial Villas). Apply for funding annually. Reach at least 50 residents on annual basis
Protection from Displacement			
Displacement from Economic Pressures	Provide and maintain multi-lingual informational materials on tenant legal counseling and resources	City-wide	**High** Create materials by August 2024; update as necessary. Metrics: In partnership with the Fair Housing Council of OC, distribute materials. Continue to evaluate effectiveness and update as necessary. Reach at least 100 residents on annual basis Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
			City meetings.
	Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, low income residents, seniors, and people with disabilities.	City-wide with emphasis on lower income and lower resource and higher need areas	**High** The City shall develop a program to collaborate with non-profit housing providers and develop a preservation strategy. The preservation strategy will allow the City to act quickly if, and when, it receives notice of conversion. As part of the strategy, the City shall ensure compliance with noticing requirements; conduct tenant education and pursue funding to preserve the units. Develop program by December 2024. On-going, with annual review and adjustment within 12 months, if adjustments are required and applicable Develop preservation strategy by December 2024. Goal is to preserve at-risk units. Provide technical assistance to developers proposing affordable housing and housing for persons with special needs.
	Explore anti-gentrification policies and regulations to combat displacement, which especially affects low-income residents and communities of color. These may include, but are not limited to foreclosure assistance, community	City-wide with emphasis on lower income and lower resource and higher need areas	**Medium Priority** Review and report to Council options on anti-gentrification policies and regulations by October 2025.

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
	land trusts, and housing trust funds.		
	City will work with federal, state, and local agencies to try to identify and secure funding for homeowners who are interested in building an ADU and are willing to offer it as an affordable rental.	Highest resource and opportunity areas, RCAAs, and higher income areas	**Medium Priority** Check the websites of HUD, HCD, and OC Housing Authority for potential funding sources and apply for eligible programs annually. Metrics: Facilitate the development of 56 ADUs during the planning period. Target 30% of affordable units in lower income areas and 30% in highest resource and opportunity areas, RCAAs, and higher income areas, with the balance throughout the City to avoid over concentration in specific neighborhoods.
Place-Based Strategies			
Areas of Lower Income	Conduct affirmative marketing to increase awareness and diversity throughout the City and in areas of lower income. This is aimed at ensuring existing residents are not displaced, as well as providing opportunity for residents within the surrounding region.	City-wide with emphasis on lower income and lower resource areas	**Medium Priority** Explore feasibility of affirmative marketing and housing mobility counseling program by September 2024. Provide annual progress reports and amend program as funding allows.

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
	Specifically, this may include, but is not limited to, noticing of affordable units/projects through direct mail targeted outreach to lower income census tracts, publishing advertising materials in multiple languages, informing service agencies, outreach to community organizations and places of worship. Annually conduct affirmative marketing for each new project that is developed with affordable units and that has affordable units open/available. Provide housing mobility counseling either directly or through referrals. This counseling may include, but is not limited to, information on opportunity areas, housing search skills and tools, workshops, search assistance, referrals, structured support for a time after a move to the City, landlord-tenant mediation, and retention counseling.		Annually throughout the 2021-2029 Cycle to reach at least 100 residents. Review development progress by 2025 and initiate a Housing Element amendment to ensure significant progress toward increasing housing mobility, choice, and affordability throughout all neighborhoods with emphasis on areas of high segregation and poverty.
	Affirmatively market first-time homebuyer and/or housing rehabilitation programs to low and moderate income areas, and areas of racial/ethnic		

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
	concentration. Work collaboratively with local housing authorities to ensure affirmative fair marketing plans and de-concentration policies are implemented.		
	Engage community health workers to conduct ground level site visits and meetings within areas of lower income to better understand resident and business barriers, resources, and needs.		**Medium Priority** Initiate outreach program by September 2024, Annually throughout the 2021-2029 Cycle to reach at least 100 residents.
	The City will annually seek funding and will annually review its Capital Improvement Program in order to prioritize projects in areas of lower income,to improve living environments and reduce the risk of displacement. Examples of projects include street improvements, multi-modal investments, safe routes to school, parks, community facilities and amenities, infrastructure, and other investment toward community revitalization.		**Medium Priority** Annually throughout the 2021-2029 Cycle. Metrics: Identify and complete capital improvement projects in TOD and OT areas, lower income and lower resource areas, and historically underinvested areas– at least 2 projects in these census tracts, as appropriate and as funding allows. Continue to prioritize capital improvement projects lower income and lower resource areas, projects benefiting affordable housing projects, and expand focus on environmental justice communities. Annually implement the Environmental Justice Element. Apply for funding

Contributing Factor	Meaningful Action	Geographic Target	Priority and Timeline
			annually.
Community Revitalization	The City will continue to encourage and emphasize public art in areas of lower income and diversity. Public art improves quality of life in neighborhoods and can provide a vehicle for residents to express themselves creatively. The TOD and Old Town zones have provisions that may require public art as part of a development agreement for developments that include twenty (20) or more units or which are over twenty thousand (20,000) square feet.	City-wide with emphasis on lower income and lower resource areas	**Medium Priority** Annually throughout the 2021-2029 Cycle. Encourage applicants of new projects to integrate public art into projects and rely upon local artists to execute public art. Explore the feasibility of adopting a Public Art Plan with a potential public art in-lieu fee.
Availability of Affordable Housing	Pursue State and Federal funding for affordable housing development. Prioritize use of funds to incentivize/partner with developers to pursue affordable housing in the City.	Highest resource areas, RCAAs, higher income areas, lower income areas, and areas of high segregation and poverty.	**High Priority** Annually throughout the 2021-2029 Cycle. Check the websites of HUD, HCD, and OC Housing Authority for potential funding sources and apply for eligible programs annually. Metrics: Facilitate the development of 50 affordable housing units through additional funding/grants. Target 30% of affordable units in lower income areas and 30% in higher income areas, with the balance throughout the City to avoid over concentration in specific neighborhoods.

Objective:	Affirmatively Further Fair Housing
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Each action provides its own timeline

Goal HE-3: Neighborhood Preservation

Encourage activities that conserve and improve existing residential neighborhoods including a housing stock that is well maintained and structurally sound, and with adequate services and facilities provided; and having a sense of community identity.

Program HE-3.1: Community Based Neighborhood Rehabilitation

Encourage neighborhood rehabilitation programs that maximize community participation in the maintenance and improvement of housing in individual neighborhoods. The City will coordinate with and assist neighborhood and non-profit organizations in implementing programs such as "Neighborhood Pride Days" where the City will collect electronic waste and bulk waste from residents, promote neighborhood cleanup and beautification especially in low-income areas. The City will monitor funding opportunities for rehabilitation grants on an annual basis and apply for funding as opportunities arise.

Objective:	Conserve and improve existing residential neighborhoods
Responsible Agency:	Development Services
Funding Source:	CDBG
Implementation Schedule:	The City will conduct annual coordination meetings with neighborhood and non-profit organizations to identify rehabilitation opportunities based on code enforcement cases. If any concentration of poor housing conditions is present during the 6th Cycle planning period, efforts will focus on those areas; Monitor funding opportunities for rehabilitation grants on an annual basis and apply for funding as opportunities arise.

Program HE-3.2: Neighborhood Identity

Encourage the creation of neighborhood themes and identity in all types of residential developments by use of building material, texture, color and landscaping linked with architectural styles.

Objective:	Create neighborhood identity
Responsible Agency:	Development Services
Funding Source:	Private sources
Implementation Schedule:	Ongoing

Program HE-3.3: Placentia Rehabilitation Grant Program

The City of Placentia shall continue to provide grants to rehabilitate owner-occupied, very-low-income housing units. The City will continue to monitor funding opportunities for rehabilitation grants on an annual basis and apply for funding as opportunities arise. The City shall outreach to potential applicants continuously through the City's website and will distribute printed material annually.

Objective:	72 units rehabilitated during the planning period
Responsible Agency:	Development Services
Funding Source:	CDBG
Implementation Schedule:	The City will monitor funding opportunities for rehabilitation grants on an annual basis and apply for funding as opportunities arise. Ongoing; annual announcements in City publications.

Program HE-3.4: Energy Conservation and Sustainable Building Practices

The City recognizes that utility costs contribute to a household's overall expenditure for housing. The City shall promote energy and water conservation and "green building" in new and existing residential developments by providing educational materials on the City's website and in print form at City Hall, the library and at other public buildings. Compliance with Title 24 of the California Building Code will be required of all residential construction necessitating a building permit. The City shall also refer residents to local utility providers for energy and water conservation programs through the City's website. Finally, through participation in the HERO Program, the City shall provide information and encourage property owners to participate in the property-assessed conservation improvements as allowed by the program.

Objective:	Energy conservation/reduced utility costs
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Continue to provide energy conservation educational materials to residents

Program HE-3.5: Monitor and Preserve Affordable Housing At-Risk of Conversion to Market Rate

The City shall continue to monitor units with affordability covenants that are eligible to expire during the next 10 years. To encourage the preservation of these "at-risk" units, the City shall coordinate with the County and non-profit housing organizations to encourage the extension and/or renewal of deed restrictions or covenants, comply with noticing requirements, provide education and assistance to tenants, assist with funding, and promptly reach out to qualified entities to preserve at-risk housing units

Objective:	Encourage preservation and extension/renewal of "At Risk" units
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing coordination with the County and nonprofits

Program HE-3.6: Vacant Building Ordinance

To prevent blight and deterioration of Placentia's residential and non-residential neighborhoods, the Municipal Code establishes owner responsibilities for the maintenance and rehabilitation of long-term vacant buildings. The ordinance requires the registration of vacant properties resulting from foreclosure, and provides for an administrative monitoring program for boarded-up and vacant buildings. To ensure compliance, the ordinance imposes fees and civil penalties; and provides for administrative review and appeal opportunities. The City will continue to implement this ordinance to prevent blight and deterioration in Placentia's neighborhoods.

Objective:	Prevent blight and deterioration in neighborhoods
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	Ongoing

Goal HE-4: Housing Cooperation and Coordination

Coordinate local housing efforts with appropriate federal, state, regional, and local governments and/or agencies and to cooperate in the implementation of intergovernmental housing programs to ensure maximum effectiveness in solving local and regional housing problems.

Program HE-4.1: Partnerships with the Housing Industry

The City of Placentia has limited resources to use for the development and maintenance of affordable housing. To maximize its funding and staff

resources, the City shall seek opportunities to partner with non-profit and for-profit housing developers.

Specifically, the City shall proactive seek partnerships to develop affordable housing on identified sites within the TOD area near the Metrolink Station to meet the City's lower-income housing needs. The City shall contribute to the partnership through activities such as in-kind technical assistance, support in seeking grant and funding opportunities, and financial assistance, which may include land write-downs and assistance with on- or off-site infrastructure costs where feasible. The City will contact affordable housing organizations annually to solicit interest in development.

Objective:	Establish partnerships with nonprofit and for-profit housing developers
Responsible Agency:	Development Services/ Neighborhood Services Division
Funding Source:	General Fund, state and federal grants
Implementation Schedule:	The City will conduct annual outreach with developers to identify development opportunities. The City will encourage development of affordable housing through activities such as in-kind technical assistance, support in seeking grant and funding opportunities, expedited processing and flexibility in development standards, and financial assistance, which may include land write-downs and assistance with on- or off-site infrastructure costs where feasible.

Program HE-4.2: Participation in Continuum of Care Forum

The City recognizes that homelessness is both a local and regional issue that requires a comprehensive and coordinated effort among various cities and agencies throughout the region. The City of Placentia will continue to participate through regular attendance at meetings of the County of Orange Continuum of Care Forum to pool resources to address homeless needs.

Objective:	Continue participation in the County of Orange Continuum of Care Forum
Responsible Agency:	Development Services
Funding Source:	General Fund
Implementation Schedule:	The City will have ongoing coordination and meeting attendance at the County of Orange Continuum of Care Forum to pool resources to

	address homeless needs. The City will support in seeking grant and funding opportunities on an annual basis for homeless assistance and services.

4.2 Quantified Objectives

Activity	Quantified Objective
New Construction	
Very Low	1,289
Low	691
Moderate	801
Above Moderate	1,693
Total	4,472
Rehabilitation	
Acquisition and Rehabilitation	6 (2 Extremely Low, 2 Very Low, 2 Low)
Placentia Rehabilitation Grant Program	30 Very Low/Low
Conservation	
At-Risk Units	Imperial Villas - 58 units

Appendix A: Community Outreach

Public participation is an important component of the Housing Element update. *Government Code* §65583(c)(8) states that "The local government shall make diligent effort to achieve public participation of all the economic segments of the community in the development of the housing element, and the program shall describe this effort." Public participation played an important role in the formulation and refinement of the City's housing goals and policies and in the development of a Land Use Plan that determines the extent and density of future residential development in the community.

City residents and other interested parties were provided many opportunities to identify housing issues of concern, recommend strategies, review the draft element, and provide recommendations to decision-makers on the Housing Element. The following public meetings were held during the course of the update:

June 8, 2021	Planning Commission study session
August 24, 2021	Public Workshop
September 14, 2021	Planning Commission study session
September 16, 2021	Public Workshop
September 21, 2021	City Council study session
October 5, 2021	Public Review Draft Posted to City's Website
October 12, 2021	Planning Commission study session
October 19, 2021	City Council study session
October 21, 2021	Submittal to HCD
January 11, 2022	Planning Commission public hearing
January 18, 2022	City Council public hearing
March 1, 2022	Public Review Draft Posted to City's Website
March 8, 2022	Planning Commission public hearing
March 15, 2022	City Council public hearing
March 17, 2022	Submittal to HCD

In addition to these public meetings, the City used several other methods to encourage participation in the Housing Element update, particularly among lower-income households, persons with special needs and non-English speakers. Early in the update process a Housing Element webpage was established (https://placentia.org/943/2021-2029-Housing-Element-Update) where meeting notices, an FAQ, draft documents and other reference materials were posted. Prior to each public meeting, notices were sent directly to a list of stakeholders (Table A-1), which included organizations that represent the interests of low-income households and persons with disabilities or other special needs. Notices were posted in both English and Spanish.

The City targeted outreach to all members of the community with an emphasis on engaging all economic segments and households with special needs. Outreach material was distributed both online and in person at City facilities. The City was able to engage and involve all economic segments in the update process through the scheduled workshops and study sessions.

A Housing Element Frequently Asked Questions was prepared and posted on the City's Housing Element website, and an online survey was also conducted for interested stakeholders to identify housing needs and issues (see Table A-2).

Common themes raised during the public meetings are the need for affordable housing, particularly for service sector employees, and also the challenges with additional development, such as traffic and demands on public services. The City considered all public comments received and addressed public comments by revising the Housing Element where appropriate. The programs described in Chapter 4 seek to address these concerns, including encouraging development of additional affordable and special needs housing, while recognizing the City's limited resources. Table A-1 below highlights Housing Programs that were adopted in the Housing Plan in response to feedback received at Housing Element workshops, Housing Element surveys, Planning Commission and City Council Study Sessions, and public comments.

Table A-1– Housing Programs

Common Themes from Public Engagement	Housing Programs in Response to Public Engagement
Need for Affordable Housing	Program HE-1.3: Pursue County, State, and Federal Housing Funds Program HE-1.8: Adequate Sites for Housing Development Program HE-1.10: Encourage Development of Housing for Extremely-Low-Income Households Program HE-1.19: Accessory Dwelling Units Program HE-2.5: Equal Housing Opportunities and Affirmatively Furthering Fair Housing Program HE-3.5: Monitor and Preserve Affordable Housing At-Risk of Conversion to Market Rate Program HE-4.1: Partnerships with the Housing Industry
Challenges of Additional Housing/Growth	Program HE-1.2: Locate Housing Near Transportation, Employment and Services Program HE-1.5: Infrastructure Provision Program HE-1.15: Transit-Oriented Development
Need for a Variety of Housing Types	Program HE-1.2: Locate Housing Near Transportation, Employment and Services Program HE-1.12: Development of Senior Housing Program HE-1.13: Development of Housing for Larger Families Program HE-1.14: Housing for Persons with Special Needs Program HE-1.19: Accessory Dwelling Units Program HE-4.1: Partnerships with the Housing Industry
Desire to Preserve Neighborhood Character	Program HE-3.1: Community Based Neighborhood Rehabilitation Program HE-3.2: Neighborhood Identity

Table A-1: Public Meeting Notification List

Kennedy Commission
17701 Cowan Ave., Suite 200
Irvine, CA 92614
cesarc@kennedycommission.org
mildredp@kennedycommission.org

League of Women Voters
PO Box 1065
Huntington Beach, CA 92647
hat@lwvorangecoast.org

OC Association of Realtors
25552 La Paz Road
Laguna Hills, CA 92653

Neighborhood Housing Services
of Orange County
198 W. Lincoln Ave., 2nd Floor
Anaheim, CA 92805

Habitat for Humanity of Orange County
2200 S. Ritchey St.
Santa Ana, CA 92705

Jamboree Housing Corp.
17701 Cowan Avenue
Suite 200
Irvine, CA 92614

The Related Companies of California
18201 Von Karman Ave Ste 900
Irvine, CA 92612

Community Housing Resources, Inc.
17701 Cowan Avenue, Suite 200
Irvine, CA 92614

BIA/OC
17744 Sky Park Circle #170
Irvine, CA 92614

Dayle McIntosh Center
501 N. Brookhurst Street, Suite 102
Anaheim, CA 92801

OC Housing Providers
25241 Paseo de Alicia, Suite 120
Laguna Hills, CA 92653

Regional Center of Orange County
P.O. Box 22010
Santa Ana, CA 92702-2010

OC Business Council
2 Park Plaza, Suite 100
Irvine, CA 92614

OC Housing Trust
198 W. Lincoln Ave., 2nd Floor
Anaheim, CA 92805

Neighborhood Housing Services
of Orange County
198 W. Lincoln Ave., 2nd Floor
Anaheim, CA 92805

Mercy Housing
480 S Batavia St
Orange, CA 92868

OC Housing & Community Development
1501 E. St Andrew Place, First Floor
Santa Ana, CA 92705

Orange County Housing Authority
1501 E St Andrew Pl
Santa Ana, CA 92705

Fair Housing Council of Orange County
2021 E. 4th Street, Suite 122
Santa Ana, CA 92705

City of Anaheim
Community Development Director
200 S. Anaheim Blvd.
Anaheim, CA 92805

City of Brea
Community Development Director
1 Civic Center Circle
Brea, CA 92821

City of Yorba Linda
Community Development Director
4845 Casa Loma Avenue
Yorba Linda, CA 92885

City of Fullerton
Community Development Director
303 W. Commonwealth Ave.
Fullerton, CA 92832

Placentia-Yorba Linda USD
1301 E. Orangethorpe Ave.
Placentia, California, 92870

Mercy House
P.O. Box 1905
Santa Ana, CA 92702

Orange County Water District
P.O. Box 8300
Fountain Valley, CA 92728-8300

Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

Pathways of Hope
1231 E Chapman Ave
Fullerton, CA 92831

OC Partnership
1505 17th St.
Santa Ana, CA 92705

Campaign for Fair Housing Elements
57 Post Street
San Francisco, CA 94104
info@fairhousingelements.org

Elizabeth Hansburg
People for Housing OC
elizabeth@peopleforhousing.org

The City of Placentia is beginning the process of updating the 2021-2029 Housing Element!

Please join us in-person or virtually to learn about what happens when the City updates its Housing Element, why the City is required to do so, and what opportunities community members have to give feedback. Your participation is important to help plan for Placentia's housing future.

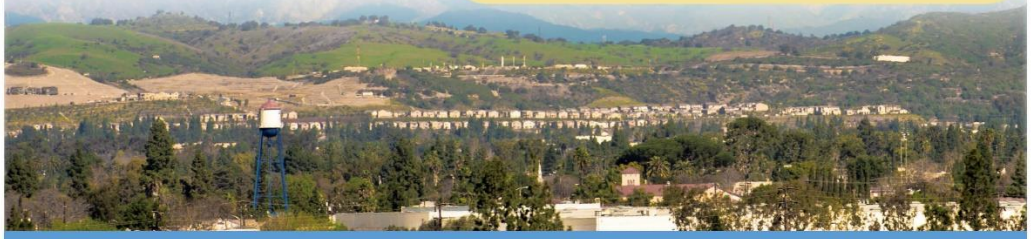
The community meeting will focus on:

- Housing needs and services within Placentia
- Opportunities to provide housing at all income levels in the community
- Identifying constraints to building and accessing housing

WHEN: Tuesday, August 24th at 6:00 pm

IN-PERSON: Whitten Community Center
900 S. Melrose Street
Placentia, CA 92870

VIRTUAL: Zoom Link: tinyurl.com/placentiahousing



For questions, please contact City Staff at DSD@placentia.org or (714) 993-8124
www.placentia.org/housingelement

¡La Ciudad de Placentia está comenzando el proceso de actualización del Elemento Vivienda 2021-2029!

Por favor, únase a nosotros en persona o virtualmente para aprender sobre lo que sucede cuando la Ciudad actualiza su Elemento de Vivienda, por qué se requiere que la Ciudad lo haga y qué oportunidades tienen los miembros de la comunidad para dar su opinión. Su participación es importante para ayudar a planificar el futuro de la vivienda de Placentia.

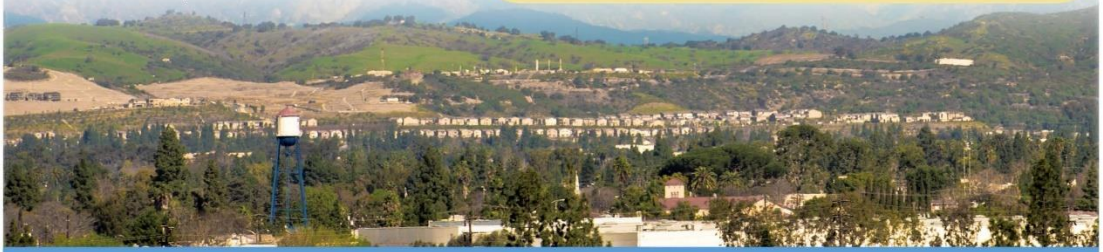
La reunión de la comunidad se centrará en:

- Necesidades y servicios de vivienda dentro de Placentia
- Oportunidades para proporcionar vivienda en todos los niveles de ingresos en la comunidad
- Identificación de limitaciones para la construcción y el acceso a la vivienda

CUÁNDO: Martes 24 de agosto a las 6:00 pm

EN PERSONA: Whitten Community Center
900 S. Melrose Street
Placentia, CA 92870

VIRTUAL: Zoom Link: tinyurl.com/placentiahousing



Si tiene preguntas, comuníquese con el personal de la ciudad al DSD@placentia.org o al (714) 993-8124
www.placentia.org/housingelement

The City of Placentia is beginning the process of updating the 2021-2029 Housing Element!

Please join us in-person or virtually to learn about what happens when the City updates its Housing Element, why the City is required to do so, and what opportunities community members have to give feedback. Your participation is important to help plan for Placentia's housing future.

The community meeting will focus on:

- Housing needs and services within Placentia
- Opportunities to provide housing at all income levels in the community
- Identifying constraints to building and accessing housing

WHEN: Thursday, September 16th at 6:00 pm

IN-PERSON: Senior Center/Powell Building
143 S. Bradford Avenue
Placentia, CA 92870

VIRTUAL: Zoom Link: tinyurl.com/placentiahousing

For questions, please contact City Staff at DSD@placentia.org or (714) 993-8124
www.placentia.org/housingelement

¡La Ciudad de Placentia está comenzando el proceso de actualización del Elemento Vivienda 2021-2029!

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La reunión de la comunidad se centrará en:

- Necesidades y servicios de vivienda dentro de Placentia
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CUÁNDO: Jueves 16 de septiembre a las 6:00 pm

EN PERSONA: Senior Center/Powell Building
143 S. Bradford Avenue
Placentia, CA 92870

VIRTUAL: Zoom Link: tinyurl.com/placentiahousing

Si tiene preguntas, comuníquese con el personal de la ciudad al DSD@placentia.org o al (714) 993-8124
www.placentia.org/housingelement

PLACENTIA
Rich Heritage, Bright Future

2021 Housing Element FAQ

1. What is a Housing Element?

State law[1] requires each city to adopt a comprehensive, long-term General Plan for its physical development. Placentia's General Plan[2] is divided into the following "elements" or chapters that contain goals, policies and programs which are intended to guide land use and development decisions:

- Land Use
- Housing
- Mobility
- Conservation
- Open Space & Recreation
- Safety
- Noise
- Economic Development
- Health, Wellness & Environmental Justice
- Sustainability

The purpose of the Housing Element is to evaluate the housing needs of Placentia's current and future residents and set forth policies and programs to address those needs.

While most portions of General Plans typically have a time horizon of 20-25 years, State law requires that the Housing Element be updated in 8-year "cycles." The City is currently preparing a Housing Element update for the 2021 to 2029 planning period, which is referred to as the "6th Housing Element cycle" in reference to the six required updates that have occurred since the comprehensive revision to State Housing Element law in 1980.

State law[3] establishes detailed requirements for Housing Elements, which are summarized in California Government Code Section 65583:

> *The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.*

[1] California Government Code Sec. 65300 *et seq.*
[2] https://www.placentia.org/166/General-Plan-Update
[3] California Government Code Sec. 65580 *et seq.*

Placentia 2021 Housing Element FAQ

2. What is Housing Element "certification" and why is it important?

The State Legislature has delegated to the California Department of Housing and Community Development ("HCD") the authority to review Housing Elements and issue findings regarding the elements' compliance with the law.[4] When HCD issues a letter finding that the Housing Element is in substantial compliance with State law it is referred to as "certification" of the Housing Element.

Housing Element certification is important for two main reasons:

- **Local control.** The General Plan and its various elements provide the foundation for the City's land use plans and development regulations, and the Housing Element is part of the General Plan. If the City were challenged in court on a planning or zoning matter and the General Plan were found by the court to be invalid, the court could order changes to City land use plans or regulations and assume control over City land use decisions. HCD certification establishes a "rebuttable presumption of validity"[5] that the Housing Element complies with State law, which would support the City's legal defense. Recent laws also allow courts to impose fines on a jurisdiction if it fails to adopt a Housing Element in compliance with State law.[6]
- **Eligibility for grant funds.** Some State grant funds are contingent upon Housing Element certification. Grants can help to cover the cost of some projects that would otherwise rely on the City's General Fund.

Placentia's last Housing Element update was completed in 2014 and was certified by HCD as fully compliant with State law.

3. What are the most important issues that must be addressed in the Housing Element update?

The major issues that must be addressed in the Housing Element update are: 1) how City policies, plans and regulations help to meet the region's housing needs for persons and families of all income levels; and 2) how City land use regulations accommodate the special housing needs of those with disabilities or other difficulties.

- **Accommodating Regional Housing Needs**. Under State law[7] all cities are required to plan for additional housing to accommodate population growth and address existing housing problems such as overcrowding and high housing cost. State law recognizes that cities generally do not build housing, since that is typically the role of private and non-profit developers and builders. However, cities are required to adopt policies, development regulations and standards to encourage a variety of housing types that are affordable for persons of all income levels. The Regional Housing Needs Assessment ("RHNA") is the method by which each jurisdiction's share of new housing needs is determined (see #5 below).

[4] California Government Code Sec. 65585
[5] California Government Code Sec. 65589.3.
[6] AB 101 of 2019
[7] California Government Code Sec. 65583

Placentia 2021 Housing Element FAQ

- **Housing for Persons with Special Needs**. Under State law[8] cities must also ensure that their plans and regulations encourage the provision of housing for persons with special needs including:

  ✓ Reasonable accommodation for persons with disabilities
  ✓ Transitional housing
  ✓ Supportive housing
  ✓ Emergency shelters and other facilities serving the homeless
  ✓ Large families (5 or more persons)
  ✓ Farm workers

4. What is "affordable" housing?

By definition, housing is considered "affordable" when total housing cost, including utilities, is no more than 30% of a family's gross income. State law describes five income categories, which are based on county median income as shown in Table 1.

Table 1. Household Income Categories

Income Category	% of county median income
Extremely low	Up to 30%
Very low	31-50%
Low	51-80%
Moderate	81-120%
Above moderate	Over 120%

Source: California Government Code Sec. 65584(f)

Affordable housing costs for all jurisdictions in Orange County are determined based on these income categories as shown in Table 2. These incomes, rents and housing prices are based on a 4-person family and are adjusted for different family sizes.

Table 2. Income Categories and Affordable Housing Costs – Orange County

Income Category	Maximum Income	Affordable Rent	Affordable Price (est.)
Extremely Low	$40,350	$1,009	(1)
Very Low	$67,250	$1,681	(1)
Low	$107,550	$2,689	(1)
Moderate	$128,050	$3,201	$500,000
Above moderate	Over $128,050	Over $3,201	Over $500,000

Assumptions:
-Based on a family of 4 and 2021 State income limits
-30% of gross income for rent or principal, interest, taxes & insurance
-5% down payment, 4% interest, 1.25% taxes & insurance, $350 HOA dues
Notes:
(1) For-sale affordable housing is typically at the moderate income level
Source: Cal. HCD; JHD Planning LLC

[8] California Government Code Sec. 65583(a)(5)

Placentia 2021 Housing Element FAQ

5. What is the "RHNA" why is it important?

Each California city is required to plan for new housing to accommodate a share of regional needs. The Regional Housing Needs Assessment ("RHNA") is the process established in State law[9] by which housing needs are determined.

Prior to each planning cycle the total new housing need for each region of California is determined by HCD based upon economic and demographic trends, existing housing problems such as overcrowding and overpayment, and additional housing needed to ensure reasonable vacancy rates and replace units lost due to demolition or natural disasters.

Placentia is located within the Southern California Association of Governments ("SCAG") region, which includes Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura counties. The total housing need for the SCAG region is distributed to cities and counties by SCAG based upon objectives and criteria established in State law.[10]

In 2019 HCD determined that the total new housing need for the entire SCAG region in the 6th Housing Element cycle is 1,341,827 units. In March 2021 SCAG adopted the RHNA plan for the 6th cycle, which fully allocates the RHNA to jurisdictions in the SCAG region.[11] Table 3 shows the RHNA allocations for Placentia, Orange County, and the entire SCAG region.

Table 3. 6th Cycle RHNA – Placentia, Orange County and SCAG Region

	Placentia	Orange County	SCAG Region
Housing need allocation 2021-2029	4,374	183,861	1,341,827

Source: SCAG, 3/4/2021

The RHNA also distributes each jurisdiction's total housing need into four income categories (the extremely-low and very-low categories are combined for RHNA purposes). Placentia's 6th cycle RHNA allocation by income category is shown in Table 4.

Table 4. 6th RHNA by Income Category – Placentia

Extremely Low + Very Low	Low	Moderate	Above Moderate	Total
1,231	680	770	1,693	4,374

Source: SCAG, 3/4/2021

6. Is the RHNA a construction mandate?

The RHNA allocation identifies the projected amount of additional housing a jurisdiction would need in order to have enough housing at all price levels to fully accommodate its assigned share projected growth over the 8-year planning period while also eliminating existing problems of overcrowding and overpayment. The RHNA is a *planning requirement* based upon housing need, *not a construction quota or mandate*. Jurisdictions are not required to build housing or issue permits to achieve their RHNA

[9] California Government Code Sec. 65584 et seq.
[10] California Government Code Sec. 65584(d)
[11] http://www.scag.ca.gov/programs/pages/housing.aspx

Placentia 2021 Housing Element FAQ

allocations, but some provisions of State law establish specific requirements when housing production falls short of RHNA allocations. One such requirement is streamlined review and approval of housing development applications that meet specific standards.[12] Other than requirements for streamlined permit processing, there are currently no legal or financial penalties imposed on cities for failing to achieve their RHNA allocations.

7. What must cities do to comply with the RHNA?

The Housing Element must provide an evaluation of the city's capacity for additional housing based on land use patterns, development regulations, other development constraints (such as infrastructure availability and environmental conditions) and real estate market trends. The analysis must be prepared at a parcel-specific level of detail and identify properties (or "sites") where additional housing could be built consistent with City regulations. This evaluation is referred to as the "sites analysis" and State law requires the analysis to demonstrate that the city has adequate capacity to fully accommodate its RHNA allocation in each income category. If the sites analysis does not demonstrate that adequate capacity exists to fully accommodate the RHNA, the Housing Element must describe what steps will be taken to increase capacity commensurate with the RHNA – typically through amendments to land use and zoning regulations that could facilitate additional housing development. Such amendments typically include increasing the allowable residential density or allowing housing to be built in areas that are currently restricted to only non-residential land uses.

8. Why are cities in high-cost areas expected to have affordable housing? Low-cost housing is not economically feasible here due to high land prices.

State housing laws are based on the premise that every city has an obligation to adopt regulations to accommodate a range of housing types for persons at all income levels. Every community is dependent on a variety of low- and moderate-income workers in jobs such as landscaping, building maintenance, child and elder care, medical technicians, personal services, clerical support and retail trade. While the existing housing stock serves the needs of many residents, market rents and prices are higher than some families can afford. In addition, low-wage jobs have increased at a much faster rate than affordable housing is being built.

While cities are not required to build new housing, they must ensure that their land use regulations encourage a full range of housing types. Rental apartments typically provide the majority of affordable housing, but other types of housing such as accessory dwelling units (ADUs) can also help to address this need. Various governmental programs provide funding assistance for affordable housing, but if a city's development regulations do not allow sufficient additional housing, the housing needs of the local workforce may be shifted to other cities.

[12] California Government Code Sec. 65913.4 (SB 35 of 2017)

Placentia 2021 Housing Element FAQ

9. Placentia is fully developed. Why is the RHNA allocation so high?

SCAG's 6th cycle RHNA allocation for the entire 6-county region is 1,341,827 units compared to 412,137 units in the 5th cycle. There are two main reasons why the 6th RHNA allocation is so much higher than the 5th cycle.

First, the 5th cycle RHNA allocation was established in 2012 while the severe economic effects of the "Great Recession" were discouraging growth. As a result, the 5th RHNA was uncharacteristically low. For comparison, SCAG's 4th cycle (2006-2013) RHNA allocation was approximately 700,000 housing units.

Second, for the 6th cycle the State made a major modification to the process for determining RHNA allocations. In prior RHNA cycles, total housing need was based only on *projected population growth*. However, for the 6th RHNA cycle the State added *existing need* to the total RHNA calculation. Existing need includes households that are currently overcrowded (defined as more than one person per room) or are overpaying for housing (defined as more than 30% of gross income). The total 6th cycle RHNA allocation for the SCAG region is comprised of the sum of existing need and projected need, as follows:

Existing need:	577,422 units
Projected need:	764,405 units
Total need:	1,341,827 units

As seen from this breakdown, if existing need were excluded (as was the case in prior RHNA cycles) the total need would be similar to the 4th cycle RHNA.

With regard to jurisdictional RHNA allocations, the methodology adopted by SCAG for the 6th cycle places greater emphasis on the proximity of housing to jobs and public transit rather than availability of vacant developable land. As a result, the urbanized areas of Los Angeles and Orange counties have been assigned much higher housing need as compared to prior cycles even though they generally have much less vacant land than inland areas.

The RHNA allocations assume that in many urbanized cities of Orange and Los Angeles counties, a significant portion of new housing needs will be met through the redevelopment of older commercial properties.

10. How will Placentia accommodate its new housing needs assigned in the RHNA?

Placentia is fully developed and very little vacant land suitable for new housing is available. Therefore, the City's RHNA allocation must be satisfied through redevelopment of properties with potential for new housing or mixed use (i.e., a combination of housing and other uses on the same property). In recent years Placentia has adopted plans for the redevelopment of properties near downtown and the future Metrolink[13] station. The Housing Element update will identify a strategy for providing additional opportunities to accommodate the City's assigned housing need.

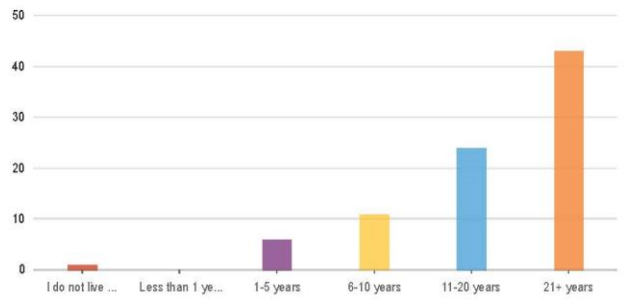
. . .

[13] https://www.placentia.org/705/Metrolink-Station-and-Parking-Structure

Table A-2: Online Survey Results

2021 Housing Element Survey

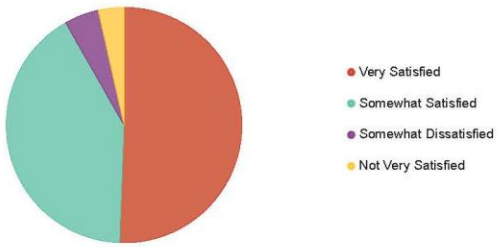
1. If you live in Placentia, how long have you lived here?



Answers	Count	Percentage
I do not live in Placentia.	1	1.18%
Less than 1 year	0	0%
1-5 years	6	7.06%
6-10 years	11	12.94%
11-20 years	24	28.24%
21+ years	43	50.59%

Answered: 85 Skipped: 0

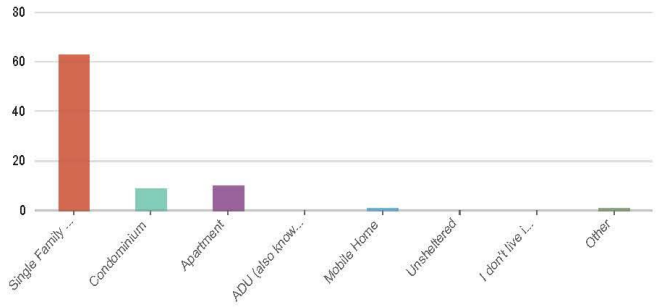
2. How satisfied are you with your current housing situation?



Answers	Count	Percentage
Very Satisfied	43	50.59%
Somewhat Satisfied	35	41.18%
Somewhat Dissatisfied	4	4.71%
Not Very Satisfied	3	3.53%

Answered: 85 Skipped: 0

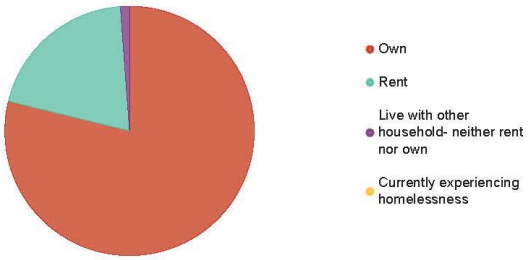
3. If you live in Placentia, select the type of housing unit you reside in:



Answers	Count	Percentage
Single Family Home	63	74.12%
Condominium	9	10.59%
Apartment	10	11.76%
ADU (also known as second unit or "Granny unit")	0	0%
Mobile Home	1	1.18%
Unsheltered	0	0%
I don't live in Placentia	0	0%
Other	1	1.18%

Answered: 84 Skipped: 1

4. Do you rent or own the home you live in?

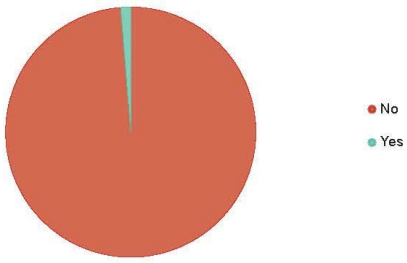


Answers	Count	Percentage
Own	67	78.82%
Rent	17	20%
Live with other household- neither rent nor own	1	1.18%

Currently experiencing homelessness	0	0%

Answered: 85 Skipped: 0

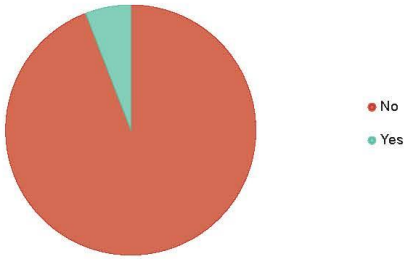
5. If you reside in a single-family house, does the property have a second unit/guest house/ADU? (If you answered No, skip to question 7.)



Answers	Count	Percentage
No	76	89.41%
Yes	1	1.18%

Answered: 77 Skipped: 8

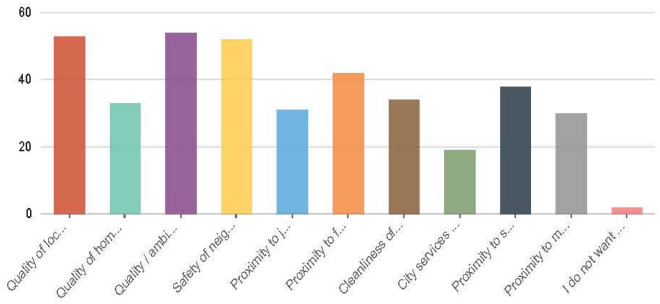
6. Is this second unit/guest house/ADU occupied?



Answers	Count	Percentage
No	16	18.82%
Yes	1	1.18%

Answered: 17 Skipped: 68

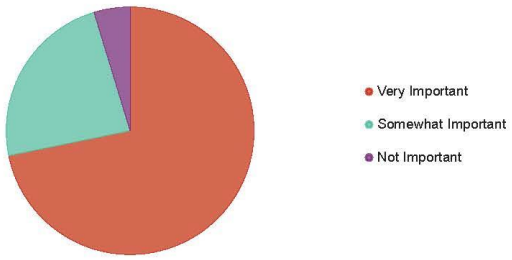
7. Please select the top reasons you choose to live or would like to live in Placentia. Check all that apply.



Answers	Count	Percentage
Quality of local school system	53	62.35%
Quality of home	33	38.82%
Quality / ambiance of neighborhood	54	63.53%
Safety of neighborhood	52	61.18%
Proximity to jobs	31	36.47%
Proximity to family	42	49.41%
Cleanliness of streets and surroundings	34	40%
City services and programs	19	22.35%
Proximity to shopping and services	38	44.71%
Proximity to medical care	30	35.29%
I do not want to live in Placentia.	2	2.35%

Answered: 85 Skipped: 0

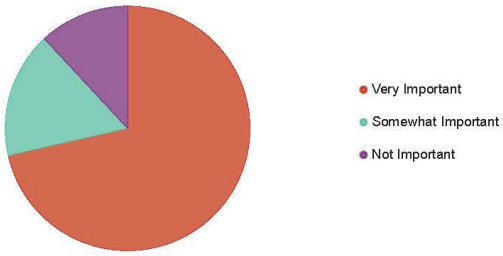
Maintaning the character of existing residential neighborhoods



Answers	Count	Percentage
Very Important	61	71.76%
Somewhat Important	20	23.53%
Not Important	4	4.71%

Answered: 85 Skipped: 0

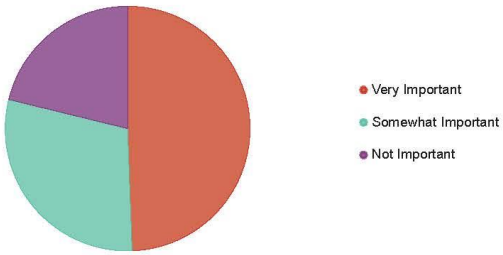
Ensuring that children who grow up in Placentia can afford to live in Placentia.



Answers	Count	Percentage
Very Important	60	70.59%
Somewhat Important	14	16.47%
Not Important	10	11.76%

Answered: 84 Skipped: 1

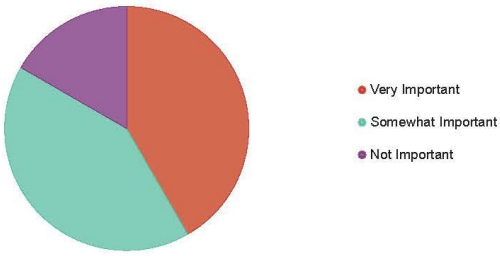
Ensuring that the housing market in Placentia provides a diverse range of housing types, including single-family, townhomes, apartments, duplex/triplex, and condo



Answers	Count	Percentage
Very Important	42	49.41%
Somewhat Important	25	29.41%
Not Important	18	21.18%

Answered: 85 Skipped: 0

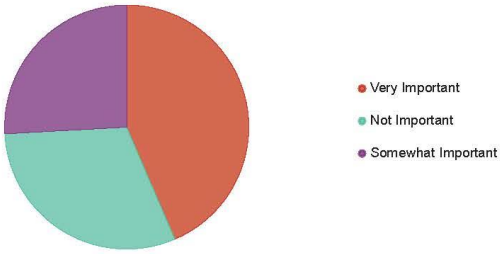
Establishing special needs housing for seniors, large families, veterans, and/or persons with disabilities



Answers	Count	Percentage
Very Important	35	41.18%
Somewhat Important	35	41.18%
Not Important	14	16.47%

Answered: 84 Skipped: 1

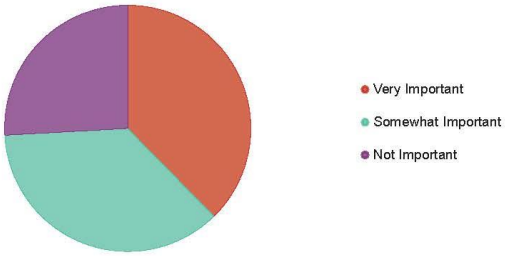
Integrating affordable housing throughout the community to create mixed-income neighborhoods



Answers	Count	Percentage
Very Important	37	43.53%
Not Important	26	30.59%
Somewhat Important	22	25.88%

Answered: 85 Skipped: 0

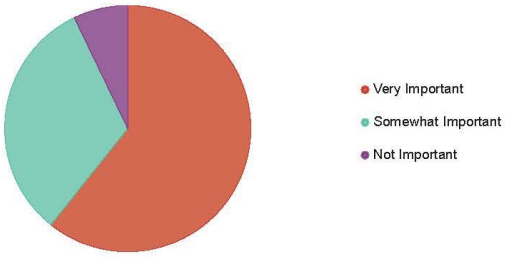
Providing shelters and transitional housing for the homeless, along with services to help move people into permanent housing



Answers	Count	Percentage
Very Important	32	37.65%
Somewhat Important	31	36.47%
Not Important	22	25.88%

Answered: 85 Skipped: 0

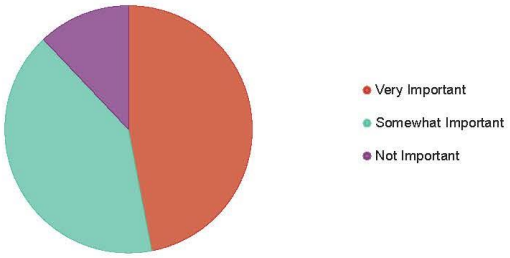
Encouraging the rehabilitation of existing housing stock



Answers	Count	Percentage
Very Important	51	60%
Somewhat Important	27	31.76%
Not Important	6	7.06%

Answered: 84 Skipped: 1

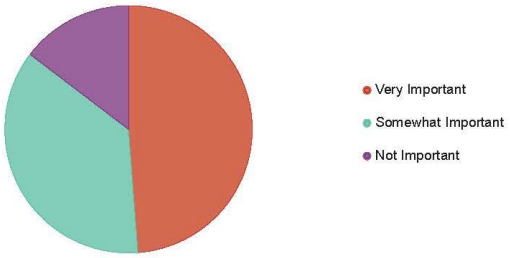
Establishing programs to help at-risk homeowners keep their homes



Answers	Count	Percentage
Very Important	39	45.88%
Somewhat Important	34	40%
Not Important	10	11.76%

Answered: 83 Skipped: 2

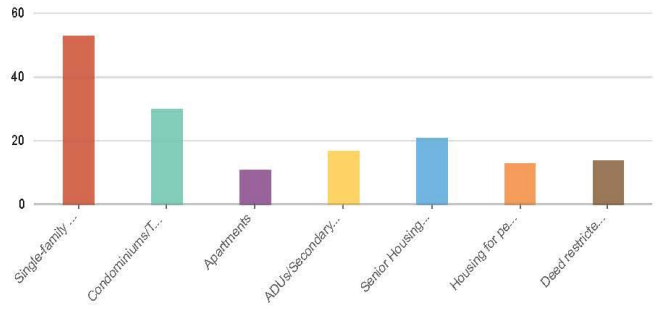
Fair/Equitable housing opportunities and programs to help maintain and secure neighborhoods



Answers	Count	Percentage
Very Important	40	47.06%
Somewhat Important	30	35.29%
Not Important	12	14.12%

Answered: 82 Skipped: 3

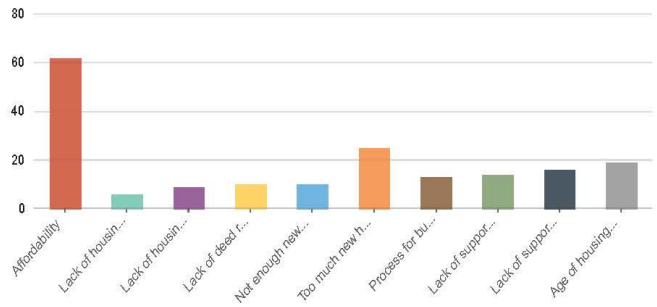
9. What type of housing do you think is most needed in the City of Placentia? Check all that apply.



Answers	Count	Percentage
Single-family houses	53	62.35%
Condominiums/Townhouses	30	35.29%
Apartments	11	12.94%
ADUs/Secondary Units or "Granny Flats"	17	20%
Senior Housing	21	24.71%
Housing for persons with Disabilities	13	15.29%
Deed restricted affordable housing	14	16.47%

Answered: 79 Skipped: 6

10. What do you think are the most important housing related issues facing Placentia today? Check all that apply.

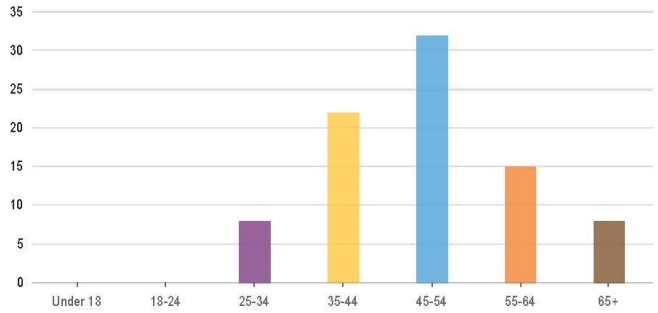


Answers	Count	Percentage
Affordability	62	72.94%
Lack of housing for large families	6	7.06%
Lack of housing for smaller families	9	10.59%
Lack of deed restricted affordable housing	10	11.76%
Not enough new housing development	10	11.76%
Too much new housing development	25	29.41%
Process for building housing is too burdensome	13	15.29%

Lack of support for renters	14	16.47%
Lack of support for homeowners	16	18.82%
Age of housing stock	19	22.35%

Answered: 82 Skipped: 3

11. What age range most accurately describes you?



Answers	Count	Percentage
Under 18	0	0%
18-24	0	0%
25-34	8	9.41%
35-44	22	25.88%
45-54	32	37.65%
55-64	15	17.65%
65+	8	9.41%

Answered: 85 Skipped: 0

12. Are there any additional comments/suggested goals that you would like to provide the City for its 2021 Housing Element update?

Word	Count

Mrvhsk#Odpehuw

Iurp=	Hd}dehwk#Kdqvexuj#E7K#P hd}dehwkC shrsdhirukrxvkjjrujA
Vhqw=	P rqgd|#Dxjxvw#k#5354#5=38#EP
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<&f<ze$^#d $O

Hi Andrew and Joe, I hope this finds you well! I wanted to check in to see if you had or will have any public meetings for the Housing Element. I was on vacation for two weeks in July, so I may have missed it. Thanks so much, Elizabeth

--

Elizabeth Hansburg
Co-Founder & Executive Director

PEOPLE FOR HOUSING
Orange County

c. (714) 872-1418
e. elizabeth@peopleforhousing.org

Click here to become a member of People for Housing!

1

ATTACHMENT 2

Mrvhsk#Odpehuw

Iurp=	R Ohdu|#Nduhq
Vhqw=	Wxhvgd|#P d|#7#5354#k68#DP
Wr=	Mhdqqhwwh#Rwhjd#Mrvhsk#Ddp ehuw
Ff=	Udp lh}#Urvdqqd
Vxemhfw=	Uhtxhvw#hu#Qrwlfh

Jeannette,

In the letter received from the Kennedy Commission after the last City Council meeting they requested to be notified when items regarding the Housing Element are presented.

> We would appreciate the City giving us notice of any public meetings regarding the Housing Element. We look forward to working with the City of Placentia to encourage effective housing policies that will help create balanced housing development and create much-needed affordable housing in our local communities. If you have any questions, please free to contact me at (949) 250-0909 or cesarc@kennedycommission.org.
> Sincerely,
> Cesar Covarrubias
> Executive Director
> Kennedy Commission

I don't think the agenda notification system on the website will work until we switch to Peak agenda.

We could put them on the agenda mailing list but those don't always reach agencies before the meeting.

Between us can we remember to notify them when you have a Housing Element item?

Let me know your thoughts.

Karen

Karen O'Leary | Deputy City Clerk
City of Placentia | 401 E. Chapman Ave. Placentia, CA 92870
714-993-8244 | FAX 714-961-0283 | koleary@placentia.org

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ATTACHMENT 2

Allen Matkins

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Timothy M. Hutter
E-mail: thutter@allenmatkins.com
Direct Dial: 619.235.1510 File Number: 391323.00001/4827-4977-7149.2

Via Electronic Mail

September 27, 2021

Joseph M. Lambert
Director of Development Services
City of Placentia
401 E Chapman Avenue
Placentia, CA 92870
jlambert@placentia.org

Re: City of Placentia 2021 Housing Element Update

Dear Mr. Lambert:

This law firm represents Orangethorpe Investment Partners LLC ("Applicant"), which has submitted an application to develop a mixed-use project ("Project") at 777 W. Orangethorpe Avenue in the City of Placentia ("City"), assessor's parcel number 339-112-27 (the "Property"). Our firm routinely assists property owners and developers as they navigate the entitlement process in jurisdictions throughout California. We also frequently advise clients regarding participation in and the implications of housing element updates. These efforts involve direct communication with the Department of Housing and Community Development and the California Attorney General's office with regard to compliance by local jurisdictions. We understand that the City is presently engaged in its planning process for its Sixth Cycle Housing Element Update covering the planning period from October 2021 to October 2029 (the "HEU").

The purpose of this letter is to formally notify the City of Applicant's interest and desire for the Property to be included as part of the City's Sites Inventory in the HEU. As you know, the Project would include up to 260 residential units. We appreciate that the HEU is a work in progress, and as you are aware, the viability of future development (and interest from property owners) can and should be considered by the City as it develops its Sites Inventory.

We will continue to work with our client and City staff to process the development application for SPA 2021-01, DPR 2021-02, and EA 2021-01, but wanted to bring this property to your attention in order to assist the City as you and your team evaluate potential opportunities for new development in the City.

ATTACHMENT 2

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law

Joseph M. Lambert
September 27, 2021
Page 2

Should you have any questions about the Project or the Property, please do not hesitate to contact me or my client's representative, Gilad Ganish.

Sincerely,

Timothy M. Hutter

TMH

cc: Gilad Ganish
Matthew R. Fogt, Esq.

ATTACHMENT 2

Appendix B: Residential Land Inventory

California Housing Element law mandates that each city show it has adequate sites available through appropriate zoning and development standards to accommodate a range of housing types and income levels. This appendix evaluates potential sites for additional housing development to accommodate the City's assigned need in the Regional Housing Needs Assessment (RHNA).

Methodology for the Sites Inventory Analysis

The residential sites inventory is comprised of four components: 1) approved projects; 2) vacant sites; 3) underutilized (non-vacant) sites with potential for additional residential development or redevelopment; and 4) potential accessory dwelling units (ADUs).

Based on the "default density" provisions of State law, vacant or underutilized sites of at least one-half acre that allow a density of at least 30 units/acre are considered suitable for housing in all income categories. Sites smaller than one-half acre and sites allowing multi-family or mixes-use at a density less than 30 units/acre are considered suitable for moderate- or above-moderate-income housing, while sites zoned for single-family-detached homes are assigned to the above-moderate category. For approved projects (Table B-2) income levels are based upon the actual or anticipated sales prices or rents.

Potential sites for residential development during the 2021-2029 planning period are summarized in Table B-1. As shown in this table, based on current zoning the capacity is not sufficient to fully accommodate the City's RHNA allocation in all income categories. Analysis supporting this finding is provided in the discussion below and in Tables B-2 through B-6. Program HE-1.8 in the Housing Plan includes a commitment to identify and rezone sufficient sites to address this shortfall.

Table B-1: Residential Sites Summary

Income Category	Very Low	Low	Moderate	Above Moderate	Total
Approved Projects (Table B-2)	-	252	-	774	1,026
Vacant Sites (Table B-4)	-	-	~~394~~ 415	65	~~459~~ 480
Underutilized Sites (Table B-5)	698	~~404~~ 315	~~371~~ 369	~~247~~ 0	~~1,720~~ 1,380
ADUs	14	24	17	1	56
Total Capacity	712	~~680~~ 591	~~782~~ 974	~~1,087~~ 840	~~3,196~~ 2,942
RHNA	1,243	680	782	1,693	4,398
Surplus (Shortfall)	(531)	(89)	19	(~~606~~ 853)	(~~1,137~~ 1,473)

Source: City of Placentia, 2021

Approved Projects

Table B-2 summarizes residential developments that have received some form of approval and will become available during the planning period. Three projects have been approved in the TOD district at densities ranging from 73 to 89 units/acre. One of these is a 100% low-income deed-restricted housing development (USA Properties, Figure B-1). These projects demonstrate that high-density residential and mixed-use development is highly marketable in this area. All of the projects were built on underutilized sites formerly occupied by industrial and warehouse uses.

Table B-2: Approved Projects

Project/ Address	Product Type	Density (units/ac)	Units by Income Category	Status/Notes
The Herald 110-132 E. Crowther Ave.	6-story multi-family	72.9	215 (market-rate)	TOD district; redevelop-ment of industrial/warehouse; 95 du/ac max allowed (77%)
505, 515, 523, 531, 535 W. Crowther Ave, 407 Goetz Place, 409 Evelyn Place	5-story mixed use	82.9	418 (market-rate)	TOD district; redevelopment of industrial/warehouse; 95 du/ac max allowed (87%)
USA Properties 207-209 W. Crowther Ave.	6-story mixed use	88.7	189 (187 deed-restricted lower-income)	TOD district; redevelopment of former packing house; 95 du/ac max allowed (93%)
Santa Angelina NE corner Angelina/Morse	2-story multi-family	16.9	65 (deed-restricted senior low income)	Redevelopment of a church campus. Zone change from R1 to R3.
455 S. Van Buren	Townhouse	25.0	139 (market-rate)	Redevelopment of under-utilized and blighted non-conforming automotive dismantling yard.
Totals			**252 low 774 above-mod**	

Figure B-1: TOD Affordable Mixed-Use Project (207-209 W. Crowther Ave)

Vacant Sites

Like many older communities in the Southern California metropolitan area, Placentia has minimal vacant land suitable for residential development. The majority of vacant land is within Specific Plan 7, bounded by Buena Vista Avenue to the north, Rose Drive to the west, Orangethorpe Avenue along the south, and the Van Buren Street to the east. Many of the vacant parcels are contiguous land areas too small to allow for construction. However, through lot consolidation these parcels have the potential to provide opportunities for new housing construction. Table B-4 shows vacant sites that are suitable for residential development. Based on the densities permitted in these areas, future units would be affordable to moderate- and above-moderate-income households. Due to high land values and the relatively low densities allowed on these parcels, it is expected that future housing developments will seek near the maximum allowable number of units on each site; however, the inventory shown in Table B-3 conservatively reflects a 10% reduction from the allowable number of units.

Underutilized Sites

Underutilized sites with potential for additional residential development or redevelopment are listed in Table B-4. Recent development activities and trends indicate that the development of residential uses on nonvacant sites that are underutilized is prevalent throughout the City. This is further supported by the policies of the City's General Plan. The most significant opportunities for additional housing development are within the TOD and Old Town areas.

Recent real estate development trends in the urban portions of Orange and Los Angeles counties demonstrate the increasing market feasibility of multi-family and mixed-use redevelopment at densities well above 30 units/acre. As discussed above, several projects have already been approved in the Placentia TOD area at densities up to 89 units/acre. The realistic yield estimated in Table B-4 for parcels in the TOD area is assumed to be 83 units/acre, which is the average density of the three recent projects described above. In all other zones the inventory conservatively reflects a 10% reduction from the allowable number of units for each site.

Given the complexity of factors that influence property owner decisions regarding development, and the large number of nonvacant, residentially zoned sites with demonstrated development potential, it has been necessary for the purposes of this sites inventory to utilize simple, standardized factors to determine which sites may realistically develop during the planning period. The broadest factor that the City has utilized is remaining residential development capacity, calculated as the difference between a site's zoned residential capacity and existing residential units on site. The City analyzed recent and past development trends to determine sites inventory selection criteria. ~~Only nonvacant sites with~~with a majority of sites have at least 25 percent of remaining residential development capacity and sites with no vacant or underutilized space were only added if they were suitable for residential uses as a mixed-use component as shown in Figures B-8 and B-9. ~~have been included in the inventory.~~ Nonvacant sites that have been developed within the last two decades have also been excluded from the inventory, due to the low likelihood of redevelopment during the planning period.

Table B-5 lists the candidate sites identified, including notes detailing why each site was selected. A number of nonvacant sites were selected as they are underutilized and have had frequent property turnover. In addition, recent and frequent property turnover may be seen as a sign of an unsuccessful commercial lot. These sites are largely commercial in nature and a majority of the nonvacant sites identified are underutilized or are considered non vacant per HCD's standards, however, have viable capacity for redevelopment. Each site was analyzed based on viability for redevelopment, sites were evaluated based on:

- Parcel acreage
- Availability of land for residential development
- Existing use
- Accessibility to resources and transit proximity

As part of the site selection process, the City analyzed existing residentially zoned parcels that have a demonstrated propensity to develop at their existing densities. The City has also evaluated recent projects which have included the development of residential units on non-vacant sites for residential use. Table B-3 provides each project's location, zoning, use prior to development with housing, and the number of dwelling units constructed on site. Table B-3 provides recent examples of redevelopment of nonvacant sites to higher-density residential use. As mentioned above, the City identified nonvacant sites with at least 25 percent of remaining residential development capacity and parcels with no recent development in the inventory. As shown in Table B-3 below, recent development on nonvacant parcels had at least 25 percent of remaining residential development capacity and existing structures were all build prior to 1990. Additionally, improvement to land-value ratios (ILV) were analyzed for the examples in Table B-3 below. All land value ratios of the parcels prior to redevelopment were less than .50, meaning that the land was more valuable than the structures that were on the parcels. Low ILV ratios indicate suitability of redevelopment. Underutilized sites in Table B-5 have similar ILV ratios to the examples in Table B-3. All parcels in the TOD zone had ILV rations under .25, meaning that the land was significantly more valuable than the structures on the parcel. Sites in the Old Town zone experiences higher ILV ratios, but on average, underutilized sites in the Old Town zone experience ILV ratios from .25 to .80.

In the examples below, parcels with existing residential uses were redeveloped to provide significantly more units than existing. On sites assuming a net gain of one residential unit, it is assumed that second units may be developed utilizing the benefits of recent state law. The City anticipates that this trend will continue. Market trends show that developers in the region aim to intensify uses of underutilized sites to increase the number of units. The efficient use of land not only brings more units to market, but also reduced overall per-unit costs for developers.

The City has also conducted a parcel specific analysis of existing uses for each of the identified sites. This analysis of existing uses, including indicators of a likelihood that the existing use will redevelop within the next eight years, are provided in Tables B-4 through B-6. The information that the City used for this analysis is readily available to the City and found through online research.

Table B-3: Examples Approved Development Projects of Non-Vacant Sites for Residential Uses

Project Address/ APN	Dwelling Units	Zoning	Size (Acres)	Use Prior to Housing	Project Description
207 & 209 W. Crowther Ave	189	TOD (Transit Oriented Development)	2.13	City-owned Property	Five-story, mixed-use building with 189 affordable housing units, two-level semi-subterranean parking structure, and 1,500-square feet of retail space. Vacant parcels since early 2015. Prior to demolition, there were multiple structures used for storage and distribution purposes. Approximately 50% of the parcels were vacant or used as parking. Original structures were built pre-1960s.
1945 E. Veterans Way	50	R-3 High Density Residential	3.66	Manufacturing	Veterans Village: Provides homeless veterans housing in the form of 45 one-bedroom units and four two-bedroom units. 49 extremely low units, plus 1 caretakers' unit. 100% Affordable. Two parcels with single structure serving as office for car storage business. Approximately 95% of the parcels were vacant. Original structure was built pre-1980s.
1314 N. Angelina Ave	65	R-3 High Density Residential	3.85	Church, multi-purpose building, and Preschool	Development of an affordable senior housing project consisting of two, two-story buildings, one with 33 units and one with 32 units, as well as a new parish hall for an existing church. Parcel has 3 existing structures that were all built pre-1990's. Approximately 60% of the parcel is vacant or used as parking.
505 W. Crowther Ave	418	TOD (Transit Oriented Development)	4.4	Manufacturing/ Industrial	Five-story, mixed-use development consisting of 418 multifamily residential units with associated amenities for residents, 10,553 square feet of retail space, 3,572 square feet of leasing office space, and a seven-level parking structure on a 5.04-gross acre site within the Transit Oriented Development (TOD) Packing House District. Market Rate. Previously three separate parcels with various industrial and manufacturing uses. All structures built pre-1970s. Each parcel was approximately 50% vacant.
150 E. Crowther Ave	215	TOD (Transit Oriented Development)	2.95	Manufacturing/ Industrial	Five-story apartment complex, with roof top amenities, and a 6-story parking garage. Previously two separate parcels

Project Address/ APN	Dwelling Units	Zoning	Size (Acres)	Use Prior to Housing	Project Description
					with industrial and manufacturing uses. Both structures built pre-1970s. Each parcel was approximately 60% vacant.
455 S. Van Buren St	139	R-3 High Density Residential	5.57	Manufacturing/ Industrial/ Residential	Development of 139, three-story townhome units on an approximately 5.57-acre site. Market Rate. Previously three separate parcels. Two parcels were existing single-family homes and the other was a mostly vacant lot with 5 existing structures used for automotive repair and parts uses. All structures built pre-1960s. One single family parcel was approximately 80% vacant and the other was approximately 60% vacant. The largest parcel was 90% vacant with most of the parcel used as a junk yard.
1049 Golden Ave	26	R-3 High Density Residential	1.3	~~Oil Extraction facility~~Single-family home	Six, three-story residential townhome buildings consisting of a total of 26 condominium units on a 1.3-acre, unimproved vacant lot. Market Rate. Previously a single-family home on a mostly vacant lot. Home was built pre-1970s and was approximately 90% vacant.
Alta Vista & Rose St	54	SP-7	6.46	Oil extraction facility	54 residential units and 10,615 square feet of commercial space on an approximately 8.46-acre former oil operation site. Market Rate.
Orchard Dr. & Highland Ave	16	R-3 High Density Residential	1.24	Oil Extraction facility	Four, three-story, multifamily buildings with 16 townhome units. Former oil extraction site.
~~1952 & 1958 Veterans Way~~	~~39~~	~~R-3 High Density Residential~~	~~1.3~~	~~Storage Facility~~	~~Four, three-story buildings, with 39 townhome units.~~
918 & 926 W. La Jolla St	10	R-3 High Density Residential	0.42	SFD home	Three-story, ten (10) unit MFR (two buildings) Previously a single-family home on a mostly vacant lot. Home was built pre-1970s and was approximately 90% vacant.
738 W. La Jolla St	10	R-3 High Density Residential	0.43	Unfinished MFR	Three-story, ten (10) unit MFR (two buildings) Previously an unfinished multifamily-family development. Unfinished development was demolished and redeveloped.
1548 Spruce St	10	SP-7	0.52	Two single-family homes	Two buildings with a total of ten attached condominiums. Previously a single-family home on a mostly vacant lot. Home was

Project Address/ APN	Dwelling Units	Zoning	Size (Acres)	Use Prior to Housing	Project Description
					built pre-1970s and was approximately 90% vacant.
503 & 513 S. Van Buren Street	12	R-3 High Density Residential	0.38	Single-family Residences (~~2~~ 5 structures total)	Development of two, three-story residential town home buildings. Previously five single-family homes on a large lot. Homes were built pre-1970s and was approximately 30% vacant.
Alta Vista Street, b/w Rose Drive and Jefferson Street	100	SP-7	17.02	Oil extraction facility	Development of a 100 single-family, detached two-story dwelling units. Former oil extraction site.

Table B-3 above shows that there is interest in redevelopment of non-vacant sites within the City. Many of the candidate housing sites within the inventory are similar in nature to those mentioned above in that they are industrial or manufacturing land uses. Additionally, many of the candidate housing sites are near residential uses, which makes them more compatible for residential development as there are already residential neighborhoods adjacent. All sites in the candidate housing site inventory have been prioritized based on their redevelopment potential and their beneficial locations within the City.

The City's oldest developed areas are the Old Town and TOD Packing District areas which were important in the City's early history. Placentia's major industries in the 20th Century were primarily oil extraction and agriculture. As both phased out, these areas which were previously major employment hubs became vacant and slowly deteriorated. The City attempted to revitalize the area through its history but limited private investment prevented any meaningful public investment. Comprehensive planning efforts have revitalized the area and have attracted private investment back into the City. As shown in Table B-3, development in the TOD and R-3 zones have successfully redeveloped from uses associated with oil and agriculture into higher density uses. The City sees this trend continuing and looks at these examples as justification for assumptions made in this Appendix.

The identified sites in Tables B-4 through B-6 are similar in size as the examples in Table B-3 which indicates that lot size is not an impediment to redevelopment. Additionally, the existing uses of identified sites are similar, and in many cases, identical to the examples in Table B-3. Past performance and examples in the City can guide future redevelopment opportunities. As mentioned above, many of the candidate sites are located near or adjacent to existing residential uses, making redevelopment into residential more feasible due to compatibility. Additionally, the existing infrastructure in already developed areas can greatly reduce the cost of infrastructure needed to serve a new development, thereby facilitating development. Many of the candidate sites are aging and underutilized, making redevelopment an attractive option for both current owners and future developers.

As the region's economy continues to diversify, it is experiencing a strong demand for infill development to meet the needs of the growing workforce. At the same time, the City and the region are experiencing market factors such as a limited land supply and low housing inventory. Many property owners of older

commercial properties are willing to consider converting their land to residential use, or adding new structures to sites with existing development to increase densities or create mixed-use developments, because of the significantly higher market land value. The City believes that these factors have and will continue to influence increased infill development.

To further justify housing opportunity sites included in this appendix, example developments have been identified in Placentia and adjacent cities to demonstrate "recycling" trends occurring in the region. Recycling land is desirable to help achieve the Legislature's goal of alleviating California's identified housing crisis. According to HCD, during the last ten years, housing production averaged fewer than 80,000 new homes each year, and ongoing production continues to fall far below the projected need of 180,000 additional homes annually. The lack of supply and high rent costs suggests that land recycling activities is a method to consider when addressing housing needs.

Considering existing development and a lack of vacant land, the City's housing strategy to demonstrate capacity for the 2021-2029 RHNA growth need relies on infill development opportunities throughout the City. In each of these sites, existing land use policy either allows residential by-right or allows residential by-right through a mixed-use development project. The TOD Zone does not allow 100 percent nonresidential development and all subzones require a residential component. Since the adoption of the TOD Zone in 2017, two projects have been completed and both were overwhelmingly residential (over 90% of total square footage). All three pipeline projects in the TOD zone are also a majority residential as shown in Table B-2.

The Old Town Zone does allow standalone 100 percent nonresidential, although in a limited capacity. Only the Main Street, Village, and Mixed-Use subareas allow 100 percent by-right nonresidential development for specific uses up to 10,000 square feet. The 100 percent nonresidential uses allowed in these subzones are typically ground floor tenants such as:

- Antique or collectible store
- Artisan/Handcraft Shop
- General retail – less than 5,000 sf
- Groceries, specialty foods – 10,000 sf or less
- Neighborhood Market (without alcohol beverage sales) – 10,000 sf or less
- Restaurant
- ATM
- Bank (2,000 sf or less)

While hypothetically the sites in the Main Street, Village, and Mixed-Use subareas can be 100 nonresidential, it is assumed that nonresidential tenants would occupy the ground floor with residential uses occupying upper floors identical to the current uses in Old Town. Similar development examples can be seen in the region such as the Anaheim Packing House District, Old Town Orange, and Downtown Santa Ana.

The High-Density Residential and Public Facility subareas do not allow noncommercial uses except for office uses on the upper floors in the Public Facility subarea. The Old Town Zone has not had new construction since its adoption in 2017 but several building rehabilitations and façade improvements have been completed.

In Old Town, the City is working with Mercy Housing to develop 65 to 70 affordable units. The proposed development would be 100 percent residential and affordable. While this is the first proposal in the Old Town Zone since it's been adopted, the City believes that development patterns in the Old Town Zone will mirror the TOD Zone due to the similarities in land uses, geographical location, and current market factors. The Old Town zone also includes built-in incentives which encourage residential developments such as a sub-area allowing high-density housing by-right without a public hearing, which significantly reduces development processing timeframes.

The City anticipates that development in both the TOD and Old Town Zones will continue to be 100 percent residential or mixed-use with residential components. As candidate and non-candidate sites develop, the City will continue to monitor development trends and if residential development is not occurring as anticipated, the City will adjust development assumptions or propose residential requirements in all Old Town subareas, similar to the TOD Zone. Additionally, the City has added Program HE-1.15: Transit-Oriented Development to the Housing Plan which encourages Transit-Oriented Developments through incentives that may include financial assistance, density bonus, and regulatory waivers.

In the interim, the City will promote SB 6 or AB 2011 to applicants and developers in an effort to encourage residential development throughout the City. SB 6 (Caballero, 2022) allows local jurisdictions to consider housing projects proposed on commercially zoned sites that are 20 acres or less where office, retail, or parking are the primary permitted uses if certain criteria are met. The legislation requires that projects meet certain criteria, in which the jurisdiction may streamline the permitting process and/or require affordability standards per SB 35 (Wiener, 2017) and the Housing Accountability Act. AB 2011 also allows jurisdictions to consider housing projects proposed on commercially zoned sites with streamlined ministerial review under two scenarios:

- 100 percent Affordable Housing Developments in Commercial Zones; and
- Mixed-Income Housing Developments Along Commercial Corridors

Projects invoking AB 2011 (Wicks, 2022) must be located on sites meeting specific criteria and approved projects are subject to skilled labor and prevailing wage requirements. The City considers future housing opportunity on commercial sites through SB 6 and AB 2011 as a local policy decision for future consideration. The City's 6th cycle RHNA goals are met through the provisions of vacant and nonvacant residential, TOD Zone, and Old Town sites. Commercial zoned parcels have not been identified as candidate sites and are not considered as part of the City's 6th cycle RHNA strategy but can provide additional development opportunity sites.

"Recycling" Examples

Regional commercial trends within Southern California are leading to the re-envisioning of shopping centers and malls as lifestyle centers where regional and neighborhood serving retail uses complement housing for a more walkable development. The sites in **Table B-5** demonstrate significant potential to

redevelop due to existing tenant vacancies and vacant land that is available to be developed within shopping center and commercial properties. These areas have drastically underutilized parking lots which represent opportunity to introduce residential uses which complement remaining existing commercial uses and bring new users into the area. The City assumes that development of these areas will either occupy underutilized surface parking areas in addition to the existing commercial uses or will replace existing uses all together. This is consistent with development seen within the region and realistic for future development in Placentia.

Recent local examples of this type of redevelopment include:

- MainPlace Mall in Santa Ana which envisions the development of up to 1,900 residential units in addition to existing commercial, office, and the addition of a hotel.
- Metro Towne Square mall in Santa Ana, an outdoor neighborhood serving shopping mall where plans are underway to redevelop the area with a new mixed-use development with nearly 4,000 dwelling units and experiential commercial retail stores/restaurants.
- Westminster Mall in Westminster which envisions up to 3,000 new residential units in a dated mall space. The new units largely occupy open parking fields as is envisioned in the sites proposed in the cities inventory.

Market Analysis

In addition to an existing use analysis, the City of Placentia utilizes information on market conditions to facilitate the redevelopment of non-vacant sites for residential use. A California Association of Realtors (CAR) report for Historic Housing trends shows that the average time a unit spent on the market in Orange County is just 17 days in the last four years (2019-2023) and just 15 days in the last two years.[1]

Additionally, according to the CAR Current Sales and Price Statistical Survey, the median cost of a home for sale in Orange County increased by over 30 percent from 2021-2023[2]. Both indicators signify an increased market demand for new housing.

In addition to market appetite, the cost of land in the City, on average, is lower than neighboring jurisdictions. Prices for vacant residential land in Placentia are estimated to be $35 to $50 per square foot. On average, this is lower than the surrounding jurisdictions and the average for Orange County which ranges from $60 to $120 per square foot. Paired with increased demand for housing, and recent infill development trends, assumed redevelopment in the City is reasonable.
Based on a multitude of factors listed above as well as past development trends, the City determined that nonvacant sites are not an impediment to additional residential development and will likely discontinue in the planning period and are suitable to accommodate the City's RHNA. Chapter 4: Housing Plan reinforces the City's objectives and supports the development of housing at all income

[1] Median time on Market of Existing Detached Homes, Historical Data, California Association of Realtors (CAR), Accessed online: October 10, 2023. https://www.car.org/marketdata/data
[2] Current Sales and Price Statistics, California Association of Realtors (CAR), Accessed online: October 10, 2023. https://www.car.org/marketdata/data

levels. The Housing Plan has programs and policies such as Program HE-1.8: Adequate Sites for Housing Development, that support the development of housing regardless of vacancy status. The Housing Plan includes incentives and concessions to encourage the development of housing in the City.

Transit Oriented Development Packing House District Corridor Analysis

The Transit Oriented Development Packing House District is an area surrounding the Crowther Ave and Melrose St intersection. The old Packing House District played a vital role in Placentia's history and was once a major employment center for the region. As the agriculture industry declined in the region, so did the businesses that served the industry. As the area declined, industrial and manufacturing buildings went into decline and some had to be demolished. With the turn of the century approaching, the City began its plans to improve the area now known at the TOD District. In 2005, the Melrose underpass and associated streetscape improvements were completed. In the same year, the plan for the Metrolink Station began. In 2009, the pedestrian bridge connecting Old Town and the old Packing District began. In 2015, the TOD and Old Town revitalization plans began and both were adopted in 2017. Since 2017, the TOD District has seen rapid redevelopment, with transit-oriented residential developments springing up along Crowther Ave. and transforming the character of the area.

Figure B-2: TOD District Project Area

The purpose of the TOD Packing House District is to encourage an appropriate mixture and density of activity around the Metrolink station to increase ridership and promote alternative modes of transportation to the automobile. The consequent intent is to decrease auto-dependency, and mitigate the effects of congestion and pollution. The development standards seek to achieve this by providing a pedestrian, bicycle, and transit-supportive environment configured in a compact pattern and a complementary mix of land uses all within a comfortable walking distance of the station.

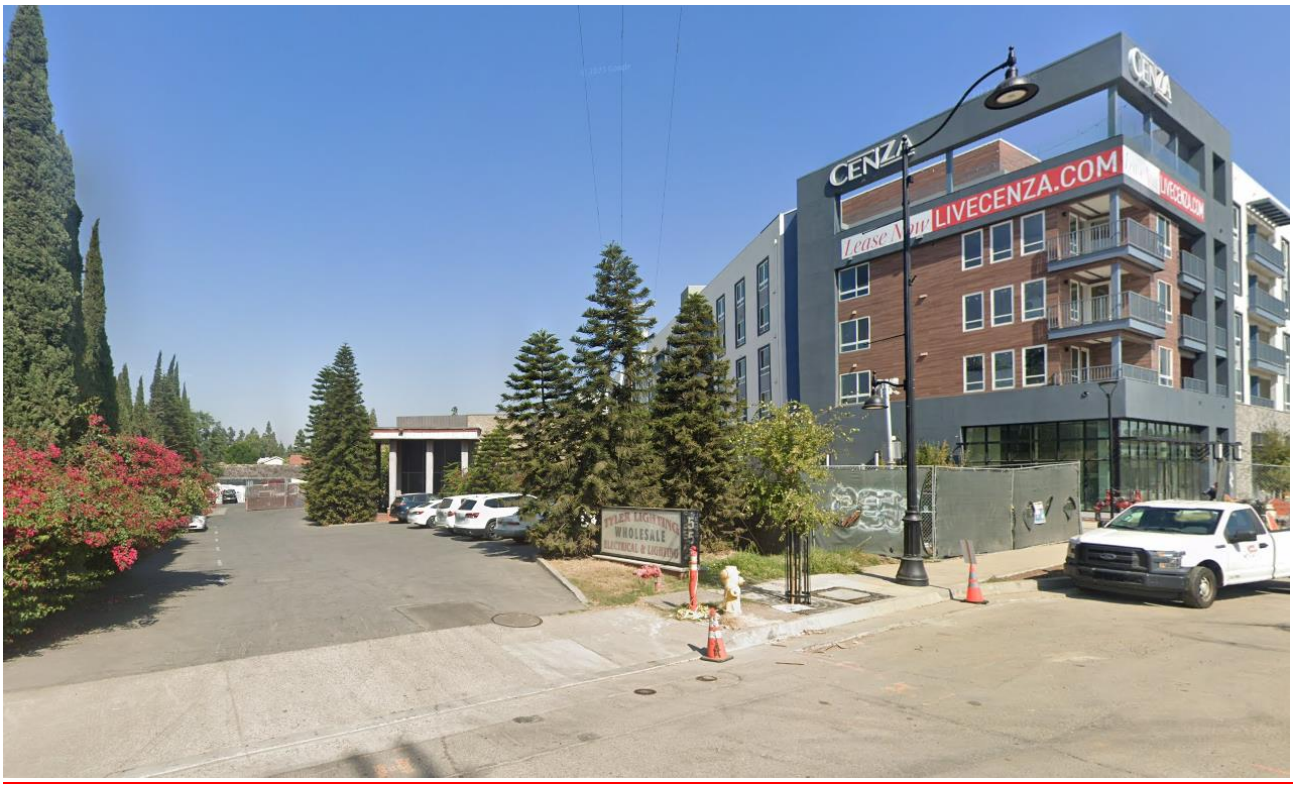
Recent developments such as The Herald (215 units) and Cenza (418 units) are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing

uses which did not align with the City's vision. These uses included industrial, storage, and manufacturing uses as shown in Figure B-3 below. Many of the existing businesses were experiencing frequent turnover or were in rapid decline. Many of the existing structures were vacant or semi vacant. Many of the uses exist and continue to present attractive opportunities for redevelopment.

Figure B-3: TOD District Existing Conditions

As the TOD District redevelops, property owners in the area become more interested in redevelopment options on their property. Because many of the existing uses are in decline, redevelopment becomes an attractive alternative to business as usual. Properties adjacent to new development, such as the one shown in Figure B-4 below, become more valuable, making property owners more inclined to redevelopment proposals. The TOD District is seeing a rapid increase in development and existing properties continue to see turnover, structural decline, and increased developer interest. Collectively, the TOD District has become one of the most attract opportunities for redevelopment in north Orange County.

Figure B-4: TOD Affordable Mixed-Use Project (505, 515, 523, 531, 535 W. Crowther Ave, 407 Goetz Place, 409 Evelyn Place)



Recently developed and approved developments in the TOD District had existing uses identical to those in Table B-5. Existing uses on these sites include large parcels with warehouses, industrial buildings, surface parking lots, truck loading bays, and dilapidated single-family homes. On all of these sites, primarily structures do not occupy more than 75 percent of the parcel. All of the commercial and industrial uses on the north side of Crowther Ave are older businesses that either experience frequent turnover, have gone out of business, or are currently vacant. The single-family homes were all constructed prior to 1970 and many are in need of substantial rehabilitation.

Recent developments such as the one shown in the Figure B-4 previously had similar or identical uses as those in Table B-5. The development in Figure B-4 was once four large parcels with commercial and

industrial uses as well as a couple single-family homes. These uses mirror the uses that are seen in Table B-5. Past, current, and recently approved development examples indicate that there is realistic redevelopment potential in the TOD District. Because existing uses did not preclude development of recent residential projects, and because these uses are similar or identical to those identified in Table B-5, the City is confident that the TOD District will redevelop as anticipated and will present one of the greatest opportunities for residential growth in the 6th Cycle.

While past, current, and recent approvals are examples of future development scenarios in the TOD District, provisions are also codified into the TOD District to encourage the City's vision of the area. As of 2022, if a structure or use in the TOD District is abandoned or discontinued for twelve months, the property or use must comply with the new TOD allowed uses. Additionally, existing structures cannot be altered or expanded if they are nonconforming uses. All of the uses on sites in Table B-5 that are not residential are nonconforming uses, meaning that if any structure or use is abandoned or discontinued for twelve months, they must conform with the adopted TOD District regulations, making redevelopment increasingly realistic. These provisions have increased property values and have allowed current property owners to benefit from the rezoning.

Old Town Revitalization Zone Corridor Analysis

The Old Town Placentia Revitalization Plan is a plan for the revitalization, activation, and economic growth of the City's original central business district founded in 1910 around the building of the Placentia train depot and the citrus packing houses. Existing property owners, residents, and businesses have preserved the area with a unique and diverse mix of small businesses, restaurants, and residential uses as shown in Figure B-5. Among Orange County's old towns, Placentia is unique in its small scale and variety of land uses. Today, population groups of all types are looking for small scale, walkable urban centers around transit to live, work, and play. This is occurring in Orange County with new, more compact, and transit-oriented developments and historic reuse districts emerging in Anaheim, Orange, Fullerton, and Santa Ana.

Figure B-5: Old Town Existing Conditions

The Plan Area consists of 33 acres and 147 parcels with a diverse mix of land uses, surrounded by residential neighborhoods to the west, east, and north as shown in Figure B-6. Old Town has many mixed-use buildings, a small number of historic buildings, including the Senior Center and Fire Station. The anchor of the plan area is the "Main Street" retail core which forms the destination for Old Town. Old Town is connected to the TOD District via a pedestrian bridge and is served by the Metrolink train station.

Figure B-6: Old Town District Boundaries

The anticipated build out for the Old Town Zone differs from the assumptions made in the TOD Zone. Whereas development is expected to replace existing uses in the TOD Zone, development in the Old Town is expected to preserve, enhance and complement existing uses in order to maintain the character of the area. In many cases, this would mean residential uses would be integrated into existing uses, would be added as additional stories, or would be constructed on underutilized portions of existing parcels. This strategy would allow for an intensification of existing uses while maintaining the Old Town character.

The Old Town Zone has not had new construction since its adoption in 2017 but several building rehabilitations and façade improvements have been completed. The City is currently working with Mercy Housing to develop 65 to 70 affordable units in the Old Town Zone. The proposed development would be 100 percent residential and affordable. While this is the first and only proposal in the Old Town

Zone since it's been adopted, the City believes that development patterns in the Old Town Zone will mirror the TOD Zone due to the similarities in land uses, geographical location, and current market factors. The Old Town zone also includes built-in incentives which encourage residential developments such as a sub-area allowing high-density housing by-right without a public hearing, which significantly reduces development processing timeframes.

As of 2022, if a structure or use in Old Town is abandoned or discontinued for twelve months, the property or use must comply with the new Old Town Zone allowed uses. Additionally, existing structures cannot be altered or expanded if they are nonconforming uses. All of the uses on sites in Table B-5 that are not residential are nonconforming uses, meaning that if any structure or use is abandoned or discontinued for twelve months, they must conform with the adopted Old Town regulations, making mixed-use redevelopment increasingly realistic. These provisions have increased property values and have allowed current property owners to benefit from the rezoning.

A potential development scenario is provided below. In this redevelopment scenario, underutilized spaces such as parking lots and generous setbacks are transformed into attractive, walkable, mixed-use developments that preserve existing uses. Existing uses do not preclude redevelopment scenarios and residential uses are incorporated into existing uses.

~~Figure B-2~~Figure B-7: Old Town Redevelopment Scenario

Old Town Representative Sites Analysis

Due to the large number of suitable sites in Old Town Placentia, the City completed three "representative site/scenario" analyses to demonstrate the suitability of development in Old Town. The analysis highlights different scenarios in which Old Town candidate sites can be categorized into. These categories include:

1. Mixed-uses with second story residential;
2. Redevelopment of existing underutilized sites and commercial uses with low improvement to land ratio (ILV); and
3. Multifamily and large residential structures.

The analysis was prepared to describe development patterns and highlight similarities with candidate sites identified in the sites inventory. During the site selection process, the City analyzed whether existing uses would impede or prevent additional development. Based on those factors, candidate sites were removed if they were deemed not suitable for residential development in the planning period. The following examples highlight existing development in the City and are representative of residential development in the Old Town zone.

1. Mixed-Uses with Second Story Residential

Old Town Placentia currently has a variety of uses ranging from dense multi-family housing to auto mechanic shops. The three blocks of Sante Fe Avenue between Bradford Avenue and Walnut Avenue are the historic core of Old Town Placentia. The three blocks have the densest commercial uses in Old Town and house many historic buildings which contribute to Old Town's character. The intent is to preserve the Old Town character while encouraging efficient use of existing development through mixed-uses.

Many of the buildings along Sante Fe Avenue are mixed-use with a residential component. Examples of mixed-use buildings in Old Town include the three buildings from 120 to 128 W Sante Fe Avenue which have first floor commercial and second floor residential (Figure B-8). The three buildings take up more than half the block from Bradford Avenue to Main Street. Directly across the street, four separate buildings also have a mixed-use component with first floor commercial and second floor residential as shown in Figure B-9 (155 to 191 W Sante Fe Avenue). Additional examples include:

- 240 S. Bradford Ave
- 214 S. Sante Fe Ave
- 216 S. Sante Fe Ave
- 314 S. Sante Fe Ave
- 217 S. Bradford
- 202 S. Bradford

The Old Town Revitalization Plan was adopted in 2017 to guide the future of the Old Town planning area. The vision for revitalization of Old Town Placentia includes a combination of historic preservation and infill complementary development. Existing mixed-use development serves as a guide and vision of what the Old Town area can become. Through the Old Town Revitalization Plan objectives and goals, the Housing Element, and private investment, the City believes the area can be enhanced with more intense

uses while preserving the neighborhood character. The City believes the Old Town area is suitable for mixed-use development and existing mixed-uses indicate it is feasible.

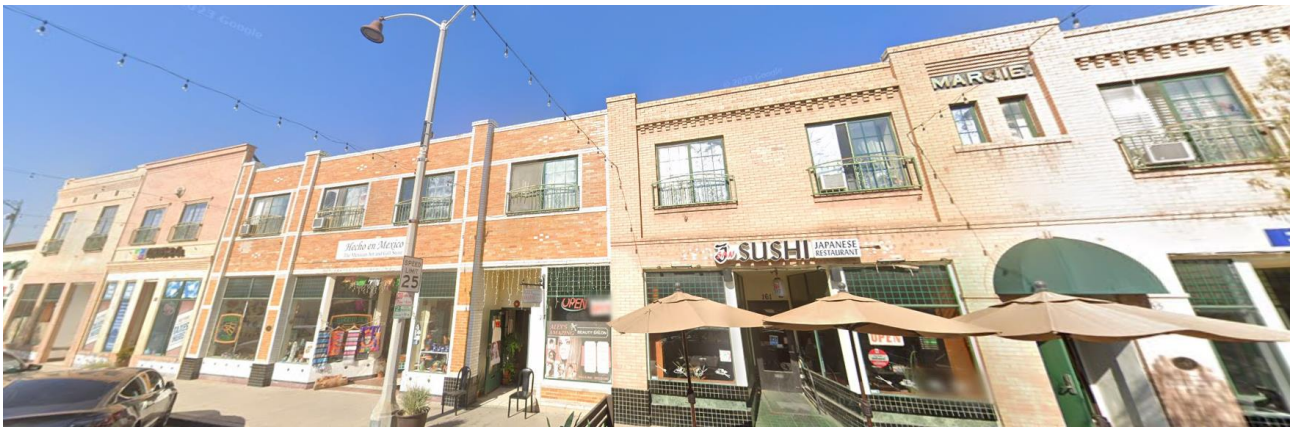
Preservation is an important objective and goal in the Old Town planning area. Although there is no development prohibition in place, the City's goal is to preserve and enhance properties identified as having historic significance. The following properties have been identified as historic and are identified as candidate sites in Table B-5. These sites will be preserved and enhanced through complimentary residential additions:

- 126 W. Sante Fe Ave
- 141 S Sante Fe Ave
- 238 S Bradford Ave
- 125 S Bradford Ave
- 102 S Bradford Ave
- 120 S Bradford Ave

The historic significance of these sites do not preclude additional development and are not an impediment to development. All of these sites are anticipated to become mixed-use developments with the intention of keeping the original character of the buildings.

Figure B-8: 120 to 128 W Sante Fe Avenue Mixed-Use Examples

Figure B-9: 155 to 191 W Sante Fe Avenue Mixed-Use Examples



2. Redevelopment of Underutilized Sites and Existing Commercial Uses with Low Improvement to Land Ratio (ILV)

As analyzed in this Appendix, the City's sites selection process considered various factors when determining the suitability of sites. One of those factors is the improvement to land ratio (ILV). The ILV ratio can be used to determine how underutilized a site may be, with ILV ratios below 1.0 indicating that the land a structure is on is more valuable than the structure itself. Sites with low ILV rations may be ripe for redevelopment. The ILV ratio is especially relevant when analyzing the redevelopment potential on sites with existing commercial uses.

During the site selection process, the City calculated ILV ratios for commercial properties it determined may be suitable candidate sites. All commercial sites in the Old Town planning areas are along Bradford Avenue and Sante Fe Avenue. An ILV ratio analysis of six commercial properties is shown below.

Street Address	APN	Existing Use	ILV Ratio
220 S BRADFORD AVE	339-061-05	Restaurant	0.12
144 S BRADFORD AVE	339-052-26	Auto Mechanic	0.53
132 S BRADFORD AVE	339-052-27	Tax Office	0.16
233 W SANTA FE AVE	339-364-10	Auto Body Repair Shop	0.03
141 W SANTA FE AVE	339-365-10	Mixed-use Building	0.95
116 W SANTA FE AVE	339-394-05	Mixed-use Building	0.15

A majority of the commercial sites in the sites inventory have ILV ratios ranging from 0.10 to 1.0. Less than 15 sites have ILV ratios above 1.0 which indicates that these sites have improvement values greater than its land value. Although these sites have greater ILV ratios than the majority of the identified sites, the City believes these sites still present valuable opportunities for redevelopment. Cumulatively, the 15 sites with ILV ratios over 1.0 accommodate under 45 moderate income units.

Market trends show that developers pursue sites with low ILV ratios because these sites often have older, dilapidated structures than may be more expensive to rehabilitate than to redevelop. The City has experienced significant growth in the TOD planning area, directly across from the Old Town planning area and all recent development has been on nonvacant sites with ILV ratios similar to the Old Town commercial sites. The City believes a similar development pattern will spread to the Old Town area. While low ILV ratios under 1.0 may indicate greater development potential, property owners ultimately determine what will happen on selected sites. The City considered local knowledge and removed sites with low ILV ratios that it believed were not suitable for redevelopment in the 6th Cycle.

The City utilized various metrics to support the selection of candidate sites, including ILV ratios, and believes that the commercial sites it has identified are suitable to meet the growing housing need in Placentia.

3. Existing Multifamily Uses and Large Residential Developments

The City's made capacity assumptions on candidate sites based on factors described in the "Underutilized Sites" section above. Most sites in the Old Town planning area are anticipated to accommodate 1-10 units each, although there are two sites with significantly greater assumptions. The two sites will accommodate 39 and 55 units, respectively.

When making these assumptions, the City considered the size and compatibility of larger developments in Old Town. The largest development currently in the Old Town is located at 400 Baker St. (Baker Gardens) which is on the south-west corner of the Old Town project boundary. Baker Gardens is a 42-unit development with lots of open space, vacant space, and off-street parking. It is surrounded by single-family homes on three sides but overall, is compatible with its adjacent uses. Other multi-family developments in Old Town include:

- 131-135 S. Melrose St.
- 129 S. Melrose St.
- 119 S. Main St. (Previously a single-family home)

Immediately outside of the Old Town boundary, there are two large residential developments:

- 106-114 E. Sante Fe St
- 152-293 E Sante Fe Ct.

These multifamily and large residential projects all complement existing uses within Old Town and demonstrate the suitability and feasibility of higher density housing in the area. As analyzed above, the City is working with Mercy Housing to develop 65 to 70 affordable units in Old Town. This would be the largest, densest, development in Old Town to date. The City believes that dense development is appropriate if sited in the appropriate area, which the City has done. The City believes that the built-in incentives in the Old Town Revitalization Plan which allow high-density housing by-right without a public hearing, will encourage multifamily development in Old Town.

Accessory Dwelling Units

Accessory dwelling units (ADUs) represent a significant opportunity for affordable housing, particularly for single persons or small households including the elderly, college students, young adults, and caregivers. Recent changes in State law have made the construction of ADUs more feasible for homeowners, and Placentia has seen an increase in ADU development interest recently.

Over the past few years interest in ADUs has increased, and during 2018-2020 the City has approved 21 ADU permits. At that rate, it is estimated that approximately 56 additional ADUs will be approved during the 2021-2029 planning period. Based on recent analysis conducted by SCAG[3] over two-thirds of future ADUs are expected to be affordable to lower-income households. The assumption of 7 ADUs per year is considered to be very conservative given that in 2021 the City issued 9 ADU permits and in 2022, 14 ADUs were permitted.

Candidate Sites for Rezoning

As noted in Table B-1 above, the sites inventory shows a shortfall of potential capacity for 531 lower-income units and ~~606~~ 853 above-moderate-income units. The City has identified the following 2-pronged strategy for addressing this shortfall:

1. The existing TOD area is proposed to be expanded to the west, creating capacity for more than ~~1,100~~ 1,188 multi-family units. This area is currently zoned *Manufacturing* and encompasses approximately 14 acres. The potential capacity for this TOD expansion area assumes an allowable density of 95 units/acre and an average yield of 82 units/acre based on recently approved projects in the existing TOD area.

2. The existing R-3 zoning district currently allows a maximum density of 30 units/acre. While all properties in the R-3 zone allow a maximum density of 30 du/acre, only the most likely sites for development are listed in Table B-5. With a conservative 10% reduction from the proposed allowable density of 30 units/acre, these parcels would have a total capacity for approximately ~~363~~ 342 units, an increase of 61 potential units compared to the estimated capacity under current regulations.

Program 1.8 in the Housing Plan describes the actions necessary to implement this rezoning strategy. This rezone strategy intends to create housing opportunities in well-connected areas of the City. The TOD rezone will permit residential uses. The proposed rezones look to promote the development of affordable housing through higher density development. These are new rezones and upzones within the City and development standards will be created with input from the community, experienced developers, and City decision-makers.

[3] SCAG, Regional Accessory Dwelling Unit Affordability Analysis, 2020 (https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527)

These development standards will be based on historical development within the City and will support development at the densities identified in this Housing Element. Table B-2 lists approved projects, with two of those projects allocating 252 units for lower-income households. While the two projects have wide variation in the densities achieved and units produced (65 units at 16.9 du/ac and 189 at 88.7 du/ac), the City is confident that new development standards, coupled with Housing Programs in Chapter 4, will encourage the development of affordable units are higher densities. There will be no inconsistencies with the base zoning or General Plan Land Use created by the implementation of these changes.

Considering existing development and a lack of vacant land, the City's housing strategy to demonstrate capacity for the 2021-2029 RHNA growth need relies on a mix of development opportunities throughout Placentia. For each of the candidate sites, existing land use policy either allows residential by-right or allows residential by-right through a mixed-use development project. As part of the identification of new sites, the City will adopt new land use regulations (found within Chapter 4: Housing Plan) that will ensure residential development is permitted by-right. It is not the City's intent to exclude the permitting of nonresidential development in these areas, as it is a vital land use component that contributes to a livable, mixed-use character in support of many citywide goals.

While the City understands its RHNA obligations, it must also continue to accommodate growth for jobs, retail, services, and amenities, especially in existing mixed-use land use category areas consistent with the General Plan. In order to account for and address this, the City has individually evaluated each of the sites and has accounted for opportunities for nonresidential growth when estimating total residential unit capacity. These assumptions vary depending on the past performance of recent development and future projected trends. In areas where there are pending applications and owner or developer interest, assumptions for residential were increased. Conversely, assumptions were decreased in areas where residential development is more speculative or is not supported by past trends, developer interest or other factors.

Development trends in the City and elsewhere in the region show that a vast majority of mixed-use zoned projects have a residential component with a marginal representation or square footage being devoted to commercial use. None of the proposed mixed-use zoned projects are 100 percent devoted to non-residential purposes. Therefore, it can also be reasonably assumed that further residential development would continue to occur in areas zoned mixed-use to accommodate both residential and non-residential uses. It is anticipated that development in mixed-use zones will integrate residential development where nonresidential and low-density residential uses are present, providing additional housing in higher-resource areas with greater access to transportation and jobs.

The City will work to continue this trend by facilitating the development of mixed-use projects by offering development incentives and working with developers to discuss housing development opportunities in areas designated for mixed-use. Additionally, the City will promote affordable housing development in the high resource areas of the City.

Between the redevelopment assumptions and the demonstrative projects exhibiting a solid trend towards residential development, the City concludes that mixed-use designated areas are highly conducive to residential development and essential to maintaining thriving, vibrant neighborhoods.

Table B-4: Vacant Sites

Street Address	APN	General Plan	Zoning	Max Density (du/ac)	Acres	2 prior cycles?	Lower	Mod	Above Mod	Total Units
Note: Almost all candidate sites in the TOD and OT zones are adjacent to each other and may be redeveloped as single parcels or may be consolidated with other candidate sites and redeveloped to yield more units cumulatively.										
Natchez Ave/Erie St	336-520-26	Medium Density	PUD	15	0.22	Yes		2		2
N. Placentia Ave/W. Palm	337-241-63	Medium Density	R-1	15	0.14	Yes			1	1
209 S. Walnut	339-361-05	Medium Density	R-2	15	0.07	Yes		1		1
307 BAKER ST	339-392-14	OT	OT	65	0.24	No		13		13
323 BAKER ST	339-392-19	OT	OT	65	0.15	No		8		8
S. Walnut Ave/Baker St	339-392-20	Medium Density	R-2	15	0.15	Yes		2		2
S. Walnut Ave/Baker St	339-392-21	Medium Density	R-2	15	0.10	Yes		1		1
230 W SANTA FE AVE	339-393-01	OT	OT	29	0.13	No		3		3
417 W. Crowther	339-401-03	TOD	TOD	95	0.09	No		7		7
adjacent to 413 W. Crowther	339-401-05	TOD	TOD	95	0.01	No		1		1
554 Vanderbilt Drive	340-401-28	Low Density	R-1	6	0.16	Yes			1	1
548 Vanderbilt Drive	340-401-29	Low Density	R-1	6	0.17	Yes			1	1
700 De Jesus Dr.	340-461-13	Low Density	PUD	6	0.22	Yes			1	1
519 Langer Drive	340-462-13	Low Density	PUD	6	0.13	Yes			1	1
525 Langer Drive	340-462-14	Low Density	PUD	6	0.11	Yes			1	1
531 Langer Drive	340-462-15	Low Density	PUD	6	0.12	Yes			1	1
Lyons Way/Langer Drive	340-462-16	Low Density	PUD	6	1.21	Yes			6	6
Powell/Ekenrode	340-511-66	Low Density	RPC	6	0.26	Yes			1	1
Vina Del Mar/Puerto Natales Dr.	341-022-10	Low Density	R-1	6	0.47	Yes			2	2
Bryce Cir./Carlsbad St.	341-042-39	Low Density	R-1	6	0.37	Yes			1	1
Vina del Mar/Jefferson St	341-042-43	Low Density	R-1	6	0.38	Yes			2	2
Olympic Ave	341-081-34	Low Density	R-1	6	0.22	Yes			1	1
Yellowstone Ave.	341-081-36	Low Density	R-1	6	0.34	Yes			1	1
Yellowstone Ave.	341-082-02	Low Density	R-1	6	0.55	Yes			2	2
1150 Mammoth Circle	341-093-02	Low Density	R-1	6	0.23	Yes			1	1
1150 Mammoth Circle	341-093-03	Low Density	R-1	6	0.24	Yes			1	1
Higland/ Orachard	341-122-83	Medium Density	PUD	15	1.13	Yes		15		15
Orangethorpe/Richfield	341-122-89	Medium Density	PUD	15	1.45	Yes		19		19
1255 Vina Del Mar	341-201-35	Low Density	R-1	6	0.49	Yes			2	2
Orangethorpe/Jefferson	341-343-10	Low Density	SP-7	6	0.18	Yes			1	1
Orchard/Van Buren	341-352-10	Medium Density	SP-7	15	0.23	Yes		3		3

Table B-4: Vacant Sites

Street Address	APN	General Plan	Zoning	Max Density (du/ac)	Acres	2 prior cycles?	Lower	Mod	Above Mod	Total Units
Cherry/Van Buren	341-352-15	Low Density	SP-7	6	0.17	Yes			1	1
17272 Cherry	341-354-01	Low Density	SP-7	6	0.18	Yes			1	1
17262 Cherry	341-354-02	Low Density	SP-7	6	0.26	Yes			1	1
N. Van Buren/Orchard	341-361-01	Low Density	PUD	6	0.96	Yes			5	5
N. Van Buren/Orchard	341-361-02	Low Density	SP-7	6	0.40	Yes			2	2
Willow St./Van Buren	341-362-01	Medium Density	SP-7	15	0.08	Yes		1		1
Willow St./Van Buren	341-362-02	Medium Density	SP-7	15	0.69	Yes		9		9
6200 Van Buren	341-365-02	Low Density	SP-7	6	0.14	Yes			1	1
6200 Van Buren	341-365-03	Low Density	SP-7	6	0.15	Yes			1	1
Cherry St./Van Buren	341-374-01	Medium Density	R-G	15	0.26	Yes		3		3
Cherry St./Depot St.	341-375-01	Medium Density	R-G	15	0.30	Yes		4		4
Cherry St./Van Buren	341-375-02	Medium Density	R-G	15	0.22	Yes		3		3
502 Gerhold Lane	341-421-33	Low Density	SP-7	6	0.41	Yes			2	2
1451 Howard Pl	341-431-01	Low Density	SP-7	6	0.44	Yes			2	2
406 Nevin Lane	341-433-23	Low Density	SP-7	6	0.48	Yes			2	2
Alta Vista/Van Buren	341-481-28	Medium Density	SP-7	15	1.00	Yes		13		13
164 Los Alamitos Cir.	343-682-24	Medium Density	PUD	15	0.11	Yes		1		1
Orchard/Richfield	343-712-03	Medium Density	PUD	15	0.42	Yes		5		5
Orchard/S. Caliente Way	343-712-47	Medium Density	PUD	15	0.05	Yes		1		1
Orchard/S. Caliente Way	343-712-48	Medium Density	PUD	15	0.13	Yes		1		1
Orchard/S. Caliente Way	343-712-49	Medium Density	PUD	15	0.03	Yes		1		1
Orchard/Richfield	343-712-69	Medium Density	PUD	15	0.04	Yes		1		1
Vincente/Maria Ave	346-013-02	Low Density	R-1	6	0.12	Yes			1	1
Vincente/Maria Ave	346-013-03	Low Density	R-1	6	0.13	Yes			1	1
Orangethorpe/Jefferson	346-162-01	HDR	R-3	30	0.47	No		10		10
Orangethorpe/Jefferson	346-162-02	HDR	R-3	30	4.55	No		102		102
503 S. Van Buren St.	346-164-23	HDR	R-3	30	0.21	No		4		4
560 S Van Buren	346-171-01	Low Density	R-1	6	0.65	Yes			3	3
17000 L Paloma	346-172-24	Low Density	R-1	6	0.26	Yes			1	1
La Paloma/Van Buren	346-172-26	Low Density	R-1	6	0.09	Yes			1	1
La Paloma/Van Buren	346-172-27	Low Density	R-1	6	0.09	Yes			1	1
17000 La Paloma	346-173-01	Low Density	R-1	6	0.20	Yes			1	1
17342 Atwood Ave	346-181-02	Low Density	R-1	6	0.06	Yes			1	1

Table B-4: Vacant Sites

Street Address	APN	General Plan	Zoning	Max Density (du/ac)	Acres	2 prior cycles?	Lower	Mod	Above Mod	Total Units
Atwood/Van Buren	346-181-11	Low Density	R-1	6	0.09	Yes			1	1
Atwood/Van Buren	346-181-12	Low Density	R-1	6	0.19	Yes			1	1
Atwood/Van Buren	346-181-13	Low Density	R-1	6	0.09	Yes			1	1
Atwood/Van Buren	346-181-14	Low Density	R-1	6	0.14	Yes			1	1
Atwood/Lincoln	346-181-16	Low Density	R-1	6	0.10	Yes			1	1
Atwood/Lincoln	346-181-17	Low Density	R-1	6	0.10	Yes			1	1
Atwood/Lincoln	346-181-18	Low Density	R-1	6	0.09	Yes			1	1
Atwood/Lincoln	346-181-19	Low Density	R-1	6	0.09	Yes			1	1
17431 Oak St	346-181-21	Low Density	R-1	6	0.09	Yes			1	1
601 S. Lakeview Ave.	346-331-02	HDR	R-3	30	4.55	No		102		102
Lakeview Loop/Veterans Way	346-331-03	HDR	R-3	30	0.13	No		2		2
625 S. Lakeview Ave.	346-331-11	HDR	R-3	30	0.53	No		12		12
2006 E. Lakeview Loop	346-331-27	HDR	R-3	30	0.38	No		8		8
2018 E. Lakeview Loop	346-331-29	HDR	R-3	30	0.39	No		8		8
613 S. Lakeview Ave.	346-331-30	HDR	R-3	30	0.45	No		10		10
1958 E. Veterans Way	346-331-32	HDR	R-3	30	0.81	No		18		18
314 BAKER ST	339-391-15	OT	OT	65	0.27	No		14		14
314 BAKER ST	339-391-14	OT	OT	65	0.14	No		7		7
Totals					~~31.9~~ 32.3			~~394~~ 415	65	~~459~~ 480

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
Note: Almost all candidate sites in the TOD and OT zones are adjacent to each other and may be redeveloped as single parcels or may be consolidated with other candidate sites and redeveloped to yield more units cumulatively.													
~~339-401-02~~	~~421 W. Crowther~~	~~0.11~~	~~TOD~~	~~TOD~~	~~95~~	~~1~~	~~-~~	~~8~~	~~-~~	~~9~~	~~8~~	~~Single-family structure on a small lot with two small accessory structures and minimal space vacant. Approximately 10% of lot is vacant. The parcel is located adjacent to residential uses and can feasibly be redeveloped into a higher intensity residential use.~~	~~Yes~~
339-401-01	425 W. Crowther	0.06	TOD	TOD	95	1		3		4	3	Small single-family structure. Approximately 50% of lot is vacant and adjacent to higher density residential. Can feasibly redevelop lot into a higher density use by adding an ADU, JADU, or additional units. Adjacent to the Cenza project (415 units) which consolidated parcels to develop a larger project. The parcel can similarly be consolidated to yield more units cumulatively.	Yes
~~339-401-06~~	~~415 Goetz Place~~	~~0.14~~	~~TOD~~	~~TOD~~	~~95~~	~~1~~	~~-~~	~~10~~	~~-~~	~~11~~	~~10~~	~~Two single-family structures with paved parking/driveway area. About 30% of the property is paved surface. The parcel is located adjacent to residential uses and can feasibly be redeveloped into a higher intensity residential use.~~	~~Yes~~
339-401-16	341 S Melrose	3.24	TOD	TOD	95		268			268	268	Large Parcel with warehouses, surface parking lot, and truck loading bay. Warehouse takes up approximately 75% of property. Developers have shown interest in the site and have expressed interest in either demo and redevelopment of the large site or adaptive reuse. Two large projects to the east and west, the Herald (215 units) and Cenza (418 units) are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the	Yes

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site.	
343-691-06	Orchard/Highland	4.13	MDR	R-G	15	16		39		55	39	Large parcel with 16 townhomes, adjacent to higher density residential and one industrial parcel, over 50% vacant land remaining on parcel which can feasibly redevelop to add additional units.	No
339-401-07	411 Goetz Place	0.06	TOD	TOD	95	1		3		4	3	Single-family structure with an accessory structure. Approximately ~~30~~ 70% of lot is vacant and adjacent to higher density residential to the north and lower density residential to the south. Can feasibly redevelop lot into a higher density use by adding an ADU, JADU, or additional units.. Adjacent to the Cenza project (415 units) which consolidated parcels to develop a larger project. The parcel can similarly be consolidated to yield more units cumulatively.	Yes
339-401-10	408 Goetz Place	0.13	TOD	TOD	95	3		7		10	7	Residential, 3 units, with ~~25~~ 30% of property vacant. Adjacent to higher density residential to the north and lower density residential to the south. Can feasibly redevelop lot into a higher density use. Although the parcel has less than 50% vacancy, the parcel can be consolidated with the adjacent parcel whichis functionally vacant and used as parking. Adjacent to the Cenza project (415 units) which consolidated parcels to develop a larger project. The parcel can similarly be consolidated to yield more units cumulatively.	Yes
~~339-401-13~~	~~409 W. Crowther~~	~~0.09~~	~~TOD~~	~~TOD~~	~~95~~	~~1~~	-	~~6~~	-	~~7~~	~~6~~	~~Single-family structure on moderate sized lot. Roughly 50% of lot is vacant. Parcel is adjacent to parking lot and residential use. Can feasibly redevelop lot into a higher density use~~	~~Yes~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-063-01	101 E. Crowther	0.6	TOD	TOD	95		49			49	49	Old Town Public Parking lot located next to pedestrian bridge connecting to Old Town Placentia. Moderate size parcel adjacent to higher density residential uses. Can feasibly redevelop lot into a higher density use. The parcel can be consolidated to yield more units cumulatively.	No
339-063-02	125 E. Crowther	0.25	TOD	TOD	95			20		20	20	Old Town Public Parking lot located next to pedestrian bridge connecting to Old Town Placentia. Moderate size parcel adjacent to higher density residential uses. Can feasibly redevelop lot into a higher density use. The parcel can be consolidated to yield more units cumulatively.	No
339-402-15	Crowther	0.1	TOD	TOD	95			8		8	8	Old Town Public Parking lot located next to pedestrian bridge connecting to Old Town Placentia. Moderate size parcel adjacent to higher density residential uses. Can feasibly redevelop lot into a higher density use. The parcel can be consolidated to yield more units cumulatively.	No
~~339-401-14~~	~~405 W. Crowther~~	~~0.1~~	~~TOD~~	~~TOD~~	~~95~~	~~1~~	~~-~~	~~7~~	~~-~~	~~8~~	~~7~~	~~Single-family structure and accessory structure with approximately 40% of lot vacant. Parcel is adjacent to residential and warehouse use. Can feasibly redevelop lot into a higher density use~~	~~Yes~~
339-401-11	417 Evelyn Place	0.26	TOD	TOD	95			20		20	20	Parking lot utilized by residential units and warehouse nearby. Can feasibly redevelop lot into a higher density use. Adjacent to the Cenza project (415 units) which consolidated parcels to develop a larger project. The parcel can similarly be consolidated to yield more units cumulatively.	Yes
~~339-401-04~~	~~Crowther/Goetz~~	~~0.08~~	~~TOD~~	~~TOD~~	~~95~~	~~1~~	~~-~~	~~5~~	~~-~~	~~6~~	~~5~~	~~Single-family home with accessory structure and approximately 50% of property vacant. Adjacent to scrapyard/storage and residential uses. Can feasibly be redeveloped for higher density residential.~~	~~Yes~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-431-01	551 W. Crowther	1.35	TOD	TOD	95		112			112	112	Large parcel used as a sales and storage office for lighting business. Adjacent to residential pipeline project. Approximately 60% of parcel is paved parking lot. ~~Adjacent to nearly completed higher residential uses. Can feasibly redevelop for higher density development.~~ Adjacent to the Cenza project (415 units) which consolidated parcels to develop a larger project. The parcel can similarly be consolidated to yield more units cumulatively.	Yes
339-091-20	190 W. Crowther	5.91	TOD	TOD	95		490			490	490	Large parcel with industrial use (trucking company). Approximately 60% of parcel is paved parking lot. Adjacent to higher density residential and industrial uses. Can feasibly redevelop to higher density similar to the development directly east of the parcel. Adjacent to the Cenza project (415 units) which consolidated parcels to develop a larger project. The parcel can similarly be consolidated to yield more units cumulatively.	No
339-401-15	Crowther/Evelyn	0.15	TOD	TOD	95			10		10	10	Part of adjacent parcel single-family structure. Includes accessory unit and is 80% vacant. Adjacent to the Cenza project (415 units) which consolidated parcels to develop a larger project. The parcel can similarly be consolidated to yield more units cumulatively.	Yes
339-394-05	116 W SANTA FE AVE	0.05	OT	OT	29			1		1	1	Commercial use located in Old Town Placentia The property is located in Old Town Placentia in the historic core. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.; ~~second story can be repurposed for dense residential use. Located within proximity to various amenities.~~	
339-394-04	118 W SANTA FE AVE	0.06	OT	OT	29			1		1	1	Restaurant in Old Town Placentia, The property is located in Old Town Placentia in the historic core. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.~~second story can accommodate residential units. Adjacent to retail uses. Located within proximity to various amenities.~~	No
339-394-03	126 W SANTA FE AVE	0.14	OT	OT	29			3		3	3	Retail structure in Old Town Placentia, The property is located in Old Town Placentia in the historic core. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.~~ second story can accommodate residential units. Adjacent to retail uses. Located within proximity to various amenities.~~	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-365-26	101 W SANTA FE AVE	0.11	OT	OT	29			2		2	2	Restaurant in Old Town Placentia. Adjacent to retail uses. Located within proximity to various amenities. Site can feasibly redevelop to higher density residential use. Approximately 70% of parcel is paved parking lot. Can feasibly redevelop to higher density residential use.	No
339-364-10	233 W SANTA FE AVE	0.14	OT	OT	29			3		3	3	Auto body repair shop adjacent to retail uses. Located in Old Town Placentia. Approximately 70% of the parcel is vacant.	No
~~339-365-08~~	~~232 S MAIN ST~~	~~0.13~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~3~~	~~-~~	~~3~~	~~3~~	~~Multi-family residential use with accessory structure. Adjacent to residential uses, a parking lot, and within proximity to Old Town Placentia. Can feasibly redevelop to higher density residential use.~~	~~No~~
~~339-365-17~~	~~225 S BRADFORD AVE~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~1~~	~~-~~	~~2~~	~~-~~	~~3~~	~~2~~	~~Single-family residential with two accessory structures. Approximately 10% of property is paved driveway. Within proximity to Old Town Placentia, can feasibly redevelop for higher density residential use.~~	~~No~~
339-061-05	220 S BRADFORD AVE	0.26	OT	OT	29			6		6	6	Restaurant with 60% ~~of parcel dedicated to parking lot~~vacancy. Adjacent to union hall, restaurants, and residential uses. Can feasibly redevelop for higher density residential use.	No
339-362-05	233 S WALNUT AVE	0.15	OT	OT	29	1		2		3	2	Single-Family Home with accessory structure on parcel. Approximately 50% of property is vacant. Adjacent to residential uses. Can feasibly redevelop for higher density residential use by adding an ADU, JADU, or additional units.	No
339-365-21	209 S BRADFORD AVE	0.15	OT	OT	29	1		2		3	2	Single-Family Home with accessory structure. Approximately ~~40~~ 75% of lot is vacant. Adjacent to residential uses and within proximity to Old Town Placentia. Can feasibly redevelop for higher density residential use by adding an ADU, JADU, or additional units.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
~~339-061-02~~	~~206 S BRADFORD AVE~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~1~~	~~-~~	~~2~~	~~-~~	~~3~~	~~2~~	~~Industrial use, auto service, adjacent to residential and industrial uses. Approximately 10 percent of property is paved rear parking. Within proximity to Old Town Placentia. Can feasibly redevelop for higher density residential use~~	~~No~~
339-394-02	128 W SANTA FE AVE	0.17	OT	OT	29			4		4	4	Commercial uses located in Old Town Placentia. The property is located in Old Town Placentia in the historic core. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. ~~Second story can be repurposed with residential use. Located within proximity to various amenities.~~	No
339-394-01	132 W SANTA FE AVE	0.09	OT	OT	29			2		2	2	Aging commercial (supermarket) building adjacent to commercial and retail uses. The property is located in Old Town Placentia in the historic core. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-365-25	109 W SANTA FE AVE	0.17	OT	OT	29			4		4	4	Commercial (coffee roasters) building adjacent to commercial and retail uses. The property is located in Old Town Placentia Placentia in the historic core. The property is located in Old Town Placentia in the historic core. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. ~~ocated within proximity to various amenities~~	No
~~339-365-03~~	~~210 S MAIN ST~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~3~~	~~-~~	~~3~~	~~3~~	~~Residential, two single-family homes sharing parcel, approximately 15% of parcel is vacant. Adjacent to lower and higher density residential uses. Can feasibly redevelop for higher density residential use.~~	~~No~~
~~339-061-01~~	~~204 S BRADFORD AVE~~	~~0.14~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~3~~	~~-~~	~~3~~	~~3~~	~~Residential, Condo, and commercial parcel, approximately 30% of property is paved surface parking, Can feasibly redevelop for higher density residential use.~~	~~No~~
~~339-365-22~~	~~205 S BRADFORD AVE~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~3~~	~~-~~	~~3~~	~~3~~	~~Single-family structure and accessory structure with approximately 30% of lot vacant. Parcel is adjacent to residential commercial uses. Can feasibly redevelop lot into a higher density use~~	~~No~~
~~339-365-07~~	~~226 S MAIN ST~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~3~~	~~-~~	~~3~~	~~3~~	~~Single-family structure and accessory structure with approximately 15% of lot vacant. Parcel is adjacent to residential commercial uses. Can feasibly redevelop lot into a higher density use~~	~~No~~
~~339-365-18~~	~~219 1/2 S BRADFORD AVE~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~1~~	~~-~~	~~2~~	~~-~~	~~3~~	~~2~~	~~Existing Use, retail structure with accessory structure. Approximately 40% of parcel is~~	~~No~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												~~paved surface parking. Adjacent to retail and residential uses. Can feasibly redevelop for higher density residential use.~~	
339-355-11	144 S MAIN ST	0.1	OT	OT	35	1		2		3	2	Single-Family Home, approximately 60% of property underutilized and vacant. Adjacent to a church, retail, and residential uses. Can feasibly redevelop for higher density residential use by adding an ADU, JADU, or additional units.	No
339-355-13	145 S BRADFORD AVE	0.29	OT	OT	35			8		8	8	Placentia Senior Center with surface parking lot, approximately 50% of parcel underutilized or vacant. Can feasibly redevelop lot into a higher density use.	No
~~339-365-10~~	~~141 W SANTA FE AVE~~	~~0.34~~	~~OT~~	~~OT~~	~~29~~	-	-	~~8~~	-	~~8~~	~~8~~	~~Commercial uses located in Old Town Placentia. Second story can be repurposed for residential use. Located within proximity to various amenities.~~	~~No~~
339-365-27	149 W SANTE FE	0.34	OT	OT	29			8		8	8	Commercial uses located in Old Town Placentia. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. ~~Second story can be repurposed for residential use. Located within proximity to various amenities.~~	No
339-061-06	228 S BRADFORD AVE	0.15	OT	OT	29			3		3	3	Existing Use- American Legion, approximately ~~30~~ 40% dedicated to surface parking lot in rear, adjacent to commercial and retail. Residential development can be facilitated through the addition of a second story, addition of residential in the rear, or complete redevelopment of the parcel.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												Residential development would complement existing and adjacent uses. The parcel is within the Old Town historic core, making the parcel attractive for redevelopment. The parcel can~~Can~~ feasibly redevelop lot into a higher density use.	
~~339-365-06~~	~~224 S MAIN ST~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~1~~	~~-~~	~~2~~	~~-~~	~~3~~	~~2~~	~~Residential, Single-Family Home with accessory structure. Approximately 20% of parcel is underutilized. Can feasibly redevelop lot into a higher density use.~~	~~No~~
339-355-10	140 S MAIN ST	0.15	OT	OT	35	1		3		4	3	Single-Family Home with accessory structure. Approximately 70% of the parcel is vacant. Can feasibly redevelop lot into a higher density use by adding an ADU, JADU, or additional units.	No
339-355-14	137 S BRADFORD AVE	0.15	OT	OT	35			4		4	4	Existing Use- Commercial, 80% vacant lot behind structure. Adjacent to commercial and residential uses. Can feasibly redevelop lot into a higher density use.	No
339-052-27	132 S BRADFORD AVE	0.31	OT	OT	35			9		9	9	Existing Use- Commercial (tax office). 75% of parcel is dedicated to surface parking. Adjacent to retail and residential units. Can feasibly redevelop lot into a higher density use.	No
339-365-19	217 S BRADFORD AVE	0.12	OT	OT	29			3		3	3	Existing Use- Commercial. 50% of parcel is dedicated to surface parking. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. Adjacent to retail and	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												residential units. Can feasibly redevelop lot into a higher density use.	
339-061-04	214 S BRADFORD AVE	0.28	OT	OT	29			7		7	7	Existing Use- industrial (auto service). 70% of parcel is dedicated to surface parking. Adjacent to retail and residential units. Can feasibly redevelop lot into a higher density use.	No
~~339-365-05~~	~~218 S MAIN ST~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~1~~	~~-~~	~~2~~	~~-~~	~~3~~	~~2~~	~~Residential, Single-Family Home with accessory structure. Approximately 10% paved surface parking. Can feasibly redevelop lot into a higher density use.~~	~~No~~
~~339-365-02~~	~~206 S MAIN ST~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~1~~	~~-~~	~~2~~	~~-~~	~~3~~	~~2~~	~~Residential, Multi-family with accessory structure, 30% of parcel dedicated to surface parking. Can feasibly redevelop lot into a higher density use.~~	~~No~~
~~339-365-23~~	~~201 S BRADFORD AVE~~	~~0.12~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~3~~	~~-~~	~~3~~	~~3~~	~~Existing Use- Restaurant with three large assembled canopies, adjacent to retail and residential uses, Can feasibly redevelop lot into a higher density use.~~	~~No~~
~~339-365-01~~	~~202 S MAIN ST~~	~~0.15~~	~~OT~~	~~OT~~	~~29~~	~~1~~	~~-~~	~~2~~	~~-~~	~~3~~	~~2~~	~~Residential, Single-Family Home with accessory structure, can feasibly develop lot into higher density use.~~	~~No~~
339-052-26	144 S BRADFORD AVE	0.31	OT	OT	35			9		9	9	Existing Use- industrial (auto service). 70% of parcel is dedicated to surface parking. Adjacent to retail and residential units. Can feasibly redevelop lot into a higher density use.	No
~~339-392-13~~	~~313 S MELROSE ST~~	~~0.06~~	~~OT~~	~~OT~~	~~65~~	~~1~~	~~-~~	~~2~~	~~-~~	~~3~~	~~2~~	~~Residential, Single-Family Home and accessory structure, close proximity to Old Town Placentia. Can feasibly redevelop lot into a higher density use.~~	~~No~~
~~339-392-16~~	~~311 BAKER ST~~	~~0.15~~	~~OT~~	~~OT~~	~~65~~	~~1~~	~~-~~	~~7~~	~~-~~	~~8~~	~~7~~	~~Small single-family structure on moderate size lot. Approximately 50% of the lot is vacant with one underutilized structure behind the single family home. This lot is feasible for redevelopment due to the adjacent vacant lot that can also be developed~~	~~No~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
~~339-391-15~~	~~312 BAKER ST~~	~~0.27~~	~~OT~~	~~OT~~	~~65~~	~~1~~	-	~~14~~	-	~~15~~	~~14~~	~~Vacant large size lot. While it may have had a structure in prior Cycle, there currently is nothing there, thus feasible for development.~~	~~No~~
~~339-391-14~~	~~314 BAKER ST~~	~~0.14~~	~~OT~~	~~OT~~	~~65~~	~~1~~	-	~~7~~	-	~~8~~	~~7~~	~~Vacant moderate size lot. Development is feasible as it is next to existing single family development, thus having already existing infrastructure needed.~~	~~No~~
~~339-391-13~~	~~320 BAKER ST~~	~~0.16~~	~~OT~~	~~OT~~	~~65~~	~~1~~	-	~~8~~	-	~~9~~	~~8~~	~~Parcel with existing structures on 70% percent of the lot. There are vacant and underutilized parcels adjacent to this lot, so by consolidating them development can be feasible.~~	~~No~~
339-393-08	202 W SANTA FE AVE	0.13	OT	OT	29			3		3	3	Large commercial building with frequent turnover. Building is currently vacant. Residential can be developed on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.~~Existing large commercial structure on a moderate size lot. The structure seems to have been boarded up since at least 2018, as well as the parcel adjacent to it. Existing infrastructure, lot consolidation and underutilization indicates redevelopment potential.~~	No
~~339-393-07~~	~~214 W SANTA FE AVE~~	~~0.06~~	~~OT~~	~~OT~~	~~29~~	-	-	~~1~~	-	~~1~~	~~1~~	~~Existing large commercial structure on a moderate size lot. The structure seems to have been boarded up since at least 2018, as well as the parcel adjacent to it. Existing infrastructure, lot consolidation and underutilization make this site have~~	~~No~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												redevelopment potential for higher density residential use.	
339-39217	315 BAKER ST	0.15	OT	OT	65	1	-	7	-	8	7	Underutilized structure with 80% of lot being underutilized or vacant. Can be subdivided to allow for higher intensity residential redevelopment.	No
339-39306	216 W SANTA FE AVE	0.06	OT	OT	29	-	-	1	-	1	1	Existing large commercial structure on a moderate size lot. The structure seems to have been boarded up since at least 2018, as well as the parcel adjacent to it. Existing infrastructure, lot consolidation and underutilization make this site have redevelopment potential for higher density residential use.	No
339-39305	220 W SANTA FE AVE	0.06	OT	OT	29			1		1	1	Large commercial building with frequent turnover. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. Existing large commercial structure on a moderate size lot. The structure seems to have been boarded up since at least 2018, as well as the parcel adjacent to it. Existing infrastructure, lot consolidation and underutilization makes this site have redevelopment potential for higher density residential.	No
339-39218	319 BAKER ST	0.15	OT	OT	65	1	-	7	-	8	7	Small single family structure on large lot with remaining space vacant. Approximately 50% of lot is vacant and adjacent to vacant land and can feasibly redevelop into a higher intensity residential use.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-393-04	222 W SANTA FE AVE	0.06	OT	OT	29			1		1	1	Commercial building with frequent turnover. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. ~~structure on a moderate size lot. The structure seems to have been boarded up since at least 2018, as well as the parcel adjacent to it. Existing infrastructure, lot consolidation and underutilization make this site have redevelopment potential use.~~	No
339-393-03	224 W SANTA FE AVE	0.06	OT	OT	29			1		1	1	Commercial building with frequent turnover. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.. ~~Existing large commercial structure on a moderate size lot. The structure seems to have been boarded up since at least 2018, as well as the parcel adjacent to it. Existing infrastructure, lot consolidation and underutilization makes this site have redevelopment potential use.~~	No
339-393-02	226 W SANTA FE AVE	0.06	OT	OT	29			1		1	1	Vacant/landscaped parcel adjacent to underutilized commercial use. The	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												underutilized adjacent parcels can be consolidated to provide redevelopment for higher intensity residential use.	
~~339-364-16~~	~~203 W SANTA FE AVE~~	~~0.09~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~2~~	~~-~~	~~2~~	~~2~~	~~The parcel currently is a commercial space with many different businesses, all of which has seen steady decline in business for much of the 5th Cycle planning period. Approximately 30% of this parcel is surface parking lot. The parcel is located adjacent to underperforming uses that can feasible be redeveloped into a higher intensity residential use.~~	~~No~~
339-364-15	209 W SANTA FE AVE	0.05	OT	OT	29			1		1	1	The parcel currently is a commercial space with many different businesses, all of which has seen steady decline in business for much of the 5th Cycle planning period. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. Approximately 30% of this parcel is surface parking lot. The parcel is located adjacent to underperforming uses that can feasible be redeveloped into a higher intensity residential use.	No
339-364-13	215 W SANTA FE AVE	0.05	OT	OT	29			1		1	1	The parcel currently is a commercial space with many different businesses, all of which has seen steady decline in business for much of the 5th Cycle planning period. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. Approximately 30% of this parcel is surface parking lot. The parcel is located adjacent to underperforming uses that can feasible be redeveloped into a higher intensity residential use.	
~~339-365-09~~	~~234 S MAIN ST~~	~~0.09~~	~~OT~~	~~OT~~	~~29~~	~~1~~	-	~~1~~	-	~~2~~	~~1~~	~~Surface parking lot located adjacent to residential uses. Can feasible be redeveloped into a higher intensity residential use.~~	~~No~~
339-391-12	322 BAKER ST	0.16	OT	OT	65	1		9		9	8	Single-family structure with accessory structure in the rear on large lot. Approximately 80% of lot is vacant and adjacent to higher density residential which can be consolidated and can feasibly redevelop into a higher intensity residential use by adding an ADU, JADU, or additional units..	No
339-391-11	326 BAKER ST	0.16	OT	OT	65	1		9		9	8	Single-family structure with accessory structure in the rear on large lot. Approximately 80% of lot is vacant and adjacent to higher density residential which can be consolidated and can feasibly redevelop into a higher intensity residential use by adding an ADU, JADU, or additional units..	No
~~339-391-10~~	~~332 BAKER ST~~	~~0.16~~	~~OT~~	~~OT~~	~~65~~	~~1~~	-	~~8~~	-	~~9~~	~~8~~	~~Small single-family structure on large lot with remaining space underutilized accessories. Approximately 80% of lot is vacant and~~	~~No~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												~~underutilized structures adjacent to higher density residential and can feasibly redevelop into a higher intensity residential use.~~	
~~339-391-09~~	~~334 BAKER ST~~	~~0.16~~	~~OT~~	~~OT~~	~~65~~	~~1~~	~~-~~	~~8~~	~~-~~	~~9~~	~~8~~	~~Small single-family structure on large lot with remaining space underutilized accessories. Approximately 80% of lot is vacant and underutilized structures adjacent to higher density residential and can feasibly redevelop into a higher intensity residential use.~~	~~No~~
~~339-061-08~~	~~238 S BRADFORD AVE~~	~~0.18~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~4~~	~~-~~	~~4~~	~~4~~	~~The parcel currently has a commercial structure which has seen steady decline in business for much of the 5th Cycle planning period. Approximately 50% is surface parking lot. The parcel is located adjacent to residential uses and can feasible be redeveloped into a higher intensity residential use.~~	~~No~~
~~339-364-12~~	~~221 W SANTA FE AVE~~	~~0.05~~	~~OT~~	~~OT~~	~~29~~	~~-~~	~~-~~	~~1~~	~~-~~	~~1~~	~~1~~	~~The parcel currently is a commercial space with many different businesses, all of which has seen steady decline in business for much of the 5th Cycle planning period. Approximately 30% of this parcel is surface parking lot. The parcel is located adjacent to underperforming uses that can feasible be redeveloped into a higher intensity residential use.~~	~~No~~
339-365-16	229 S BRADFORD AVE	0.13	OT	OT	29	1		2		3	2	Small single-family structure on large lot with remaining space underutilized accessories. Approximately 60% of lot is vacant and underutilized structures adjacent to higher density residential and can feasibly redevelop into a higher intensity residential use~~.~~ by adding an ADU, JADU, or additional units	No
339-364-11	229 W SANTA FE AVE	0.09	OT	OT	29			2		2	2	The parcel currently is a commercial space with many different businesses, all of which has seen steady decline in business for much of the 5th Cycle planning period. The Old Town Revitalization Plan allows residential	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. Approximately 30% of this parcel is surface parking lot. The parcel is located adjacent to underperforming uses that can feasible be redeveloped into a higher intensity residential use.	
339-362-06	239 S WALNUT AVE	0.18	OT	OT	35	1		4		5	4	Small single-family structure on large lot with remaining vacant space. Approximately 60% of lot is vacant and adjacent to higher density residential and can feasibly redevelop into a higher intensity residential use. by adding an ADU, JADU, or additional units	No
339-365-20	211 S BRADFORD AVE	0.15	OT	OT	29	1		2		3	2	Small single-family structure on large lot with remaining space underutilized accessories or vacant Approximately 60% of lot is vacant and underutilized adjacent to higher density residential and can feasibly redevelop into a higher intensity residential use. by adding an ADU, JADU, or additional units	No
339-061-03	200 S BRADFORD AVE	0.15	OT	OT	29			3		3	3	Surface parking lot located adjacent to residential uses. Can feasible be redeveloped into a higher intensity residential use.	No
339-365-04	216 S MAIN ST	0.15	OT	OT	29	1		2		3	2	Large single-family structure on large lot with remaining space taken by a large underutilized accessory structure. Lot splitting and redeveloping the newly create parcels can provide feasibility for redevelopment.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-355-09	134 S MAIN ST	0.15	OT	OT	35	1		3		4	3	Single-family structure on large lot with accessory structure. Approximately 50% of lot is vacant. Can feasibly redevelop for higher density residential use by adding an ADU, JADU, or additional units	No
~~339-355-15~~	~~131 S BRADFORD AVE~~	~~0.15~~	~~OT~~	~~OT~~	~~35~~	~~-~~	~~-~~	~~4~~	~~-~~	~~4~~	~~4~~	~~Two large commercial structures on large lot with remaining space vacant. Approximately 40% of lot is vacant and adjacent to higher density residential which can be consolidated and can feasibly redevelop into a higher intensity residential use.~~	~~No~~
~~339-052-28~~	~~120 S BRADFORD AVE~~	~~0.2~~	~~OT~~	~~OT~~	~~35~~	~~-~~	~~-~~	~~6~~	~~-~~	~~6~~	~~6~~	~~One large residential structure on large lot with remaining space a large accessory structure. Approximately 20% of lot is vacant and adjacent to another highly underutilized lot which can be consolidated and can feasibly redeveloped into a higher intensity residential use.~~	~~No~~
~~339-052-29~~	~~120 S BRADFORD AVE~~	~~0.2~~	~~OT~~	~~OT~~	~~35~~	~~-~~	~~-~~	~~6~~	~~-~~	~~6~~	~~6~~	~~One large residential structure on large lot with remaining space a large accessory structure. Approximately 20% of lot is vacant and adjacent to another highly underutilized lot which can be consolidated and can feasibly redeveloped into a higher intensity residential use.~~	~~No~~
~~339-355-08~~	~~132 S MAIN ST~~	~~0.15~~	~~OT~~	~~OT~~	~~35~~	~~1~~	~~-~~	~~3~~	~~-~~	~~4~~	~~3~~	~~One large residential structure on large lot with remaining space a large accessory structure. Approximately 20% of lot is vacant and adjacent to another highly underutilized lot which can be consolidated and can feasibly redeveloped into a higher intensity residential use.~~	~~No~~
339-355-16	125 S BRADFORD AVE	0.15	OT	OT	35			4		4	4	Small ~~commercial~~ city-owned structure on moderate size lot with remaining space surface parking. Approximately ~~40~~60% of lot is vacant and adjacent to higher density residential and can to feasibly redevelop into a higher intensity residential use.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
~~339-355-07~~	~~126 S MAIN ST #A~~	~~0.15~~	~~OT~~	~~OT~~	~~35~~	~~1~~	~~-~~	~~3~~	~~-~~	~~4~~	~~3~~	~~One large residential structure on large lot with remaining space a large accessory structure. Approximately 20% of lot is vacant and adjacent to another highly underutilized lot which can be consolidated and can feasibly redeveloped into a higher intensity residential use.~~	~~No~~
339-052-24	110 S BRADFORD AVE	0.22	OT	OT	35			6		6	6	Two small commercial structures on large lot with remaining space vacant. Approximately 50% of lot is vacant and adjacent to higher density residential which can be consolidated and can feasibly redevelop into a higher intensity residential use.	No
339-355-06	122 S MAIN ST	0.15	OT	OT	35	1		3		4	3	One residential structure on large lot with unpermitted accessory structures. Approximately 50% of lot is vacant and can be feasibly redevelop into a higher intensity residential use by adding an ADU, JADU, or additional units. Unpermitted structures can be permitted and counted as full units.	No
339-355-18	117 S BRADFORD AVE	0.12	OT	OT	35			3		3	3	One large commercial structure on large lot with remaining space vacant. Approximately 50% of lot is vacant and feasibly redeveloped into a higher intensity residential use.	No
339-355-05	118 S MAIN ST	0.15	OT	OT	35	1		3		4	3	One large residential structure on large lot with remaining space a large accessory structure. Approximately 60% of lot vacant and can be feasibly redeveloped into a higher intensity residential use.	No
339-355-19	113 S BRADFORD AVE	0.15	OT	OT	35	1		3		4	3	Residential structure on large lot with. approximately 50% of lot is vacant and can be feasibly redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No
~~339-355-04~~	~~114 S MAIN ST~~	~~0.15~~	~~OT~~	~~OT~~	~~35~~	~~1~~	~~-~~	~~3~~	~~-~~	~~4~~	~~3~~	~~Two large residential structures on a moderate size parcel. For this parcel, the Land values cost more than the Improvement~~	~~No~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												~~value, thus making redevelopment for this parcel feasible.~~	
339-052-21	102 S BRADFORD AVE	1.81	OT	OT	55		~~89~~ 55			~~89~~ 55	~~89~~ 55	Two ~~commercial~~ church structures on a very large lot. ~~70~~ 90% of the remaining lot is surface parking which is being underutilized, which makes this parcel feasible for higher density redevelopment .	No
339-355-03	110 S MAIN ST	0.15	OT	OT	35	1		3		4	3	Residential structure on large lot with accessory structure. Approximately 50% of lot is vacant and can be feasibly be redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No
339-355-20	100 W CHAPMAN AVE	0.32	OT	OT	35			10		10	10	Commercial structure on large lot with remaining space surface parking. Approximately 65% of lot is vacant and can be feasibly redeveloped into a higher intensity residential use.	No
339-355-02	106 S MAIN ST	0.15	OT	OT	35	1		3		4	3	Single family home on large lot with accessory structure and open area. Approximately 60% of lot is vacant and can be feasibly redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No
339-355-22	CHAPMAN/MAIN	0.13	OT	OT	35			4		4	4	This parcel contains the Placentia Water Tower~~, with remaining space containing small accessory uses.~~ Approximately 80% of this lot is vacant. The tower is now empty and has not stored water since 1993. The decorative tower could be incorporated into redevelopment or removed. It does not preclude development.	No
339-392-02	350 W SANTA FE AVE	0.14	OT	OT	35	1		3		4	3	Single family home on large lot with accessory structure and open area. Approximately 60% of lot is vacant and can be feasibly redeveloped into a higher intensity	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												residential use by adding an ADU, JADU, or additional units.	
~~339-392-01~~	~~352 W SANTA FE AVE~~	~~0.14~~	~~OT~~	~~OT~~	~~35~~	~~1~~	-	~~3~~	-	~~4~~	~~3~~	~~One large residential structure on large lot with remaining space a large accessory structure and open area. The accessory structure looks like it has been underutilized for some time, which can allow for a lot split and the newly split lots can be redeveloped into a higher intensity residential use.~~	~~No~~
339-392-22	320 S WALNUT AVE	0.1	OT	OT	65			5		5	5	One large commercial structure on large lot with remaining space surface parking. Approximately 60% of lot is vacant and can be feasibly redeveloped into a higher intensity residential use.	No
339-392-12	305 S MELROSE ST	0.11	OT	OT	35			3		3	3	A moderate size parcel with no structure on it, just landscaping. This parcel is functionally vacant and feasible for development potential.	No
339-392-04	338 W SANTA FE AVE	0.06	OT	OT	35			1		1	1	Single family home on large lot with accessory structure and open area. Approximately 60% of lot is vacant and can be redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No
339-392-07	330 W SANTA FE AVE	0.06	OT	OT	35			1		1	1	The parcel currently is a commercial space which has seen steady decline in business for much of the 5th Cycle planning period. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												the Old Town Revitalization Plan. Approximately 30% of this parcel is surface parking lot. The parcel is located adjacent to underperforming uses that can feasible be redeveloped into a higher intensity residential use.	
339-392-09	322 W SANTA FE AVE	0.11	OT	OT	35			3		3	3	Small Zumba studio with surface parking in the rear and street parking. Approximately 25% of the lot is surface parking. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.	No
339-392-08	326 W SANTA FE AVE	0.06	OT	OT	35			1		1	1	The parcel currently is a commercial space which has seen steady decline in business for much of the 5th Cycle planning period. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. Approximately 30% of this parcel is surface parking lot. The parcel is located adjacent to underperforming uses that can feasible be	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												redeveloped into a higher intensity residential use.	
~~339-392-10~~	~~314 W SANTA FE AVE~~	~~0.04~~	~~OT~~	~~OT~~	~~35~~	~~-~~	~~-~~	~~1~~	~~-~~	~~1~~	~~1~~	~~Two-story residential multi-family residential unit. Parcel has surface parking in the rear and street parking. Approximately 25% of the lot is surface parking. The parcel is located adjacent to another parcel, and can feasible be redeveloped into a higher intensity residential use.~~	~~No~~
339-392-11	310 W SANTA FE AVE	0.07	OT	OT	35			2		2	2	Small vacant building which has not been leased or occupied for much of the 5th Cycle planning period. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. The parcel is located adjacent to a vacant parcel, and can be consolidated and feasibly be redeveloped into a higher intensity residential use.	No
339-363-09	232 S WALNUT AVE	0.15	OT	OT	35	1		3		4	3	Residential single family with vacant land. Approximately 60% of the lot is vacant and can be feasibly redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No
339-363-10	349 W SANTA FE AVE	0.15	OT	OT	35			4		4	4	Residential single family with vacant land. Approximately 50% of the lot is vacant and can be feasibly redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No
339-363-19	301 W SANTA FE AVE	0.06	OT	OT	35			1		1	1	Small restaurant building with street parking. The property is located in Old Town in the	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												historic core. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. ~~The parcel is located adjacent to a higher density residential and can feasible be redeveloped into a higher intensity residential use.~~	
339-363-11	341 W SANTA FE AVE	0.17	OT	OT	35	1		4		5	4	Small single family home with an adjacent surface parking lot. Approximately 60% of lot is vacant. The parcel is located adjacent to a surface parking lot and can feasible be redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units..	No
339-363-29	325 W SANTA FE AVE	0.11	OT	OT	35	1		2		3	2	Small single family home with a surface parking lot. Approximately 70% of the lot is surface parking. The parcel is considered underutilized, land value exceeds the commercial structure. The parcel is located adjacent to a surface parking lot and can feasible be redeveloped into a higher intensity residential use use by adding an ADU, JADU, or additional units...	No
~~339-363-18~~	~~307 W SANTA FE AVE~~	~~0.11~~	~~OT~~	~~OT~~	~~35~~	-	-	~~3~~	-	~~3~~	~~3~~	~~The parcel currently has a multi-family residential unit with parking on the ground floor. There is an adjacent vacant lot and can feasible to consolidate for feasible redevelopment into a higher intensity residential use.~~	~~No~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-391-16	400 BAKER ST	1.61	OT	OT	65	42	~~94~~ 39			~~94~~ 81	~~94~~ 39	The parcel currently has a multi-family structure. Approximately 60% of the parcel is surface parking and 15% is vacant, undeveloped land. The parcel is located adjacent to residential uses and can feasible be redeveloped into a higher intensity residential us use by adding by adding additional structures.	No
339-391-16	400 BAKER ST	0.16	OT	OT	65			9		9	9	Vacant portion of parcel above.	No
339-391-06	321 S WALNUT AVE	0.14	OT	OT	65	4		~~8~~4		8	~~8~~4	The parcel currently single-family home with parking garage in the rear and street parking in the front. The property can be intensified by adding a second story, similar to the adjacent property. The parcel is located adjacent to residential uses and can feasible be redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No
~~339-391-01~~	~~412 W SANTA FE AVE~~	~~0.13~~	~~OT~~	~~OT~~	~~35~~	~~1~~	-	~~3~~	-	~~4~~	~~3~~	~~The parcel currently has a residential unit with garages and parking on the first floor. Approximately 20% of the parcel is dedicated for parking. The parcel is located adjacent to residential uses and can feasible be redeveloped into a higher intensity residential use.~~	~~No~~
339-391-02	307 S WALNUT AVE	0.13	OT	OT	35	1		3		4	3	The parcel currently has a single-family residential unit with surface parking. Approximately 60% of the parcel is dedicated for parking and 10% is vacant. ~~The parcel is adjacent to another parcel allowing the potential for consolidation.~~ The parcel is underutilized, land value exceeded the improvement value of the parcel. The parcel is located adjacent to residential uses and can feasible be redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-391-03	311 S WALNUT AVE	0.13	OT	OT	35			4		4	4	The parcel currently has a single-family residential unit with surface parking. Approximately 60% of the parcel is dedicated for parking. The parcel is underutilized, land value exceeded the improvement value of the parcel. The parcel is located adjacent to residential uses and can feasible be redeveloped into a higher intensity residential use by adding an ADU, JADU, or additional units.	No
~~339-391-04~~	~~315 S WALNUT AVE~~	~~0.13~~	~~OT~~	~~OT~~	~~65~~	~~1~~	-	~~6~~	-	~~7~~	~~6~~	~~The parcel currently has a single-family residential unit with surface parking. Approximately 60% of the parcel is dedicated for parking and 10% is vacant. The parcel is adjacent to another parcel allowing the potential for consolidation. The parcel is underutilized, land value exceeded the improvement value of the parcel.~~	~~No~~
~~339-391-05~~	~~319 S WALNUT AVE~~	~~0.14~~	~~OT~~	~~OT~~	~~65~~	~~1~~	-	~~7~~	-	~~8~~	~~7~~	~~The parcel currently has a single-family residential unit with surface parking. Approximately 30% of the parcel is dedicated for parking and 10% is vacant. The parcel is adjacent to another parcel allowing the potential for consolidation. The parcel is underutilized, land value exceeded the improvement value of the parcel.~~	~~No~~
~~346-164-24~~	~~513 S. Van Buren St.~~	~~0.17~~	~~HDR~~	~~R-3~~	~~30~~	~~1~~	-	~~2~~	-	~~3~~	~~2~~	~~The parcel currently has a single-family residential unit with vacant, undeveloped land. There is a secondary unit that is located to the western border of the parcel. Surrounding uses are vacant and can feasible be redeveloped into a higher intensity residential use. Approximately 70% of the parcel is vacant.~~	~~No~~
339-052-28	120 S BRADFORD AVE	0.20	OT	OT	35			6		6	6	The parcel ~~currently has the old placentia city hall building.~~ houses the Old Placentia City Hall and is owned by the City. The City may sell the property if residential units are	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												developed. The Placentia Fire and Life Safety Station 1 is adjacent to this site. The site is considered underutilized as the land value exceeds the improvement value. Residential can be incorporated as a mixed-use, second story residential, retrofit existing to become residential, or a completely new development.	
339-061-07	234 S BRADFORD AVE	0.17	OT	OT	29			4		4	4	Surface parking lot located adjacent to commercial buildings. Can feasible be redeveloped into a higher intensity residential use.	No
~~339-355-13~~	~~145 S BRADFORD AVE~~	~~0.29~~	~~OT~~	~~OT~~	~~35~~			~~9~~		~~9~~	~~9~~	~~The parcel currently has the Public Placentia Library. Approximately 20% of the parcel is surface parking, and another 0% is vacant land. The parcel is adjacent to residential uses and can feasible be redevelopment into a higher intensity residential use.~~	~~No~~
339-355-17	121 S BRADFORD AVE	0.15	OT	OT	35			4		4	4	Surface parking lot located adjacent to commercial buildings. Can feasible be redeveloped into a higher intensity residential use.	No
339-363-12	333 W SANTA FE AVE	0.06	OT	OT	35			1		1	1	Surface parking lot located adjacent another residential parcel. Can feasible be redeveloped into a higher intensity residential use.	No
339-363-13	329 W SANTA FE AVE	0.06	OT	OT	35			1		1	1	Surface parking lot located adjacent another residential parcel. Can feasible be redeveloped into a higher intensity residential use.	No
339-364-12	221 W SANTA FE AVE	0.05	OT	OT	29			1		1	1	Parcel has an existing commercial building. Parcel considered underutilized as land value exceeds the improvement value. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
												residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.The parcel is adjacent to residential uses and can feasible be redeveloped into residential uses.	
~~339-364-16~~	~~203 W SANTA FE AVE~~	~~0.09~~	~~OT~~	~~OT~~	~~29~~			~~2~~		~~2~~	~~2~~	~~Parcel has a two story commercial building. The parcel is located adjacent to residential uses and can feasible be redeveloped into residential use.~~	~~No~~
339-365-09	234 S MAIN ST	0.09	OT	OT	29			2		2	2	Surface parking lot located adjacent to residential parcel. Can feasible be consolidated and redeveloped into residential use.	No
339-365-10	141 W SANTA FE AVE	0.34	OT	OT	29			8		8	8	Parcel has an existing restaurant building with parklets along W Santa Fe Ave. The parcel is considered underutilized, land value exceeds the improvement value. The parcel ~~is adjacent to~~may have existing residential uses on the second floor and can add additional stories of residential. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. ~~and can feasible be redeveloped into residential use.~~	No
339-365-15	235 S BRADFORD AVE	0.09	OT	OT	29			2		2	2	Surface parking lot located adjacent another residential parcel. Parcel can feasible be redeveloped to residential use.	No

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
339-365-18	219 S BRADFORD AVE	0.15	OT	OT	29			3		3	3	The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan. ~~Existing two story residential and commercial building, on parcel.~~ The parcel is adjacent to a mixed-use building and can be intensified with residential uses similar to the adjacent building. Large parking lot and can feasibly be redeveloped into residential uses.	No
339-392-10	314 W SANTA FE AVE	0.04	OT	OT	35			1		1	1	Parcel has an existing commercial building. Parcel considered underutilized as land value exceeds the improvement value. The parcel is adjacent to residential uses and can feasible be redeveloped into residential uses. The Old Town Revitalization Plan allows residential on the second story similar to adjacent uses and as shown in Figures B-8 and B-9. Adjacent uses are currently mixed use with first floor commercial and second story residential. The property is also served by parking and is located within proximity to various amenities, making it ripe for additional development. This type of development would accomplish the goals and objectives of the Old Town Revitalization Plan.	No
~~339-392-11~~	~~310 W SANTA FE AVE~~	~~0.07~~	~~OT~~	~~OT~~	~~35~~			~~2~~		~~2~~	~~2~~	~~Parcel has an existing commercial building. Parcel considered underutilized as land value exceeds the improvement value. The parcel is adjacent to residential uses and can feasible be redeveloped into residential uses.~~	~~No~~

Table B-5: Underutilized Sites

APN	Street Address/Situs	Acres	General Plan	Zoning	Allowable Density (du/ac)	Existing Units	Lower	Mod	Above Mod	Total	Net	Existing Use	Prior Planning Period?
~~339-39302~~	~~226 W SANTA FE AVE~~	~~0.06~~	~~OT~~	~~OT~~	~~29~~			~~1~~		~~1~~	~~1~~	~~Vacant parcel adjacent to commercial buildings. There are adjacent residential uses and can feasible be redeveloped into higher residential use.~~	~~No~~
~~339-39401~~	~~132 W SANTA FE AVE~~	~~0.09~~	~~OT~~	~~OT~~	~~29~~			~~2~~		~~2~~	~~2~~	~~Vacant parcel adjacent to commercial buildings. There are adjacent residential uses and can feasible be redeveloped into higher residential use.~~	~~No~~
339-39406	110 W SANTA FE AVE	0.05	OT	OT	29			1		1	1	Surface parking lot located adjacent to another commercial office building. The parcel is relatively close to other residential units and can feasible be redeveloped into a higher intensity residential use. The lot is also adjacent to another parking lot and can be consolidated into a single parcel.	No
339-39407	100 W SANTA FE AVE	0.07	OT	OT	29			1		1	1	Surface parking lot located adjacent to another commercial office building. The parcel is relatively close to other residential units and can feasible be redeveloped into a higher intensity residential use. The lot is also adjacent to another parking lot and can be consolidated into a single parcel.	No
		38.4				~~71~~ 88	~~1,102~~ 1,013	~~618~~ 369	**0**	~~1,791~~ 1,468	~~1,720~~ 1,380		

Table B-6: Candidate Sites for Rezoning

APN	Street Address	Acres	General Plan	Zoning	Proposed GP/Zoning	Density (du/ac)	Potential Units	Lower	Mod	Above Mod	Existing Use
Note: Almost all candidate sites in the TOD and OT zones are adjacent to each other and may be redeveloped as single parcels or may be consolidated with other candidate sites and redeveloped to yield more units cumulatively.											
339-451-01	500-511 Cameron St.	0.89	Industrial	M (PMD)	**TOD**	95	73	40		33	Two parcels with existing industrial buildings. Approximately ~~30~~ 55% of the lot is dedicated to parking. Adjacent to this parcel is a multi-family residential unit and across from E Santa Fe Ct are single-family residential units. The parcels can feasible be redeveloped to residential use.

APN	Street Address	Acres	General Plan	Zoning	Proposed GP/Zoning	Density (du/ac)	Potential Units	Lower	Mod	Above Mod	Existing Use
339-451-14	510 Cameron St.	0.29	Industrial	M (PMD)	**TOD**	95	24	16		8	Existing industrial building on the parcel with approximately 40% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site.
339-451-06	516 Cameron St.	0.34	Industrial	M (PMD)	**TOD**	95	28	16		12	Existing industrial building on the parcel with approximately 60% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. The parcel is adjacent to another parcel enabling the possibility of consolidation and can be feasible be redeveloped into higher intensity residential use.~~
339-451-05	530 Cameron St.	0.49	Industrial	M (PMD)	**TOD**	95	40	18		22	Existing industrial building on the parcel with approximately 60% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not

APN	Street Address	Acres	General Plan	Zoning	Proposed GP/Zoning	Density (du/ac)	Potential Units	Lower	Mod	Above Mod	Existing Use
											believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. The parcel is adjacent to another parcel enabling the possibility of consolidation and can be feasible be redeveloped into higher intensity residential use.~~
339-451-03	531 Cameron St.	0.58	Industrial	M (PMD)	**TOD**	95	48	22		26	Existing industrial building on the parcel with approximately 60% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. The parcel is adjacent to another parcel enabling the possibility of consolidation and can be feasible be redeveloped into higher intensity residential use.~~
339-451-02	521 Cameron St.	0.37	Industrial	M (PMD)	**TOD**	95	30	16		14	Existing industrial building on the parcel with approximately 50% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. The parcel is adjacent to another parcel enabling the possibility of consolidation and can be feasible be redeveloped into higher intensity residential use.~~

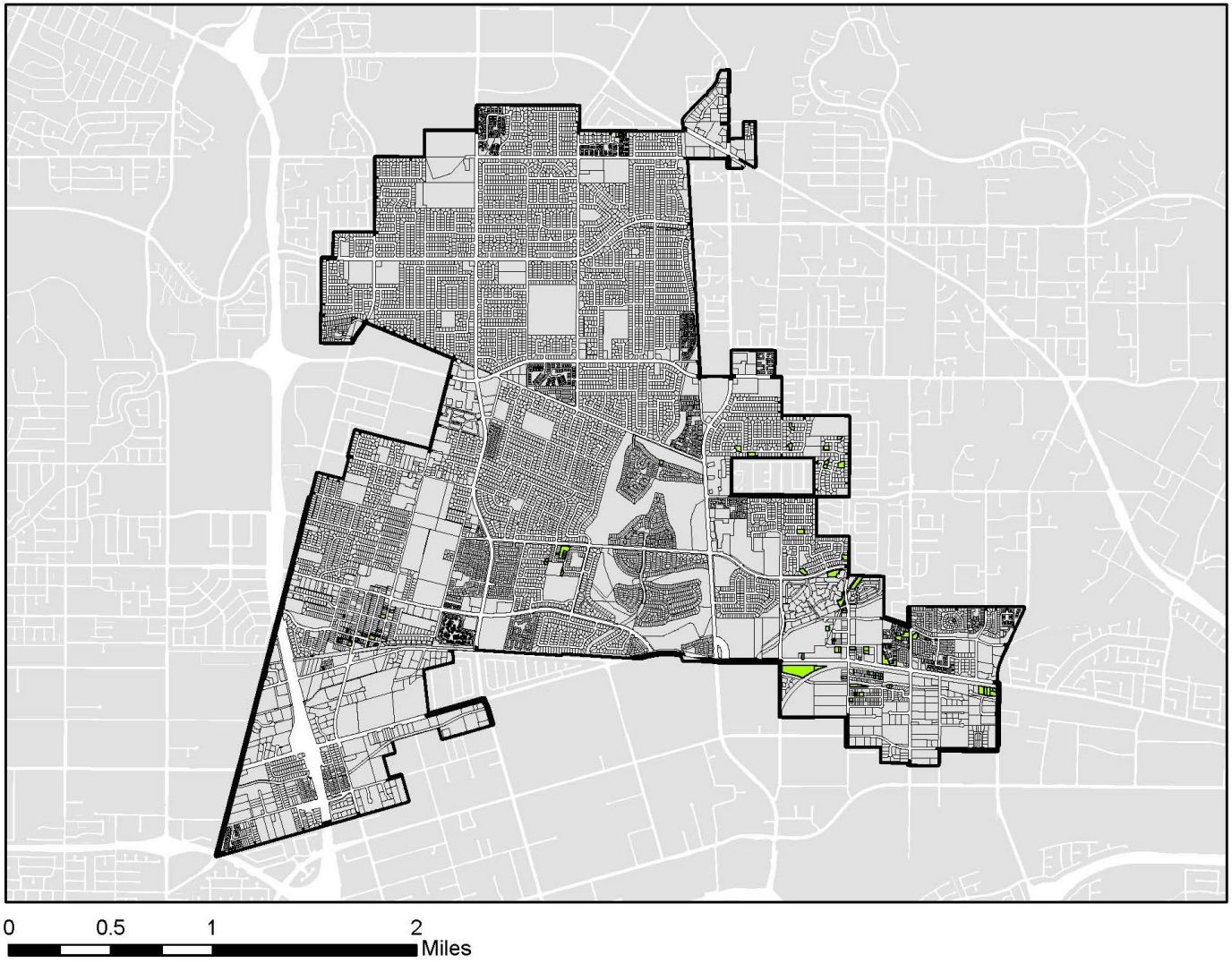
APN	Street Address	Acres	General Plan	Zoning	Proposed GP/Zoning	Density (du/ac)	Potential Units	Lower	Mod	Above Mod	Existing Use
339-101-13	515 S. Melrose St.	1.54	Industrial	M	**TOD**	95	126	61		65	Existing industrial building on the parcel with approximately 60% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. Approximately 30% of the lot is used for parking and for vehicular loading. The parcel is considered underutilized, land value exceeds improvement value.~~
339-101-12	505 S. Melrose St.	1.12	Industrial	M	**TOD**	95	92	41		51	Existing industrial building on the parcel with approximately 60% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. Approximately 30% of the lot is used for parking and for vehicular loading. The parcel is considered underutilized, land value exceeds improvement value.~~
339-101-11	330 W. Crowther Ave.	0.59	Industrial	M	**TOD**	95	48	22		26	Existing industrial building on the parcel with approximately 50% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both

APN	Street Address	Acres	General Plan	Zoning	Proposed GP/Zoning	Density (du/ac)	Potential Units	Lower	Mod	Above Mod	Existing Use
											developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. Approximately 30% of the lot is used for parking and for vehicular loading. The parcel is considered underutilized, land value exceeds improvement value.~~
339-101-14	420 W. Crowther Ave.	1.55	Industrial	M	**TOD**	95	127	57		70	Existing industrial building on the parcel with approximately 50% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. Approximately 30% of the lot is used for parking and for vehicular loading. The parcel is considered underutilized, land value exceeds improvement value. The parcel is adjacent to another parcel enabling consolidation and redevelopment for higher intensity residential use.~~
339-101-10	440 W. Crowther Ave.	0.53	Industrial	M	**TOD**	95	43	20		23	Existing industrial building on the parcel with approximately 60% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not

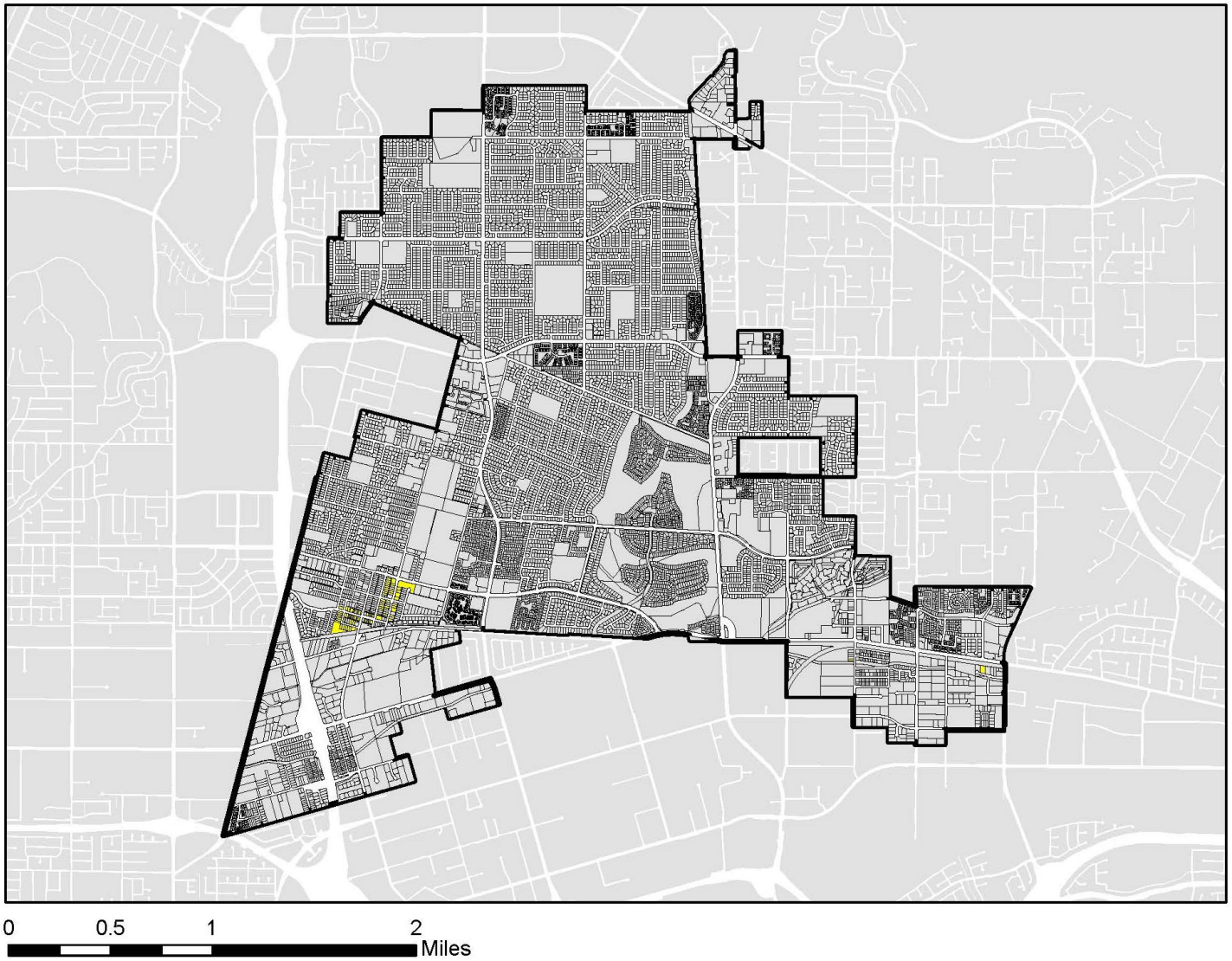
APN	Street Address	Acres	General Plan	Zoning	Proposed GP/Zoning	Density (du/ac)	Potential Units	Lower	Mod	Above Mod	Existing Use
											believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. Approximately 30% of the lot is used for parking and for vehicular loading. The parcel is considered underutilized, land value exceeds improvement value. The parcel is adjacent to another parcel enabling consolidation and redevelopment for higher intensity residential use.~~
339-101-07	480 W. Crowther Ave.	3.34	Industrial	M	**TOD**	95	274	120		154	Existing industrial building on the parcel with approximately 30% vacancy. The parcel can be consolidated or redeveloped similar to large projects to the west, the Herald (215 units) and Cenza (418 units) which are examples of the type of developments the City envisioned when drafting the TOD District plan. Both developments had existing uses which did not align with the City's vision similar to the existing site. In both examples, vacancy did not preclude development and the City does not believe that vacancy will preclude development on this site. ~~Existing industrial building on the parcel. The parcel is considered underutilized, land value exceeds improvement value. The parcel is adjacent to another parcel enabling consolidation and redevelopment for higher intensity residential use.~~
339-101-06	550 W. Crowther Ave	2.87	Industrial	M	**TOD**	95	235	120		115	Existing industrial building on the parcel. The parcel is considered underutilized, land value exceeds improvement value. The parcel is adjacent to another parcel enabling consolidation and redevelopment for higher intensity residential use. Approximately 50% of the parcel is vacant.
346-162-01	Orangethorpe/Jefferson	0.47	HDR	R-3	**HDR/R3**	30	13			13	Vacant land
346-162-02	Orangethorpe/Jefferson	4.55	HDR	R-3	**HDR/R3**	30	123	54		69	Vacant land
346-164-23	503 S. Van Buren St.	0.21	HDR	R-3	**HDR/R3**	30	6			6	Vacant land
346-331-02	601 S. Lakeview Ave.	4.55	HDR	R-3	**HDR/R3**	30	123	54		69	Vacant land
346-331-03	Lakeview Loop/Veterans Wy	0.13	HDR	R-3	**HDR/R3**	30	3			3	Vacant land

APN	Street Address	Acres	General Plan	Zoning	Proposed GP/Zoning	Density (du/ac)	Potential Units	Lower	Mod	Above Mod	Existing Use
346-331-11	625 S. Lakeview Ave.	0.53	HDR	R-3	**HDR/R3**	30	14			14	Vacant land
346-331-27	2006 E. Lakeview Loop	0.38	HDR	R-3	**HDR/R3**	30	10			10	Vacant land
346-331-29	2018 E. Lakeview Loop	0.39	HDR	R-3	**HDR/R3**	30	11			11	Vacant land
346-331-30	613 S. Lakeview Ave.	0.45	HDR	R-3	**HDR/R3**	30	12			12	Vacant land
346-331-32	1958 E. Veterans Way	0.81	HDR	R-3	**HDR/R3**	30	22			22	Vacant land
346-164-24	513 S. Van Buren St.	0.17	HDR	R-3	**HDR/R3**	30	5			5	The parcel currently has a single-family residential unit with 70% vacant, undeveloped land. There is a secondary unit that is located to the western border of the parcel. Surrounding uses are vacant, and currently developing land with high density residential and can feasible be redeveloped into a higher intensity residential use.
Totals		**27.1**					~~1,531~~ 1,530	677	0	853	

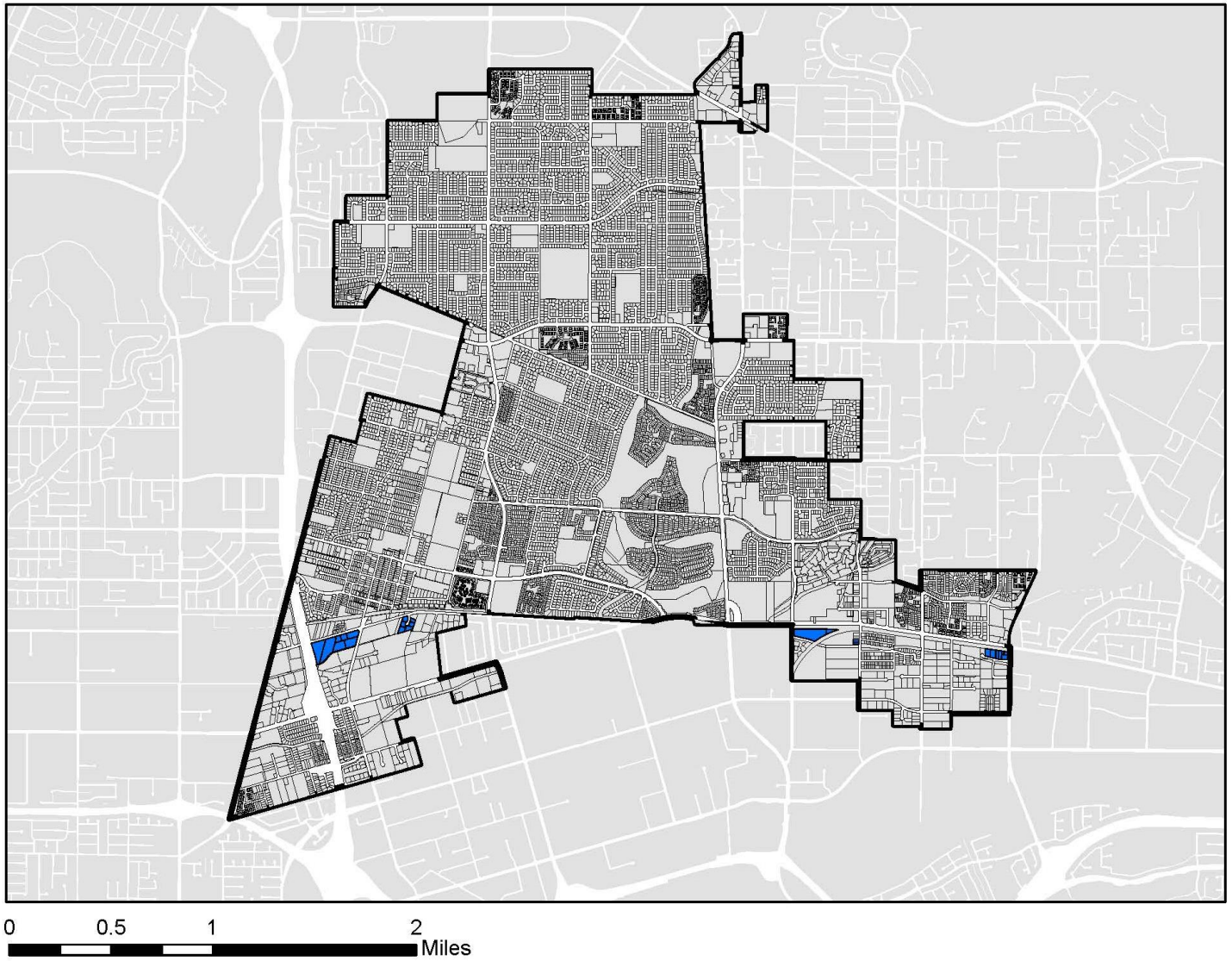
~~Figure B-3~~Figure B-10: Vacant Sites



~~Figure B-4~~Figure B-11: Underutilized Sites



~~Figure B-5~~Figure B-12: Candidate Sites for Rezoning



Appendix C: Review of Housing Element Performance

Section 65588(a) of the *Government Code* requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This appendix contains a review the housing goals, policies, and programs of the previous housing element, and evaluates the degree to which these programs have been implemented during the previous planning period, 2013 through 2021. The findings from this evaluation have been instrumental in determining the City's 2021 Housing Implementation Program.

Table C-1 summarizes the programs contained in the previous Housing Element along with the City's progress in implementation.

Table C-2 presents the City's progress in meeting the quantified objectives from the previous Housing Element.

During the prior planning period the City has been very successful in addressing the housing needs of special needs populations.

In early 2019 the North Orange County Service Planning Area for Homelessness Outreach Efforts reached an important milestone. A regional partnership of 13 cities located in northern Orange County (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park and Yorba Linda) came together to share intelligence and resources to address regional homelessness. Their concept was to promote greater regional coordination on homeless issues while reducing the span of control regarding working with the County of Orange and others.

After months of extensive discussions, negotiations and assessments, two locations within the North Orange County Service Planning Area were identified for the development of "navigation centers" based on a number of factors including zoning, proximity to related services and site availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to a shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in the city of Anaheim that accommodated 325 new beds.

Funding for the Navigation Centers was secured through application and governmental meetings with state, regional, county and local officials resulting in the $12 million in State of California Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of these Navigation Centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing operation of the Navigation Centers. A Memorandum of Understanding was prepared and presented to the City Councils of all thirteen city governments for execution in May 2019. Construction began in 2019 and the opening of the first 100-bed Navigation Center in Placentia

occurred on March 31, 2020. This groundbreaking success story was born of the regional need and public official desire to come together to address homelessness and pioneer the way to create and operate a multi-jurisdictional homelessness facility. Programs 1,4, 1.14 and 2.3 identify actions the City is taking to address homelessness.

In addition to the Placentia Navigation Center, the City successfully facilitated development of a 189-unit 100% low-income deed-restricted housing development (USA Properties, Figure B-1). The project is currently under construction adjacent to the Placentia Metrolink Station.

Table C-1: 2013-2021 Program Evaluation

Name of Program	Objective	Timeframe	Status of Program Implementation
HE-1.1: Manufactured Housing and Mobile Homes	Use of Manufactured Housing	Zoning Code amendment by June 2014	Ongoing.
HE-1.2: Locate Housing Near Transportation, Employment and Services	Encourage new housing in proximity to transportation, employment and services	Ongoing	Ongoing. This remains a high priority of the City as the construction of the Placentia Metrolink Station is scheduled to start late 2019. The City Council approved and adopted the Transit Oriented Development (TOD) Packing House District near the future Metrolink Station on April 18, 2017 which allows densities up to 95 du/acre. To date, 633 units have been entitled in the TOD District. On July 18, 2017, the Old Town Zoning District was adopted (Ordinance No. O-2017-05) by City Council and the Development Standards include a sub-area allowing high density housing by right without a public hearing, at a density up to 65 dwelling units per acre. Both the TOD and Old Town Zoning Districts are immediately adjacent to the Placentia Metrolink Station.
HE-1.3: Pursue County, State and Federal Funds	Increase use of County, State and Federal funds	Monitor funding opportunities on an annual basis and apply for funding as opportunities arise	Ongoing. The City is continually reviewing grant funding opportunities for housing developments and is actively pursuing County and State funds, including transportation circulation grants provided by the State Department of Transportation and SCAG. In partnership with SCAG, the City Council recently approved formation of an EIFD in the Old Town Zoning District that will result in $8.2 million in funding for infrastructure related to transit oriented development. The City successfully applied for and received SB2 and LEAP Grant funding.
HE-1.4: Emergency Shelters and Transitional and Supportive Housing	Continue to encourage the provision of emergency shelters, transitional and supportive housing	Ongoing	PMC Ch. 23.47 amended to permit emergency shelters in the M Zone. The City of Placentia purchased a property at 731 S. Melrose Street, Placentia, and constructed a 100-bed homeless shelter, which opened in March 2020.
HE-1.5: Infrastructure Program	Reduce constraints associated with infrastructure	Annual review, revisions as appropriate	Ongoing. The City annually reviews development costs and opportunities for removing constraints due to the high cost of infrastructure improvements. The City is near built-out with infrastructure mostly in place. Infrastructure near proposed Metrolink Station is a strong candidate for competitive grant funding. The City is continually reviewing grant funding opportunities for housing developments and is actively pursuing County and State funds, including transportation circulation grants provided by the State Department of Transportation and SCAG. In partnership with

Name of Program	Objective	Timeframe	Status of Program Implementation
			SCAG, the City Council recently approved formation of an EIFD in the Old Town Zoning District that will result in $8.2 million in funding for infrastructure related to transit-oriented development.
HE-1.6: Development Processing System Review	Minimize development review/processing time	Ongoing, Annual Review	Completed/Ongoing. The City annually reviews its development processing procedures and has adopted several streamlined procedures in the last three years. Ordinance No. O-2017-05 adopted by City Council in July 2017 codifies Old Town Development Standards including a sub-area allowing high density housing by right without a public hearing, reducing development processing timeframes, allowing housing at a density up to 65 dwelling units per acre.
HE-1.7: Vacant and Underutilized Land Inventory	Inventory of vacant and underutilized land	Annual update of inventory	Ongoing. The City provides the inventory of vacant and underutilized land upon request by developers, including affordable housing developers and routinely discusses these parcels with developers. The City has budgeted consulting services with a private economic development firm to assist with identifying up-to-date inventory of vacant and underutilized land. The City is in the process of selling these vacant lands to qualified developers. The City keeps a list of vacant and under-utilized sites that are owned by the City and/or City-related agency.
HE-1.8: Adequate Sites for Housing Development	Rezone a minimum of 8 acres to permit residential development at a density of 30 du/ac (or an amount of land needed to accommodate at least 231 units at an alternate density of more than 30 units/acre).	Prior to October 2014	Completed. Ordinance No. O-2017-05 adopted by the City Council in July 2017 codifies the Old Town District Development Standards which includes a sub-area allowing high-density residential housing by right without a discretionary review nor public hearing, at a density up to 65 dwelling units per acre for an area exceeding 1.27 acres. The maximum density for this sub-area is up to 65 dwelling units/acre. In addition, TOD Zone was also adopted in 2017 at densities of 65-95 du/ac).
HE-1.9: Monitoring of Constructed Units Based on Income Level	Tracking performance by income level	Ongoing	Ongoing. Forms have been developed to gain the information at the time a building permit is issued.
HE-1.10: Encourage Development of Housing for Extremely Low-Income Households	67 ELI Units by 2021	Annual consultation with affordable housing developers, or as development opportunities arise	Completed. The completion and occupancy of 49 very low income units in 2020 (the Veteran's Village development) contributes to achieving this goal. The City is reviewing other incentive programs to implement. The City has increased its contacts with non-profit developers regarding affordable housing opportunities. The elimination of redevelopment set aside funds severely restricts this

Name of Program	Objective	Timeframe	Status of Program Implementation
			effort. (John, also see attached 189 unit USA Properties staff report. Some of those units may be extremely low).
HE-1.11: Amend the Density Bonus Ordinance	Review and Revise Density Bonus Ordinance	2/1/2014	Completed. The City's density bonus ordinance was reviewed and the City will follow changes in State law relating to such bonuses. (John see PMC CH. 23.23, adopted in 2002. Not sure if it is consistent with State law).
HE-1.12: Development of Senior Housing	Senior Housing Development	Ongoing	Ongoing. The City provides incentives and density bonuses for senior housing development. On December 1, 2020, City Council approved entitlements for a 64-unit affordable senior housing development at 1314 N. Angelina Drive. (see attached staff report)
HE-1.13: Development of Housing for Larger Families	Housing Units with larger bedroom counts	Ongoing	Ongoing. The City has not implemented an incentive program. The elimination of redevelopment funds severely restricts this effort. The City is reviewing incentive programs to implement. The City has increased its contacts with non-profit developers regarding affordable housing opportunities.
HE-1.14: Housing for Persons with Special Needs	Housing Units for households with special needs	Ongoing	Completed/Ongoing. The City has not implemented an incentive program at this time, however the issuance of permits for 49 very low income units in 2018 (the Veteran's Village development) contributes to this as qualified residents must be Veterans who are homeless or at risk of homelessness and the development will provide "wrap around" services to provide vocational training, mental health services, job placement, and more. The City has also identified potential parcels for additional special needs housing.
HE-1.15: Transit-Oriented Development	Encourage Transit-Oriented Development	Ongoing	Completed and ongoing. The City Council approved and adopted the Transit Oriented Development (TOD) Packing House District near the future Metrolink Station on April 18, 2017 which allows densities up to 95 du/acre. To date, 633 units have been entitled in the TOD District. On July 18, 2017, the Old Town Zoning District was adopted (Ordinance No. O-2017-05) by City Council and the Development Standards include a sub-area allowing high density housing by right without a public hearing, at a density up to 65 dwelling units per acre. Both the TOD and Old Town Zoning Districts are immediately adjacent to the Placentia Metrolink Station and allow Transit Oriented Development. The City continues to work with developers on Transit Oriented Development opportunities connected with the forthcoming Placentia Metrolink Station. Incentives include the utilization of City owned property as well as reduced parking requirements and

Name of Program	Objective	Timeframe	Status of Program Implementation
			densities up to 95 dwelling units per acre for the TOD Zone and up to 65 dwelling units per acre for the Old Town Zone, both of which surround the proposed facility.
HE-1.16: Single-Room Occupancy Units (SROs)	Facilitate development of SROs	Ongoing	Completed. On May 7, 2016 the City Council approved Ordinance No. O-2013-08 to amend Title 23 (Zoning Ordinance) of the Placentia Municipal Code Pertaining to Emergency Shelters, Supportive and Transitional Housing Facilities, Single Room Occupancies and Provisions for Reasonable Accommodations for Persons with Disabilities, including Standards and Procedures thereto. (John, see PMC CH. 23.24)
HE-1.17: Review and Revise Residential Parking Requirements	Adopt appropriate parking requirements for new TOD and mixed-use development; Review existing multi-family parking standards and revise as necessary	2014	Partially completed. The City will review and propose amendments to its city-wide residential parking requirements during the forthcoming General Plan and Zoning Code updates. The City has already adopted significantly reduced parking requirements for the newly adopted Transit Oriented Development (TOD) Zone and Old Town District Zone, both of which were adopted in 2017.
HE-1.18: Encourage and Facilitate Lot Consolidation	Encourage and Facilitate Lot Consolidation	Zone Code amendment in 2014	Completed and Ongoing. The City will address potential regulatory incentives through the General Plan, Zoning Code, and newly adopted Transit Oriented Development (TOD) Zone and Old Town Zone, both of which were adopted in 2017 and both of which encourage lot consolidation. To date, 633 units have been entitled in the TOD District. One development consists of two lots being consolidated to accommodate the new TOD development and the other consists of seven lots consolidated to accommodate the new TOD development.
HE-2.1: Support of Regional Fair Housing Efforts	Fair Housing Activities	Ongoing	Ongoing. The City continues to support the Fair Housing Council of Orange County and to refer members of our community to the Council for counseling, mediation and low-cost advocacy for housing related needs.
HE-2.2: Section 8 Rental Assistance	Provide information regarding housing assistance	Ongoing	Ongoing. The City continues to partner with the Orange County Housing Authority to receive vouchers for Placentia residents.
HE-2.3: Reasonable Accommodation Procedures	Provide reasonable accommodation in housing regulations for persons with disabilities	Ongoing	On May 7, 2016 the City Council approved Ordinance No. O-2013-08 to amend Title 23 (Zoning Ordinance) of the Placentia Municipal Code Pertaining to Emergency Shelters, Supportive and Transitional Housing Facilities, Single Room Occupancies and Provisions for Reasonable Accommodations for Persons with Disabilities, including Standards and Procedures Therefore.

Name of Program	Objective	Timeframe	Status of Program Implementation
HE-2.4: Comprehensive Housing Resource Directory	Housing Resource Directory	Ongoing	The City does not have the resources to develop its own directory but works with the Orange County Community Resources Department to provide information and direct residents to their online housing resource area for information.
HE 2.5: Zoning Regulations	Revise the Municipal Code definition of family consistent with current law	March 2014	In process - not yet completed.
HE-3.1: Community Based Neighborhood Rehabilitation	Conserve and Improve existing residential neighborhoods	Ongoing	Ongoing. The City created a Neighborhood Services Division in order to foster increased neighborhood services to include the coordination of CDBG funded rehabilitation. This Office is responsible for the rehabilitation program and is working with specific neighborhoods on community-centered programs.
HE-3.2: Neighborhood Identity	Creation of Neighborhood Identity	Ongoing	Ongoing. Through the City's Neighborhood Services Division, the City continues to work with neighborhoods to foster their sense of identification.
HE-3.3: Placentia Rehabilitation Grant Program	72 units provided rehabilitation grants	Ongoing	Ongoing/Completed. The City is very successful in implementing the CDBG rehabilitation program. The City is on track to exceed the identified number of units rehabilitated.
HE-3.4: Energy Conservation and Sustainable Building Practices	Energy conservation/reduced utility costs	Continue to provide energy conservation educational materials to residents	The City has utilized federal Energy Efficiency & Conservation Block Grants to provide material and energy efficient products to residents in order to promote energy efficiency. Additionally, on December 6, 2016, the City Council adopted Ordinance No. O-2016-07 adopting the new 2016 California Building Codes, including the latest Green Building Code and the City Council has authorized incentivizing increased compliance with Title 24 through building permit fee reduction.
HE-3.5: Monitoring At-Risk Units	Encourage the preservation and extension of "at-risk" units. Prevent blight and deterioration in neighborhoods	Ongoing coordination with the County and nonprofits	Ongoing. The City continues to work with the County of Orange Community Resources department to target at-risk projects and seek assistance from the County and non-profit housing groups to continue monitoring and implementing a strategy to preserve such units. Separately, the City is currently partnering with a non-profit to possibly apply for a Federal grant.
HE-3.6: Vacant Building Ordinance	Prevent blight and deterioration in neighborhoods	Ongoing	Completed and ongoing. On May 7, 2013 the City Council adopted Ordinance No. O-2013-02 pertaining to the maintenance and rehabilitation of long term boarded and vacant buildings. In addition, in late 2020, the City adopted the International Property Maintenance Code, 2018 Edition (latest edition). The City continues to enforce the

Name of Program	Objective	Timeframe	Status of Program Implementation
			Vacant Building Ordinance through its Code Enforcement, Planning, and Building Divisions.
HE-4.1 Partnerships with Housing Industry	Establish partnerships with non-profit and for-profit housing developers	Ongoing	Ongoing. The City began to establish, and continues to do establish, relationships with non-profit and for-profit housing partners. The City issued building permits for 49 very low income units in 2018 (the Veteran's Village development) and qualified residents must be Veterans who are homeless or at risk of homelessness and the development will provide "wrap around" services to provide vocational training, mental health services, job placement, and more. The City has also identified potential parcels for additional special needs housing.
HE-4.2: Participation in Continuum of Care Forum	Continue participating in the County of Orange Continuum of Care Forum	Ongoing	The City continues to participate with the County of Orange Continuum of Care Forum and has actively responded to the needs of the County in providing letters of support and other requested material in support of funding applications to the Federal government.

Table C-2 – Progress in Achieving Housing Element Quantified Objectives, 2013-2021

Program	Quantified Objective	Level of Achievement
New Construction		
Extremely Low	67	49
Very Low	66	
Low	98	-
Moderate	90	40
Above-moderate	209	343
TOTAL	**530**	**432**
Rehabilitation		
Acquisition/Rehabilitation		-
Extremely Low	2	-
Very Low	2	-
Low	2	-
TOTAL	**6**	-
Placentia Rehabilitation Grant Program		-
Very Low/Low	30	-
Preservation/Conservation		
At-Risk Units	Imperial Villas- 58 Moderate	58

Appendix D: Affirmatively Furthering Fair Housing

Assembly Bill (AB) 686 requires housing elements to contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

Under California law, AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

To comply with AB 686, the City has completed the following outreach and analysis.

1. Outreach

As discussed in the Public Participation appendix, early in the Housing Element update process the City developed a list of stakeholders with local expertise in housing issues, including fair housing. The stakeholder list included local service providers, affordable housing developers, and fair housing organizations in an effort to include the interests of lower-income residents and persons with special needs in the community.

Over the course of the Housing Element update process the City conducted a series of public meetings. Public notice of each meeting was posted on the City's dedicated Housing Element website and was also sent directly to persons and organizations on the stakeholder list. Public meetings were held both online and in person to encourage those with mobility difficulties to participate. Agendas and other information for each meeting was posted on the City website to allow interested stakeholders to access to this information throughout the process. Interested persons were also encouraged to provide input or ask questions via telephone or email. Please refer to Appendix A for additional information regarding the outreach efforts and how public input was incorporated into the Housing Element. Information was made available in both English and Spanish.

In addition to public workshops and hearings, the City also directly contacted housing advocates, housing service providers, and community organizations who serve the interests of lower-income households and special needs groups to solicit comments on housing needs, barriers to fair and affordable housing, and opportunities for development.

To encourage continuing stakeholder involvement in local housing issues throughout the planning period, Program 2.1 includes a commitment to conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

2. Fair Housing Assessment

This section provides an assessment of fair housing issues in Placentia including fair housing enforcement and outreach capacity, patterns of integration and segregation, racial or ethnic patterns of concentration, disparities in access to opportunities, and disproportionate housing needs, including displacement risk.

A. Fair Housing Enforcement and Outreach Capacity

The primary fair housing organization serving Placentia is the Fair Housing Council of Orange County (https://www.fairhousingoc.org/). The FHCOC was formed in 1965 in the wake of the civil rights movement that resulted in the Civil Rights Act of 1964. The Council incorporated in 1968, the same year that Congress extended civil rights protections to cover housing with the adoption of the Fair Housing Act. Under the direction of a volunteer board of directors and staff, the agency works to fulfill a mission of protecting the quality of life in Orange County by ensuring equal access to housing opportunities, fostering diversity and preserving dignity and human rights. An operating member of the National Fair Housing Alliance, the FHCOC works to eliminate housing discrimination and guarantee the rights of all people to freely choose the housing for which they qualify in the area they desire. Services provided by the Fair Housing Council include fair housing enforcement and education, landlord/tenant counseling, mediation and homebuyer HUD counseling, which includes first-time homebuyer education and mortgage default counseling. Services are available to low-to-moderate income clients free of charge and to others for a moderate donation. Services are available in English, Spanish, and Vietnamese.

Orange County

The County of Orange acts as lead agency for the "Urban County," which includes 21 non-entitlement cities. Placentia is a participating city in the Urban County Program. The most recent Orange County Analysis of Impediments to Fair Housing Choice (the "AI") was adopted in June 2020 and includes a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards the County's obligation to affirmatively furthering fair housing. The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with Orange County jurisdictions and with input from a wide range of stakeholders through a community participation process, prepared the AI. To provide a foundation for the conclusions and recommendations presented in this AI, the following information was reviewed and analyzed:

- Data from the U.S. Census Bureau, American Community Survey and other sources about the demographic, housing, economic, and educational landscape of the county, nearby communities, and the broader region;
- Various County and city planning documents and ordinances;

- Data reflecting housing discrimination complaints;
- The input of a broad range of stakeholders that deal with the realities of the housing market and the lives of members of protected classes in Orange County.

As required by federal regulations, the AI draws from the sources listed above to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs. The analysis also examines publicly supported housing in the County as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

To ensure that the analysis contained in the AI truly reflects conditions in the community and that the goals and strategies are targeted and feasible, the participation of a wide range of stakeholders is of critical importance. A broad array of outreach was conducted through community meetings, focus groups, and public hearings.

In preparing this AI, the Lawyers' Committee reached out to tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal services provers, social services providers, housing developers, and industry groups to hear directly about fair housing issues affecting residents of Orange County.

Beginning in October 2019, the Lawyers' Committee held meetings with individual stakeholders throughout the County. In January and February 2020, evening community meetings were held in Mission Viejo, Westminster/Garden Grove, Santa Ana, and Fullerton (which is immediately adjacent to Placentia). Also in February, the Lawyers' Committee held a focus group with a wide array of nonprofit organizations and government officials.

Geographically specific community meetings were held across Orange County, including the South, West, Central, and North parts of the County. Additional outreach was conducted for members of protected classes, including the Latino and Vietnamese communities. All community meetings had translation services available if requested in Spanish and Vietnamese. In addition, all meetings were held in locations accessible to people with mobility issues. The Executive Summary of the AI was translated into Spanish and Vietnamese. Public hearings and City Council meetings were held throughout the County.

The County AI describes the departments and organizations that handle fair housing enforcement and outreach in Orange County. The California Department of Fair Employment and Housing (DFEH) investigates complaints of employment and housing discrimination. The Fair Housing Council of Orange County (FHCOC) provides services throughout the Urban County, including Placentia, to ensure equal access to housing. FHCOC's services include outreach and education, homebuyer education, mortgage default counseling, landlord-tenant mediation, and limited low-cost advocacy. The Fair

Housing Council investigates claims of housing discrimination and assists with referrals to DFEH. Community Legal Aid SoCal is a legal service provider serving low-income people in Orange County and Southeast Los Angeles County.

The 2020 Orange County AI reported that:

- FHCOC regionally conducted or participated in 467 education and/or outreach activities. Regionally, over 9,550 people were served by these activities. Through its various regional outreach efforts FHCOC distributed over 82,130 pieces of literature on fair housing, its services and other housing-related topics. Additionally, throughout Orange County FHCOC held 32 training sessions for rental property owners/managers. FHCOC presented 16 fair housing seminars, 70 general fair housing workshops
- On a regional basis, FHCOC staff received 363 allegations of housing discrimination and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. FHCOC also conducted 362 systemic onsite tests, either paired or 'sandwich', 51 tests occurring in the jurisdiction and 215 other testing activities.
- On a regional basis, activities provided by FHCOC included assisting 7,664 unduplicated households addressing 24,766 issues, disputes and/or inquires.

City of Placentia

As seen in Figure D-1, the HCD AFFH Data Viewer reported a Fair Housing Enforcement and Outreach (FHEO) inquiry rate of less than 0.25 per 1,000 persons for the 2013-2021 period in Placentia. FHEO inquiries allow residents to submit complaints or questions related to their housing situation. The goal of the FHEO program intends to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities by leading the nation in the enforcement, administration, development, and public understanding of federal fair housing policies and laws. Inquiries are not official cases and may have been dropped by a residents for different reasons.

In the City of Placentia, there were a total of 10 FHEO inquiries from 2013 to 2021. Of the 10 inquiries:

- Four failed to respond after the inquiry was made and processed,
- Two were not pursued by the resident who made the inquiry,
- One was found to have no valid basis,
- Two were found to have no valid issue,
- One classified as "other" in FHEO categories.

When inquiries are made, they are categorized and approved into different protected classes such as disability, race, and religion among others. HUD reported four inquiries

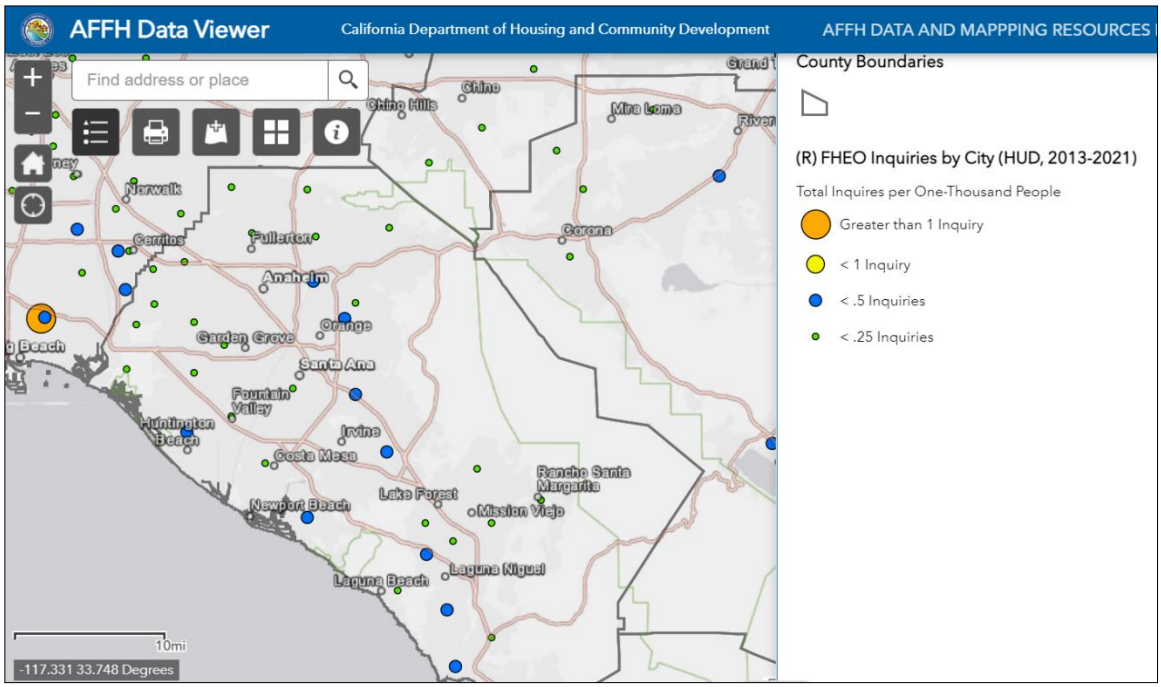
related to disability. One individual inquiry may be classified in multiple protected groups.

In comparison to surrounding jurisdictions, Placentia had an inquiry rate 0.19 inquires per one-thousand people. This rate was lower compared to cities with higher rates such as Brea (0.25 per one-thousand), Fullerton (0.20 per one-thousand), Anaheim (0.37 per one-thousand), and Orange (0.42 per one-thousand). Northward to Los Angeles County, more instances of communities that are populous areas receive more inquiries.

To address potential discrimination based on disability status and other protected classes, the City has added the following policy actions in the Housing Plan:

- Program HE-2.3: Minimize Constraints on Housing for Persons with Disabilities
- Program HE-1.14: Housing for Persons with Special Needs
- Program HE-1.12: Development of Senior Housing
- Program HE-1.13: Development of Housing for Larger Families

Figure D-1: FHEO Inquiries – Orange County and Placentia



Capacity to Address Fair Housing Complaints

The Constraints section of this Housing Element describes ways that the City works to address potential impediments to fair housing choice. The City continues to contract with the FHCOC to implement the regional Fair Housing Plan (AI) and to offer fair

housing services and tenant/landlord counseling to residents. The FHCOC provides the following services to Orange County residents, including Placentia residents:

- Serving as a fair housing resource for the region, including implementation of an affirmative fair housing marketing plan, testing, and complaint verification;
- Responding to all citizen complaints regarding violation of fair housing laws;
- Providing tenant-landlord counseling to all inquiring citizens;
- Promoting community awareness of tenant-landlord rights and responsibilities;
- Reporting monthly on complaint processing;
- Providing fair housing education to residents, County staff, community organizations, agencies, and service providers;
- Increasing the supply of affordable housing in high opportunity areas;
- Preventing displacement of low- and moderate-income residents, seniors, and people with disabilities;
- Increasing community integration for persons with disabilities;
- Ensuring equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness; and
- Expanding access to opportunities for protected classes.

The FHCOC ensures that the City's fair housing practices are consistent with State law and that residents have the tools and resources they need to address fair housing issues appropriately. The City relies on the FHCOC to track, monitor, and investigate fair housing cases as well as hold training sessions for property owners/managers within the City and throughout the region.

Fair Housing Laws

The City is in compliance with existing fair housing laws, and often seeks to go beyond State requirements to address fair housing and access to affordable housing. The following lists State and local fair housing laws and specifies how the City complies:

State

- **California Fair Employment and Housing Act (FEHA):** The City continues to implement and update programs to promote fair and equal access to housing. The City continues to disseminate information regarding fair housing in a variety of locations and seek funding to support FHCOC.
- **Government Code section 65008:** The City continues to implement programs that encourage affordable housing development. The City implements

Programs HE-1.2, 1.3, 1.6, 1.8, and 1.10 that comply with State's requirement for fair review of affordable housing development.

- **Government Code Section 8899.50:** The City implements programs and actions in compliance with State law that affirmatively furthers fair housing. As detailed in the Housing Plan, the City administers programs to promote equal housing access and affordable resources.
- **Government Code Section 11135:** The City promotes State-funded programs and actions, such as the First-Time Homebuyer Loan Program, on the City's website and at the public counter. The City continues to implement and encourages programs that promote full and equal access to all programs and activities.
- **Density Bonus Law:** The City established a Density Bonus Ordinance consistent with State Density Bonus Law. The City provides incentives to developers to produce affordable housing to very low-income households, low-income households, moderate-income households, senior citizens, transitional foster youth, disabled veterans, and persons experiencing homelessness, as well as for the development of childcare facilities. The Housing Plan includes a program ensuring the City maintains compliance with Density Bonus Law updates.
- **No-Net-Loss Law:** Appendix B: Residential Land Inventory, details how the City maintains adequate sites to accommodate all income categories for RHNA.
- **Excessive Subdivision Standards:** The City continues to update its Zoning Ordinance, waive certain development fees, and offer incentive packages to facilitate housing development.
- **Housing Element Law:** The City identifies and includes an analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs.

Local

- **Local Ordinances:** The City has multiple local ordinances that establishes procedures for rezoning, development permit processing, affordable housing fees, and other programs that encourage fair housing practices.
- **Housing Plan:** The Housing Plan details the City's goals, policies, programs, and objectives. The City addresses the need for additional housing opportunities, remove constraints to affordable housing, improve the existing housing stock, and provide equal opportunities for current and future residents of Placentia.

B. Patterns of Integration and Segregation

It is important to note that segregation is a complex topic, difficult to generalize, and is influenced by many factors. Individual choices can be a cause of segregation, with some

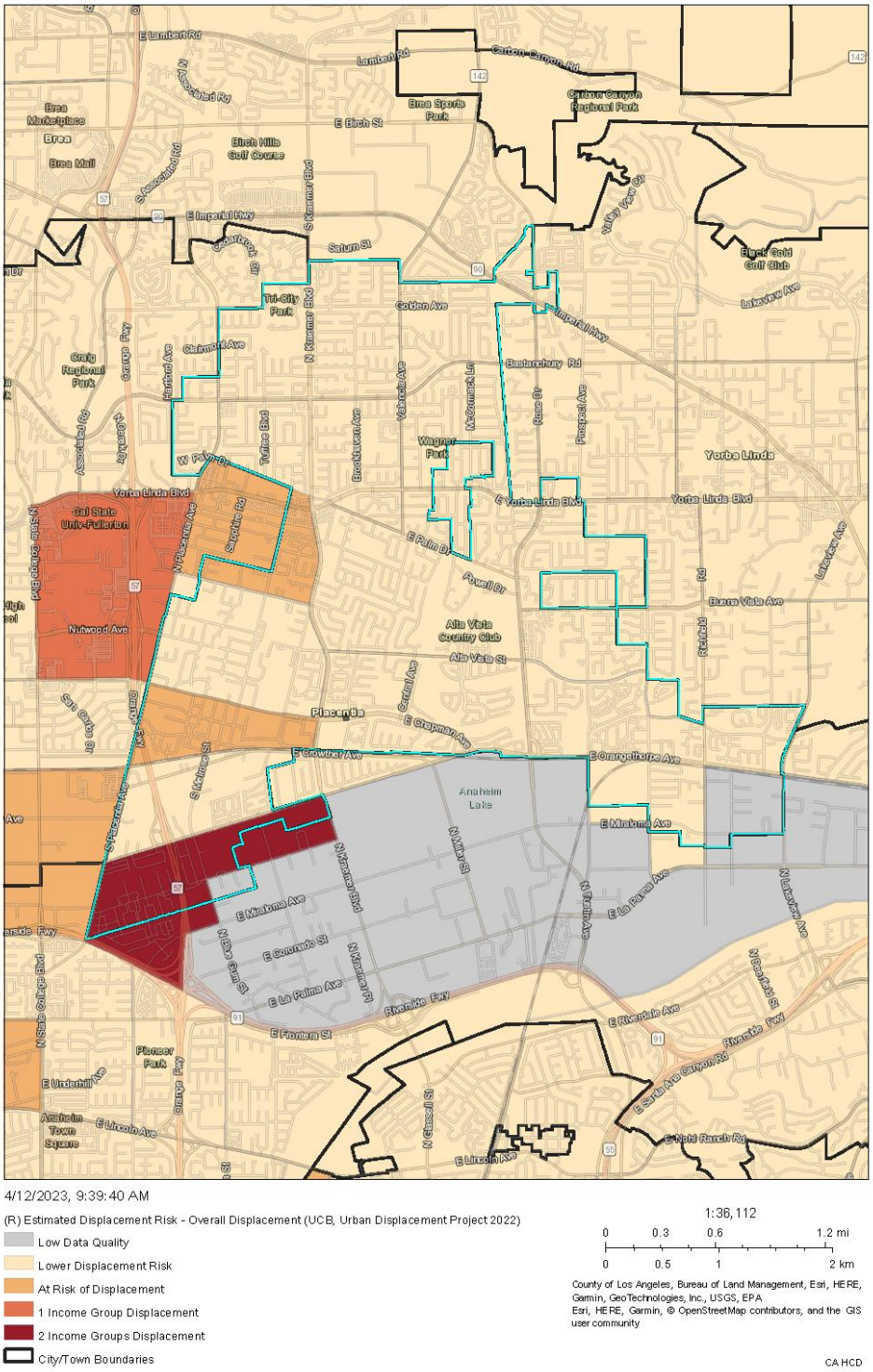
residents choosing to live among people of their own race or ethnic group. For instance, recent immigrants often depend on nearby relatives, friends, and ethnic institutions to help them adjust to a new country. Alternatively, when white residents leave neighborhoods that become more diverse, those neighborhoods can become segregated. Other factors, including housing market dynamics, availability of lending to different ethnic groups, availability of affordable housing, and discrimination can also cause residential segregation.

Table D-1 shows two census tracts within the City that are susceptible to displacement risk. Displacement risk means that, in the most recent year with reliable census data, a census tract had characteristics which are strongly correlated with more low-income renter population loss than gain. The model estimates that more low-income households left these neighborhoods than moved in. Tract 06059011720 has a lower median income than tract 06059011721 at $46,148. Tract 06059011721 has a higher percentage of low-income households, and higher percentage of renter-occupied units compared to tract 06059011720. Tract 06059011720 is probable to displacement risk and tract 06059011721 is elevated for displacement for very low- and low-income households. Figure D-2 shows the estimated displacement risk in the City of Placentia. The darker red census tract located in the southern borders of the City has an elevated displacement for the Very Low- and Low-income households (Census tract 06059011720).

Table D-1: Neighborhood Segregation Household Data

Census Tract	Median Income	Low Income Households	Speak English Less than Very Well	Renter-Occupied	Displacement Risk
06059011721	$64,531	54.9%	22.1%	68.8%	Probable Displacement Risk
06059011720	$46,148	76.4%	33.7%	82.7%	Elevated Displacement for Very Low- and Low-income households

Figure D-2: Estimated Displacement Risk in Placentia



1) Race and Ethnicity

Segregation is defined as the separation or isolation of race/ethnic group, national origin group, individuals with disabilities, or other social group by enforced or voluntary residence in a restricted area, by barriers to social connection or dealing between persons or groups, by separate educational facilities, or by other discriminatory means.

To measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. Dissimilarity indices are used to measure the evenness with which two groups (frequently defined on racial or ethnic characteristics) are distributed across the geographic units, such as block groups within a community. The index ranges from 0 to 100, with 0 meaning no segregation and 100 indicating complete segregation between two groups. The index score can be understood as the percentage of one of two groups that would need to move to produce an even distribution of racial/ethnic groups within the specified area. For example, if an index score is above 60, 60 percent, of people in the specified area would need to move to eliminate segregation. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

Table D-2 displays the racial composition of the Orange County Region compared to the City of Placentia. Overall, the data shows that the City is diverse and is follows similar trends to the county. According to the 2017-2021 American Community Survey, the majority of residents were white (38.2 percent), 16.2 percent were Asians, and 2.5 percent were black or African Americans. Approximately 39.1 percent of the City's residents identify as Hispanic or Latino.

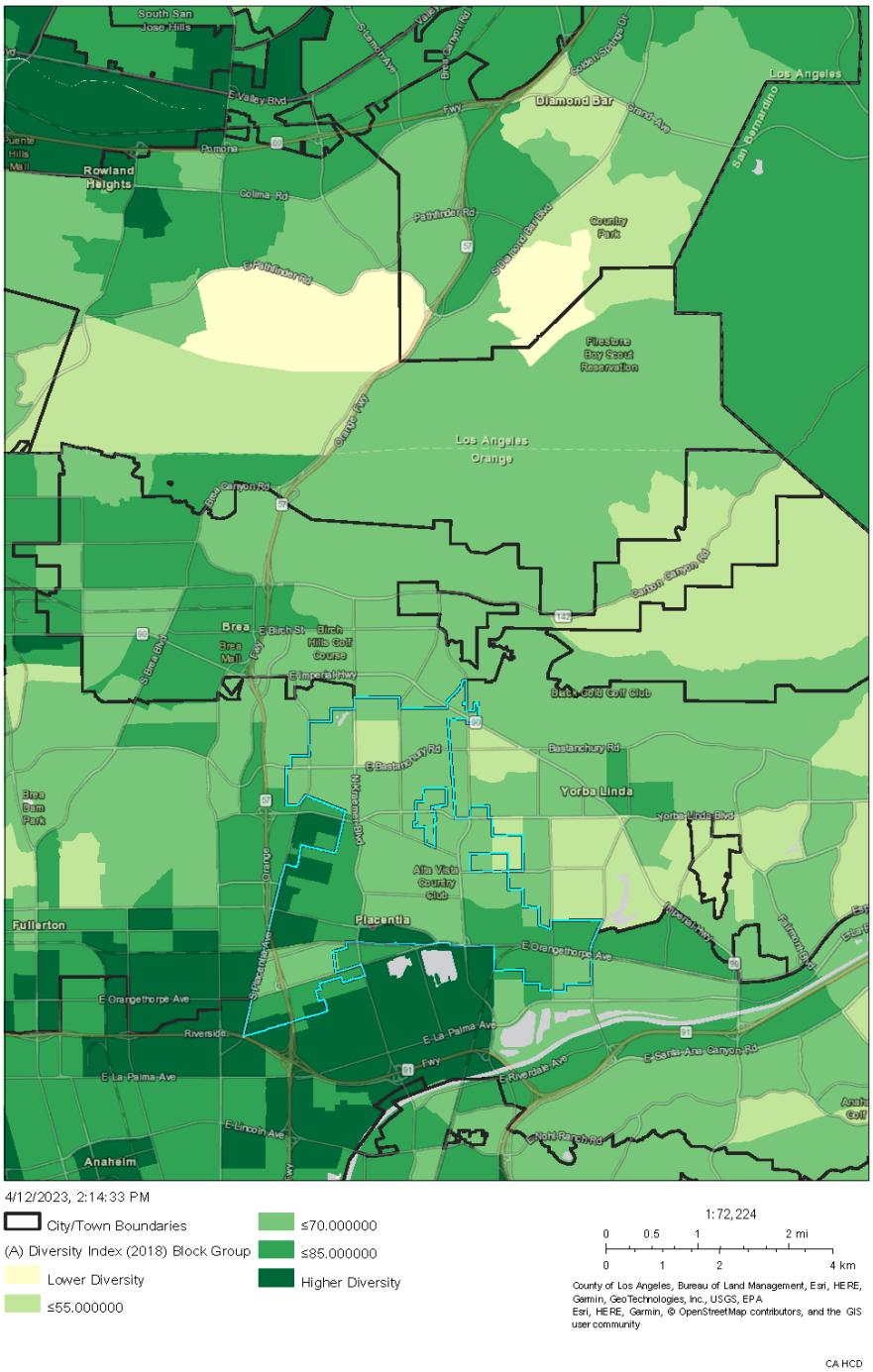
Table D-2: Racial Composition for Orange County and Placentia

Race/Ethnicity	Orange County	City of Placentia
White, Non-Hispanic	39.0%	38.2%
Black, Non-Hispanic	1.6%	2.5%
Hispanic or Latino	34.0%	39.1%
Asian or Pacific Islander	21.4%	16.2%
Native American	0.1%	0.0%
Two or More Races	3.5%	3.5%
Other	0.3%	0.5%

Source: ACS 5-Year Estimates, B03002, 2021 5-Year Estimates

Figure D-3 Placentia Diversity Index, 2010 and 2018 uses data from ESRI 2010 and 2018 demographic estimates. The figure shows the diversity index by block group within the City. The western portion of the City has high diversity (85 percent – 100 percent) whereas the northern portion of the City has less than moderate to moderate (40 percent to 55 percent). In 2018, the area north increased in diversity.

Figure D-3: Placentia Diversity Index, 2010 & 2018



As seen in Figure D-4, the percentage of non-white population in Placentia is highest in the southeastern portion of the City and is similar to the adjacent areas in Anaheim and Fullerton, while the northern and northeastern areas have the lowest non-white proportion similar to the adjacent areas of Yorba Linda. In describing the County-wide racial and ethnic make-up, the County AI (p. 122) states that, "In general, White

residents tend to reside towards the outer edges of the county, while Hispanic and sometimes Asian residents are found more in the center of the county." This countywide distribution is illustrated in Figure D-5.

Figure D-4: Racial Demographics - Placentia

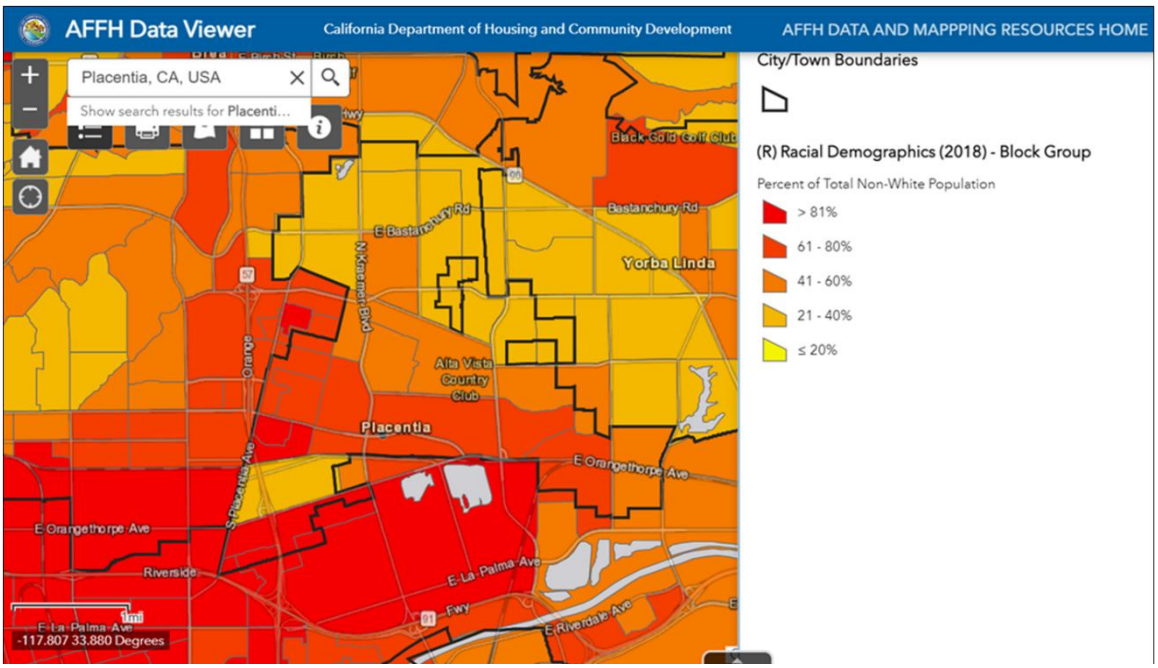
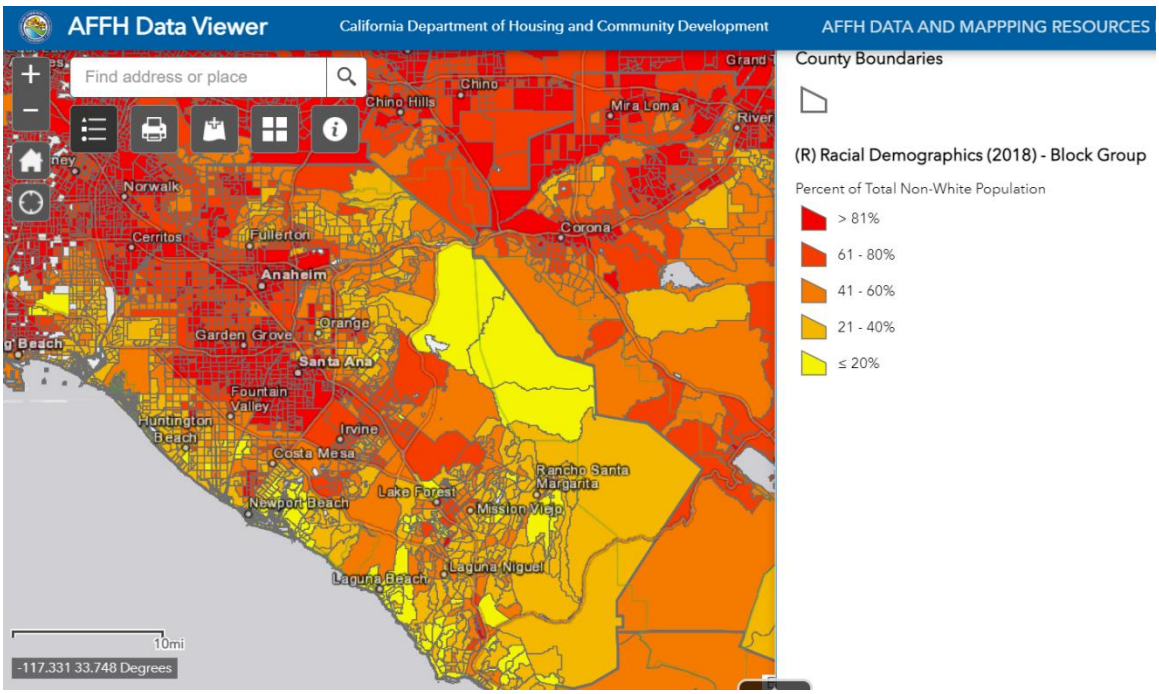


Figure D-5: Racial Demographics – Orange County

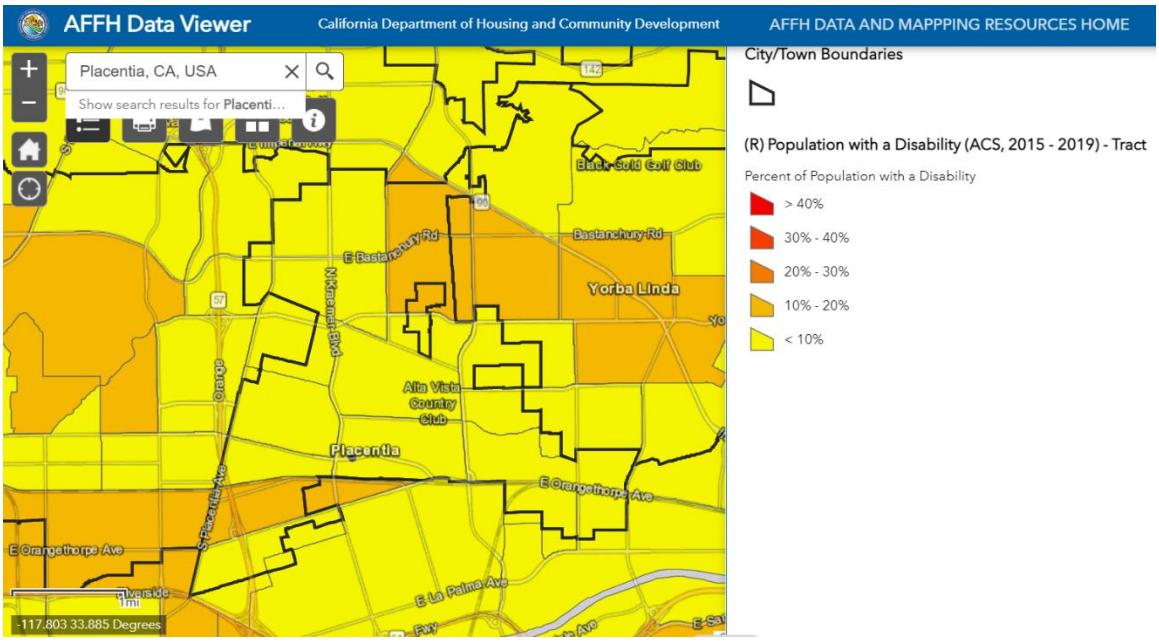


2) Persons with Disabilities

As shown on Figure D-6, higher percentages of disabled residents (10-20%) are located in the northeastern and southwestern portions of the city while the disability rate in other areas of the city is under 10%.

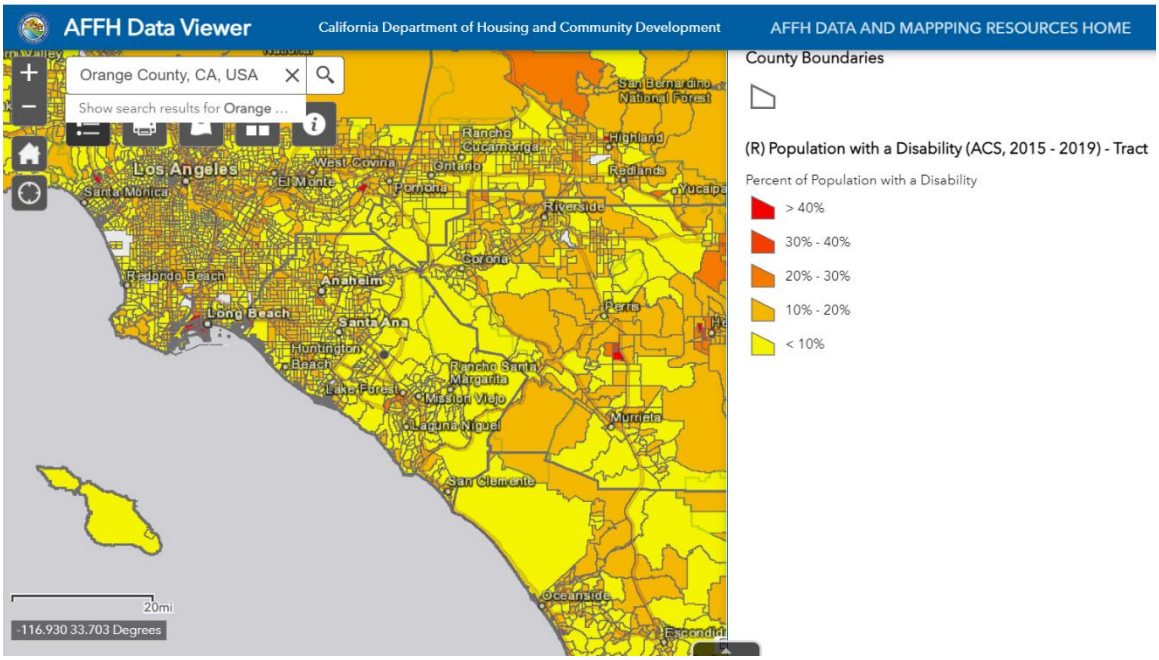
Additional data regarding the number of people with disabilities by disability type in Placentia is provided in Figure 2-20 of Chapter 2: Housing Needs Assessment. Some individuals may experience more than one disability, and some disability types are not recorded for children below a certain age. The California Department of Developmental Services (DDS) estimates that there are 392 persons with developmental disabilities within the ZIP code areas that encompass the City of Placentia.

Figure D-6: Population with a Disability – Placentia



The Orange County AI discusses disability information countywide. According to the AI, "Communities with higher concentrations of persons with disabilities are somewhat more likely to be located in the more racially and ethnically diverse northern portion of the county than they are in the southern portion of the county" (see Figure D-7). This is reflected in the fact that six of the eight cities that have higher concentrations of persons with disabilities are in northern Orange County.

Figure D-7: Population with a Disability – Orange County



The housing needs of persons with disabilities vary, but generally include accessible and affordable housing, and access to supportive services. More severely disabled individuals may require a group living environment where supervision is provided, and the most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. The City of Placentia facilitates housing for persons with disabilities through its Reasonable Accommodation procedures and regulations to encourage production of supportive housing.

3) Familial Status

Under the Federal Housing Administration, housing providers (e.g., landlords, property mangers, real estate agents, or property owners) may not discriminate because of familial status. Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the martial status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns.

Single-parent households are also protected by fair housing law. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. As discussed in the Housing Needs Assessment, 12.6% of Placentia households are female-headed (compared to 14.3% in the SCAG region), 5.8% are female-headed and with children (compared to 6.6% in the SCAG region), and 0.4% are

female-headed and with children under 6 (compared to 1.0% in the SCAG region). Figure D-8 shows the percentage of children living in married couple households in Placentia while Figure D-9 shows similar data for the county as a whole.

Figure D-8: Percentage of Children in Married Couple Households - Placentia

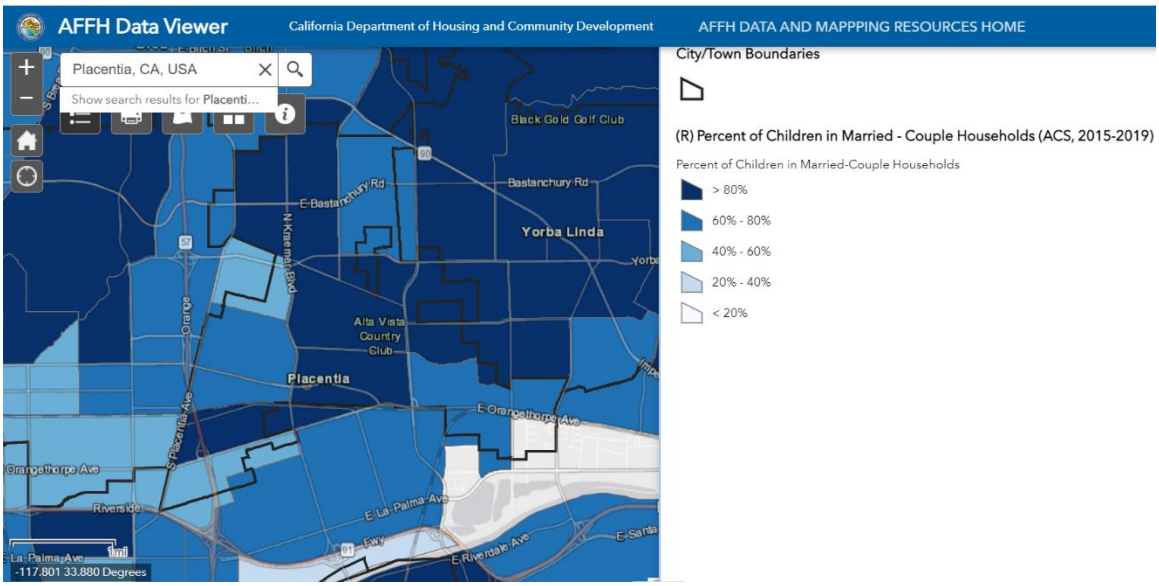


Figure D-9: Percentage of Children in Married Couple Households – Orange County

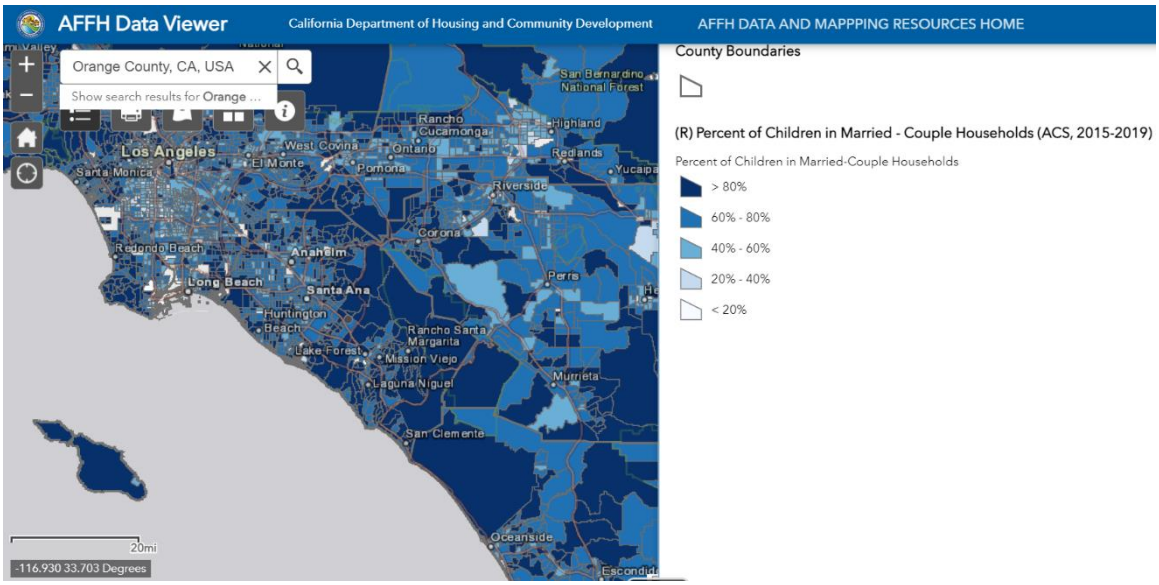


Table D-3 displays the household type for the State, County, and City. Overall, the City has the highest percentage of family households than the County and State; this includes married-couple family households and those with children. Of the three jurisdictions, Placentia has the lowest percentage of non-family households at approximately 6 percent below than the county and 8.5 percent less than the State.

Table D-3: Population by Familial Status, Compared by Geography, 2021

Familial Status	City of Placentia	Orange County	California
Family Households	77.1%	71.1%	68.6%
Married-Couple Family Households	58.4%	54.2%	49.5%
Female Householder, no spouse present	12.6%	11.5%	12.9%
With Children	34.2%	29.9%	29.5%
Non-Family Households	22.9%	28.9%	31.4%
Total Households	16,371	1,057,592	13,217,586

Source: American Community Survey, 5-Year Estimates, S1101, 2021

4) Income

Identifying low/moderate-income (LMI) areas is an important aspect in understanding patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). Figure D-10 shows that most of the City has fewer than 50 percent of its population within LMI groups, although some areas in the western portion of the city are above 50% LMI.

Countywide, larger LMI concentrations are located in the central portion of the county to the west and south of Placentia, in Anaheim, Santa Ana, Orange and Costa Mesa. The student population at UC Irvine has the highest percentage of poverty countywide (over 40 percent).

Figure D-10: Low/Moderate Income Population – Placentia

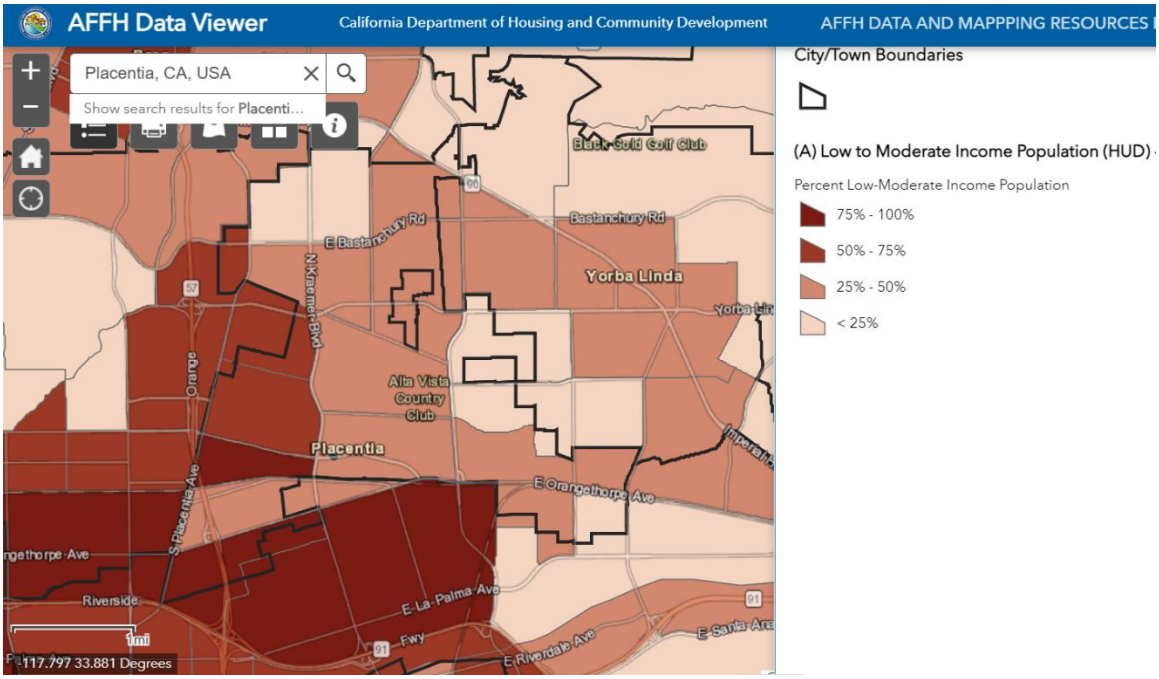
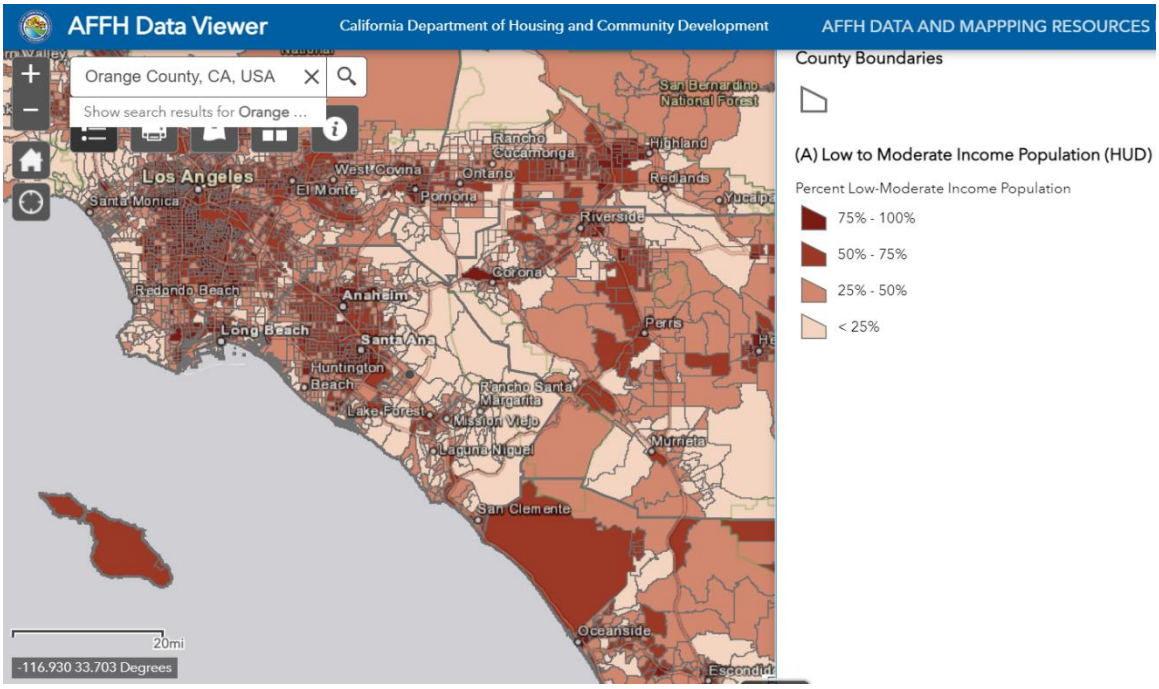


Figure D-11: Low/Moderate Income Population – Orange County



C. Racially/Ethnically Concentrated Areas

1) Racially/Concentrated Areas of Poverty

According to HUD, a racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50 percent or more of the population identifies as non-White and 40 percent or more of residents are living in poverty. As shown in Figure D-12, there are no designated R/ECAP areas in Placentia. The nearest R/ECAP areas are in the City of Santa Ana approximately 10 miles to the south of Placentia (Figure D-12).

Figure D-12: Racially/Ethnically Concentrated Areas of Poverty – Placentia

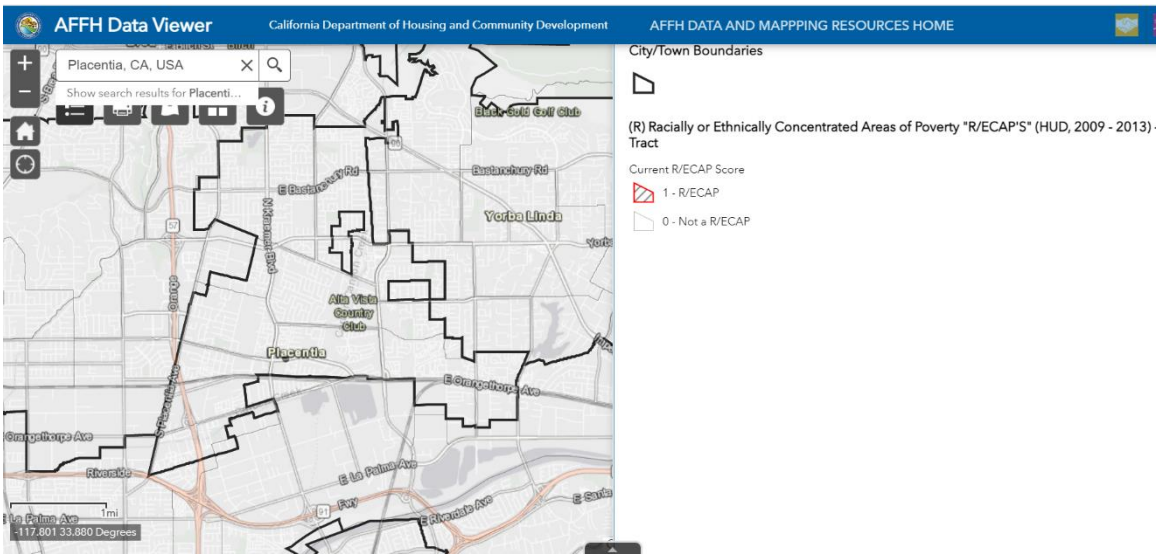
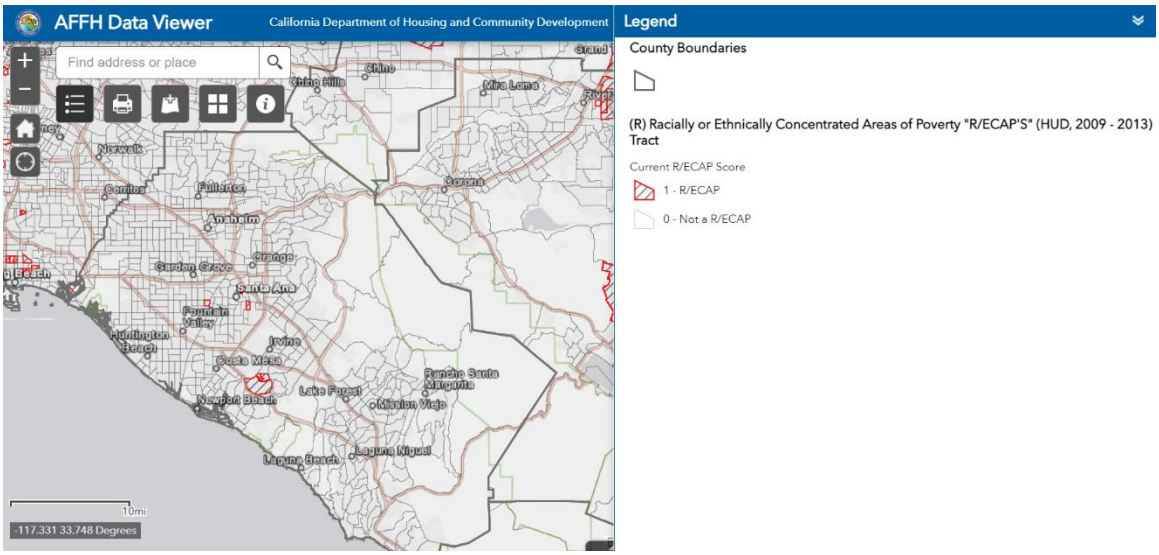
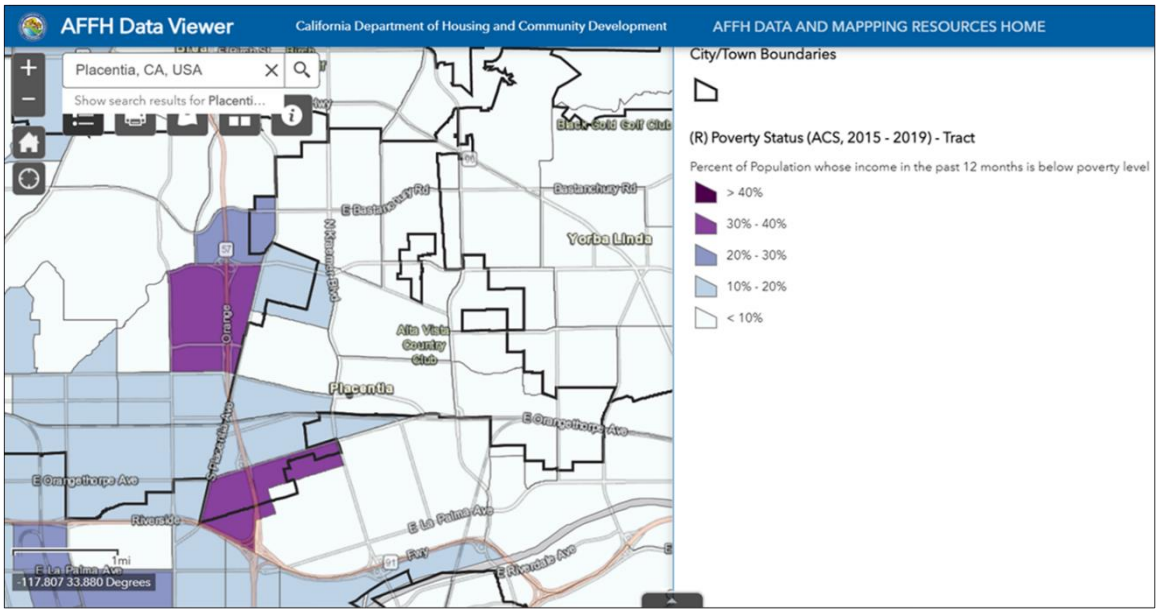


Figure D-13: Racially/Ethnically Concentrated Areas of Poverty – Orange County



Recent Census estimates regarding poverty status of households in Placentia are shown in Figure D-14. As seen in this map, poverty is highest (30-40%) in the southwestern portion of the city, which are also the areas with an older housing stock and lower housing values. Poverty rates in Placentia are similar to the adjacent areas of Brea, Yorba Linda, Fullerton and Anaheim. The area immediately west of Placentia in the City of Fullerton with a high incidence of poverty is comprised primarily of the campus of California State University, Fullerton, and is likely influenced by the relatively low incomes of college students.

Figure D-14: Poverty Status - Placentia



Program 2.1 in the Housing Plan includes training to landlords on requirements under fair housing law, such as the acceptance of Housing Choice Vouchers, and programs such as 1.3 (Pursue County, State, and Federal Housing Funds), 1.10 (Encourage Development of Housing for Extremely-Low-Income Households), 1.15 (Transit-Oriented Development), 1.19 (Accessory Dwelling Units), 2.2 (Section 8 Rental Assistance) and 2.4 (Comprehensive Housing Resource Directory) will help to expand the supply of affordable housing to provide more options for lower-income households throughout the city.

2) Racially/Concentrated Areas of Affluence

According to the Housing and Community Development AFFH Guidance Memo, "segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices." Therefore, both sides of the continuum must be examined. Racially Concentrated Areas of Affluence (RCAAs) are defined by the HUD as communities with a large proportion of affluent and non-Hispanic White residents. According to a policy paper published by HUD, non-Hispanic Whites are the most racially segregated group in the United States. In the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, distinct advantages are associated with residence in affluent, White communities. RCAAs are defined as census tracts where (1) 80 percent or more of the population is white, and (2) the median household income is $125,000 or greater (slightly more than double the national median household income in 2016).

The nationwide RCAA analysis identifies the following:

- RCAA tracts have more than twice the median household income of the average tract in their metro area.

- Poverty rates in RCAAs are significantly lower and are, on average about 20 percent of a typical tract.
- RCAAs tracts are more income homogenous than a typical tract.
- The average RCAA is about 57 percent affluent.
- The typical RCAA tract has a rate of affluence 3.2 times that of a typical tract.

Comparison to Local and Regional Trends

Figure D-15 shows the RCAAs in Placentia. There are three census tract areas that have RCAAs in the Eastern and Northern parts of the City. This aligns with the City's racial demographic and median income (summarized in Table D-4 below). Although not all census tracts/block groups meet the criteria to qualify as RCAAs, there is a trend of census block groups with higher white populations having higher median incomes throughout the county.

There are many RCAAs in the County, including jurisdictions surrounding Placentia. These include the cities of Anaheim, Brea, Orange, Fullerton and Yorba Linda. Many of the areas with RCAA designations have historically had majority white populations with higher incomes. As shown in Table D-4, Placentia has a White, Non-Hispanic population of 39.2 percent, which is slightly lower than the average of 42.2 percent for the other jurisdictions. However, Placentia's median household income of $99,951 is similar to the average for the surrounding jurisdictions.

Table D-4: RCAAs of Nearby Jurisdictions

Jurisdiction	White, Non-Hispanic Population	Median Household Income (2019)
Anaheim	24.2%	$84,345
Brea	41.8%	$95,124
Fullerton	32.8%	$85,567
Orange	44.6%	$99,995
Placentia	39.2%	$99,951
Yorba Linda	58.4%	$126,105

While there are RCAAs in Placentia, the City is showing a trend of diversification. This is similar to the local region where large areas that were once "High White Segregation" have transitioned to "Low-Medium Segregation" and in some cases changed to Racially Integrated.

Pursuant to AB 686, the City will affirmatively further fair housing by taking meaningful actions that foster inclusive communities free from barriers, which restrict access to opportunities based on protected classes, as defined by State law. The City has added programs to Chapter 4: Housing Plan to address RCAAs in the City of Placentia.

Table D-5: RCAAs in Placentia

Census Tract	White Population	Median Household Income (2019)
06059011718	57.8%	$117,969
06059011709	58.2%	$131,607
06059021820	55.5%	$139,948

Figure D-15: Racially/Concentrated Areas of Affluence (RCAA) – Placentia

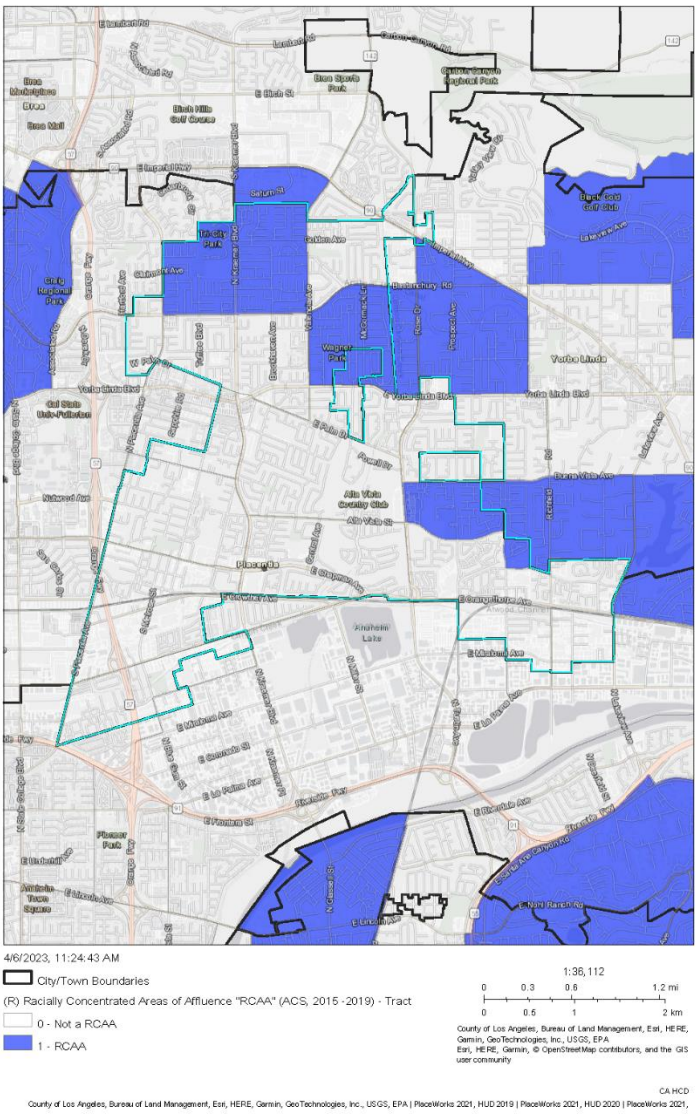


Table D-6 compares the median household incomes of White/non-Hispanic residents in Placentia and Orange County as a whole to the median incomes for the total population of the city and county. This table shows that in Placentia, the median income for non-Hispanic White households is about 4% higher than for the city's population as a whole. Countywide, the median income for non-Hispanic White households is about 13% higher than for the population as a whole. These data suggest that there is less racial concentration of affluence in Placentia that in Orange County as a whole.

Table D-6: Median Household Income by Race – Placentia and Orange County

Median Household Income	Placentia	Orange County
White Alone (not Hispanic)	$99,951	$101,958
All Households	$95,757	$90,234

Source: U.S. Census ACS 2015-2019
B19013 (all)
B19013H (white alone, not Hispanic)

Contributing Factors influencing RCAA's In Placentia

Historic use of racially restrictive redlining by both public and private entities nationwide may be considered a contributor to today's racial disparities in homeownership rates and wealth attainment. Historically, redlining laid the foundation for the clustering of homogenous racial groups in cities which may experience infrastructure disinvestment, economic inequality, and segregation. This discriminatory practice is often reflected geographically in racial segregation and land use patterns that still exist today at the local level. For example, Placentia's areas of higher educational and economic opportunity and areas of concentrated affluence are in areas of the City that have predominantly detached single-family housing. Areas in the City that have a predominance of multifamily housing are more likely to have lower resource and opportunity scores.

While redlining may have affected the early development of Placentia, it is the City's oil extraction and agricultural origins which have contributed to the development patterns seen today. The City's oldest developed areas are the Old Town and TOD Packing District areas which were important in the City's early history. Placentia's major industries in the 20th Century were primarily oil extraction and agriculture. As both phased out, more land became available. Developers began purchasing large land tracts and developed large subdivisions that make up most of the City. In a matter of two decades, the City's population increased five-fold and the community character changed. These new subdivisions were almost exclusively market rate and attracted households with higher incomes. This was in stark contrast to areas in the historic areas of the City which had been relatively affordable. As Placentia transitioned into a mixed-income community, a split between "Old Town" and newer subdivisions became obvious. These development patterns contributed to the establishment of RCAAs within the City.

As the City continues to implement Housing Programs and as the region changes, Placentia continues to become more economically, socially, and racially/ethnically diverse. Since the last Housing Element cycle, overall incomes have become more diverse and the ethnic/racial demographic have become more diverse. The region is also experiencing this trend.

The City has historically been predominantly single-family neighborhoods, although the City has more recently encouraged the development of higher density uses through increased residential densities and rezones to accommodate additional residential opportunities. Although the City has encouraged more affordable housing, housing developers in the City have typically developed housing at costs affordable to moderate and above moderate income households.

Areas in the City identified as RCAAs have some of the newest housing units. Newer housing, especially in areas with large master-planned single-family homes, is typically less affordable than older, existing housing. The trend towards expensive, single-family housing, has prevented households with lower incomes the ability to access housing. Through the Housing Plan, the City is committed to integrating these areas and increasing mobility for all residents.

The Housing Plan's policies and programs seek to address equity, prevent displacement, and provide for ongoing affordability to help address this historic pattern of racial disparity. Programs in the Housing Plans such as Program HE-1.2 will create opportunities for affordable housing and multi-family near transportation options, major employment centers, and services. This program will allow for more housing types in areas of higher resources and opportunity to promote inclusion. The Housing Plan also contains a variety of policies and programs that seeks to increase affordable housing, offer a variety of housing types, and promote equal housing opportunities for all residents. The Housing Plan programs also notes the city's housing goals focus on four priority areas. The four priorities are:

- Developing and Maintaining Housing Supply and Variety
- Promoting Equal Housing Opportunity
- Promoting Housing and Neighborhood Preservation and Conservation
- Encouraging Housing Cooperation and Coordination

The Housing Element programs incorporate these recommended goals as they relate to Placentia. The AI identified the following contributing factors:

- Lack of private fair housing outreach and enforcement
- Lack of local public fair housing outreach and enforcement
- Lack of access to opportunity due to high housing costs
- The loss of affordable housing
- Lack of affordable, accessible housing in a range of unit sizes

Overall, RCCAs may represent a public policy issue to the extent that they have been created and maintained through exclusionary and discriminatory land use and development practices. Postwar patterns of suburbanization in many metropolitan areas were characterized by White communities erecting barriers to affordable housing and engaging in racially exclusionary practices.

D. Disparities in Access to Opportunity

1) Overview

AB 686 requires analysis of disparities in access to opportunity as part of the fair housing assessment. The California Tax Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) have developed maps showing access to various types of opportunities, including:

- Educational Opportunity
- Economic Opportunity
- Transportation Opportunity
- Environmental Indicators

2) Access to Educational Opportunity

Housing and school policies are mutually reinforcing. Therefore, it is important to analyze access to educational opportunities when assessing fair housing. At the most general level, school districts with the greatest amount of affordable housing tend to serve larger numbers of lower income families. A general trend in California shows a correlation between test scores and student demographics. School districts serving lower income communities typically have higher populations of Black and Hispanic or Latino students and on average score lower than their peers in less diverse schools with higher white populations. As mentioned above, there is a trend of census block groups with higher white populations having higher median incomes throughout the county.

The City of Placentia experiences high educational opportunities and has high achieving schools. As shown in Figure D-16, Placentia is surrounded by high educational opportunities similar to nearby jurisdictions. Due to the high cost of housing in the City, public schools are well funded and contribute to increased opportunities for students. The Placentia-Yorba Linda Unified School District is located in northeast Orange County. The district prides itself on serving a diverse population with student enrollment for the 2022-2023 school year at approximately 23,300 students. Academically, the district continues to excel on standardized tests, outpacing both the state and county averages. In total, the district has a total of 34 schools; 20 elementary schools, 5 middle schools, 1 K-8 school, 4 comprehensive high schools, 1 special education school, 1 continuation high school, 1 TK-12 home school, and 1 K-12 online school. While students in higher income households benefit from the City's high educational opportunities, students from lower income households who cannot access affordable housing in the City often do not benefit due to high cost of housing in the area. This may contribute to lower educational opportunities because as higher income families to move to the area, the overall cost of housing rises and an exclusionary feedback loop is created, leading to increased racial and economic segregation across districts as well as deceased access to high-performing schools for non-White students.

Regional Comparison to Cities in Orange County

The County or Orange Analysis of Impediments[1] describes disparities in access educational opportunities across Orange County. Countywide, there are disparities across racial/ethnic groups in access to educational opportunities as measured by the index. Across all tracts in Orange County, non-Hispanic Whites exhibit the highest exposure to educational opportunity (index score of about 59) and non-Hispanic Asians second highest (53). Hispanics have the lowest access to these opportunities (31), with non-Hispanic Blacks in between (46).

Jurisdiction that score low on the education opportunity index exhibit different residential patterns. For instance, Santa Ana has high concentrations of Hispanics and a very light presence of any other racial or ethnic group. Anaheim also has high concentrations of Hispanics in the low-opportunity western neighborhoods of the city, but Whites and Asian/Pacific Islanders also appear to reside in those tracts (although at lower densities). The high opportunity eastern Anaheim neighborhoods are almost exclusively White. Garden Grove, Westminster, Buena Park, and La Habra are examples of cities with low educational opportunity and that have a noticeable mix of Hispanics, Asians, and Whites. Costa Mesa, San Juan Capistrano and San Clemente are low opportunity jurisdictions with high densities of Whites.

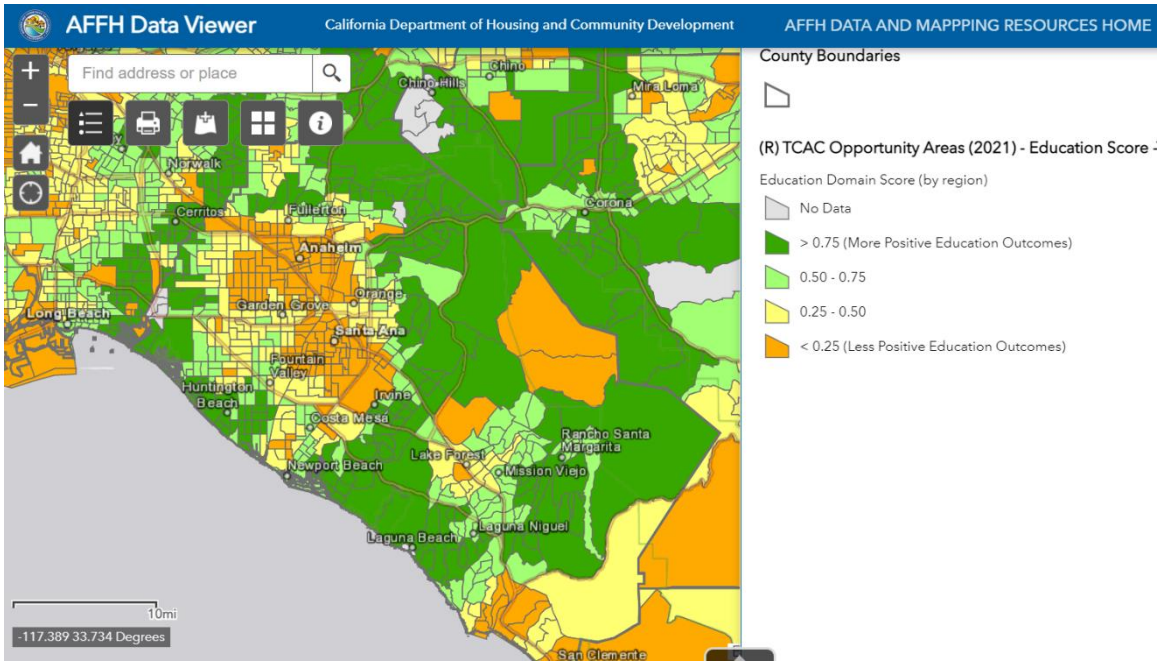
Jurisdictions with the highest educational opportunity also appear to have primarily large concentrations of non-Hispanic Whites and Asian/Pacific Islanders. Irvine, Aliso Viejo, and Huntington Beach are good examples of cities with large populations of those groups. Other high opportunity cities, by contrast appear more segregated and more heavily populated by non-Hispanic Whites. Rancho Santa Margarita and Mission Viejo are two examples of such places.

Jurisdictions with the highest educational opportunity also appear to have primarily large concentrations of non-Hispanic Whites and Asian/Pacific Islanders. Irvine, Aliso Viejo, and Huntington Beach are examples of cities with large populations of those two groups. Other high opportunity cities, by contrast appear more segregated and more heavily populated by non-Hispanic Whites. Rancho Santa Margarita and Mission Viejo are two examples of such places.

Educational opportunity scores for Orange County are shown in Figure D-16.

[1] P. 144

Figure D-16: TCAC Educational Opportunity Areas – Orange County



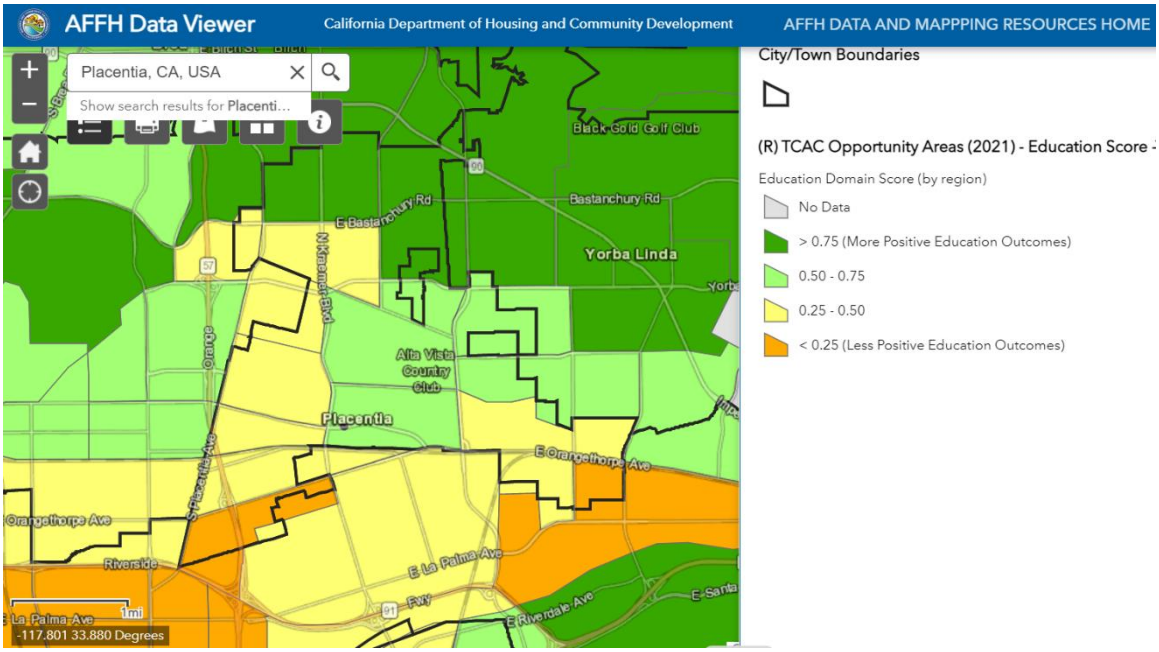
The City of Placentia is served by the Placentia-Yorba Linda Unified School District, which also serves the city of Yorba Linda, as well as portions of Anaheim, Brea, Fullerton and rapidly developing unincorporated territory that reaches the Riverside County line. The District maintains its reputation for academic excellence, remains fiscally solvent, and recently completed a $600 million massive facilities modernization and new school construction program.

Student enrollment for the 2021-2022 school year is roughly 24,000. The District's 34 school sites include 20 elementary schools, 5 middle schools, 1 K-8 school, 4 comprehensive high schools, 1 special education school, 1 continuation high school, 1 TK-12 home school, and 1 K-12 online school. Twenty-five schools have been designated California Distinguished Schools, eight have been named National Blue Ribbon Schools, seventeen have been honored as California Gold Ribbon Schools, one has earned the title of California Model Continuation High School, and another has received California's Exemplary Independent Study recognition. The District has been placed on the College Board's AP District Honor Roll three times since the program's inception in 2011. PYLUSD high schools are consistently named to America's Best High Schools rankings issued by Newsweek, U.S. News and World Report, and other news organizations.

As shown in Figure D-17, TCAC educational opportunity scores are highest in the northern portion of the city. The City shows disparities in the southwestern portion of the city. Placentia scored an average index value at (58). Several Orange County jurisdictions had similar scores (index values at or above 60) on educational opportunity across all racial categories. These cities include Aliso Viejo, Huntington Beach, Irvine, Laguna Niguel, La Palma, Mission Viejo, and Rancho Santa Margarita. A few cities have educational opportunity patterns that mirror those of Placentia. Non-

Hispanic Whites in Fountain Valley have high exposure to educational opportunity (scores of about 60), whereas Hispanics in the city do not (30). In both Fullerton and Tustin, Non-Hispanic Whites and Asians have much higher access than do Blacks and Hispanics.

Figure D-17: TCAC Educational Opportunity Areas – Placentia



3) Access to Economic Opportunity

Economic opportunities are analyzed utilizing two indices:

- Labor market engagement index
- Jobs proximity index.

The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood, considering the unemployment rate, labor-force participation rate, and percent with a bachelor's degree or higher. The index ranges from 0 to 100, with higher values indicating higher labor force participation and human capital.

The jobs proximity index quantifies the accessibility of a neighborhood to jobs in the region by measuring the physical distances between jobs and places of residence. It too varies from 0 to 100, and higher scores point to better accessibility to employment opportunities.

In Orange County, there are significant disparities in access to economic opportunity, as seen in 0. Non-Hispanic White residents have the greatest access to economic opportunity. Asian and Pacific Islander residents (49), Native Americans (46), and Black residents (46) have lower index scores in the high to mid-40s. Hispanic residents

(32) have the lowest access to economic opportunity of all racial and ethnic groups in Orange County.

A number of Orange County jurisdictions have relatively little disparity between groups. There are high economic opportunity scores for all racial and ethnic groups in Aliso Viejo and Irvine (high 60s to low 70s). La Palma also has relatively high opportunity and little variation in scores between groups (index values ranging from 60 to 66). Huntington Beach, Laguna Niguel, Mission Viejo, and Rancho Santa Margarita have moderate economic opportunity scores for all racial/ethnic groups (scores from the mid-40s to mid-50s).

Economic Opportunity Index scores are generally lower in North Orange County than in South County. Scores are especially low in Westminster, Garden Grove, and much of Santa Ana and Anaheim. Scores are generally high in much of Irvine, La Palma, and Tustin and along the coast from Newport Beach to Laguna Niguel as well as in unincorporated areas near the eastern border with Riverside County.

Areas in Orange County with the highest index scores tend to have large concentrations of non- Hispanic and Asian residents. By contrast, areas with the highest concentration of Hispanic residents tend to have lower economic index scores. Cities such as Fullerton and Costa Mesa are examples of localities with segregated living patterns and significant disparities between racial and ethnic groups. Neighborhoods in these cities with higher Hispanic populations score lower than neighborhoods that are heavily populated by non-Hispanic and Asian residents.

Figure D-18: TCAC Economic Opportunity – Orange County

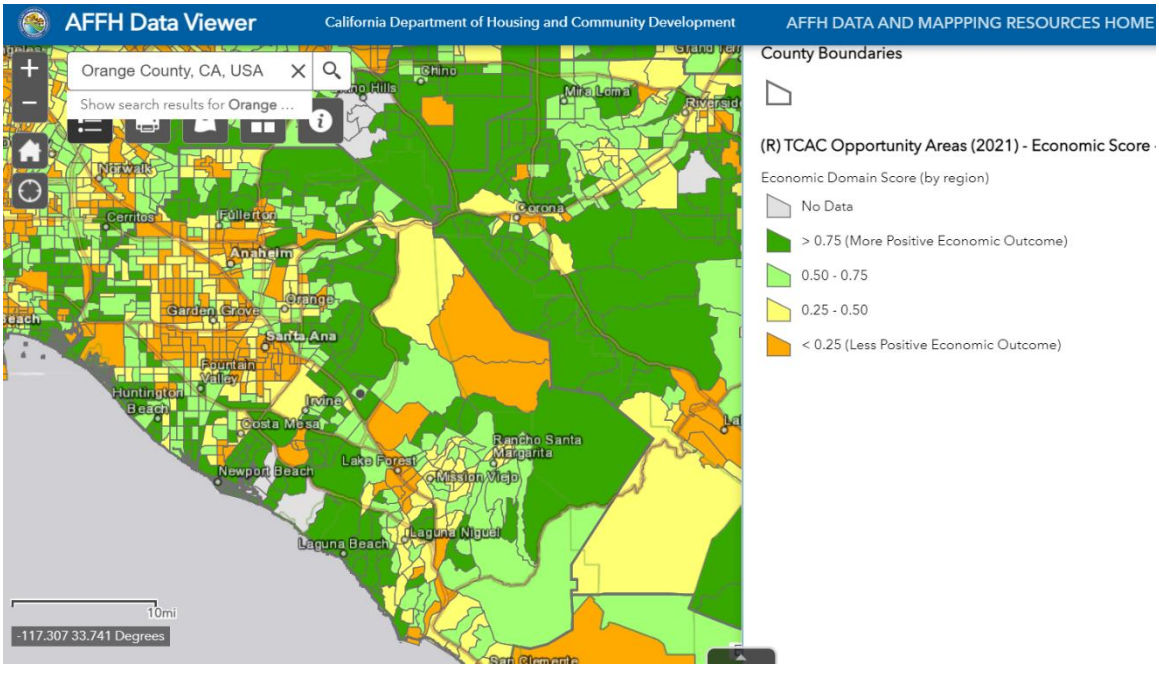
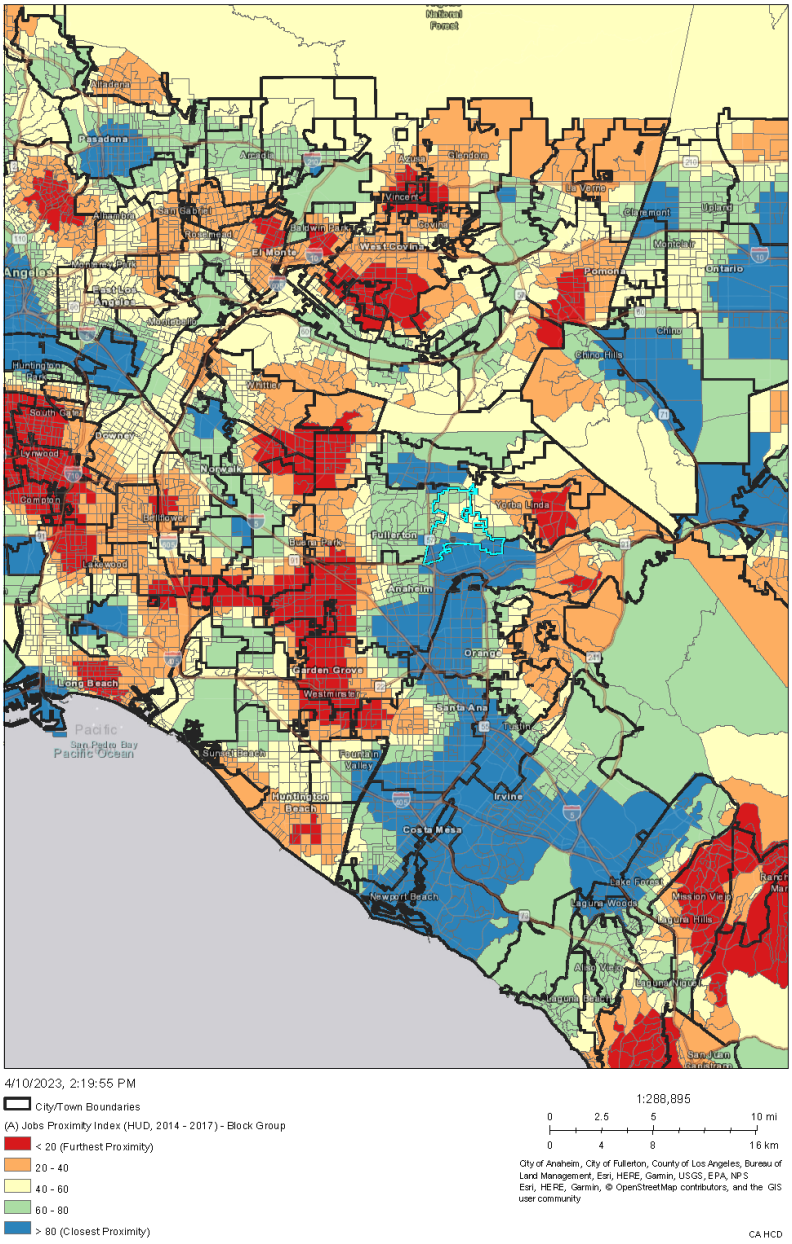


Figure D-19 shows the spatial variability of job proximity in Orange County. Tracts in the central County area have the highest index score indicating the closest proximity to

jobs. Cities such as Anaheim, Santa Ana, and Irvine are major employment hubs serving the greater Orange County region. Placentia is fortunate to have great job proximity within the City's boundaries and to areas in the region with employment opportunities.

Figure D-19: Jobs Proximity Index – Orange County



In Placentia, the highest economic opportunity scores are in the northern and eastern portions of the city (Figure D-20). These disparities are similar to those for educational opportunity scores.

Figure D-20: TCAC Economic Opportunity – Placentia

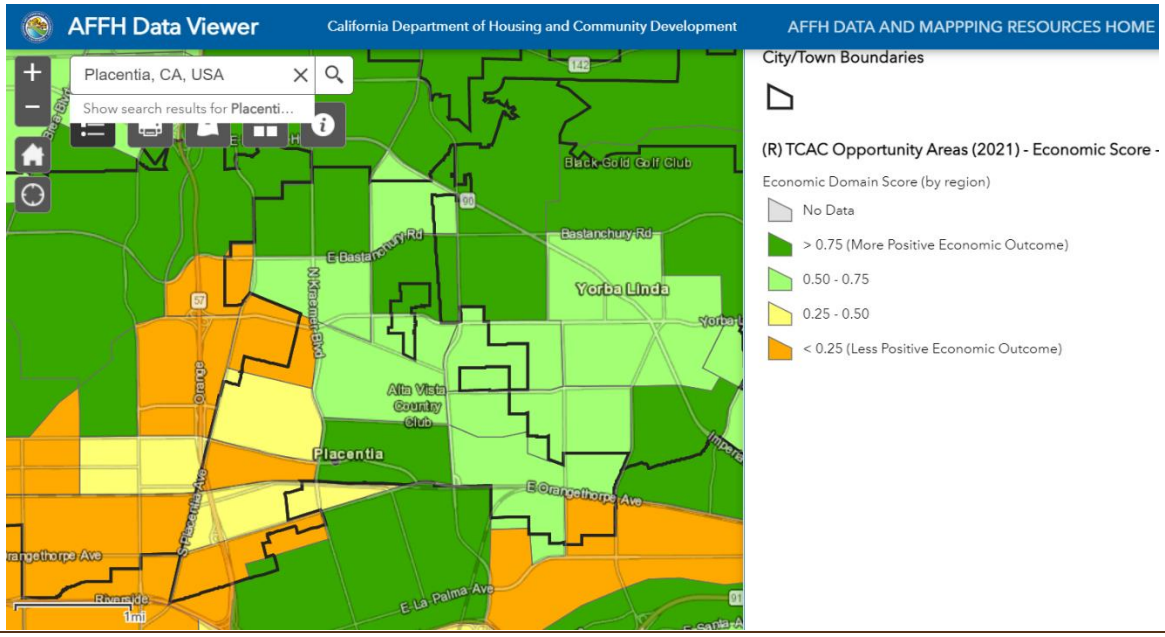
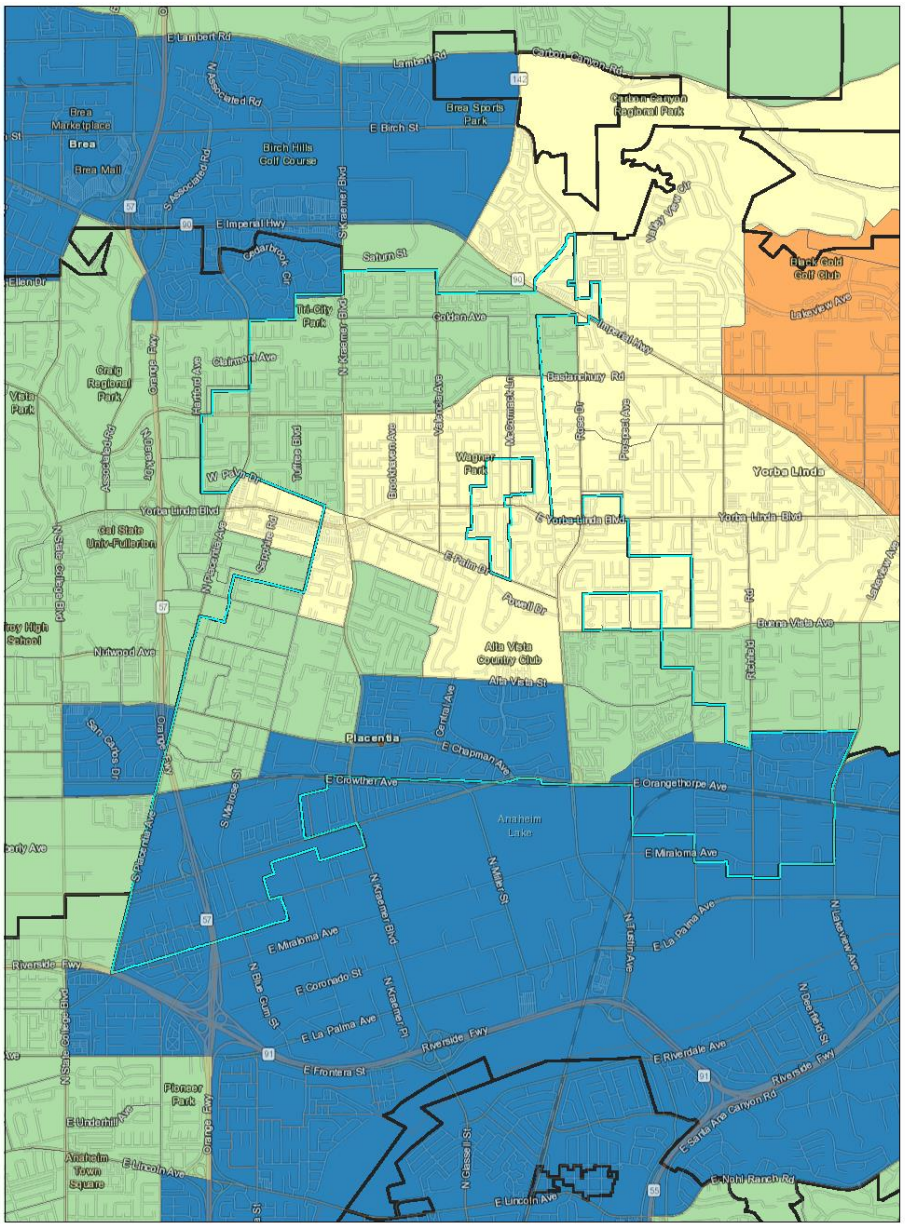


Figure D-21 shows the job proximity index by block group for the City of Placentia. Tracts in the south of the City have the highest job proximity index, meaning the closest proximity from jobs and shortest commute times. Residents in north and west Placentia are slightly further in proximity to jobs (indices of 60 to 80) but still experience greater access to employment than many other communities in the region. Based on the ACS 2017-2021 5-year estimates, 9.9 percent of Placentia residents have a commute time of 60 or more minutes. 11.8 percent of residents have a commute time of 45 to 59 minutes, and 8.8 percent of residents have a commute time of 35 to 44 minutes. According to the ACS data, the average transit commute times in Placentia exceed 29 minutes. Western portions of Orange County have lower economic and environmental opportunity than do the central and northern areas. This could potentially be the result of high housing costs that may be significant contributing factor to fair housing issues in Orange County. The City is in the process of constructing a new bus rapid transit line that will connect Placentia with Anaheim and Fullerton. This new line is expected to reduce commute times by up to 50 percent. Furthermore, the City is working to improve coordination between different transit agencies and to add more park-and-ride facilities. As shown in Figure D-22, Placentia has a relatively lower AllTransit score which indicates low combination of trips per week and number of jobs accessible.

Figure D-21: Jobs Proximity Index – Placentia



4) Access to Transportation Opportunities

Access to public transit is imprtant to households with lower incomes coupled with higher than average living expenses (rent, utilities, etc.), Lower income households are often transit dependent. Public transit can provide a transportation option for lower incomehouseholds. This can improve access to more employment opportunities that may be restricted by lack of transportation options. . Access to employment via public transportation contributes to lowering overall household costs and increases housing options.

Transportation opportunities are depicted by two indices:

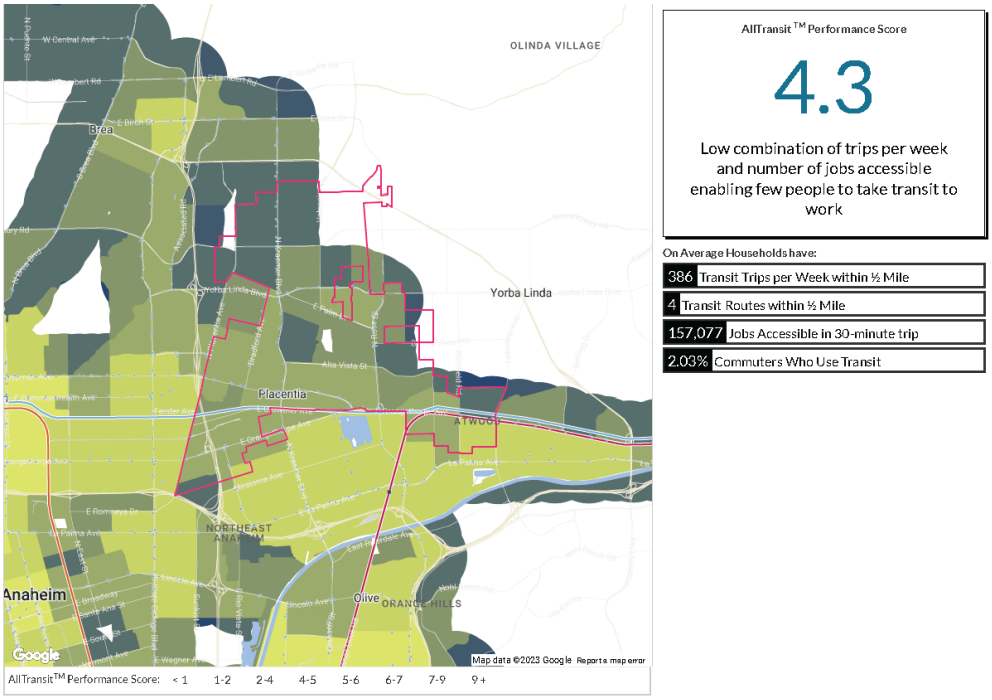
- Transit trips index
- Low transportation cost index.

The transit trips index measures how often low-income families in a neighborhood use public transportation. The index ranges from 0 to 100, with higher values indicating a higher likelihood that residents in a neighborhood utilize public transit.

The low transportation cost index measures cost of transportation and proximity to public transportation by neighborhood. It too varies from 0 to 100, and higher scores point to lower transportation costs in that neighborhood.

Figure D-22 illustrates AllTransit scores ranging from Less than 1.0 to 9.0 or greater. Higher scores indicate higher connectivity, access to jobs, and frequency of service. Overall, AllTransit scores Placentia 4.3/10 for its transit performance, which indicates the city has a low combination of trips per week and low number of jobs accessible enabling few people to take transit to work.

Figure D-22: AllTransit Score



According to the County AI, low transportation cost index scores as well as transit index scores are generally higher in North Orange County than in South Orange County. Scores are generally higher in jurisdictions with greater levels of density. In Placentia, proximity to the SR-57 and SR-91 freeways, OCTA bus routes and the Metrolink light rail system provide access to many transit options. The new Placentia Metrolink station is conveniently located at Melrose Avenue and Crowther Avenue near the Orange Freeway (SR-57), serving the communities of Anaheim, Fullerton, Placentia, and Yorba Linda. The Placentia Station serves the Metrolink 91 Line that extends to Riverside, Fullerton, and Downtown Los Angeles. OCTA and the City of Placentia are also constructing a new shared-use multi-story parking structure to provide increased travel options for riders.

5) Environmental Opportunities

The Environmental Health Index summarizes potential exposure to harmful toxins at a neighborhood level. Index values range from 0 to 100 and the higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group. The County AI notes that there are disparities across racial/ethnic groups in access to environmental opportunities, measured as lower exposure to and effects from pollution (0). Across all tracts in Orange County, non-Hispanic Whites exhibit the highest access to environmentally healthy neighborhoods (index score of about 54). All other racial/ethnic groups obtain lower index scores in the 40s:

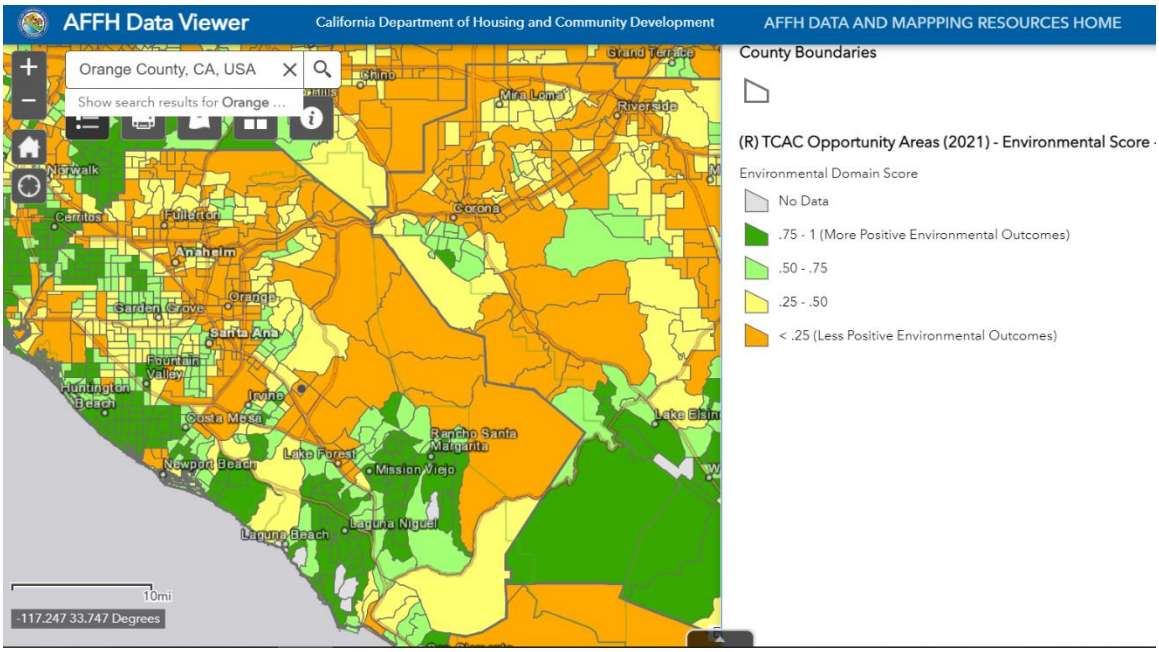
Hispanics score lowest at 41, followed by non-Hispanic Blacks (45), non-Hispanic Asian/Pacific Islander (47), and non-Hispanic Native American (48).

Several jurisdictions score especially highly on environmental opportunity across all racial categories. Laguna Niguel, Aliso Viejo, Mission Viejo, and Rancho Santa Margarita all have index scores in the 70s to 90s for all racial and ethnic groups. Fountain Valley and Huntington Beach also have higher access to environmental health, scoring in the 50s to low-70s on the index. Other cities are low-scoring across the board. Orange City, La Habra, and Fullerton are the least environmentally healthy, with index scores in the 20s. Anaheim, Buena Park, Irvine, Santa Ana, and Westminster also have low access to environmental opportunity, scoring in the 30s to 40s on the index.

Jurisdictions with the highest environmental opportunity appear to have primarily large concentrations of non-Hispanic Whites and Asian/Pacific Islanders. Laguna Niguel, Aliso Viejo, Fountain Valley, and Huntington Beach are good examples of cities with large populations of those two groups. Other high opportunity cities, by contrast appear more segregated and more heavily populated by non-Hispanic Whites. Rancho Santa Margarita, and Mission Viejo are two examples of such places.

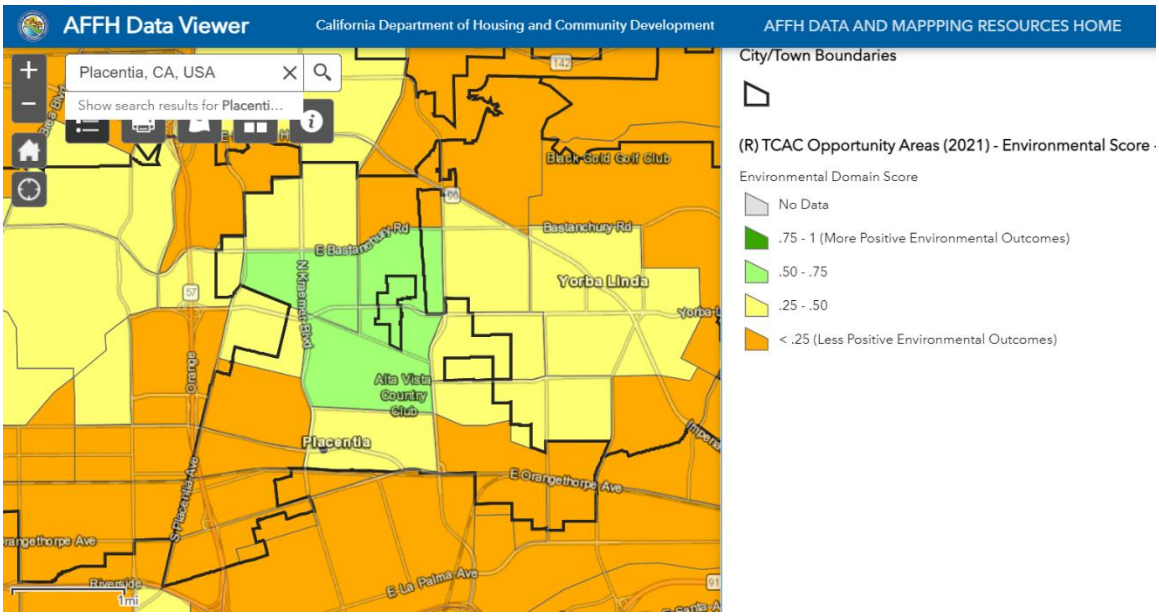
Lower-scoring cities exhibit a diversity of residential patterns. For example, Orange (city) has concentrations of both Hispanics and non-Hispanic Whites. Similarly, Fullerton has concentrations of Hispanic neighborhoods as well as non-Hispanic Whites and Asian/Pacific Islanders. Anaheim and La Habra follow a similar pattern. By contrast, Santa Ana is a city with low environmental quality that is characterized almost exclusively by dense concentrations of Hispanics.

Figure D-23: TCAC Environmental Opportunity – Orange County



In Placentia, the highest environmental opportunity scores are found in the central portion of the city (Figure D-24) while neighborhoods in the southwestern and northeastern portions of the city show lower scores.

Figure D-24: TCAC Environmental Opportunity – Placentia



CalEnviroScreen was developed by the California Environmental Protection Agency (CalEPA) to evaluate pollution sources in a community while accounting for a community's vulnerability to the adverse effects of pollution. Measures of pollution burden and population characteristics are combined into a single composite score that is mapped and analyzed. Higher values on the index indicate higher cumulative environmental impacts on individuals arising from these burdens and population factors.

The California Office of Environmental Health Hazard Assessment (OEHHA) complies these scores to help identify California communities disproportionately burdened by multiple sources of population. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also considers socioeconomic factors such as educational attainment, linguistic isolation, poverty, and unemployment.

Figure D-25 shows updated scores for CalEnviroScreen 4.0 released by the California Office of Environmental Health Hazard Assessment. Generally speaking, adverse environmental impacts are concentrated around the northern border of the county (Buena Park to La Habra and Santa Aana) and central of the county (Buena Park to Anaheim). Areas around the coast and southern border of the county (Irvine, Costa Mesa, and Laguna Woods).

Figure D-25: CalEnviroScreen 4.0 Results in Orange County

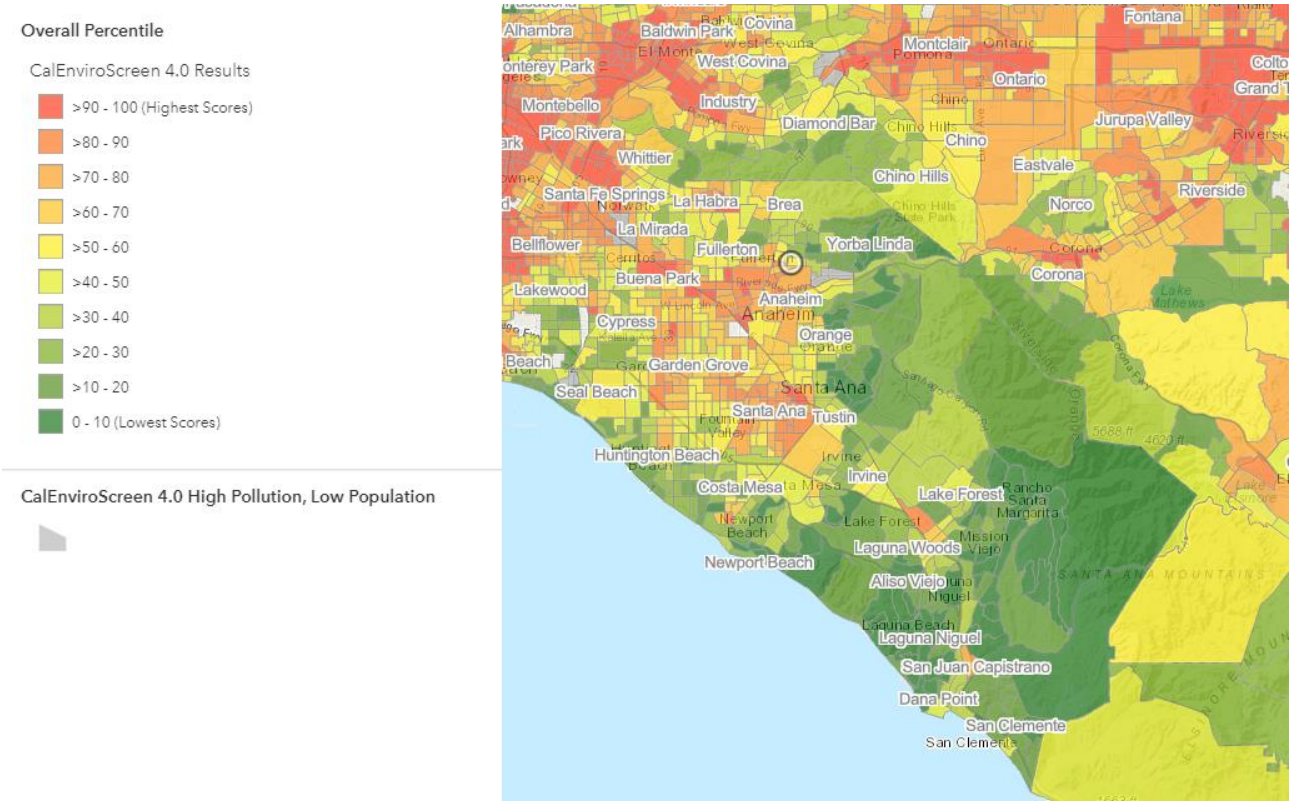
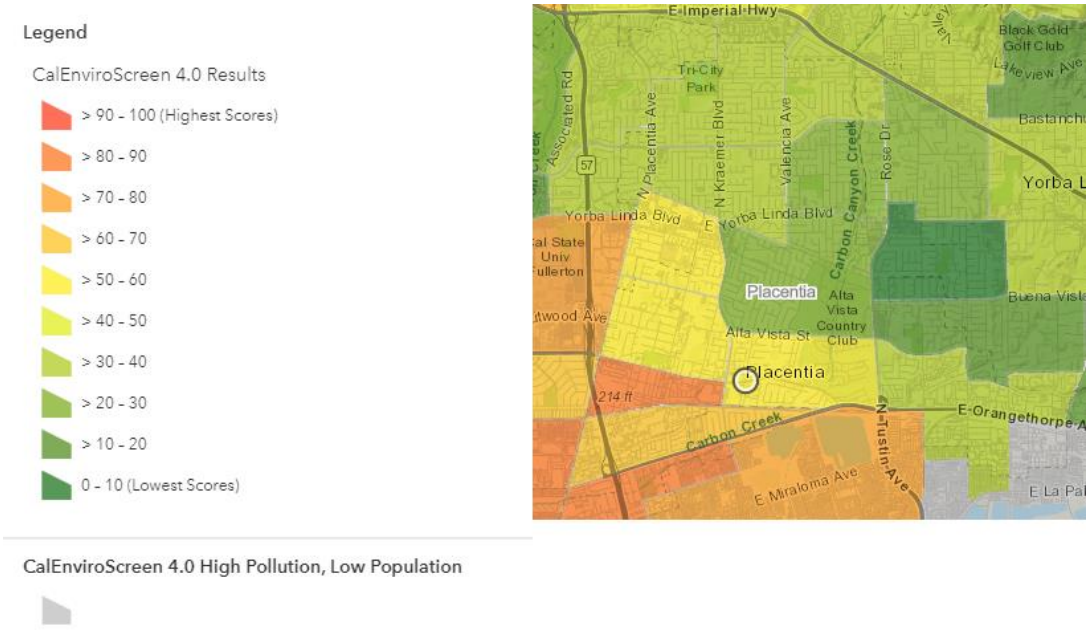


Figure D-26 CalEnviroScreen scores for the City of Placentia. There is an almost gradient effect that can be seen from green to red (least to most pollution) as the tracts goes from north to south.

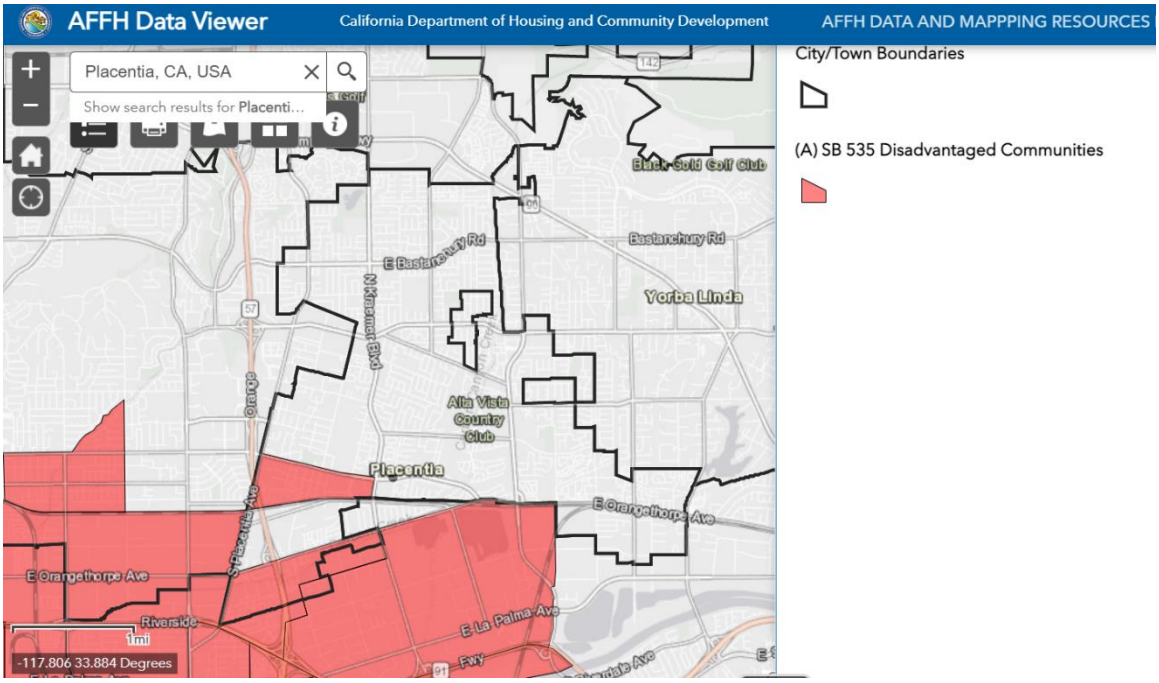
Figure D-26: CalEnviroScreen 4.0 Results in Placentia



6) Disadvantaged Communities

Senate Bill 1000 (SB 1000) requires cities with designated disadvantaged communities to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities. CalEnviroScreen examines various indicators to characterize pollution and socioeconomic factors. As seen in Figure D-27 below, two areas in the southeastern portion of Placentia are classified as disadvantaged communities. The Placentia General Plan includes policies to address environmental justice consistent with SB 1000.

Figure D-27: Disadvantaged Communities – Placentia



E. Disproportionate Housing Needs and Displacement Risk

The AFFH Rule Guidebook (24 C.F.R. § 5.152) defines "disproportionate housing needs" as "a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area." The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing. In addition, this analysis examines homelessness and displacement risk.

1) Cost Burden (Overpayment)

A household is considered cost-burdened if it spends more than 30 percent of its income in housing costs, including utilities. Reducing housing cost burden can also help foster more inclusive communities and increase access to opportunities for persons of color, persons with disabilities, and other protected classes.

Overpayment is a problem for many Placentia residents, particularly for lower-income households. According to recent HUD estimates (0) approximately 2,940 renter households (50% of all renters) and 3,260 owner households (30% of all owners) were paying more than 30% of income for housing. The highest rates of overpayment occur among very-low-income and extremely-low-income households. The impact of housing overpayment on lower income households is particularly significant for special needs populations – seniors, persons with disabilities, and female-headed households with children.

Figure D-28: Cost Burden by Tenure and Income Category - Placentia

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	845	785	1,015
Household Income >30% to less-than or= 50% HAMFI	850	465	1,015
Household Income >50% to less-than or= 80% HAMFI	870	195	1,360
Household Income >80% to less-than or= 100% HAMFI	295		855
Household Income >100% HAMFI	80		1,575
Total	2,940	1,445	5,825
Income by Cost Burden (Owners only)	**Cost burden > 30%**	**Cost burden > 50%**	**Total**
Household Income less-than or= 30% HAMFI	605	400	865
Household Income >30% to less-than or= 50% HAMFI	345	170	695
Household Income >50% to less-than or= 80% HAMFI	870	345	1,750
Household Income >80% to less-than or= 100% HAMFI	465	65	1,115
Household Income >100% HAMFI	975	30	6,320
Total	3,260	1,010	10,750

Extremely-low-income (ELI) households are defined as households with income less than 30 percent of the AMFI. The provisions of *Government Code Section* 65583(a) requires "Documentation of projections and a quantification of the locality's existing and projected housing needs for all income levels, including extremely low-income households."

According to ACS data, an estimate of 3,313 (20.3 percent) households in the City are considered Extremely Low Income. This number includes both renters and homeowners, and through the Orange County Housing Authority (OCHA), the City provides programs for these households to afford housing. The OCHA administers the Housing Choice Voucher Program to all of Orange County, except for the cities of Santa Ana, Garden Grove, and Anaheim.

There are various programs provided by the City to assist Extremely Low Income Households and their related needs. The programs provided goes as follows:

- **Child Support Services:** The Orange County Department of Child Support Services provides professional cost-effective services to parents or caretakers of minor children.
- **Friendly Center:** Friendly Center assists the economically less fortunate through programs and services, such as children and youth academic tutoring, family advocacy, supplemental food programs and emergency assistance.
- **Orange County Head Start:** Head Start is a comprehensive child development program designed to meet the educational, emotional, social, health, and

nutritional needs of children and families. The program encompasses much more than what is generally thought of as a preschool program.

- **Paint Your Heart Out:** Paint Your Heart Out, Inc is a volunteer driven nonprofit organization that helps low income, senior, disabled, and veteran homeowners maintain their dignity, safety, independence, and connections to the community by painting and providing homeowners with essential repairs and upkeep to their homes.
- **CalOptima:** CalOptima is a county organized health system that administers health insurance programs for low-income families, children, seniors, and persons with disabilities in Orange County.
- **Placentia WIC:** The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is a federal assistance program of the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA), created by an amendment to section 17 of the Child Nutrition Act of 1966 on September 26, 1972. PHFE WIC began serving communities of Los Angeles, Orange, and San Bernardino Countries County in 1976. Foods offered by the WIC program help supplement participants diets with key nutrients important to fetal development and adult and child health. WIC is a cost-effective program, reducing participants healthcare costs by providing healthy foods and prenatal services, improving birth outcomes, and promoting breastfeeding.
- **Hot Meals:** Throughout the City, there are several churches that provide free hot meals for those who are in need of it, which includes low-income individuals and families, those who are experiencing homelessness, etc.

To further address and provide resources for those who are extremely low-income, the City has created programs in this Housing Elements Policy Plan section. Doing so will provide more assistance for City residents facing these related issues. Based on the RHNA, the City is projected to have 622 extremely low-income households.

As shown in Figure D-29, overpayment among renters is most prevalent in the central and southern portions of the city. When compared to conditions in other areas of Orange County (0) overpayment among Placentia renters appears be similar to adjacent communities.

Figure D-29: Renters Overpaying for Housing - Placentia

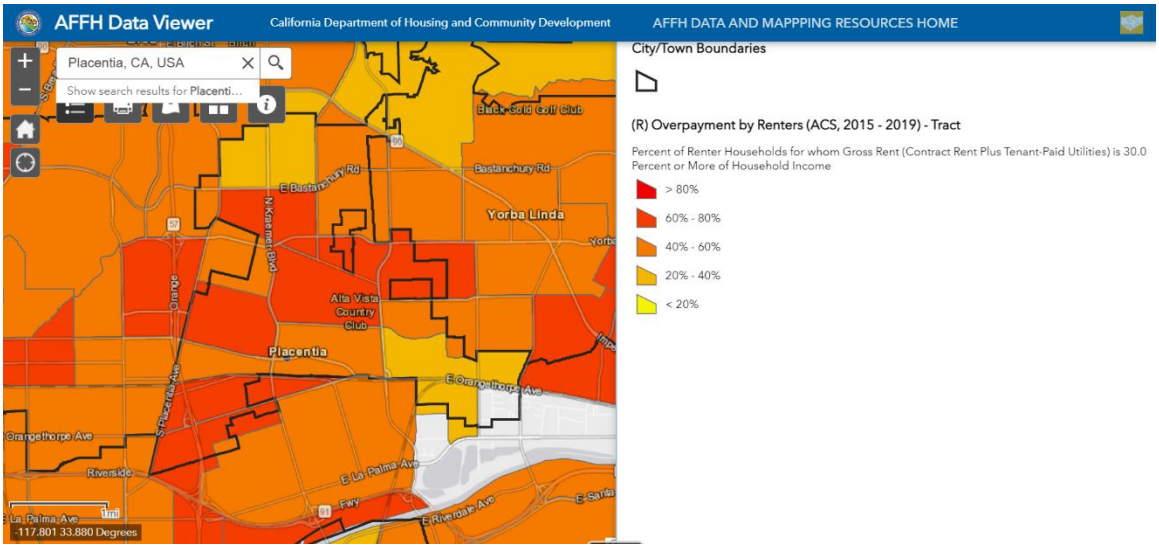
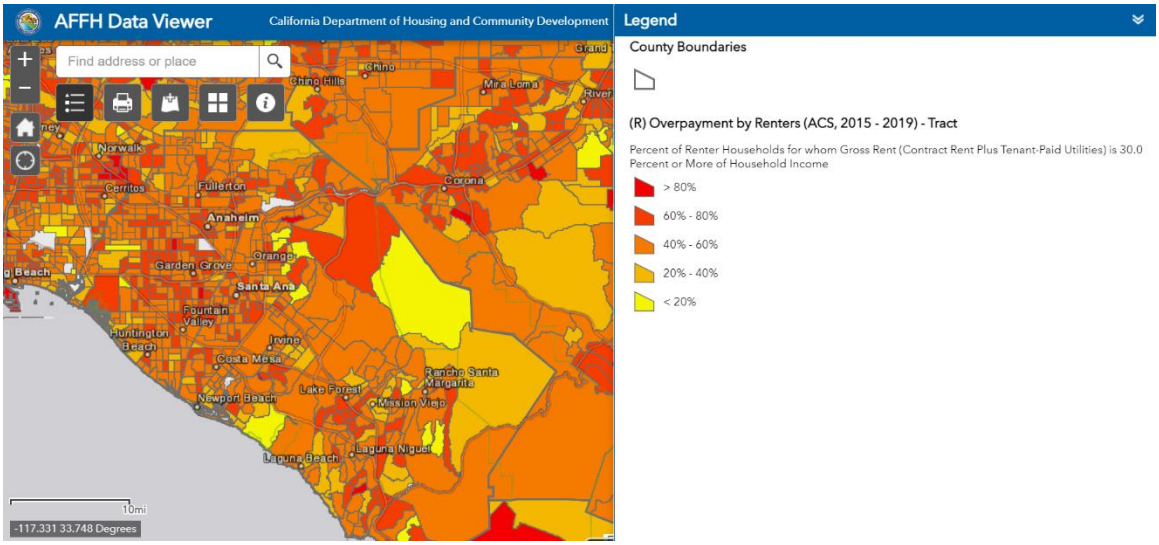


Figure D-30: Renters Overpaying for Housing – Orange County



Overpayment among Placentia homeowners is highest in the central and southwestern portions of the city (0). Countywide, rates of overpayment among homeowners in Placentia appear similar to other communities.

The problems of overpayment are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Program 1.3: Pursue County, State, and Federal Housing Funds, Program 1.8: Adequate Sites for Housing Development, Program 1.10: Encourage Development of Housing for Extremely-Low-Income Households, Program 1.11: Density Bonus Ordinance, Program 1.13: Development of Housing for Larger Families, Program 2.2: Section 8 Rental Assistance,

Program 2.4: Comprehensive Housing Resource Directory, Program 3.5: Monitor and Preserve At-Risk Units, Program 4.1: Partnerships with the Housing Industry).

Figure D-31: Homeowners Overpaying for Housing – Placentia

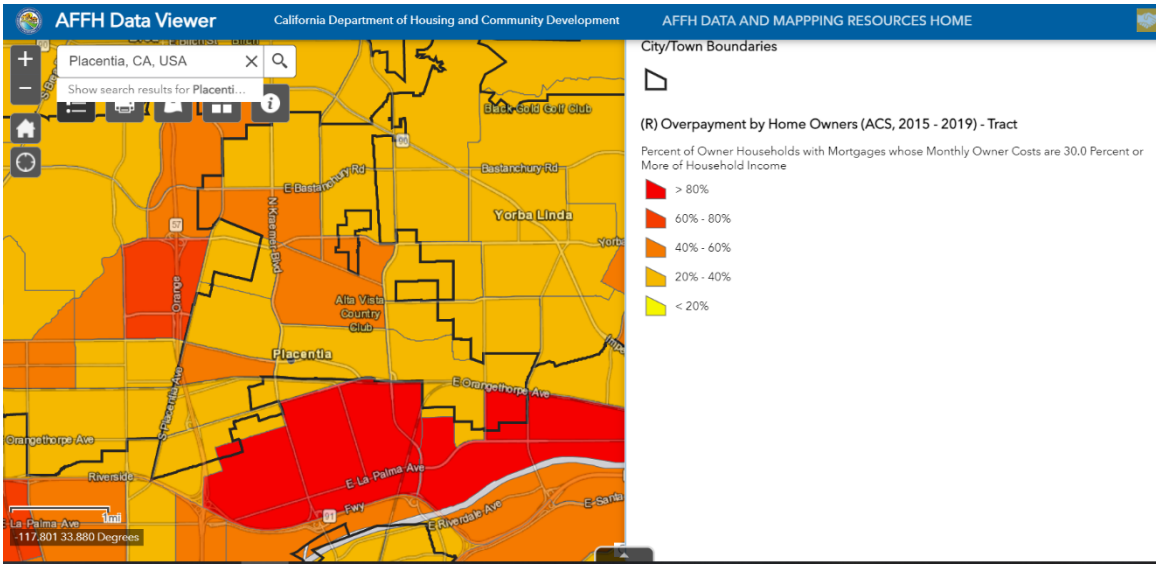


Figure D-32: Homeowners Overpaying for Housing – Orange County

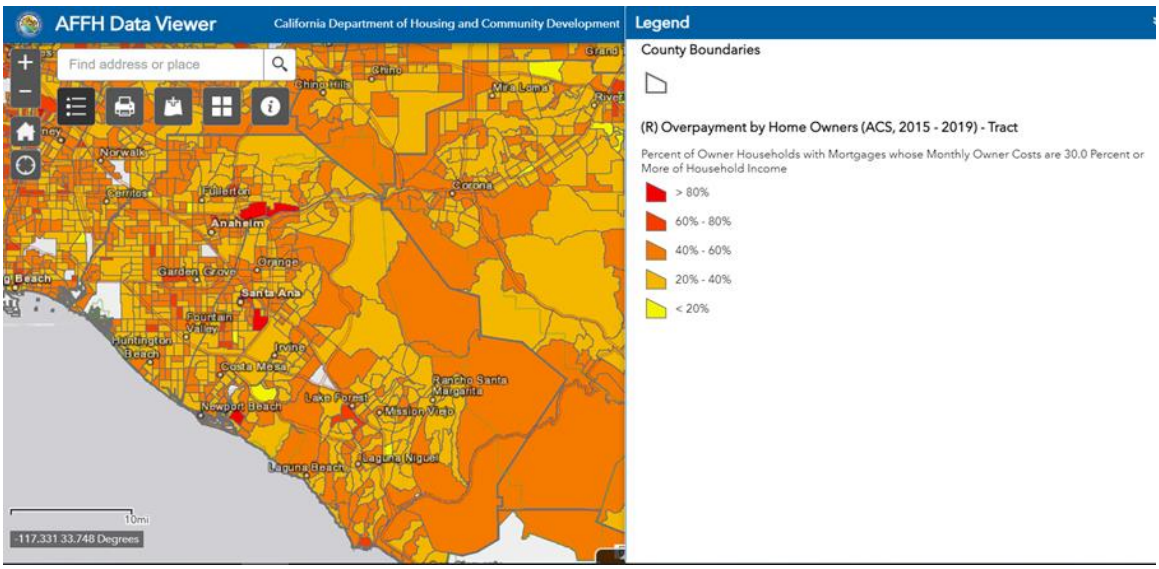


Table D-6 displays data for overpayment across two census tracts within the City. The table also displays data for the entire City. Census tract 06059011715 has the highest percentage of households using more than 30 percent of their household income to pay rent at 30.2 percent and the highest percentage of households using more than 50 percent of their household income to pay rent at 39 percent. Census tract 06059011712 has the lowest percentage of households using more than 30 percent of

their household income to pay rent 19.4 percent compare to census tract 06059011715 (24.1 percent) and the City (19.8 percent).

Table D-6: Overpayment for by Census Tract, Homeowner vs. Renter, Placentia

	Census Tract 06059011715	Census Tract 06059011712	City of Placentia
Renter			
Cost Burden >30%	30.2%	27.9%	24.3%
Cost Burden > 50%	39.0%	32.7%	24.3%
Cost Burden Data Not Available	0%	4.1%	<1%
Owner			
Cost Burden >30%	24.1%	19.4%	19.8%
Cost Burden > 50%	6.0%	10.6%	8.6%
Cost Burden Data Not Available	0%	0%	<1%

Source: HCD AFFH Date Viewer. Consolidated Planning/CHAS Data.

2) Overcrowding

"Overcrowding" is defined as a housing unit occupied by more than 1.01 persons per room (excluding kitchens, porches, and hallways). A unit with more than 1.51 occupants per room is considered "severely overcrowded." The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding is also related to overpayment, because households may not be able to afford a large enough home to accommodate their needs. Overcrowding can lead to a variety of other problems such as lower educational performance among children, psychological stress and adverse health impacts.

The County AI reported that for Orange County as a whole, White residents experience an overcrowding rate of 1.95%, Black residents 6.52%, Native American residents 11.38%, Asian American or Pacific Islander residents 7.76%, and Hispanic residents 25.72%. Hispanic residents face especially high rates of overcrowding. This is especially true in Anaheim and Santa Ana, where their rates of overcrowding are 29.07% and 42.93%, respectively. Overcrowding in Orange County is illustrated in 0.

In Placentia, the highest rates of overcrowding occur in the southwestern portion of the city (0), which are also the areas with higher percentages of minority residents.

The problems of overcrowding are addressed in the Housing Plan through efforts to facilitate production and preservation of affordable housing (see Program 1.3: Pursue County, State, and Federal Housing Funds, Program 1.8: Adequate Sites for Housing Development, Program 1.10: Encourage Development of Housing for Extremely-Low-Income Households, Program 1.11: Density Bonus Ordinance, Program 1.13: Development of Housing for Larger Families, Program 2.2: Section 8 Rental Assistance, Program 2.4: Comprehensive Housing Resource Directory, Program 3.5: Monitor and Preserve At-Risk Units, Program 4.1: Partnerships with the Housing Industry).

Figure D-33: Overcrowded Households – Placentia

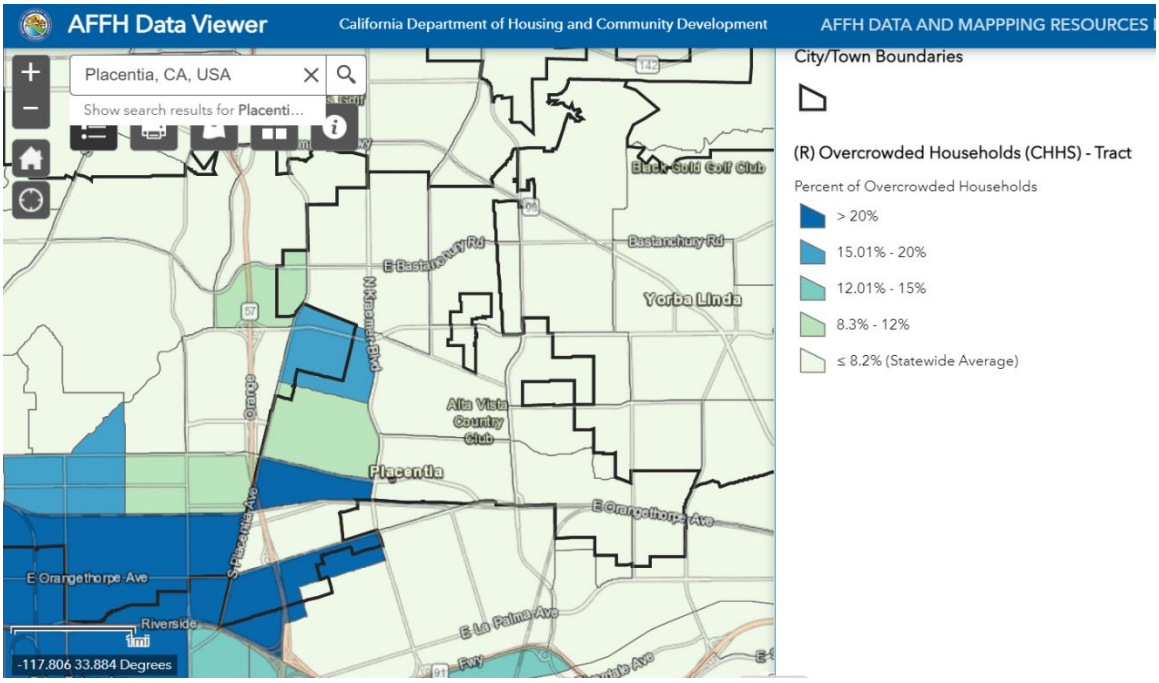


Figure D-34: Overcrowded Households – Orange County

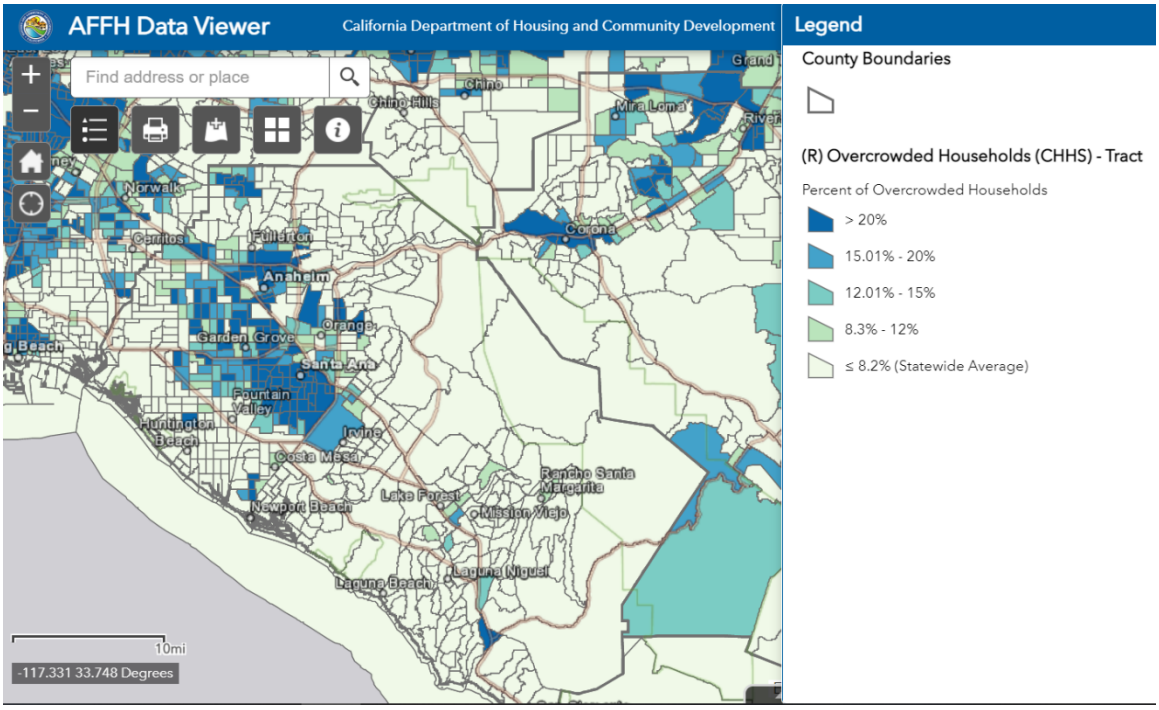


Table D-7: Overcrowding by Census Tract, Homeowner vs. Renter, Placentia

	Census Tract 06059011715		Census Tract 06059011712		City of Placentia	
Year	2010	2020	2010	2020	2010	2020
Percent of Overcrowded Households	2.2%	2.3%	9.2%	8.8%	8.9%	7.3%

Source: HCD AFFH Date Viewer, U.S. Census Bureau 5-Year ACS Estimates.

Table D-7 compares overcrowding by census tract in Placentia. Census tract 06059011712 has the highest percentage of overcrowded households at 8.8 percent compared to census tract 06059011715 at 2.3 percent. Census tract 06059011715 saw a 0.1 percent increase from 2010 to 2020 while the City overall has seen its overcrowding rate decrease from 8.9 percent in 2010 to 7.3 percent in 2020.

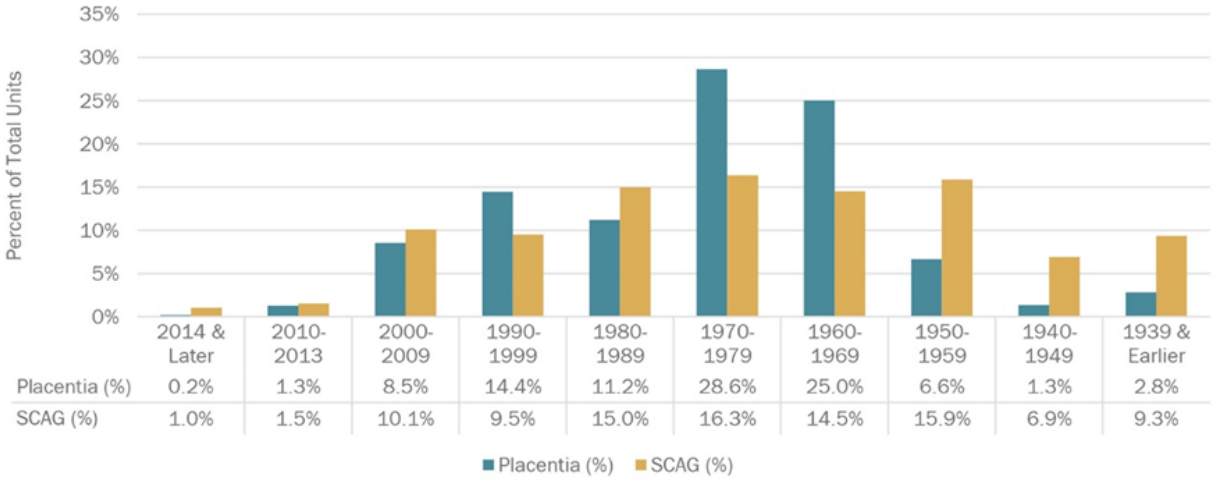
3) Substandard Housing

The age of a housing unit is often an indicator of housing conditions. Housing units without proper maintenance can deteriorate over time. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls or is pulverized by windows and doors opening and closing.

Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs. Additionally, older units may not be built to current building standards for fire and earthquake safety.

The age of housing units in Placentia compared to the SCAG region as a whole is shown in 0. Nearly two-thirds of Placentia's housing units were constructed prior to 1980 and are now more than 40 years old. These findings suggest that there may be a substantial need for maintenance and rehabilitation, including remediation of lead-based paint. Based upon field observations of City building inspectors and code enforcement staff, it is estimated there are more than 200 substandard housing units currently in the City, which are primarily concentrated in the La Jolla and Santa Fe areas. Less than 5% of those (10 units) are estimated to have structural problems that are not feasible to repair and therefore are in need of total replacement. Housing programs to assist lower-income households with needed repairs are described in Chapter 4 and include Program 3.1: Community Based Neighborhood Rehabilitation and Program 3.3: Placentia Rehabilitation Grant Program.

Figure D-35: Age of Housing Units – Placentia vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

Table D-8: Substandard Housing by Census Tract, Homeowner vs. Renter, Placentia

	Census Tract 06059011715		Census Tract 06059011712		City of Placentia	
Year	**2010**	**2020**	**2010**	**2020**	**2010**	**2020**
Percent of households that lacks complete kitchen,	1.8%	0%	<1%	1.3%	1.6%	<1%
Percent of households that lacks complete plumbing	<1%	0%	1.8%	0%	1.1%	<1%

Source: HCD AFFH Date Viewer, U.S. Census Bureau 5-Year ACS Estimates.

Table D-8 displays substandard housing data by census tract in Placentia. There is a higher concentration of households lacking a complete kitchen in census tract 06059011715 (1.8 percent) compared to census tract 06059011712 (1.3 percent) and the City overall (less than a percent). Less than a percent of households in Placentia lacks complete plumbing. Census tract 06059011712 experienced the largest decrease in households from 1.8 percent in 2010 to zero in 2020.

4) Homelessness

The Orange County homeless population includes many working families and individuals who live in cars, parks, under bridges, in motels and in homeless shelters trying to maintain their dignity while they struggle to survive. As a result, most homeless remain hidden. The most recent available Orange County Point-in-Time Count and Survey report of the Homeless (2019) reported 55 unsheltered and 108 sheltered homeless persons in Placentia.

During the City's presentation on "Addressing Homelessness in Placentia and North Orange County," residents and city officials identified concentrations of people experiencing homelessness in the following areas:

- Crowther Ave and the 57 Freeway
- Land adjacent to the 57 Freeway, including underpasses
- Teen Center at Kraemer Memorial Park

Regional strategies to combat homelessness are developed through Orange County's Continuum of Care System. The goal of the Continuum of Care Strategic Plan is to work toward a seamless system of care through advocacy, homeless prevention, outreach and assessment, emergency shelter, transitional shelter and permanent affordable housing.

Persons threatened with homelessness are often those with incomes at 30% of area median income or below who are paying more than 30% of their income for rent.

The nonprofit 2-1-1 Orange County organization is a 24-hours-a-day, 7 days-a-week, toll-free number that people in need of assistance can call to obtain comprehensive information and referrals to health and human services. Available services include food, shelter, government assistance programs, urgent care, substance abuse and treatment programs, and workforce development.

In early 2019 the North Orange County Service Planning Area for Homelessness Outreach Efforts had reached an important milestone. A regional partnership of 13 cities located in northern Orange County (Anaheim, Brea, Buena Park, Cypress, Fullerton, La Habra, La Palma, Los Alamitos, Orange, Placentia, Stanton, Villa Park, and Yorba Linda) came together to share intelligence and resources to address regional homelessness. Their concept was to promote greater regional coordination on homeless issues while reducing the span of control regarding working with the County of Orange and others.

After months of extensive discussions, negotiations and assessments, two locations within the North Orange County Service Planning Area were identified for the development of "navigation centers" based on a number of factors including zoning, proximity to related services and site availability. The navigation centers are a multi-jurisdictional approach to guiding underserved residents back into society by increasing access to a shelter with basic needs, health and job resources, and opportunities to reunite with friends and family. Each center was planned to accommodate 100 beds, thereby increasing the regional bed count to 525 additional beds available to homeless individuals in conjunction with a project in the city of Anaheim that accommodated 325 new beds.

Funding for the Navigation Centers was secured through application and governmental meetings with state, regional, county and local officials resulting in the $12 million in State of California Homeless Emergency Aid Program (HEAP) funds dedicated for the site acquisitions and construction of the navigation centers. Each of the North Orange County Service Planning Area cities also committed funds for construction and ongoing

operation of the navigation centers. A Memorandum of Understanding was prepared and presented to the city councils of all 13 cities in May 2019. Construction began in 2019 and the opening of the first 100-bed Navigation Center in Placentia occurred on March 31, 2020. This groundbreaking success story was born of the regional need and public official desire to come together to address homelessness and pioneer the way to create and operate a multi-jurisdictional homelessness facility. Program 1.4: Emergency Shelters, Low Barrier Navigation Centers, Transitional and Supportive Housing and Agricultural Employee Housing, Program 1.14: Housing for Persons with Special Needs, and Program 2.3: Minimize Constraints on Housing for Persons with Disabilities are included in the Housing Plan to describe actions the City is taking to address the issue of homelessness.

5) Displacement Risk

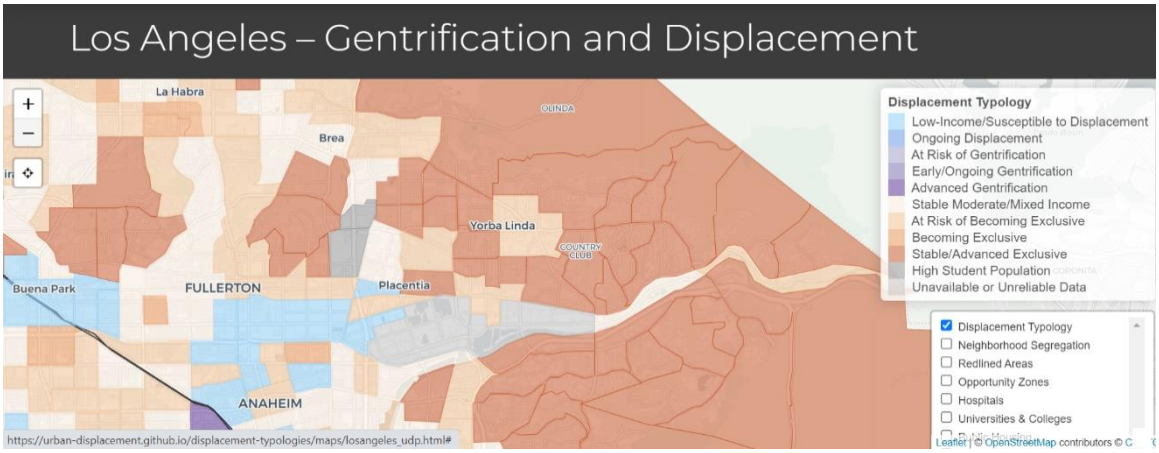
In 2016, the UCLA Urban Displacement Project[2] team developed a neighborhood change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The database includes Los Angeles, Orange, and San Diego counties, with gentrification and sociodemographic indicators based on data from the Census Bureau American Community Survey and shows whether each Census tract gentrified between 1990 and 2000; gentrified between 2000 and 2015; gentrified during both of these periods; or exhibited characteristics of a "disadvantaged" tract that did not gentrify between 1990 and 2015.

Based on this neighborhood change database, the UCLA team found that of the three counties, Orange County exhibited the greatest share of neighborhoods that were considered to be "disadvantaged" and potentially susceptible to gentrification (~43%).

The areas most susceptible to displacement in northern Orange County are portions of Buena Park, Fullerton, Anaheim and Garden Grove. The eastern, south and coastal communities are primarily exclusive or at risk of becoming exclusive. 0 shows the displacement typology levels for Placentia and adjacent areas. The northern portion of the city and the area near Alta Vista Country Club are identified as "Stable/Advanced Exclusive" while other areas in the western portion of the city are considered "Stable Moderate/Mixed Income" or "Low Income/Susceptible to Displacement."

[2] https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/

Figure D-36: Displacement Typologies - Placentia



As noted in the Housing Plan, Program 1.8: Adequate Sites for Housing Development includes a commitment to ensure compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments.

As discussed in Section 2.3 of the Housing Needs Assessment, there is one assisted low-income housing development in Placentia – Imperial Villas – that is at risk of conversion to market rate in the next 10 years. Program 3.5: Monitor and Preserve Affordable Housing At-Risk of Conversion to Market Rate is included in the Housing Plan to facilitate the preservation of these affordable units.

The U.C. Berkely Urban Displacement Project developed a neighborhood change database to map neighborhood transformations and identify areas vulnerable to gentrification and displacement. The data was developed to assist local decision-makers and stakeholders to better plan for existing communities and provide additional resources to areas in need or at risk of displacement and gentrification.

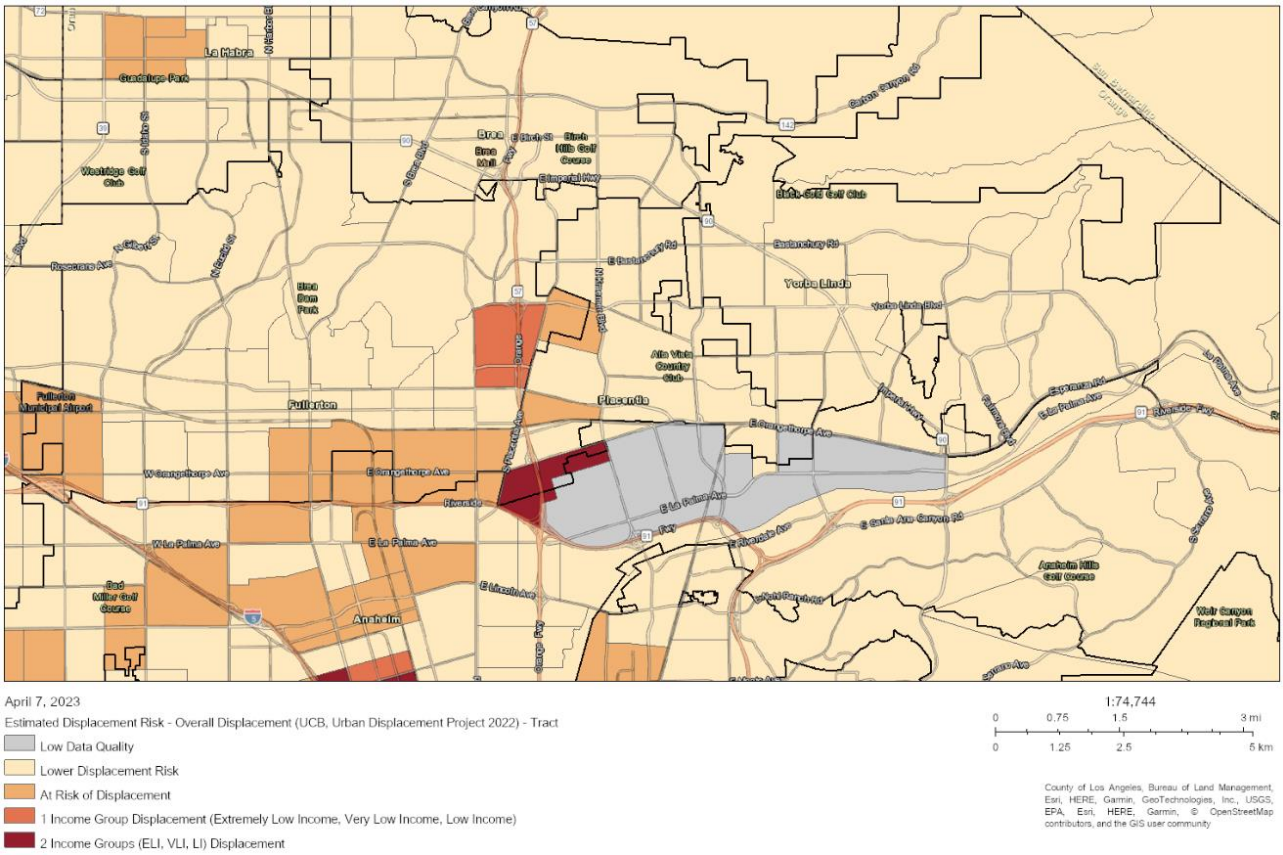
Figure D-37 shows the census tracts in the City of Placentia at risk of displacement. The following table identifies demographics for two demographics for two census tracts. Census tract 117.20 (shown in dark red in Figure D-37) includes the largest population of individuals who speak English "less than well," as well as a greater ratio of low-income households at 76.4 percent. Census tract 117.20 has lower percentages of White and Asian residents compared to City averages and shows elevated displacement risk for low-income (50%-80% AMI) and very low-income households (0%-50% AMI). Census tract 117.20 (shown in orange in Figure D-37) is currently at risk of displacement, with renter occupied households making up 68.8 percent all households within the census tract. Census tract 117.21 has a higher percentage 16.1 percent of White residents than census tract 1720, but a lower percentage of residents speaking English "less than well" (22.1 percent).

Table D-9: Areas At Risk of Displacement (2022)

		Census Tract 117.20	Census Tract 117.21	Citywide
Demographics				
Population		6,573	5,364	51,824
Households		1,505	1,473	16,378
Renter Occupied		82.7%	68.8%	36.1%
Median Income		$46,148	$64,531	$100,707
Low-Income Households		76.4%	54.9%	49.3%
Speak English Less Than Very Well		33.7%	22.1%	12.7%1
Race/Ethnicity: Latino-White	White	3.8%	16.1%	39.3%
	Black	1.7%	2.2%	2.4%
	Asian	4.2%	5.7%	15.8%
	LatinX	88.8%	75.0%	38.3%
	Other	1.5%	1.0%	4.2%
Housing				
Median Rent		$1,532	$1,646	$1,856
Rent Gap		Tract rent is $161.56 lower rent than nearby rents	Tract rent is $34.74 higher than nearby rents	-
Hot Market		No	No	-
Displacement Type:		Elevated Displacement for Low-Income (50%-80% AMI) Elevated Displacement for Very Low-Income households (0%-50% AMI)	At Risk of Displacement	-

Average of City of Placentia census tracts.
Source: California Department of Housing and Community Development – AFFH Data Viewer

Figure D-37 - Displacement Risk, Placentia (2022)



Source: California Department of Housing and Community Development – AFFH Data Viewer

3. Sites Inventory Analysis

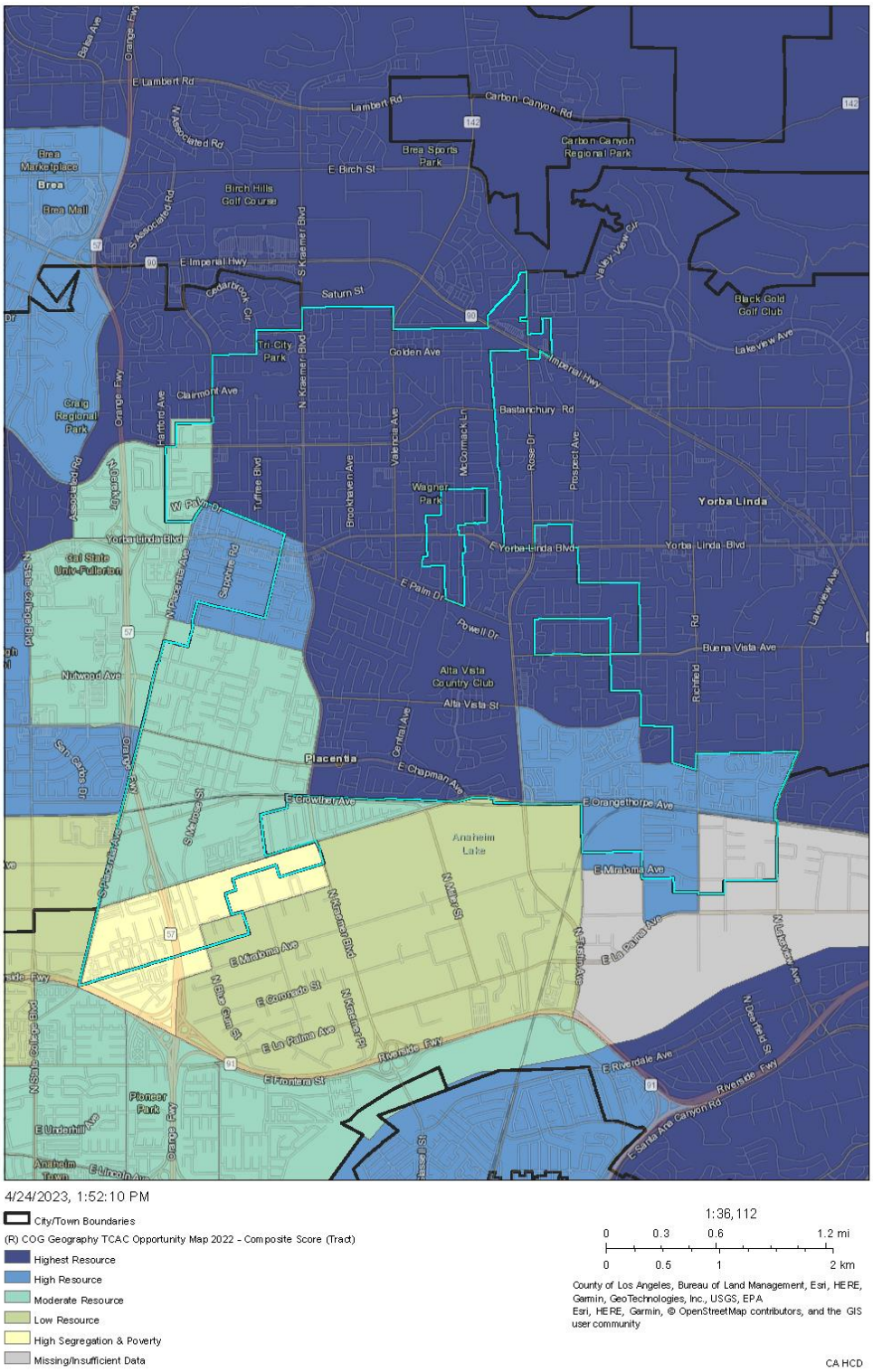
The City's inventory of sites for potential housing is presented in Appendix B. As summarized in Table B-1, the inventory is comprised of approved projects, vacant sites, non-vacant underutilized sites and future ADUs. The sites analysis shows that as with most cities in the metro areas of Southern California, vacant developable land is very rare and underutilized sites provide the majority of future housing capacity.

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA, but also whether the identified sites serve the purpose of replacing segregated living with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

As illustrated in Figures B-2 through B-5 in Appendix B, the focus of the Placentia sites inventory is on redevelopment of underutilized sites in the commercial and light industrial areas near the new Metrolink rail station. The candidate sites take into consideration access to vital goods, services, and public transportation and are

therefore ideal areas for the City to focus much of its future housing growth. As shown in Figure D-38, the candidate sites are located in areas designated by the TCAC/HCD opportunity maps as Moderate Resource and High Resource, they provide the most significant potential for new housing development because most other areas are developed with stable residential neighborhoods with minimal potential for redevelopment.

Figure D-38: TCAC Opportunity Areas Composite Score - Placentia



As shown in Figure D-2, majority of the projected housing units are located in areas that have a lower displacement risk. Table D-11 shows the neighborhood segregation household data where the candidate sites are located. Approximately 50 percent of all projected housing units are located in tract 06059011722 where 41.5 percent of the population is White, and 36.3 percent is Latinx. Approximately 25 percent of all projected housing units are located in tract 06059021821 where 41.1 percent of the population is White, and 29.6 percent is Latinx. Both census tracts are designated in areas that have lower displacement risk. The remaining 25 percent of all projected housing units are located on tract 1813, where there was low data quality. The redistribution of lower-income household opportunities into places where Hispanic predominance is not as strong could mean the alteration of settlement trends for Hispanic and low-income households. As a result, Placentia communities could become further integrated in regard to race/ethnicity and income.

Table D-11: Candidate Sites in Neighborhood Segregation - Household Data

Data		Census Tract 117.22	Census Tract 118.21	Census Tract 1813
Demographics				
Population		2,259	7,772	4
Households		1,054	2,578	4
Renter Occupied		40.7%	44.4%	-
Median Income		$48,929	$101,023	-
Low-Income Households		65.2%	30.8%	100%
Speak English Less Than Very Well		15.9%	12.7%	100%
Race/Ethnicity: Latino-White	White	41.5%	41.1%	-
	Black	2.5%	4.2%	-
	Asian	18.9%	22.2%	-
	LatinX	36.3%	29.6%	100%
	Other	0.9%	2.9%	-
Housing				
Median Rent		$1,191	$2,092	-
Rent Gap		Tract rent is $562.04 lower than nearby rents.	Tract rent is $47.74 lower than nearby rents.	$295.09 lower than nearby rents.
Hot Market		Yes	No	Yes
Displacement Type:		Lower Displacement Risk	Lower Displacement Risk	Low Data Quality

Source: AFFH Data Viewer

Figure D-10 shows that majority of the candidate sites, approximately 75 percent of all projected housing units, are located in the City tracts where 25 percent to 50 percent of the population have low to moderate income. Although concentrating housing in areas with high low- and moderate-income majorities has the potential to overburden these communities, the median household income of Placentia is $103,041, which is $2,556 above the Orange County's median household income of $100,485. By concentrating affordable housing in these areas, households would have more opportunities to have reliable housing. The remaining 25 percent of all housing units are in areas in the City tract where the low to moderate income household proportion

of the population is less than 50 percent. By allocating housing in these areas, segregation based on income can be mitigated. Additionally, higher income areas tend to have greater access to resources.

The candidate sites were directly identified due to their proximity to transit, major corridors, employment opportunities, as well as property owner/developer interest and high likelihood for residential development. The City plans for new units in close proximity to community and commercial resources, as well as increased private investments in the area – ultimately leading to increased access to opportunities and resources for existing and future residents. Having lower-income units dispersed throughout the City helps create more mixed-income communities and brings resources and services closer to special needs and vulnerable populations. This further improves conditions in these areas and does not exacerbate any conditions.

While former commercial and light industrial areas provide the largest component of the potential residential inventory, it is important to recognize that existing residential neighborhoods also provide substantial potential for new housing in areas of higher opportunity through ADUs and SB 9 urban lot splits.

History of Investment and Disinvestment

The City of Placentia is a mature, suburban, community located within one of the wealthiest and economically diverse suburban counties in the country. The City has a well-established track record of local public and private investment. The Measure U sales tax implemented in April 2019, continues to help fund critical programs and infrastructure. As a full-service City, Placentia provides the following services to its residents, property owners, business owners, and visitors:

- Public Safety (Police, Fire & Paramedic)
- Sanitation and Refuse Collection
- Parks, Planning & Zoning, Housing & Community Development

Placentia is one of the only cities in Orange County that never closed its operations during the COVID-19 pandemic which ensured continuous and upward economic development throughout the City. The City continuously invests in infrastructure improvements and community character improvements. The City has master plans for the revitalization, activation, and economic growth of the City's original Old Town, TOD Packing House District and Chapman Corridor areas.

The City has established an Enhanced Infrastructure Financing District (EIFD) adjacent to the planned Metrolink Station, Old Town, and TOD Packing House District. The EIFD creates a funding mechanism to facilitate the construction of public infrastructure improvements to attract private investment. A tax increment will be used to pay for projects listed in the Infrastructure Financing Plan. Anticipated improvements include street, pedestrian connectivity, and both landscape and lighting upgrades.

Since 2018, the City has allocated an average of $10 million per fiscal year to complete capital improvements throughout the City. Historically, capital improvement projects

have focused on areas of higher need and in the last decade, the City has focused on the City's original Old Town, TOD Packing House District and Chapman Corridor areas. Beginning in 2022, the City began a citywide Roadway Rehabilitation Project to repair, main, and improve approximately 80 percent of all public roads in the City. The seven-year long project will be complete in 2028, almost mirroring the 6th Cycle planning period.

The City's oldest developed areas are the Old Town and TOD Packing District areas which were important in the City's early history. Placentia's major industries in the 20th Century were primarily oil extraction and agriculture. As both phased out, these areas which were previously major employment hubs became vacant and slowly deteriorated. The City attempted to revitalize the area through its history but limited private investment prevented any meaningful public investment. Comprehensive planning efforts have revitalized the area and the City continues to see these historic areas as vital opportunities for growth.

Placentia suffered from private disinvestment and economic decline with the widespread growth of Orange County's suburbanization from the 1960's to the 1990's, though existing property owners, residents, and businesses kept Placentia active with a mix of small businesses, restaurants, churches, and public venues. Private disinvestment led to less public revenue to invest in public improvements. While periods of economic decline reduced public revenue, Placentia has always been able to maintain and improve its local infrastructure.

Fair Housing Sites Summary

The fair housing analysis above displays the following results:

- The City has ample capacity to accommodate future housing at all income levels
- The sites identified to accommodate the RHNA are strategically placed to further integrate racial and ethnic groups, varieties of income categories, and to enhance the availability of opportunities throughout the City.
- The areas identified to accommodate the low and very low-income RHNA create opportunities for lower income residents to access affordable housing in higher resources areas.
- Above moderate and moderate income units are dispersed throughout the community and have the potential to enhance resources and opportunities in neighborhoods that historically have less access to resources.

This section reviews fair housing findings and data within Appendix D on a local level by analyzing findings based on all Census Tracts in the City as shown in Table D-12 below. It is important to note that a majority of the City is identified by TCAC as high resource with some pockets of moderate resource. The southwest and southeast portions of the City, which are the Transit Oriented Development District (TOD) and Old Town Plan areas, contain high resource and highest resource census tracts. These

areas site a majority of the lower income housing within underutilized parcels throughout the area.

In 2017, the City adopted the Transit Oriented Development District (TOD) and the Old Town Placentia Plan. In 2019, the General Plan was comprehensively updated. Although housing growth has occurred citywide due to infill development and ADU construction, the southwest and southeast quadrants of the City have experienced major growth, Both the TOD and Old Town Plans are in the southwest quadrant of the City, and those plans currently include zoning for some by right affordable housing, with up to 1,100 additional units possible due to ongoing TOD expansion (Program HE-1.8). Approximately 650 units have been built in the TOD Zone already, with an additional 189 affordable units entitled. Program HE-1.8 proposed to increase the R-3 density citywide, which the City completed in late 2022, along with re-zoning of several industrial sites to R-3 between 2020-2022. Many of these aforementioned areas rezoned to R-3 from industrial have already been entitled with approximately 200 units, and half of those have been built already. Another 300-500 units are anticipated to be entitled in these areas alone.

The detailed analysis in Table D-12 shows how Moderate and High Resource areas, adaptive reuse of underutilized commercial and industrial parcels can play a key role in increasing housing stock volume and improving affordability. Urban Displacement indicators show that Census Tract 117.21 is experiencing "Risk of Displacement". This area has been strategically sited for lower income RHNA sites to mitigate the rate of displacement. It is also important to note that the City accommodated a majority of lower income RHNA sites in areas that experience "Lower Displacement Risk", which may avoid advanced gentrification and further increase opportunities for lower income households.

The potential addition of units at all income limits would positively impact both existing and future residents in the southwest and southeast regions of the City. Mixed-income communities garner social and economic advantages for residents, property owners, communities, and entire neighborhoods. Mixed-income communities are a way to preserve economic integration and increase the acceptance of affordable housing amongst community members. Additional benefits include better access to schools and safety for low-income residents and promote social cohesion and equity. Mixed-income housing can foster social interaction and integration among different income groups, which can reduce stigma, stereotypes, and isolation, and enhance mutual trust and support. Some studies also suggest that mixed-income housing can lower crime rates by creating more stable and cohesive neighborhoods, reducing exposure to violence and disorder. Through capital improvements, Housing Element actions and commitments, and social/cultural community events, the City believes the western region will become an area where residents of all socio-economic backgrounds can live and thrive.

Table D-12: Fair Housing Summary Analysis

Data	Census Tract 117.08	Census Tract 117.15	Census Tract 117.16	Census Tract 117.17	Census Tract 117.21	Census Tract 117.22	Census Tract 218.10	Census Tract 218.131	Census Tract 218.20	Census Tract 218.21
Demographics										
Population	4961	6875	5,757	2769	5,368	2,291	3,704	3	4,855	7,768
Households	1923	2534	1,648	919	1,448	1,107	1,203	3	1,548	2,537
Renter Occupied	72.3%	31.7%	22.3%	25.3%	74.%	37.3%	18.6%	100%	13.4%	50.0%
Median Income	$82,614	$94,028	$143,382	$111,818	$96,169	$106,042	$114,542	N/A	$141,354	$106,813
Hispanic/ Latino of Any Race	37.5%	23.7%	27.7%	18.3%	74.1%	33.3%	23.4%	100%	19.1%	25.8%
Non-White	33.2%	35.5%	48.2%	30.6%	43.4%	48.5%	37.7%	0%	32.6%	49.4%
Low/Moderate Income Households	61.3%	31.7%	38.15%	33.1%	81.9%	48.6%	24.5%	N/A	18.0%	36.6%
RHNA Lower Income	0	0	0	0	183	919	0	0	0	0
RHNA Moderate	0	0	0	2	481	115	0	10	0	313
RHNA Above Moderate	1	1	12	0	0	0	13	0	13	40
RHNA Total	1	1	12	2	664	1,034	13	10	13	353
Metrics										
TCAC Opportunity Indicator - Composite Score	Moderate Resource	Highest Resource	Moderate Resource	Highest Resource	High Resource	Highest Resource	Highest Resource	No Data	Highest Resource	High Resource
Displacement Type	Lower Displacement Risk	Lower Displacement Risk	Lower Displacement Risk	Lower Displacement Risk	At Risk of Displacement	Lower Displacement Risk	Lower Displacement Risk	Lower Displacement Risk	Lower Displacement Risk	Lower Displacement Risk

Source: California Department of Housing and Community Development – AFFH Data Viewer, US Census: American Community Survey (2021, 5-Year Estimates)
1. AFFH Data Viewer and US Census data are not reliable for Census Tract 218.13. Sources significantly undercount true population and household totals.

4. Contributing Factors

The housing element must include an identification and prioritization of significant contributing factors to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs. "Fair housing contributing factor" means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all the prior efforts and analyses: outreach, assessment of fair housing, and site inventory. Contributing factors must also be prioritized in terms of needed impact on fair housing choice and strongly connect to goals and actions.

Through the participation of stakeholders, fair housing advocates, and the assessment of fair housing issues described in this appendix, the City has identified fair housing issues and contributing factors as well as meaningful actions to address those issues as described in 0: Fair Housing Issues, Contributing Factors and Meaningful Actions.

5. Goals, Policies and Actions

Based upon the analysis presented above, the City has identified fair housing issues, contributing factors, and meaningful actions that will be taken to address those issues during the planning period. The 2020-2024 Orange County Analysis of Impediments to Fair Housing Choice prepared by the Urban County consortium, of which Placentia is a participating jurisdiction, was of key importance in helping to identify these issues, contributing factors and actions.

Table D-13: Fair Housing Issues, Contributing Factors and Meaningful Actions

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
Fair Housing Outreach	1. Lack of local private fair housing outreach and enforcement may be a significant contributing factor to fair housing issues in Orange County. Although Orange County is served by two high-quality private, non-profit fair housing organizations, they are underfunded and understaffed in comparison to the total need for their services. Victims of discrimination would be more able to exercise their rights, thus deterring future discrimination, if the capacity of existing organizations grew to meet the scale of the problem. 2. Lack of local public fair housing outreach and enforcement may also be a significant contributing factor to fair housing issues in Orange County. There are no local public entities that conduct fair housing outreach and enforcement, with the California Department of Fair Employment and Housing and HUD constituting the only public enforcement bodies that operate in Orange County. Advocates across Orange County and the state of California have reported issues with the timeline of the California Department of Fair Employment and Housing's investigations and the standards that it applies in making probable cause determinations. A local public enforcement agency, if created, would have the potential to be more responsive to victims of discrimination in Orange County than either the state or HUD.	High	The City will continue to disseminate information regarding fair housing in a variety of locations including City Hall, the City website and the library, and conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings. The City will continue to seek funding to support the Fair Housing Council of Orange County (FHCOC), which provides community education, individual counseling, mediation, and low-cost advocacy with the expressed goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire. The City will invite FHCOC to conduct annual fair housing outreach targeted to Placentia residents and landlords. (Program 2.1)
Access to Opportunity	Lack of access to opportunity due to high housing costs may be a significant contributing factor to fair housing issues in Orange County. In Placentia, while access to quality transportation and educational resources is generally good throughout the city, the western portions of the county have lower economic and environmental opportunity than do the central and northern areas. Increasing housing affordability in those areas would make it easier for low-income households to access the types of services and amenities that further social mobility.	High	The City will seek to improve access to opportunity in the following ways: Program HE-1.2: Locate Housing Near Transportation, Employment and Services To increase livability within new housing developments, the City shall encourage and coordinate the location of major housing developments, particularly affordable housing and multi-family units, near transportation options, major employment centers and services. Program HE-1.3: Pursue County, State, and Federal Housing Funds

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
			Monitor availability of county, state, and federal housing programs and pursue available funds on an annual basis. Program HE-1.8: Adequate Sites for Housing Development To ensure the availability of adequate sites to accommodate the City's assigned housing need, the City will rezone additional land to accommodate the shortfall of lower-income sites compared to the RHNA allocation in all income categories. as identified in Appendix B. The City shall encourage the development of housing through financial incentives (such as land write-downs; assistance with on- or off-site infrastructure costs, fee waivers, or deferrals to the extent feasible); expedited entitlement review; in-kind technical assistance; and other regulatory concessions or incentives, and provide incentives for lot consolidation. Program HE-1.11: Density Bonus Ordinance The City provides incentives and concessions to facilitate development of lower-income housing units through its Density Bonus Ordinance. To ensure that City regulations are consistent with recent changes to State law, the City will process an amendment to the ordinance in 2022. Program HE-1.15: Transit-Oriented Development Transit-Oriented Development (TOD) is a compact mixed-use or commercial area designed to maximize access to public transport, and often incorporates features to encourage transit ridership. Consistent with federal, state and regional policies focusing on concentrated growth around transit, in 2017 the City Council adopted the TOD Packing House zoning district, which allows densities up to 95 du/acre near the future Metrolink Station. Since then, 633 multi-family units have been entitled in the TOD District. Also in 2017, the Old Town Zoning District was adopted, which includes a sub-area allowing high-density housing by-right up to 65 units per acre. Development incentives include the utilization of City-owned property as well as reduced parking requirements, financial assistance, density bonus, and regulatory waivers. To expand housing opportunities, an

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
			amendment to the TOD zone will processed to extend the district as described in Program 1.8 and Appendix B. Program HE-1.19: Accessory Dwelling Units Accessory dwelling units (also known as ADUs, second units or granny flats) can help to address a portion of the city's housing needs, particularly for small lower-income households. The City will continue to monitor legislation and revise regulations as necessary to ensure conformance with current law. In addition, the City will explore and pursue ADU funding annually, modify development standards and reduce fees beyond the minimum requirements of State law, prepare pre-approved plans, and provide homeowner/applicant assistance tools. Program HE-4.1: Partnerships with the Housing Industry The City has limited resources to use for the development and maintenance of affordable housing. To maximize its funding and staff resources, the City shall seek opportunities to partner with non-profit and for-profit housing developers. Specifically, the City shall proactively seek partnerships to develop affordable housing and contribute to the partnership through activities such as in-kind technical assistance, support in seeking grant and funding opportunities, and financial assistance, which may include land write-downs and assistance with on- or off-site infrastructure costs where feasible. The City will contact affordable housing organizations annually to solicit interest in development.
Affordable Housing Preservation	The loss of affordable housing may be a significant contributing factor to fair housing issues in Orange County. When subsidy contracts expire, the housing providers that often have the least economic incentive to renew their affordability restrictions are those that are located in higher opportunity areas or in areas that are gentrifying or at risk of gentrification. In Placentia, there is one subsidized low-income development that could expire in the next 10 years. The loss of these affordable units could contribute to segregation and displacement.		Program HE-3.5: Monitor and Preserve Affordable Housing At-Risk of Conversion to Market Rate The City shall continue to monitor units with affordability covenants that are eligible to expire during the next 10 years. To encourage the preservation of these "at-risk" units, the City shall coordinate with the County and non-profit housing organizations to encourage the extension and/or renewal of deed restrictions or covenants., comply with noticing requirements, provide education and assistance to tenants, assist with funding, and promptly reach out to qualified entities to preserve at-risk housing units.

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
Availability of Affordable Housing	Lack of affordable, accessible housing in a range of unit sizes may be a significant contributing factor to fair housing issues in Orange County. As discussed in connection with several other contributing factors, there is a general shortage of affordable housing in the county. This shortage has a particular effect on low-income families in which at least one member has a disability that requires accessibility features, and persons with disabilities who require the services of live-in aides.	High	All of the meaningful actions described above address this issue. In addition, the following program specifically addresses the issue of housing for persons with disabilities: Program HE-1.12: Development of Senior Housing Seniors typically have specialized housing needs and fixed incomes that may require housing units not generally included in market rate housing. In 2020 the City Council approved entitlements for a 64-unit affordable senior housing development at 1314 N. Angelina Drive. The City shall continue to encourage the development of a wide range of housing choices for seniors through incentives (e.g., financial assistance, parking reductions, regulatory waivers). These may include independent living communities and assisted living facilities with on-site services and access to health care, nutrition, transportation and other appropriate services. Program HE-1.13: Development of Housing for Larger Families Providing appropriately sized housing units for large families is important to improving livability, reducing instances of overcrowding and minimizing deferred maintenance issues. The City shall encourage incorporation of units with 3 or more bedrooms in for-sale and rental housing developments to accommodate the needs of larger families through activities such as technical assistance, expedited processing, and flexibility in development standards. Program HE-1.14: Housing for Persons with Special Needs Housing to accommodate persons and families with special needs is a high priority for Placentia. In 2018 the City approved the Veteran's Village development with 49 very-low-income units for veterans who are homeless or at risk of homelessness. The project also provides services such as vocational training, mental health counseling, job placement, etc. The City shall continue to work with non-profit housing developers, service providers and the County of Orange to encourage and support the development of housing for special needs households, including persons with developmental disabilities, through activities such as technical assistance, assistance in seeking

Fair Housing Issue	Contributing Factor	Priority	Meaningful Action
			funding annually, expedited processing and flexibility in development standards. Program HE-2.3: Minimize Constraints on Housing for Persons with Disabilities The City will continue to implement the Reasonable Accommodation Ordinance, which provides relief from local regulations and permitting procedures that may have a discriminatory effect on housing for persons with disabilities. In addition, a Zoning Ordinance amendment will be processed in 2022 to update the definition of "family" consistent with State law.

Appendix E: Glossary

Above Moderate-Income Household. A household with an annual income greater than 120% of the Area Median Income (AMI) adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

Apartment. An apartment is one or more rooms in an apartment house or dwelling occupied or intended or designated for occupancy by one family for sleeping or living purposes and containing one kitchen.

Assisted Housing. Generally multi-family rental housing, but sometimes single-family ownership units, whose construction, financing, sales prices, or rents have been subsidized by federal, state, or local housing programs.

Below-market-rate (BMR). Any housing unit specifically priced to be sold or rented to Low- or Moderate-Income households for an amount less than the fair-market value of the unit. Both the State of California and the U.S. Department of Housing and Urban Development set standards for determining which households qualify as "Low-Income" or "Moderate-Income." May also refer to the financing of housing at less than prevailing interest rates.

Build-out. That level of urban development characterized by full occupancy of all developable sites in accordance with the General Plan; the maximum level of development envisioned by the General Plan.

Community Development Block Grant (CDBG). A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitlement communities and by counties or the California Department of Housing and Community Development (HCD) for non-entitled jurisdictions. This grant allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.

Condominium. A type of ownership in which the interior space is individually owned and the balance of the property (both land and building) is owned in common by the owners of the individual units. (See "Townhouse.")

Covenants, Conditions, and Restrictions (CC&Rs). A term used to describe private restrictive limitations that may be placed on property and its use, and which usually are made a condition of holding title or lease.

Density Bonus. The allocation of development rights that allow a parcel to accommodate additional square footage or residential units beyond the maximum for which the parcel is zoned, usually in exchange for the provision of affordable housing at the same site or at another location.

Density, Residential. The number of residential dwelling units per acre of land. Densities specified in the General Plan may be expressed in units per gross acre or per net developable acre.

Developable Land. Land that is suitable as a location for structures.

Down Payment. Money paid by a buyer from his own funds, as opposed to that portion of the purchase price that is financed.

Duplex. A detached building under single ownership that is designed for occupation as the residence of two families living independently of each other.

Dwelling Unit (du). A building or portion of a building containing one or more rooms, designed for or used by one family for living or sleeping purposes, and having a separate bathroom and only one kitchen or kitchenette. See Housing Unit.

Elderly Housing. Typically, small apartments or condominiums designed to meet the needs of persons 62 years of age and older or, if more than 150 units, persons 55 years of age and older, and restricted to occupancy by them.

Emergency Shelter. Temporary housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay. [*California Health and Safety Code* §50801(e)]

Extremely Low-Income Household. A household with an annual income equal to or less than 30% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD)or the California Department of Housing and Community Development.

Fair Market Rent. The rent, including utility allowances, determined by the United States Department of Housing and Urban Development (HUD) for purposes of administering the Section 8 Program.

Family. (1) Two or more persons related by birth, marriage, or adoption [U.S. Bureau of the Census]. (2) An individual or a group of persons living together who constitute a bona fide single housekeeping unit in a dwelling unit, not including a fraternity, sorority, club, or other group of persons occupying a hotel, lodging house or institution of any kind.

General Plan. A comprehensive, long-term plan mandated by State Planning Law for the physical development of a city or county and any land outside its boundaries which, in its judgment, bears relation to its planning. The plan shall include seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. The plan must include a statement of development policies and a diagram or diagrams illustrating the policies.

Goal. A general, overall, and ultimate purpose, aim, or end toward which the City will direct effort.

Green Building. Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition. (US Environmental Protection Agency)

Historic Preservation. The preservation of historically significant structures and neighborhoods until such time as, and in order to facilitate, restoration and rehabilitation of the building(s) to a former condition.

Historic Property. A historic property is a structure or site that has significant historic, architectural, or cultural value.

Household. All those persons—related or unrelated—who occupy a single housing unit. (See "Family.")

Housing and Community Development Department (HCD). The state agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of Low-and Moderate-Income households.

Housing Element. One of the seven state-mandated elements of a local general plan. It assesses the existing and projected housing needs of all economic segments of the community, identifies potential sites adequate to provide the amount and kind of housing needed, and contains adopted goals, policies, and implementation programs for the preservation, improvement, and development of housing.

Housing Payment. For ownership housing, this is defined as the mortgage payment, property taxes, insurance and utilities. For rental housing this is defined as rent and utilities.

Housing Unit. The place of permanent or customary abode of a person or family. A housing unit may be a single-family dwelling, a multi-family dwelling, a condominium, a modular home, a mobile home, a cooperative, or any other residential unit considered real property under state law.

Housing and Urban Development, U.S. Department of (HUD). A cabinet-level department of the Federal government that administers housing and community development programs.

Implementing Policies. The City's statements of its commitments to consistent actions.

Implementation. Actions, procedures, programs, or techniques that carry out policies.

Infill Development. The development of new housing or other buildings on scattered vacant lots in a built-up area or on new building parcels created by permitted lot splits.

Jobs-Housing Balance. The existing or projected ratio of employment to housing units within a geographic area.

Land Use Classification. A system for classifying and designating the allowable use of properties.

Live-Work Units. Buildings or spaces within buildings that are used jointly for commercial and residential purposes where the residential use of the space is secondary or accessory to the primary use as a place of work.

Low-Income Household. A household with an annual income usually no greater than 51%-80% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD)or the California Department of Housing and Community Development.

Low-Income Housing Tax Credits. Tax reductions provided by the Federal and state governments for investors in low-income housing.

Manufactured Housing. Residential structures that are constructed entirely in the factory, and which since June 15, 1976, have been regulated by the Federal Manufactured Home Construction and Safety Standards Act of 1974 under the administration of the U. S. Department of Housing and Urban Development (HUD). (See "Mobile Home" and "Modular Unit.")

Mixed-use. Properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design. A "single site" may include contiguous properties.

Moderate-Income Household. A household with an annual income usually no greater than 81%-120% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD) or the California Department of Housing and Community Development.

Monthly Housing Expense. Total principal, interest, taxes, and insurance paid by the borrower, or total rent and utilities paid by a tenant on a monthly basis. Used with gross income to determine affordability.

Multiple Family Building. A building designed and used exclusively as a dwelling by two or more households occupying separate suites.

Ordinance. A law or regulation set forth and adopted by a governmental authority, usually a city or county.

Overcrowded Housing Unit. A housing unit in which the members of the household or group are prevented from the enjoyment of privacy because of small room size and housing size. The U.S. Bureau of Census defines an overcrowded housing unit as one that is occupied by more than one person per room.

Parcel. A lot or tract of land.

Persons with Disabilities. Persons determined to have a physical impairment or mental disorder expected to be of long or indefinite duration. Many such impairments or disorders are of such a nature that a person's ability to live independently can be improved by appropriate housing conditions.

Planning Area. The area directly addressed by the general plan. A city's planning area typically encompasses the city limits and potentially annexable land within its sphere of influence.

Policy. A specific statement of principle or of guiding actions that implies clear commitment but is not mandatory. A general direction that a governmental agency sets to follow, in order to meet its objectives before undertaking an action program.

Poverty Level. As used by the U.S. Census, families and unrelated individuals are classified as being above or below the poverty level based on a poverty index that provides a range of income cutoffs or "poverty thresholds" varying by size of family, number of children, and age of householder. The income cutoffs are updated each year to reflect the change in the Consumer Price Index.

Program. An action, activity, or strategy carried out in response to adopted policy to achieve a specific goal or objective. Policies and programs establish the "who," "how" and "when" for carrying out the "what" and "where" of goals and objectives.

Redevelop. To demolish existing buildings; or to increase the overall floor area existing on a property; or both; irrespective of whether a change occurs in land use.

Regional. Pertaining to activities or economies at a scale greater than that of a single jurisdiction, and affecting a broad geographic area.

Regional Housing Needs Assessment. A quantification of existing and projected housing need, by household income group, for localities within a region.

Rehabilitation. The repair, preservation, and/or improvement of substandard housing.

Residential. Land designated in the General Plan and zoning ordinance for building consisting of dwelling units. May be improved, vacant, or unimproved. (See "Dwelling Unit.")

Residential Care Facility. A facility that provides 24-hour care and supervision to its residents.

Residential, Multiple Family. Two or more dwelling units on a single site, under common ownership.

Residential, Single-Family. A single dwelling unit on a building site.

Retrofit. To add materials and/or devices to an existing building or system to improve its operation, safety, or efficiency. Buildings have been retrofitted to use solar energy and to strengthen their ability to withstand earthquakes, for example.

Rezoning. An amendment to the map to effect a change in the nature, density, or intensity of uses allowed in a zoning district and/or on a designated parcel or land area.

Second Unit. A self-contained living unit, either attached to or detached from, and in addition to, the primary residential unit on a single lot. "Granny Flat" is one type of second unit.

Section 8 Rental Assistance Program. A Federal (HUD) rent-subsidy program that is one of the main sources of Federal housing assistance for low-income households. The program operates by providing housing assistance payments to owners, developers, and public housing agencies to make up the difference between the "Fair Market Rent" of a unit (set by HUD) and the household's contribution toward the rent, which is calculated at 30% of the household's adjusted gross monthly income (GMI).

Shared Living. The occupancy of a dwelling unit by persons of more than one family in order to reduce housing expenses and provide social contact, mutual support, and assistance. Shared living facilities serving six or fewer persons are permitted in all residential districts by §1566.3 of the California Health and Safety Code.

Single-family Dwelling, Attached. A dwelling unit occupied or intended for occupancy by only one household that is structurally connected with at least one other such dwelling unit. (See "Townhouse.")

Single-family Dwelling, Detached. A dwelling unit occupied or intended for occupancy by only one household that is structurally independent from any other such dwelling unit or structure intended for residential or other use. (See "Family.")

Single Room Occupancy (SRO). A single room, typically 80 to 250 square feet, with a sink and closet, but which may require the occupant to share a communal bathroom, shower, and kitchen.

Subsidize. To assist by payment of a sum of money or by the granting to terms or favors that reduces the need for monetary expenditures. Housing subsidies may take the form of mortgage interest deductions or tax credits from Federal and/or state income taxes, sale or lease at less than market value of land to be used for the construction of housing, payments to supplement a minimum affordable rent, and the like.

Substandard Housing. Residential dwellings that, because of their physical condition, do not provide safe and sanitary housing.

Supportive Housing. Housing with no limit on length of stay, that is occupied by the target population as defined in *California Health and Safety Code* §3260(d), and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. "Target population" means adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people. [*California Health and Safety Code* §50675.14(b) and §53260(d)]

Target Areas. Specifically designated sections of the community where loans and grants are made to bring about a specific outcome, such as the rehabilitation of housing affordable by very-low- and low-income households.

Tenure. A housing unit is "owned" if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. All other occupied units are classified as "rented," including units rented for cash rent and those occupied without payment of cash rent.

Townhouse. A townhouse is a dwelling unit located in a group of three (3) or more attached dwelling units with no dwelling unit located above or below another and with each dwelling unit having its own exterior entrance.

Transitional Housing. Shelter provide to the homeless for an extend period, often as long as 18 months, and generally integrated with other social services and counseling programs to assist in the transition to self-sufficiency through the acquisition of a stable income and permanent housing. (See "Emergency Shelter") Buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. [*California Health and Safety Code* §50675.2(h)]

Very-Low-Income Household. A household with an annual income usually no greater than 50% of the area median income adjusted by household size, as determined by the U.S. Department of Housing and Urban Development (HUD)or the California Department of Housing and Community Development.

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May 16, 2022

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

Dear Joe Lambert:

RE: City of Placentia's 6th Cycle (2021-2029) Adopted Housing Element

Thank you for submitting the City of Placentia's (City) housing element adopted March 15, 2022 and received for review on March 17, 2022. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The adopted housing element addresses many statutory requirements described in HCD's December 20, 2021 review; however, additional revisions are necessary to fully comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. During the housing element revision process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the

statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

HCD appreciates the efforts of the housing element update team during housing element review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Chelsea Lee, of our staff, at Chelsea.Lee@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX
CITY OF PLACENTIA

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml. Among other resources, the housing element section contains HCD's latest technical assistance tool, Building Blocks for Effective Housing Elements (Building Blocks), available at http://www.hcd.ca.gov/community-development/building-blocks/index.shtml and includes the Government Code addressing State Housing Element Law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Fair Housing Enforcement and Outreach: The element now includes information on the City's general public outreach efforts and provides some regional context on fair housing issues from the 2020 Orange County Analysis of Impediments (AI), including a quantification of fair housing testing and complaints received. The element also provides some analysis on the number of local complaints received. However, additional information is required. The element must also include information on the City's ability to provide enforcement and outreach capacity, which can consist of actions such as the City's ability to investigate complaints, obtain remedies, or the City's ability to engage in fair housing testing. Additionally, the element must also include analysis on the characteristics of local fair housing complaints and analyze data for any patterns and include additional local and regional knowledge, relevant factors, and a summary of issues. Finally, the analysis must also describe compliance with existing fair housing laws and regulations.

   Racially/Ethnically Concentrated Areas of Poverty and Affluence (RCAA): In response to HCD's prior review, the element now clarifies that there are no R/ECAPs in the City and includes regional analysis on surrounding areas of poverty and R/ECAPs near the City. However, additional information is required. Specifically, the element should address patterns of RCAAs at a neighborhood or tract level. The analysis should also include local and regional knowledge, evaluate patterns and changes over time, and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.

   Disparities in Access to Opportunity: In response to HCD's prior review, the element now includes analysis in the areas of education, environmental, transportation, and environmental factors. However, additional information is required. More specifically, the element must include information on local disparities in each of the four areas at a

neighborhood or tract level. The analysis should also include local and regional knowledge, evaluate patterns and changes over time, and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.

Integration and Segregation: In response to HCD's prior review, the element now includes analysis in the areas of disability and familial status, in addition to income. However, the element still does not include local (patterns within the City) analysis for race/ethnicity. The analysis also utilizes regional data and knowledge from the 2020 Orange County AI for race/ethnicity, disability status, and income, but must still address familial status and should be revised to include this information. In addition, the element must include information on integration and segregation in each of the four areas at a neighborhood or tract level. The analysis should also include local data and knowledge, evaluate patterns and changes over time, and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.

Disproportionate Housing Needs and Displacement Risk: In response to HCD's prior review, the element now includes data at the local and regional level on overcrowded households, substandard housing conditions, cost burdened households, and homelessness; but additional information is required. As an example, the local analysis did not address displacement risk. In addition, the element must include information on disproportionate housing needs in each of the four areas at a neighborhood or tract level. The analysis should also include local data and knowledge, evaluate patterns and changes over time, and consider other relevant factors, such as public participation, past policies, practices, and investments and demographic trends.

Sites Inventory: In response to HCD's prior review, the element now includes additional information on pages D-26 and D-27 that indicates most of the City's sites are concentrated near the Metrolink rail station and in areas identified by the TCAC/HCD opportunity maps as Low Resource or High Segregation and Poverty but provides no further analysis. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that effects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to mitigate this (e.g., anti-displacement strategies).

Goals, Priorities, Metrics, and Milestones: Goals and actions must significantly seek to overcome contributing factors to fair housing issues. The element identifies programs to encourage and promote affordable housing; however, most of these programs do not appear to facilitate any meaningful change nor address affirmatively furthering fair housing requirements. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. For example, Program 2.1 (Support Regional and Local Fair Housing Efforts) lacks firm commitments and timelines to conducting targeted outreach. As another example, Program 3.1 (Community Based Neighborhood Rehabilitation) does not describe specific place-based strategies or other initiatives the City will undertake in the planning period and

similarly lacks firm commitments and timelines for program implementation. In many other areas, programs lack a clear nexus to addressing contributing factors as identified in the analysis. The element must add, and revise programs based on a complete analysis. For more information, please see HCD's guidance at https://www.hcd.ca.gov/community-development/affh/index.shtm.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

   Extremely Low-Income (ELI) Households: In response to HCD's prior review, the element now quantifies the number of ELI households that are cost burdened by tenure. However, the element must also examine the availability of resources available to ELI households to determine gaps in housing needs. Please see HCD's prior review for additional information.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   Parcel Listing: The element generally was not revised to address this requirement. Please see HCD's prior review for additional information.

   Realistic Capacity: In response to HCD's prior review, the element now includes additional information on pages B-1 to B-3 on market trends and approved projects to support its assumptions. However, additional information is required. For example, the element still does not account for the likelihood of nonresidential development in the TOD zone in its capacity assumptions. As another example, the element cites several approved projects, but only two of those projects are for lower-income households and have wide variation in the densities achieved and units produced (65 units at 16.9 du/ac and 189 at 88.7 du/ac). Please see HCD's prior review for additional information.

   Suitability of Nonvacant Sites: In response to HCD's prior review, the element now includes revisions to Program 1.8 (Adequate Sites for Housing Development) regarding the replacement of sites with existing residential uses. However, aside from this, revisions do not otherwise address HCD's findings regarding nonvacant sites.

   In addition, as noted in the prior review, the housing element appears to rely upon nonvacant sites to accommodate more than 50 percent of the regional housing need allocation (RHNA) for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA. Based

on a review of the adoption resolution, this requirement was not addressed and any future -re-adoption must make the appropriate findings.

Please see HCD's prior review for additional information.

Availability of Infrastructure: The element now clarifies sufficient water and sewer capacity to accommodate the RHNA. However, as noted in the prior review, the element must still address requirements related to priority water and sewer service for developments with units affordable to lower-income households. Please see HCD's prior review for additional information.

Environmental Constraints: The element now describes potential environmental constraints on identified sites, but it must still address consolidation or other factors that may impact the development of sites identified for moderate and above-moderate income households. Please see HCD's prior review for additional information.

Electronic Site Inventory: As noted in the prior review, pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory and submit an electronic version of the sites inventory. While the City has submitted an electronic version of the sites inventory, if changes occur, any future re-adopted versions of the element must also submit the electronic version of the sites inventory.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

   Land-Use Controls: In response to HCD's prior review, the element now includes additional information (pages 3-6 to 3-21) on achieved densities in the TOD zone and specifies development standards for the TOD and Old Town Placentia areas. The revisions also identify parking requirements as potential constraints and includes Program 1.17 (Residential Parking Requirements) to remove parking constraints in the R-3 district. However, the element still does not analyze heights as potential constraints on housing. Depending on the outcomes of a complete analysis, the element should include programs to remove or mitigate identified constraints. Please see HCD's prior review for additional information.

   Development Plan Review (DPR): In response to HCD's prior review, the element now includes revisions on pages 3-32 to 3-35 that specify standards for DPR project approval and concludes that these standards do not constraint development but provides minimal analysis and evidence to support this finding. The element should fully analyze DPR processes and procedures as potential constraints on housing. For example, many DPR standards reference conserving property values, preserving the character of existing buildings, and neighborhood depreciation as factors of

consideration. As another example, the element notes that decisions are subject to public hearings and may be appealed by City Council. Based on the outcomes of this analysis, the element should modify Program 1.6 (Development Processing System Review) with specific commitment and timing to address identified constraints.

Fees and Exactions: In response to HCD's prior review, the element now includes minor revisions on page 3-31 regarding typical project fees and notes in its response that other types of fees, including General Plan amendments, specific plans, and zone changes are not required unless an applicant is seeking to change land use regulations. However, regardless of typical entitlements for projects, the element must list and analyze planning fees as potential constraints on development. Please see HCD's prior review for additional information.

Housing for Persons with Disabilities: In response to HCD's prior review, the element now includes additional information (pages 3-22 to 3-24) on the City's reasonable accommodation procedures and clarifies that group homes of seven or more persons are permitted in residential and commercial districts either by-right or subject to a conditional use permit (CUP) in the C-2 zone. However, the element still must analyze the City's reasonable accommodation and CUP procedures as a potential constraint on persons with disabilities. As an example, the revisions include several findings with language on "substantial adverse impact[s] on surrounding land uses, or a public nuisance…" or "minimizing adverse impacts on surrounding land uses" that should be further evaluated as potential constraints. As another example, the element notes that decisions are subject to appeal by the Planning Commission or City Council and these procedures should also be evaluated as potential constraints to persons with disabilities. The element must add or modify programs based on the outcomes of a complete analysis.

Codes and Enforcement: In response to HCD's prior review, the element now includes additional information on pages 3-30 to 3-31 that indicates violations are primarily complaint-based. However, the element must still describe the actual local amendments to the building code and include analysis as appropriate. Please see HCD's prior review for additional information.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including… …the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584… (Gov. Code, § 65583, subd. (a)(6).)*

   Approval Times: In response to HCD's prior review, the element now includes information on page 3-40 that indicates no requests were received to develop housing at lower densities than those identified in the prior planning period. However, the element did not specify the average length of time between receiving approval for housing development and submittal of application for building permits. Please see HCD's prior review for additional information.

B. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)*

   In response to HCD's prior review, the element now includes revisions to Programs 1.8 (Adequate Sites for Housing Development) and some revisions to 1.15 (Transit-Oriented Development). However, Program 1.15 still does not specify a discrete timing of completion. In addition, Programs 1.1 (Manufactured Housing and Mobile Homes), 1.2 (Locate Housing Near Transportation, Employment and Services), 1.3 (Pursue County, State, and Federal Housing Funds), 1.14 (Housing for Persons with Special Needs), 3.1 (Community Based Neighborhood Rehabilitation), 3.3 (Placentia Rehabilitation Grant Program), 4.1 (Partnerships with the Housing Industry), and 4.2 (Participation in Continuum of Care Forum) either do not include revisions or the revisions do not otherwise address HCD's findings. Please see HCD's prior review for additional information.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory... (Gov. Code, § 65583, subd. (c)(1).)*

   As noted in Finding A3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition:

   Shortfall of Sites: In response to HCD's prior review, the element now includes additional information on pages 4-6 and B-19 that indicates the acreages and densities to accommodate the shortfall for the lower-income RHNA. However, the Program does not appear to include the appropriate number of acres to accommodate the lower-income RHNA and does not address the shortfall for the above moderate-income RHNA.

3. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

   In response to HCD's prior review, the element now includes revisions to Programs 1.3 (Pursue Funding), 1.8 (Adequate Sites), and 1.14 (Housing for Persons with Special Needs) that commit the City to pursue funding annually. However, the Programs should

also specifically commit to annual outreach with developers to identify development opportunities.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

   As noted in Findings A4 and A5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected... (Gov. Code, § 65583, subd. (c)(5).)*

   As noted in Finding A1, the element must include a complete analysis of AFFH. Based on the outcome of that analysis, the element must add or modify programs. For more information, please see HCD's guidance at https://www.hcd.ca.gov/community-development/affh/index.shtml.

6. *Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households... (Gov. Code, § 65583, subd. (c)(7).)*

   While Program 1.19 (Accessory Dwelling Units (ADUs)) now commits to various actions such as updating the ordinance and utilizing an ADU toolkit, it must still commit to monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time (e.g., six months).

C. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd. (c)(8).)

HCD's prior review found the element must specify when the City made the element available to the public prior to submittal to HCD, how public outreach included diligent efforts involve all economic segments of the community in the development of the housing element, and address public comments received in response to the element. The element was not revised to address this requirement. Please see HCD's prior review for additional information.

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
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October 27, 2023

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

Dear Joe Lambert:

RE: City of Placentia's 6th Cycle (2021-2029) Revised Draft Housing Element

Thank you for submitting the City of Placentia's (City) revised draft housing element received for review on August 30, 2023, along with revisions that were received on October 19, 2023. The review was facilitated by a conversation on October 10, 2023, with the City's housing element team. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The revised draft element addresses many statutory requirements; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq). The revisions needed to comply with State Housing Element Law are as follows:

1. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services… (Gov. Code, § *65583, subd. (c)(1).)*

   Realistic Capacity: While the element provides some information regarding capacity assumptions, it must still analyze the likelihood of 100 percent nonresidential development in zones that allow 100 percent nonresidential development and account for that likelihood in residential capacity assumptions. For example, the element could examine all development in the zones allowing 100 percent non-residential development, determine how often 100 percent

nonresidential development occurs then account for the likelihood in residential capacity assumptions. Alternatively, the element could clarify that all zones or sub-zones in the Transit Oriented Development and Old Town zones do not allow 100 percent non-residential development or programs could be added to require a residential component.

Suitability of Nonvacant Sites: While the element provides some information regarding past redevelopment and lists indicators of the potential for redevelopment, it should be revised, as follows:

- *Indicators of the Potential for Redevelopment*: The element lists indicators of the potential for redevelopment but should also support the validity of these indicators. For example, the element uses a 25 percent underutilization rate and age of structure of 20 years or more. Further, the element appears to utilize redevelopment ratios for sites with existing residential; in some cases, two-to-one net gain of existing versus allowable residential units. None of these indicators are supported. The element should utilize past trends or other methods to support these indicators or adjust the indicators, including providing supporting information, to demonstrate the potential for redevelopment. Finally, these indicators should be listed in the sites inventory on a site basis.

- *Extent Existing Uses Impeded Additional Development*: The element includes some broad descriptions of existing uses and redevelopment potential but should also evaluate the extent existing uses impede additional development. For example, the element describes a large parcel with an industrial structure and paved parking but should also evaluate the use and any impediments to redevelopment or indicators that the use will likely discontinue. Examples of evaluating the use include interest from property owners or developers in residential development; lack of improvements; lack of long-term leases; recent and frequent turnover in uses; existing versus allowable uses; and age and condition of structures. This analysis may be conducted on a site-by-site basis or sub-area level like a corridor where uses are similar.

In addition, as noted in the prior review, the housing element appears to rely upon nonvacant sites to accommodate more than 50 percent of the regional housing need allocation (RHNA) for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA. Based on a

review of the adoption resolution, this requirement was not addressed and any future re-adoption must make the appropriate findings.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. While the City has submitted the electronic sites inventory, it should re-submit the inventory, including any changes, as part of future re-adoption and submittal. Please see HCD's housing element webpage at https://www.hcd.ca.gov/planning-and- community-development/housing-elements for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Programs: As noted above, the element does not contain a complete analysis of the sites inventory. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites.

2. *Promote AFFH opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

While the element provides additional analysis and identifies contributing factors to fair housing issues in Placentia, it should include significant and meaningful actions to overcome patterns of segregation and foster inclusive communities. Actions should include geographic targeting and numeric targets to demonstrate significant and meaningful actions toward more inclusive communities.

In addition, the City has distinct patterns of socio-economic characteristics. For example, some areas are predominantly higher income, higher resource with racially concentrated affluence. Other areas are lower-income and relatively lower resources with higher segregation and poverty and higher displacement risk. Further, a large portion of the RHNA is identified in one census tract. For these reasons, the element must include significant actions toward housing mobility (choices and affordability across greater geographies, including higher resource areas), place-based strategies toward community revitalization in lower-resourced areas, and programs to mitigate displacement risk. For more information on potential actions, please see HCD's AFFH Guidance Memo (starting on p. 72) at https://www.hcd.ca.gov/planning-and-community-development/affirmatively-furthering-fair-housing.

The element will meet the statutory requirements of State Housing Element Law once it has been revised and re-adopted to substantially comply with the above requirements pursuant to Government Code section 65585.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

Pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), a jurisdiction that failed to adopt a compliant housing element within one year from the statutory deadline cannot be found in compliance until rezones to make prior identified sites available and accommodate a shortfall of sites are completed pursuant to Government Code section 65583, subdivision (c)(1)(A) and Government Code section 65583.2, subdivision (c). As this year has passed and Program, HE-1.8 (Adequate Sites for Housing Development) has not been completed, the housing element will remain out of compliance until the rezoning have been completed.

Public participation in the development, adoption, and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Further, as noted in prior reviews, the City must employ a variety of methods to engage individuals, households or organizations representing lower-income and special needs households. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the dedication and work of the City's housing element team during the update and review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jadah Francisco, of our staff, at Jadah.Francisco@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

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January 26, 2024

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

Dear Joe Lambert:

RE: City of Placentia's 6th Cycle (2021-2029) Revised Draft Housing Element

Thank you for submitting the City of Placentia's (City) revised draft housing element received for review on November 28, 2023, along with revisions received on January 26, 2024. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The revised draft element addresses many statutory requirements described in HCD's October 27, 2023 review; however, revisions will be necessary to substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq), as follows:

1. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics…(Gov. Code, § 65583, subd. (c)(5).)*

   Goals, Actions, Metrics, and Milestones: While Program HE-2.6 (Affirmatively Further Fair Housing (AFFH)) now provides further detail on actions to AFFH, the element must add actions that promote housing mobility (increasing housing choices and affordability) in relatively higher opportunity, higher median income and racially concentrated areas of affluence (RCAA). For example, given the presence of a RCCA and the presence of income disparities within the community, the element must also provide a significant and robust suite of actions (not limited to meeting the regional housing needs allocation (RHNA)) to promote housing mobility and increase housing choices. Additional actions to promote housing mobility include promoting more housing choices and affordability in lower density areas, religious institutional sites, publicly-owned sites, and enhancing accessory dwelling units (ADU), junior accessory dwelling units (JADU), and home sharing strategies. Lastly, these additional actions must

have a specific commitment, timing, metrics or numeric objectives, and geographic targeting, as appropriate.

2. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory…(*Gov. Code, § *65583, subd. (c)(1).)*

   Suitability of Nonvacant Sites: While the element provides additional information on the suitability of nonvacant sites, it should provide analysis on the likelihood of redevelopment on sites with existing residential uses. While the element includes statements (p. B-22) regarding the density and incentives are sufficient to encourage redevelopment, the element should still provide supporting analysis. For example, the element should discuss how recent trends relate to identified sites and if necessary remove or add sites. The element should add or modify programs based on the outcomes of a complete analysis.

   In addition, while the element includes Program HE-1.15 (Transit Oriented Development) to monitor redevelopment and sites inventory assumptions, the Program should commit to when adjustments will occur and identifying suitable sites for redevelopment.

   Finally, as noted in the prior review, the housing element appears to rely upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA. Based on a review of the adoption resolution, this requirement was not addressed, and any future re-adoption must make the appropriate findings.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. While the City has submitted the electronic sites inventory, it should re-submit the inventory, including any changes, as part of future re-adoption and submittal. Please see HCD's housing element webpage at https://www.hcd.ca.gov/planning-and- community-development/housing-elements for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Zoning for a Variety of Housing Types (Emergency Shelters): While the element provides additional information regarding emergency shelters, the element must also describe the M zone and proximity to amenities and services.

The element will meet the statutory requirements of State Housing Element Law once it has been revised, adopted, submitted, and reviewed by HCD to comply with the above requirements pursuant to Government Code section 65585.

Pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), a jurisdiction that did not adopt a compliant housing element within one year from the statutory deadline cannot be found in compliance until rezones to make prior identified sites or accommodate a shortfall of sites (e.g., Program HE-1.8 – Adequate Sites for Housing Development) are completed pursuant to Government Code sections 65583, subdivision (c)(1)(A) and section 65583.2, subdivision (c). For example, as this year has passed and Program HE-1.8 (Adequate Sites for Housing Development) has not been completed, the housing element will remain out of compliance until the rezoning have been completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the hard work, responsiveness, and dedication the City's housing element team provided during the course of our review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jose Ayala, of our staff, at Jose.Ayala@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Placentia City Council

AGENDA REPORT

TO: CITY COUNCIL

VIA: CITY ADMINISTRATOR

FROM: DIRECTOR OF DEVELOPMENT SERVICES

DATE: FEBRUARY 6, 2024

SUBJECT: **PUBLIC HEARING REGARDING GENERAL PLAN AMENDMENT NO. GPA 2023-01, ZONE CHANGE NO. ZCA 2023-01, AND SUPPLEMENTAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION NO. EA 2023-01 EXPANDING THE CITY'S EXISTING TRANSIT-ORIENTED DEVELOPMENT (TOD) PACKING HOUSE DISTRICT ZONING AND LAND USE DESIGNATION TO INCLUDE APPROXIMATELY 11.5 ACRES LOCATED SOUTH OF CROWTHER AVENUE AND WEST OF SOUTH MELROSE STREET AND APPROXIMATELY THREE (3) ACRES ALONG CAMERON STREET SOUTH OF CROWTHER AVENUE**

FISCAL IMPACT: Potential for significant increase in annual sustainable revenue (property tax, transient occupancy tax, sales tax) and approximately $8-$10 million in one-time revenue including development impact fees. Infrastructure costs associated with TOD District will be funded by impact fees and annual assessments. No General Fund dollars will be utilized for the proposed District.

SUMMARY:

On April 4, 2017, the City Council adopted General Plan Amendment 2017-01 and Zone Change 2017-01 creating the Transit-Oriented Development (TOD) Packing House District. The impetus and centerpiece of the TOD District is the planned Metrolink station located near Melrose Street and Crowther Avenue across from Old Town Placentia. The original TOD area included approximately 28 acres and included all new development standards and public realm standards, which have resulted in three entitled and two finished mixed-use and residential developments, with brand new streetscape and infrastructure, mainly along Crowther Avenue. The TOD expansion General Plan Amendment 2023-01 and Zone Change 2023-01 will expand the TOD designation and zone by approximately 14.5 acres. On January 23, 2024, the Planning Commission unanimously recommended adoption of a Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) and approval of the General Plan Amendment (GPA) and Zone Change (ZCA).

2.b.
Feb 06, 2024

RECOMMENDATION:

It is recommended that the City Council take the following actions:

1. Open the Public Hearing concerning General Plan Amendment No. GPA 2023-01 and Zone Change No. ZCA 2023-01; and

2. Receive the Staff Report and consider all Public Testimony; and

3. Close the Public Hearing; and

4. Adopt Resolution No. R-2024-07, a Resolution of the City Council of the City of Placentia, California, adopting Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration of Environmental Impacts for GPA 2023-01 and ZCA 2023-01, prepared in full compliance with the California Environmental Quality Act ("CEQA"), California Public Resources Code §§ 21000, *et seq.*, and the Environmental Guidelines of the City of Placentia; and adopting General Plan Amendment No. GPA 2023-01 to change the current land use designation from Industrial to Transit-Oriented Development (TOD) for the approximately 14.5 acre project area; and

5. Waive full reading, by title only, and introduce for first reading Ordinance No. O-2024-01, an Ordinance of the City Council of the City of Placentia, California Approving Zone Change No. ZCA 2023-01, expanding the Transit-Oriented Development (TOD) Zone for the approximately 14.5-acre project area.

STRATEGIC PLAN STATEMENT:

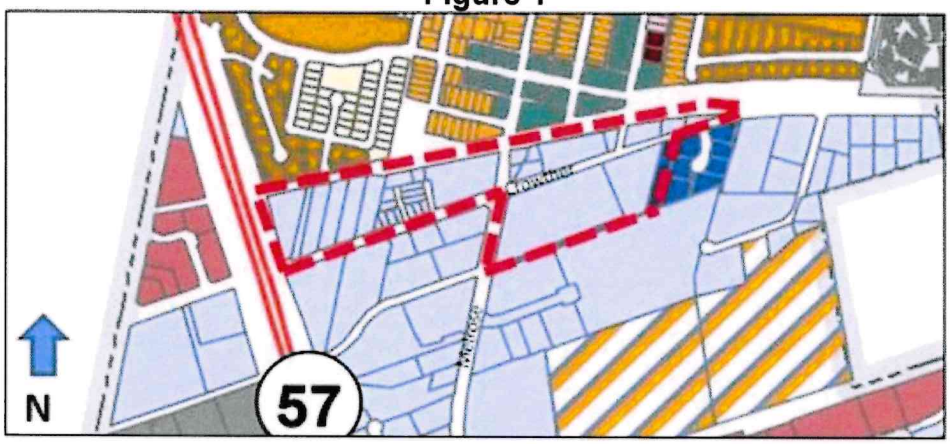
This item is consistent with the City Council approved 5-Year Strategic Goal to achieve:

Implementation of Housing Element Strategies, Objective Number 3.10. This agenda item will specifically create opportunities for the development of more housing in the City, including a mix of housing at various price points.

BACKGROUND:

The City of Placentia's sixth cycle 2021-2029 Housing Element was approved by City Council in March 2022 and is proposed to be amended minimally to achieve State certification no later than end of February 2024. The revised draft Housing Element estimates a shortfall of approximately 1,137 potential housing units compared to the new Regional Housing Needs Assessment (RHNA) requirement based on current zoning. In order to bridge the shortfall, the Housing Element identified land use strategies and potential sites that could be rezoned to meet the new RHNA requirement. As such, City Council directed staff to include the rezoning strategy of expanding the TOD zone in areas mapped in Figure 2. The TOD zoning district currently allows up to 95 units/acre, and the current boundaries are reflected below in Figure 1:

Figure 1

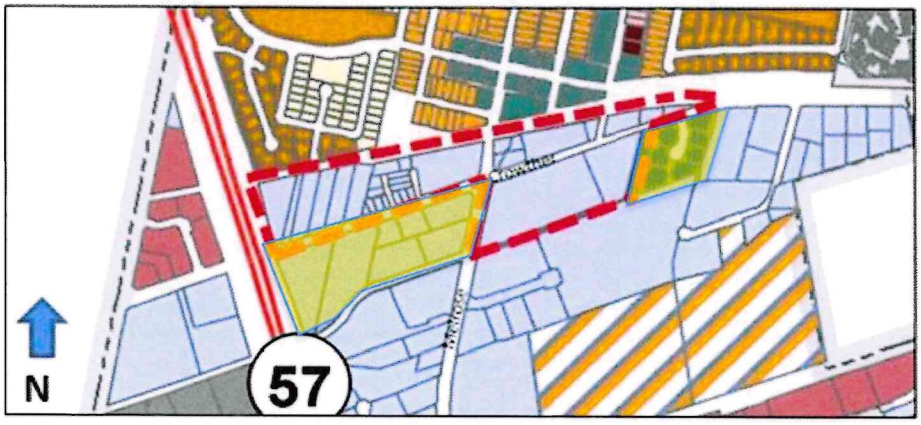


TOD Boundary

Several Housing Element Programs direct the City to expand the TOD District to meet the new RHNA requirement. Under the Housing Element Program HE-1.2: Locate Housing Near Transportation, Employment and Services, the program states that the City will encourage housing near transportation, employment, and services through Program HE-1.15: Transit-Oriented Development, and that the City will further expand opportunities for housing near high-quality public transportation by expanding the TOD zone per Program 1.8. Program HE-1.8 states that in order to ensure the availability of adequate sites to accommodate this assigned need (RHNA), the City shall identify and rezone at least 14 acres of land with allowable densities of at least 30 units/acre to accommodate the shortfall of lower-income sites compared to the RHNA allocation as identified in Appendix B (Attachment 1 - Exhibit A). Program HE-1.15 of the Housing Element further states that in order to expand housing opportunities, an amendment to the TOD zone will be processed to extend the district as described in Program 1.8 and Attachment 1A.

As such, the area encompassing Project Area, TOD zone expansion, is highlighted in yellow on the following map (Figure 2):

Figure 2



TOD Boundary

TOD Expansion Area

TOD Expansion Area

The expansion of the TOD district will require a General Plan amendment and map change, expanding the TOD land use designation, and a Zoning Code Amendment/Zone Change to expand the zoning designation and the development standards of the TOD district to the area identified in Figure 2.

The ZCA and GPA will further the direction of City Council from the March 15, 2022 City Council meeting in which the City Council adopted General Plan Amendment (GPA 2021-02) updating the Housing Element of the General Plan, which included direction to expand the TOD district and to amend the Zoning Code to be in compliance with the State housing laws. It should be noted that the Housing Element will be amended minimally to achieve State certification no later than end of February 2024 under a separate agenda item.

DISCUSSION:

The City proposes a ZCA and GPA to expand the TOD Zoning Designation and to expand the TOD Land Use designation of the General Plan Land Use Element as shown on Figure 2. This will result in the amendment to the Land Use Element (Attachment 1 – Exhibit B). The GPA will also amend the General Plan Land Use and Zoning maps to indicate the expanded TOD Land Use District as shown in Attachment 1 - Exhibit C.

General Plan Land Use Element and Land Use Map Amendment:

In accordance with Government Code Section 65350, a city may amend their respective General Plan from time to time. Such amendments shall be made pursuant to Government Code Section 65860 when making a zoning designation of properties consistent with the General Plan. As previously mentioned, to further the direction of City Council, the Project Area includes a General Plan Amendment to expand the existing TOD land use designation as mapped in Figure 2 for approximately 14.5 acres. A General Plan Amendment is also necessary to amend language to the land use element related to the expansion, related to the acreage of the expansion area. Furthermore, the zoning map will also indicate the expansion of the TOD district as reflected in Figure 2 consistent with City Council direction from March 15, 2022.

Zone Change:

Per Government Code Section 65860, a city shall bring its zoning ordinance and zoning map into consistency with its General Plan. The Project Area includes a General Plan amendment as well as a Zone Change/Zoning Map Amendment to expand the TOD land use designation for the approximately 14.5-acre project area (Attachment 2 – Exhibit A). As previously stated, the recommended General Plan amendment and Zoning actions will be consistent with the General Plan Amendment described above and will be consistent with the Housing Element Programs previously adopted by City Council.

Development Standards:

Chapter 23.111 of the Placentia Municipal Code (PMC) codifies the TOD development standards adopted by City Council in April 2017 via Ordinance No. O-2017-04. The same development standards will apply to the TOD expansion project area. In general, the standards follow current planning practice for zoning for transit-oriented development. Many of these include minimum and maximum standards, unlike many existing zoning codes. These minimum/maximum standards

help further the tenets of TOD type development and encourage developers to not "over park" their projects, but rather park their residential and commercial developments appropriately utilizing TOD examples. Some of the other highlights of the development standards include:

- Mixed-Use development (residential and non-residential uses in same building)
- Higher Density residential development (min 65 du/ac; max 95 du/ac)
- Greater height for buildings (up to 68')
- Refined list of land uses: active commercial and multi-family (commercial uses that would complement residential areas)
- Fewer parking spaces required, including a "maximum number"
- Public art and plazas encouraged
- Improved signage and "special" signage

Other City Actions Related to the TOD Zone

When the original TOD Zone and Land Use designation were created in April 2017, City Council also adopted the following documents (via Resolution R-2017-15) in order to implement the vision of the TOD District:

1. Adopted a TOD Streetscape Master Plan; and
2. Adopted TOD Packing House District and Old Town Placentia District Public Realm Design Standards.

In addition to the preceding, the following City Council actions have also contributed to the realization of the TOD District:

1. Adopted a TOD specific Development Impact Fee Program; and
2. Ensured Orange County Transportation Authority (OCTA) Bus Routes service the TOD and Old Town Placentia areas; and
3. Completed a Wayfinding Signage Program with TOD-District specific sign design.

All of the aforementioned plans and programs including TOD Development Impact Fees will apply to the TOD expansion area. However, the aforementioned programs may require further action and amendment by City Council to specifically address the properties in the expansion area. In addition, Government Code §65583.2(h) requires jurisdictions to permit owner-occupied and rental multi-family residential uses by-right for developments in which at least 20 percent of the units are affordable to lower-income households. Future development in the TOD Zone (and TOD expansion area) must comply with Government Code §65583.2(h) for any development in which at least 20 percent of the units are affordable to lower-income households. This applies to residentially zoned sites that are capable of being developed at a higher density citywide (throughout the State).

Amortization

The amortization language previously adopted in Chapter 23.111 of the PMC preserves private property rights in existence at the time of this zone change. If the Zone Change for the TOD Expansion Area is adopted, all legal uses, buildings or structures may continue to operate as a legal non-conforming use, building or structure. Additionally, for the five-year period after the zone

change is adopted, these same legal non-conforming uses may be transferred or assigned. After this five-year period has elapsed, legal non-conforming uses can continue if the business is transferred to a child or parent of the owner or to the owner's employees. After that time, the businesses may not be modified or expanded; however secondary uses are permitted to change. Due to its historic nature, the existing Packing House continues to be exempt from the amortization clause altogether.

PLANNING COMMISSION RECOMMENDATION:

On January 23, 2024, the Planning Commission conducted a public hearing concerning General Plan Amendment No. GPA 2023-01, Zone Change No. ZCA 2023-01, and Supplemental Initial Study/Mitigated Negative Declaration No. EA 2023-01. The Planning Commission concluded the public hearing and unanimously adopted Resolution PC 2024-03 recommending that City Council approve GPA No. 2023-01 and ZCA No. 2023-01 and recommending adoption of Supplemental Mitigated Negative Declaration No. EA 2023-01 for the project.

CEQA COMPLIANCE:

In accordance with the California Environmental Quality Act (CEQA) and State Environmental Guidelines, a Supplemental Initial Study/Mitigated Negative Declaration (No. EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration of Environmental Impacts was prepared for the project which concluded that no new or more severe significant environmental effects than identified in previous environmental documents would occur under the proposed project. The Supplemental Initial Study/Mitigated Negative Declaration is provided as an attachment to this report and as stated, the Planning Commission recommended that City Council adopt the Supplemental Mitigated Negative Declaration (Attachment 4).

CONCLUSION:

The proposed expansion of the TOD Packing House District will further the direction of the City Council from the March 15, 2022 meeting. At that time, the City Council adopted the earlier version of the Housing Element which included direction to expand the TOD District. Several Housing Element Programs also directly relate to the TOD District expansion to meet the new RHNA requirement. The Housing Element also requires location of housing near transportation, employment, and services. City Council also directed staff to amend the Zoning Code to be in compliance with the State housing laws.by providing opportunities for additional housing and those goals provide justification for the General Plan Amendment and related Zone Change. It also fulfills several goals of the City's Economic Development Plan, including providing more opportunities for retail sales to stay within the City, and allows for sales tax producing mixed-use development. The TOD District has proven to be an effective tool to attract and enable new development within the District while creating high-quality public and private improvements surrounding the forthcoming Metrolink Station.

Prepared by:

Joseph M. Lambert
Director of Development Services

Reviewed and approved:

Damien R. Arrula
City Administrator

Attachments:

1. Resolution No. R-2024-07
   - Exhibit A: Appendix B of the Housing Element
   - Exhibit B: Amendments to the General Plan Land Use Element
   - Exhibit C: Amended General Plan Land Use Map
2. Ordinance No. O-2024-01
   - Exhibit A: Amendment to the Official Zoning Map
3. Correspondence Received
4. Supplemental Initial Study/Mitigated Negative Declaration for the Project Area, appendices available here: https://www.placentia.org/776/Environmental-Documents

RESOLUTION NO. R-2024-07

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PLACENTIA, CALIFORNIA, ADOPTING SUPPLEMENTAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (EA 2023-01) TO A PREVIOUSLY ADOPTED INITIAL STUDY/MITIGATED NEGATIVE DECLARATION OF ENVIRONMENTAL IMPACTS FOR GPA 2023-01 AND ZCA 2023-01, PREPARED IN FULL COMPLIANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA"), CALIFORNIA PUBLIC RESOURCES CODE §§ 21000, *ET SEQ.*, AND THE ENVIRONMENTAL GUIDELINES OF THE CITY OF PLACENTIA; AND ADOPTING GENERAL PLAN AMENDMENT NO. GPA 2023-01 TO CHANGE THE CURRENT LAND USE DESIGNATION FROM INDUSTRIAL TO TRANSIT ORIENTED DEVELOPMENT (TOD) FOR THE APPROXIMATELY 14.5 ACRE PROJECT AREA

A. Recitals.

(i.) The Transit Oriented Development Institute created standards for developments that focus land uses around transit centers, and are typically characterized by a mix of residential and commercial uses, pedestrian orientation/connectivity, various transportation options, and reduced dependence on parking.

(ii.) The City Council originally adopted the City's Transit Oriented Development ("TOD") Land Use Designation and adopted TOD land use and zoning standards in April 2017.

(iii.) The City of Placentia wishes to expand the boundaries of its previously adopted Transit Oriented Development ("TOD") Land Use Designation and corresponding Zoning Designation utilizing standards that complement the future development around the Placentia Metrolink Station. Implementation of TOD standards require various City Council approvals including an amendment to the Land Use Element of the General Plan to expand the boundaries of it's previously adopted Transit Oriented Development ("TOD") Land Use Designation and amending the Official Zoning Map of the City of Placentia, utilizing previously adopted Public Realm Standards and the previously adopted Streetscape Master Plan that will provide standards for the development of public improvements in and around the TOD expansion project area, and certification of a Subsequent Mitigated Negative Declaration to ensure environmental impacts associated with the TOD expansion area are mitigated to a level that is less than significant in accordance with the with the California Environmental Quality Act ("CEQA") and the City of Placentia Environmental Guidelines as codified in Title 14 of the California Code of Regulations ("CCR") Section 15000 et. seq., Public Resources Code Section 21000 et. seq.

(iv.) In accordance with the California Environmental Quality Act (CEQA) and State and City Environmental Guidelines, a Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration of Environmental Impacts was prepared for the project which concluded that no new or more severe significant environmental effects than identified in previous environmental documents would occur under the proposed project.

(v.) The Supplemental Initial Study/Mitigated Negative Declaration were made available for thirty (30) days ("public review period") during which time the public could comment on the Supplemental IS/MND in accordance with CCR Section 15073. After completion of the public review period, the City prepared written responses to all comment letters received on the Supplemental Mitigated Negative Declaration during the public review period.

(vi.) On or about January 23, 2024, the Planning Commission of the City of Placentia held a duly noticed public hearing and unanimously recommended to the City Council approval of General Plan Amendment No. GPA 2023-01, Zone Change No. ZCA 2023-01, and recommended City Council adopt Supplemental Initial Study/Mitigated Negative Declaration No. EA 2023-01 for the entire project.

(vii.) The City of Placentia provided notice of the City Council's public hearing in accordance with California Government Code Section 65090 and the City of Placentia Municipal Code Section 23.96.030.

(viii.) All other legal prerequisites to the adoption of this resolution have occurred.

B. Resolution.

NOW, THEREFORE, the City Council of the City of Placentia does hereby find, determine and resolve as follows:

SECTION 1. In all respects, as set forth in the Recitals, Part A, of this Resolution.

SECTION 2. The City Council certifies and adopts Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration of Environmental Impacts for the "project" including the General Plan Amendment No. GPA 2023-01 and the Zone Change No. ZCA 2023-01. Said Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) is attached to the related staff report dated February 6, 2024 and by this reference incorporated as though fully set forth herein. The City Council finds that Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration brings all environmental effects of the project to a level that is less than significant in accordance with CCR Section 15070. The City Council further finds that Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration was prepared in compliance with the California Environmental Quality Act ("CEQA"), California Public

Resources Code §§ 21000, *et seq.,* the State CEQA Guidelines, California Code of Regulations, Title 14, Chapter 3, §§ 15000, *et seq.,* and the Environmental Impact Report Guidelines of the City of Placentia. The City Council also makes the following findings:

a. The Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration was made available for a 30-day public review and comment period from on or about December 22, 2023 to January 22, 2024. The Supplemental Mitigated Negative Declaration (EA 2023-01) to a previously adopted Mitigated Negative Declaration of Environmental Impacts prepared for the project concluded that no new or more severe significant environmental effects than identified in previous environmental documents would occur under the proposed project, in accordance with CCR Section 15070; and

b. Facts supporting the above-specified findings are contained in the Supplemental Mitigated Negative Declaration (EA 2023-01), the staff report and exhibits, and the information provided during the public hearing conducted with respect to the application and the Supplemental Mitigated Negative Declaration (EA 2023-01). Any Mitigation Measures from the original or Supplemental Mitigated Negative Declaration are hereby made a condition of approval of said project and are intended to mitigate and/or avoid environmental effects identified in the Supplemental Mitigated Negative Declaration (EA 2023-01).

SECTION 3. The City Council hereby approves an amendment to the City of Placentia General Plan (GPA 2023-01) including an amendment to the General Plan Land Use Map as set forth in Exhibit "C" and an amendment to the Land Use Element as set forth in Exhibit "B".

SECTION 4. The City Council hereby finds that this approval is based in whole or in part on Housing Element Program HE-1.2: Locate Housing Near Transportation, Employment and Services, the program states that the City will encourage housing near transportation, employment, and services through Program HE-1.15: Transit-Oriented Development, and that the City will further expand opportunities for housing near high-quality public transportation by expanding the TOD zone per Program 1.8. Program HE-1.8 states that in order to ensure the availability of adequate sites to accommodate this assigned need (RHNA), the City shall identify and rezone at least 14 acres of land with allowable densities of at least 30 units/acre to accommodate the shortfall of lower-income sites compared to the RHNA allocation as identified in Appendix B of the Housing Element, set forth in Exhibit "A" of this Resolution. Program HE-1.15 of the Housing Element further states that in order to expand housing opportunities, an amendment to the TOD zone and General Plan Land Use District will be processed to extend the district as described in Program 1.8 and as set forth in Exhibit "A" of this Resolution.

SECTION 5. The City Council hereby certifies and states that that the TOD Streetscape Master Plan and TOD Packing House District and Old Town Placentia District Public Realm Design Standards as adopted in Resolution R-2017-15 shall apply

to the TOD expansion project area as set forth in Exhibit "B", which further refines the Public Realm standards to provide further more-detailed direction for public right of way and streetscape improvements including street furniture, street/traffic lights, landscaping, pavement and other standards in order to provide unifying, consistent and aesthetically pleasing features of the public areas within the original TOD and TOD expansion project area. The Director of Development Services in conjunction with the Public Works Director shall have the authority to make minor amendments to the streetscape master plan when deemed necessary without City Council action and said plans may be further amended by City Council from time to time.

SECTION 6. The City Council exercises its independent judgment based on substantial evidence on the Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration, all of the information and data in the administrative record, and all oral and written testimony received, and finds that the Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration was prepared in full compliance with CEQA.

SECTION 7. The City Council finds, recognizes, and agrees that, Government Code §65583.2(h) requires jurisdictions to permit owner-occupied and rental multifamily residential uses by-right for developments in which at least 20 percent of the units are affordable to lower-income households. The City Council hereby directs City Staff to adhere to and apply all requirements related to Government Code §65583.2(h) for any development in which at least 20 percent of the units are affordable to lower-income households. This applies citywide and also specifically to properties within the original TOD Land Use District and TOD expansion project area.

SECTION 8. If any section, subsection, sentence, clause, or phrase of this resolution and/or the documents in support of this resolution is/are for any reason held to be invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this resolution.

SECTION 9. The City Clerk shall certify to the adoption of this Resolution.

PASSED, ADOPTED AND APPROVED this 6th day of February 2024.

_____
Jeremy Yamaguchi, Mayor

Attest:

_____
Robert S. McKinnell, City Clerk

STATE OF CALIFORNIA
COUNTY OF ORANGE

I, Robert S. McKinnell, City Clerk of the City of Placentia, do hereby certify that the foregoing Resolution was adopted at a regular meeting of the City Council of the City of Placentia, held on the 6th day of February 2024 by the following vote:

AYES: Councilmember:
NOES: Councilmember:
ABSENT: Councilmember:
ABSTAIN: Councilmember:

_____
Robert S. McKinnell, City Clerk

APPROVED AS TO FORM:

_____
Christian L. Bettenhausen, City Attorney

Exhibit "A"

Appendix B of the Housing Element

Exhibit "B"

Amendments to the General Plan Land Use Element

Exhibit "C"

Amended General Plan Land Use Map

EXHIBIT "A"

HOUSING ELEMENT APPENDIX B – RESIDENTIAL LAND INVENTORY, CANDIDATE SITES FOR REZONING;

Figure B-4: Candidate Sites for Rezoning

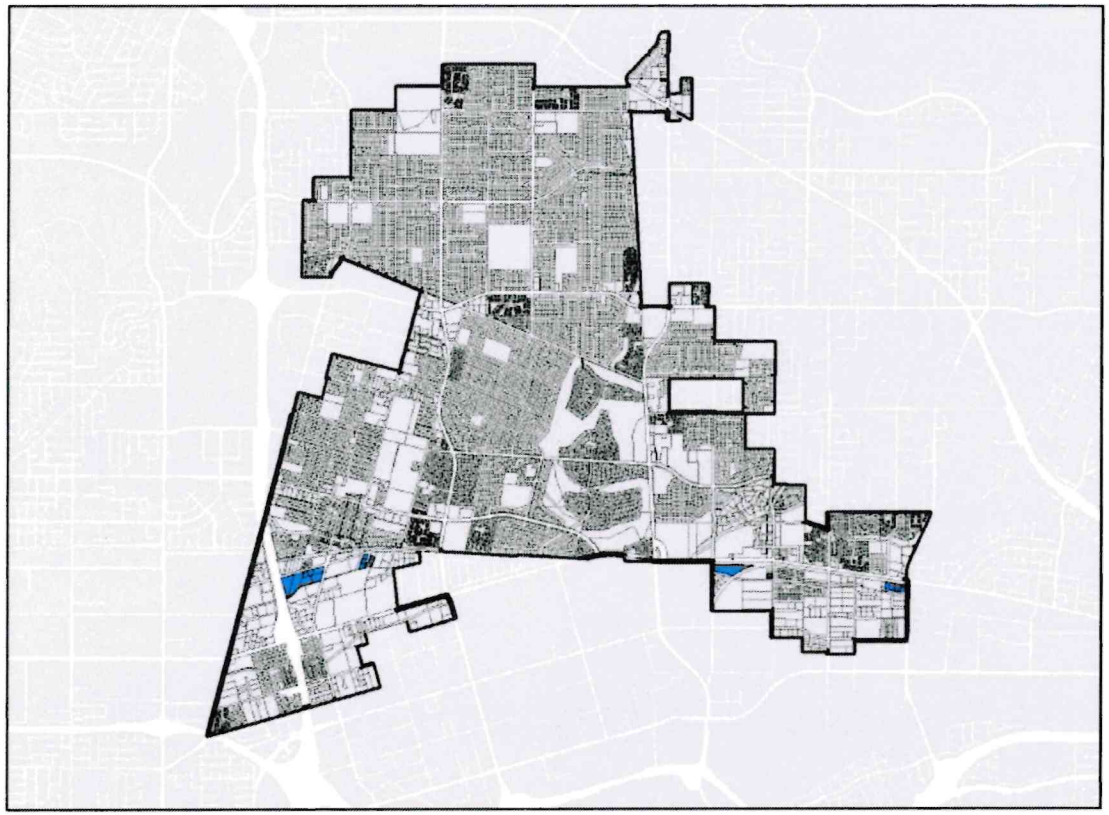


EXHIBIT "B"

GENERAL PLAN LAND USE ELEMENT AMENDMENTS EXPANDING THE EXISTING TRANSIT ORIENDTED DEVELOPMENT AREA WITHIN THE TEXT OF THE LAND USE ELEMENT;

2 Land Use

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2.1 Introduction

Rich Heritage, Bright Heritage: Our Vision in Motion.

More than any other element, the Land Use Element sets our vision in motion, as it will shape the way our community evolves over the next twenty years. We cherish our rich heritage and seek to protect the attributes that have contributed to creating a thriving community: well-maintained neighborhoods, quality schools, a diversified economy and a variety of recreational opportunities. We also embrace changes that will result in a more improved quality of life for future generations, changes that create a more sustainable and equitable environment for all stakeholders.

This Element serves as the long-range planning guide for development in the City. It determines where people live, work, shop, play and socialize; and our quality of life depends on how each of these fit together in a coherent pattern to create a sense of place that fosters health and well-being.

The Land Use Element commits Placentia to realizing its vision by achieving the following, each of which is described and accompanied by goals and policies in Section 2.7 of this Element:

- Balanced Development with Economic Growth;
- Compatible and High-Quality Development;
- Revitalization of Existing Uses and Properties;
- Protection of Natural Resources;
- Well Designed Places, Buildings and Streetscapes; and
- Provision of High-Quality Infrastructure and Services.

The Land Use Element serves as a guide to public officials, the investment community and private citizens for decisions regarding the type, intensity and general distribution of uses of land for housing, business, industry, and open space. The Element provides public officials with the framework for directing new development and providing high-quality public infrastructure and community services in a way that achieves the community vision.

The Essential Components

The essential components of the Land Use Element are the General Plan Land Use Map and the goals and policies that guide future development. While the General Plan Land Use Map is an essential component of the entire General Plan, it also provides a graphic representation of the goals and policies expressed by all the General Plan's elements. Users of this document should refer to the goals, policies and the Land Use Map when evaluating proposed development and improvements.

2.2 Authority for the Element

The State of California Government Code Section 65302 (a) requires that a General Plan include:

"A Land Use Element that designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space including

agriculture, natural resources, recreation and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, greenways and other categories for public and private uses of land. The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan. The land use element shall identify and annually review those areas covered by the plan that are subject to flooding identified by flood plain mapping prepared by the Federal Emergency Management Agency (FEMA) or the department of water resources."

2.3 Summary of Existing Land Uses

Placentia has grown into a community of approximately 50,533 residents according to the most recent 2010 US Census. The general layout and land use pattern of the City has stayed relatively consistent throughout the years. Exhibit 2-1 shows the distribution of existing land uses within the City, as of the date of this General Plan. Table 2-1, Existing Land Use Distribution, quantifies the amount of acreage devoted to each land use, as well as the existing number of dwelling units within each category. The City of Placentia, which represents the planning area for the Placentia General Plan, encompasses approximately 4,238 acres, including the area devoted to public right-of-way (ROW). The planning area also includes the 76 acres of unincorporated area within the city boundaries. See the Local Agency Formation Commission (LAFCO) Sphere of Influence map in Appendix 2-1. **It should be noted that the 76 acre unincorporated area within the city boundaries formerly known as Hamer Island was annexed into the City of Placentia in July 2022. This area is now designated as Low Density Residential on the Land Use Map.**

The City is almost entirely developed. New development occurs on the limited remaining vacant and underutilized parcels (i.e., parcels that have remaining development capacity pursuant to the Zoning Code). Vacant land within the City of Placentia encompasses 54.5 acres, or 1.3 % of the City's total acreage. Exhibit 2-2, *Vacant Parcels*, illustrates vacant lands within the City. Table 2-2, *Summary of Vacant Land,* identifies the land uses of the vacant acres. Vacant parcels are primarily located in the southeastern portion of the City within Specific Plan areas. The majority of vacant residential parcels are located in low-density residential areas.

Table 2-1. Existing Land Use Designation

Land Use Designation	Existing Acreage	Percentage [1]	Number of Units
Low Density Residential	1266	30%	6,900
Medium Density Residential	400	9%	3,676[2]
High Density Residential	136	3%	2,503

Land Use Designation	Existing Acreage	Percentage [1]	Number of Units
Commercial	137	3%	--
Planned Community (Alta Vista Golf Course)	337	8%	1,614
Old Town	29	1%*	285
Transit Oriented Development (TOD)	~~22~~ 36	1%*	633
Commercial-Manufacturing	47	1%	--
Office	32	1%*	--
Industrial	327	8%	--
Schools	212	5%	--
Park	94	2%	--
Specific Plan	309	7%	2,281
ROW- Railroad	25	1%*	--
ROW - Parkway Vista	18	1%*	--
ROW- Local streets	798	19%	--
ROW - Freeways, Flood Control, Highway	49	1%	--
TOTAL AREA OF CITY W/O ROW	**3,348**		
TOTAL AREA OF CITY	**4,238**	**100%**	**17,270**

*[1] Percentage ages based on 4,238 acres of total land area within City limits, which includes the right of way acreage. %age figures are rounded to closest whole numbers. The symbol * means that the %age is less than 1%.*

[2] 569 mobile homes are principally located in the Medium-Density district.

Table 2-2. Summary of Vacant Land by Land Use Designation

Land Use Designation	Vacant Areas	Vacant Parcels
Low Density Residential	3.6	24
Medium Density Residential	6.1	8
High Density Residential	5.2	3
Commercial	2.3	3
Old Town	0.2	3
Transit Oriented Development (TOD)	0.4	1
Office	1.4	2
Commercial-Manufacturing	8.4	5
Industrial	5.7	4
Specific Plan	21.2	65
Total	**54.5**	**118**

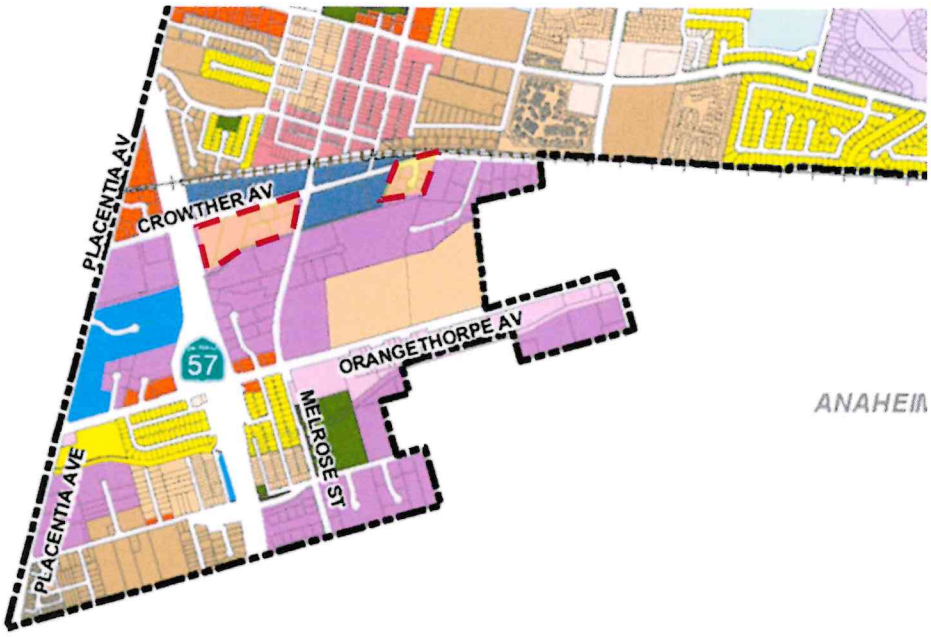
Source: City of Placentia, 2018

Note: 1.3% of total city is vacant

EXHIBIT “C”

AMENDED GENERAL PLAN LAND USE MAP

General Plan Land Use Map Amendment



LEGEND

Land Use Description

- Low Density Residential (1266 acres)
- Medium Density Residential (400 acres)
- High Density Residential (136 acres)
- Planned Community (337 acres)
- Office (32 acres)
- Commercial (137 acres)
- Commercial-Manufacturing (47 acres)
- Industrial (326 acres)
- Parks (94 acres)
- Parkway Vista (18 acres)
- Railroad (25 acres)
- Schools (212 acres)
- Specific Plan (310 acres)
- Old Town (29 acres)
- TOD (22 acres)
- Live-work (0 acres)
- Mixed-use (0 acres)
- Railroad
- City Boundary

TOD Expansion Area

ORDINANCE NO. O-2024-01

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF PLACENTIA, CALIFORNIA APPROVING ZONE CHANGE NO. ZCA 2023-01, EXPANDING THE TRANSIT ORIENTED DEVELOPMENT (TOD) ZONE FOR THE APPROXIMATELY 14.5-ACRE PROJECT AREA

City Attorney Summary

This Ordinance would approve Zone Change No. ZCA 2023-01, expanding the Transit Oriented Development (TOD) for the approximately 14.5-acre project area to include approximately 11.5 acres located south of Crowther Avenue and west of South Melrose Street and approximately three (3) acres along Cameron Street south of Crowther Avenue, resulting in an amendment to the Official Zoning Map of the City of Placentia.

A. Recitals.

(i). The Transit Oriented Development Institute created standards for developments that focus land uses around transit centers and are typically characterized by a mix of residential and commercial uses, pedestrian orientation/connectivity, various transportation options, and reduced dependence on parking.

(ii) The City Council originally adopted the City's Transit Oriented Development ("TOD") Land Use Designation and adopted TOD land use and zoning standards in April 2017.

(iii) The City of Placentia wishes to expand the boundaries of its previously adopted Transit Oriented Development ("TOD") Land Use Designation and corresponding Zoning Designation utilizing standards that complement the future development around the Placentia Metrolink Station. Implementation of TOD standards require various City Council approvals including an amendment to the Land Use Element of the General Plan to expand the boundaries of it's previously adopted Transit Oriented Development ("TOD") Land Use Designation and amending the Official Zoning Map of the City of Placentia, utilizing previously adopted Public Realm Standards and the previously adopted Streetscape Master Plan that will provide standards for the development of public improvements in and around the TOD expansion project area, and certification of a Subsequent Mitigated Negative Declaration to ensure environmental impacts associated with the TOD expansion area are mitigated to a level that is less than significant in accordance with the with the California Environmental Quality Act ("CEQA") and the City of Placentia Environmental Guidelines as codified in Title 14 of the California Code of Regulations ("CCR") Section 15000 et. seq., Public Resources Code Section 21000 et. Seq.

(iv.) In accordance with the California Environmental Quality Act (CEQA) and State and City Environmental Guidelines, a Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration of Environmental Impacts was prepared for the project which concluded that no new or more severe significant environmental effects than identified in previous environmental documents would occur under the proposed project.

(v.) The Supplemental Initial Study/Mitigated Negative Declaration were made available for thirty (30) days ("public review period") during which time the public could comment on the Supplemental IS/MND in accordance with CCR Section 15073. After completion of the public review period, the City prepared written responses to all comment letters received on the Supplemental Mitigated Negative Declaration during the public review period.

(vi.) On or about January 23, 2024, the Planning Commission of the City of Placentia held a duly noticed public hearing and unanimously recommended to the City Council approval of General Plan Amendment No. GPA 2023-01, Zone Change No. ZCA 2023-01, and recommended City Council adopt Supplemental Initial Study/Mitigated Negative Declaration No. EA 2023-01 for the entire project.

(vii.) The City of Placentia provided notice of the City Council's public hearing in accordance with California Government Code Section 65090 and the City of Placentia Municipal Code Section 23.96.030.

(viii.) All other legal prerequisites to the adoption of this Ordinance have occurred.

B. Ordinance.

NOW, THEREFORE, the City Council of the City of Placentia does hereby find, determine and ordain as follows:

SECTION 1. In all respects as set forth in the Recitals, Part A, of this Ordinance.

SECTION 2. The Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) to a previously adopted Initial Study/Mitigated Negative Declaration of Environmental Impacts for the "project" was circulated for public review and contains all contents as required in CCR Section 15071. The City has complied with the requirements of CEQA and the City of Placentia Environmental Guidelines. In adopting Resolution No. R-2024-07, the City Council certified and adopted Supplemental Initial Study/Mitigated Negative Declaration (EA 2023-01) for the for the "project" including the General Plan Amendment No. GPA 2023-01 and the Zone Change No. ZCA 2023-01 in compliance with CEQA and the City of Placentia Environmental Guidelines.

SECTION 3. The City Council hereby amends the Official Zoning Map of the City of Placentia, maintained in accordance with the provisions of § 23.08.020 of the Placentia

Municipal Code, as set forth in Exhibit "A" attached hereto and by this reference made a part hereof.

SECTION 4. The City Council hereby certifies and states that that the TOD Streetscape Master Plan and TOD Packing House District and Old Town Placentia District Public Realm Design Standards as adopted in Resolution R-2017-15 shall apply to the TOD expansion project area as set forth in Exhibit "A", which further refines the Public Realm standards to provide further more-detailed direction for public right of way and streetscape improvements including street furniture, street/traffic lights, landscaping, pavement and other standards in order to provide unifying, consistent and aesthetically pleasing features of the public areas within the original TOD and TOD expansion project area. The Director of Development Services in conjunction with the Public Works Director shall have the authority to make minor amendments to the streetscape master plan when deemed necessary without City Council action and said plans may be further amended by City Council from time to time.

SECTION 5. The City Council hereby finds that this approval is based in whole or in part on Housing Element Program HE-1.2: Locate Housing Near Transportation, Employment and Services, the program states that the City will encourage housing near transportation, employment, and services through Program HE-1.15: Transit-Oriented Development, and that the City will further expand opportunities for housing near high-quality public transportation by expanding the TOD zone per Program 1.8. Program HE-1.8 states that in order to ensure the availability of adequate sites to accommodate this assigned need (RHNA), the City shall identify and rezone at least 14 acres of land with allowable densities of at least 30 units/acre to accommodate the shortfall of lower-income sites compared to the RHNA allocation as identified in Appendix B of the Housing Element. Program HE-1.15 of the Housing Element further states that in order to expand housing opportunities, an amendment to the TOD zone and General Plan Land Use District will be processed to extend the district as described in Program 1.8 of the Housing Element.

SECTION 6. The City Council finds, in accordance with the requirements of Section 23.96.040 ("Amendments") of the Placentia Municipal Code, that the proposed amendment to the official Zoning Map will not be 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, and that it will not be injurious to property or improvements within the neighborhood or within the city. The City Council also finds that the amendment is consistent with the latest adopted General Plan.

SECTION 7. The City Council finds, recognizes, and agrees that, Government Code §65583.2(h) requires jurisdictions to permit owner-occupied and rental multifamily residential uses by-right for developments in which at least 20 percent of the units are affordable to lower-income households. The City Council hereby directs City Staff to adhere to and apply all requirements related to Government Code §65583.2(h) for any development in which at least 20 percent of the units are affordable to lower-income households. This applies citywide and also specifically to properties within the original TOD Zone and the TOD expansion project area.

SECTION 8. If any section, subsection, sentence, clause, or phrase of this ordinance and/or the documents in support of this ordinance is/are for any reason held to be invalid or unconstitutional by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this Ordinance.

SECTION 9. The Mayor shall sign and the City Clerk shall certify to the passage and adoption of this Ordinance and shall cause the same, or the summary thereof, to be published and posted pursuant to the provisions of law and this Ordinance shall take effect thirty (30) days after passage.

INTRODUCED at a regular meeting of the City Council of the City of Placentia held on February 6th, 2024.

PASSED, APPROVED AND ADOPTED this 20th day of February, 2024.

_____
Jeremy Yamaguchi, Mayor

Attest:

_____
Robert S. McKinnell, City Clerk

I, Robert S. McKinnell, City Clerk of the City of Placentia, do hereby certify that the foregoing Ordinance was introduced at a regular meeting of the City Council of the City of Placentia, held on the 6th day of February 2024, and adopted at a regular meeting of the City Council of the City of Placentia, held on the 20th day of February, 2024 by the following vote:

AYES:	Councilmembers:
NOES:	Councilmembers:
ABSENT:	Councilmembers:
ABSTAIN:	Councilmembers:

_____
Robert S. McKinnell, City Clerk

APPROVED AS TO FORM:

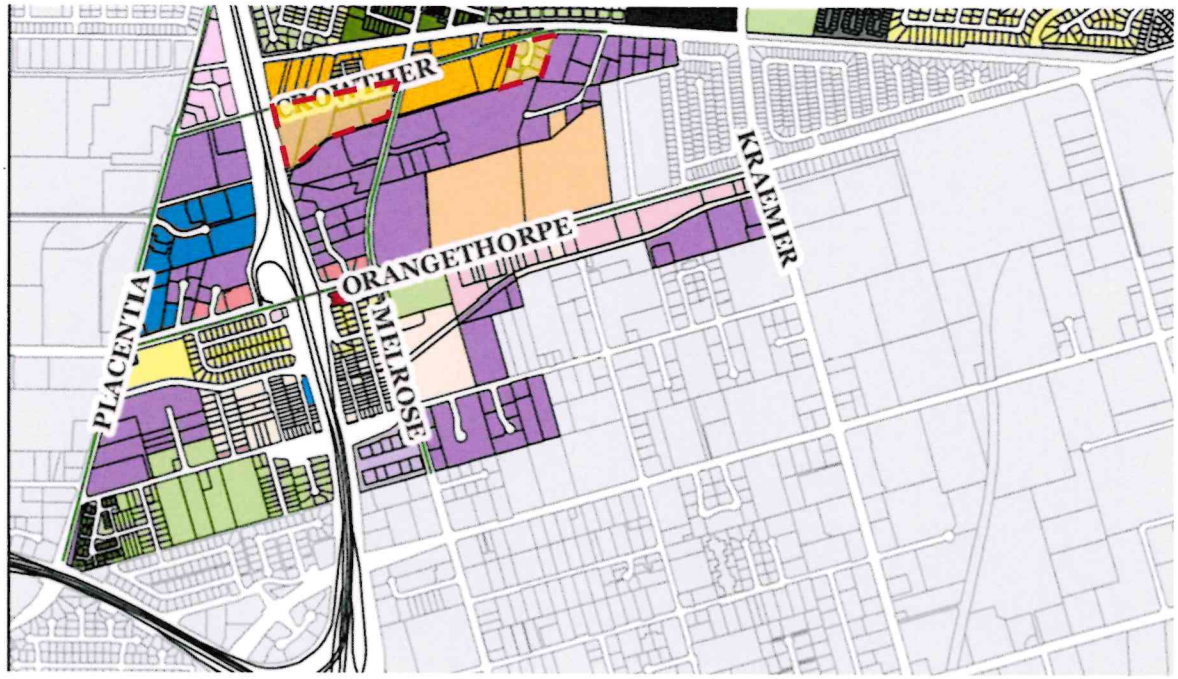
_____
Christian L. Bettenhausen, City Attorney

Exhibit “A”
AMENDMENT TO THE OFFICIAL ZONING MAP

EXHIBIT “A”

AMENDED ZONING MAP

Zoning Map Amendment



Zoning Codes

C-1	C-2	M	PUD-2	PUD-4	R-2	R-A	RPC (O)	SP-4	SP-8	Old Town
C-1 (O)	C-2-H65	M (O)	PUD-2 (O)	R-1	R-2 (MHP)	R-G	SP-1	SP-5	SP-9	TOD
C-1 (O-1)	C-M	M (PMD)	PUD-3	R-1 (MHP)	R-3	R-G (O)	SP-2	SP-6 (O)	SP-10	
	C-O	PUD-1	PUD-3 (O)	R-1 (O)	R-3 (O-1)	R-G(O) & C-1 (O)	SP-3	SP-7	T-C	

TOD Expansion Area

ISIDORE C. MYERS
JOSEPH A. ERICKSON
PROPERTIES, INC

ICM-JAE INVESTMENTS, LTD. c/o

January 17, 2024

Original Sent By Email to jlambert@placentia.org
To be distributed to the Planning Commission

Mr. Frank Perez, Chairman and Commissioners
City of Placentia Planning Commission
401 E. Chapman Avenue
Placentia, CA 92870

RE: City of Placentia GPA No. 2023-01, Zone Change No. ZCA 2023-01, and Supplemental Initial Study / Mitigated Negative Declaration No. 2023-01

Dear Chairman Perez and Commissioners,

My company owns the industrial property at 210 E. Crowther Street, Placentia (AP 339-451-13). This parcel is not included in the proposed TOD Expansion Area but is adjacent to it. There is a long-term lease encumbering the property. The lessee is Express Packaging Company, a business that manufactures corrugated boxes. This company employs approximately 57 people in good paying jobs. A number of the employees live in Placentia.

I will not be able to attend the Planning Commission Special Meeting on January 23, 2024 and will express my comments in this letter.

Express Packaging Company operates two shifts from 6:00 AM to 11:00 PM five days a week. In the manufacturing process, large machines make noise and create vibrations. Numerous trucks and forklifts load and unload cargo in the yard at all hours. At night the yard is well lit. The operation is well suited to operate within the existing General Plan and Zoning designations.

The proposed TOD Expansion Area, if approved, will create incompatible land uses as housing will be allowed directly adjacent to manufacturing uses. Conflicts will inevitably take place between new residents and people trying to make a living as they have done for many years.

Specifically, please note that I take issue with the following statements contained in the Supplemental Initial Study / Mitigated Negative Declaration No. EA 2023-01

- 5.11 "Land Use and Planning" – It is stated that there are no significant impacts. This is not true. The project will physically change an established industrial community and could cause significant operational impacts on businesses in close proximity to residential units. Newly arriving residents will voice their complaints about noise, light, and truck traffic near their housing units.

- 5.13 "Noise" – It is stated, "These businesses are assumed to operate under standard business hours". More research should take place. As stated above, Express Packaging Company operates 5 days a week between 6:00 AM and 11:00 PM. Businesses do what is necessary to compete and survive, including make noise. Other businesses in the area are open more than 5 days a week, from 8:00 AM to 5:00 PM.

- 5.14.3 "Impact Analysis" – It is stated, "it is assumed that property owners will agree to property purchases and will find alternative locations for their businesses". Does the City of Placentia really want to kick businesses out of the city ? Should local residents drive to the inland empire or other distant locations to work in manufacturing jobs that pay a decent wage ? How many Placentia business owners own the properties their businesses operate in ? I don't know the statistics in Placentia but elsewhere, most business owners lease buildings, they do not own them. Is the creation of more very high density housing (densities up to 95 units to the acre) at the expense of quality local jobs really a good idea ? I don't think so. I hope you agree.

Please do not make a recommendation to the City Council to expand the TOD Packing House District zoning and land use designation as is being proposed for the reasons stated in this letter.

Please call me at (949) 752-2100, extension 14, if you have questions regarding this matter. Thank you.

Sincerely,

Joe Erickson

JOE ERICKSON
President

AD-320.80 (475)

FINAL

SUPPLEMENTAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

PACKING HOUSE DISTRICT TRANSIT-ORIENTED DEVELOPMENT EXPANSION PROJECT

PLACENTIA, CALIFORNIA

PREVIOUS SCH #2017021012

LSA

February 2024

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TABLE

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APPENDIX

A: DRAFT SUPPLEMENTAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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LIST OF ACRONYMS AND ABBREVIATIONS

APNs	Assessor's Parcel Numbers
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
City	City of Placentia
County	County of Orange
GHG	greenhouse gas
HQTA	High Quality Transit Area
IS/MND	Initial Study/Mitigated Negative Declaration
LOS	Level of Service
NOCC+	North Orange County Collaborative
NOI	Notice of Intent
OCTA	Orange County Transportation Authority
OCTAM	Orange County Transportation Analysis Model
OPR	Governor's Office of Planning and Research
project	Packing House District Transit-Oriented Development Expansion Project
RHNA	Regional Housing Needs Assessment
ROW	Right-of-Way
SB	Senate Bill
SCAG	Southern California Association of Governments
SR-57	State Route 57
TOD	Transit-Oriented Development
TPA	Transit Priority Area
VMT	Vehicle Miles Traveled

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1.0 INTRODUCTION

This document comprises the Comments and Responses of the Final Supplemental Initial Study/ Mitigated Negative Declaration (IS/MND) for the proposed Packing House District Transit-Oriented Development Expansion Project (project) in the City of Placentia (City), County of Orange (County). The purpose of this document is to respond to all comments received by the City regarding the environmental information and analyses contained in the Supplemental IS/MND.

Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15073, a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration was sent to responsible agencies and trustee agencies in addition to various public agencies, citizen groups, and interested individuals concerned with the project. The NOI was filed with the Orange County Clerk-Recorder and the State Clearinghouse on December 22, 2023.

The Draft IS/MND was initially circulated for public review for a period of 32 days, from December 22, 2023, to January 22, 2024. Copies of the Draft IS/MND were made available for public review at the following locations:

- City of Placentia – City Hall, 401 E. Chapman Avenue, Placentia, CA 92870
- Placentia Library, 411 E. Chapman Avenue, Placentia, CA 92870
- City of Placentia website at: https://www.placentia.org/776/Environmental-Documents

Two comment letters were received during the public review period. Comments were received from State and local agencies.

The City is the Lead Agency under CEQA and is required to consider agency and public comments on the IS/MND. Although preparation of responses to comments on an IS/MND is not required under the provisions of CEQA, responses have been prepared.

Information provided in this Final Supplemental IS/MND clarifies, amplifies, or makes minor modifications to the Draft Supplemental IS/MND. No significant changes have been made to the information contained in the Draft Supplemental IS/MND as a result of the comments received on the Draft Supplemental IS/MND, and no significant new information has been added that would require recirculation of the document pursuant to *State CEQA Guidelines* Section 15088.5.

1.1 INDEX OF COMMENTS RECEIVED

The following is an indexed list of the agencies and individuals that commented on the Draft Supplemental IS/MND. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed or coded with a number as shown in Table 1.A below.

Table 1.A: Comments Received During the Public Comment Period

Comment Code	Signatory	Date
State Agencies		
S-1	California Department of Transportation (Caltrans) District 12	1/22/2024
Local Agencies		
L-1	Orange County Transportation Authority (OCTA)	1/22/2024

Source: Compiled by LSA (2024).

1.2 FORMAT OF RESPONSES TO COMMENTS

Responses to each of the indexed/coded comment letters are provided on the following pages. The comment index numbers are provided in the upper right corner of each comment letter, and individual comments within each letter are numbered along the right-hand margin of each letter. The City's responses to each comment letter immediately follow each letter and are referenced by the index numbers in the margins.

2.0 RESPONSES TO COMMENTS

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2.1 STATE AGENCIES

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DEPARTMENT OF TRANSPORTATION
DISTRICT 12
1750 EAST FOURTH STREET, SUITE 100
SANTA ANA, CA 92705
PHONE (657) 328-6000
FAX (657) 328-6522
TTY 711
www.dot.ca.gov/caltrans-near-me/district12

Comment Letter S-1

Making Conservation a California Way of Life.

January 22, 2024

Mr. Joseph Lambert
Director of Development Services
City of Placentia
401 East Chapman Avenue
Placentia, CA 92870

File: IGR/CEQA
SCH#: 2017021012
12-ORA-2023-02450
SR 57, PM 16.603
SR 91, PM 7.289

Dear Mr. Lambert,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Supplemental Mitigated Negative Declaration for the Packing House District Transit-Oriented Development Expansion Project in the City of Placentia. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment.

The project proposes the expansion of the City's existing Transit Oriented Development (TOD) Packing House District zoning and land use designation to include approximately 14.5 additional acres of land adjacent to the existing TOD Packing House District that were identified as potential housing sites in the City's 2021-2029 General Plan Housing Element Update. Regional access to the project area is provided by State Route 57 (SR 57) and State Route 91 (SR 91). Caltrans is a commenting agency for this project and upon review, we have the following comments: S-1-1

1. According to City of Placentia Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment, it appears that a Traffic Impact Analysis which includes LOS shall be required for a proposed project that meets any of the following criteria:

    a. *When either the AM or PM peak hour trip generation is expected to exceed 100 vehicle trips from the proposed development.*
    b. *Projects on the Arterial Highway System which generate 1,600 Average Daily Trips (ADT).*
    c. *Projects that will add 51 or more trips during either the AM or PM peak hours to any intersection.*
    d. *When determined by the City Transportation Manager that existing or proposed traffic conditions in the project vicinity have unique characteristics that warrant evaluation.*

S-1-2

2. Please ensure analysis considers the Orangethorpe/Placentia Mixed Use Project traffic impact on Orangethorpe Ave on/off-ramps. This development is located on the Northeast corner of Placentia Ave and Orange Ave. The document was prepared by Harris & Associates and the Transportation Study was conducted by RK Engineering. S-1-3

3. Please consider the additional AM and PM peak volumes and the impact on the delay of the surrounding intersections, including the on/off-ramps. These additional trips could impact the operation of the signal/ramp meters and the respective freeway system. S-1-4

   Please ensure that queuing and delay of these on/off-ramps is satisfactory and no mitigation is required for any Caltrans facilities.

4. Please analyze the impacts of the merging and diverging of on and off-ramps at both Orangethorpe Ave and Chapman Ave to and from the mainline SR 57. S-1-5

5. Per page 5-80, Section MM XVI-1, please consult with Caltrans District 12 Division of Transportation Planning and Local Assistance Local Development Review Branch on coordination of any necessary Traffic Mitigation Agreements. S-1-6

6. Provide a discussion on existing bus route services and future transit improvement opportunities including intercounty and regional connectivity. S-1-7

   Consider providing adequate wayfinding signage to nearby transit services within the project vicinity roadways. Connectivity of first and last mile mobility options and transit services help integrate a complete multimodal transportation network.

7. The proposed expansion of this TOD zone will bring additional development within 1-2 miles of the proposed Placentia Metrolink Station, the Cal State Fullerton campus, and the Santa Ana River Trail. Considering strategies to better integrate the expanded TOD zone with these and other important destinations through complete streets elements, such as vertically separated bicycle infrastructure (e.g., Class I and IV bicycle lanes), bicycle parking, and traffic calming mechanisms. S-1-8

   When considering enhancements for bicyclists and pedestrians, please review OCTA's 4th District Bikeways Report (https://octa.net/pdf/4thDistrictBikewaysReport.pdf) and the forthcoming Yorba Linda-Placentia Active Transportation Plan.

8. Caltrans firmly embraces racial equity, inclusion, and diversity. These values are foundational to achieving our vision of a cleaner, safer, and more accessible and more connected transportation system. Please consider including a discussion on equity in the environmental document. S-1-9

9. Establish freight pick up & drop off times that do not coincide with peak commute hours to reduce passenger vehicle conflicts and congestion for freight. Consider designating on-street freight-only parking and delivery time windows so trucks will not resort to double parking, thus causing street traffic congestion. S-1-10

10. Consider offering pick-up point services or automated parcel systems (e.g. Amazon Lockers) so that deliveries can be made with one truck stop instead of multiple stops to individual residences. S-1-11

11. Bicycle parking design may need to accommodate cargo bikes, such as for food delivery services, to encourage and facilitate the growing use of food delivery services and parcel deliveries. This can alleviate the need for delivery trucks and GHG emissions associated with them. S-1-12

    Installing bicycle parking for workers encourages active transportation, especially in areas supported by transit.

12. Any project work proposed in the vicinity of the State Right-of-Way (ROW) would require an encroachment permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans's requirements for work done within State ROW, additional documentation would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual at: http://www.dot.ca.gov/hq/traffops/developserv/permits/ S-1-13

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Joseph Jamoralin at (805) 732-8047 or Joseph.Jamoralin@dot.ca.gov S-1-14

Sincerely,

SCOTT SHELLEY
Branch Chief, Local Development Review-Climate Change-Transit Planning
District 12

2.1.1 CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) DISTRICT 12

Letter Code: S-1
Date: January 22, 2024

Response to Comment S-1-1

This comment provides introductory remarks, describes Caltrans' mission, and describes the proposed project.

The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Supplemental Draft IS/MND. No further response is required.

Response to Comment S-1-2

This comment states the criteria that would require a Traffic Impact Analysis, including Level of Service (LOS) metrics, according to the City's *Traffic Impact Analysis for Vehicle Miles Traveled and Level of Service Assessment*.

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law, which directed the Governor's Office of Planning and Research (OPR) to establish new CEQA guidance for jurisdictions that remove LOS method, which focuses on automobile vehicle delay and other similar measures of vehicular capacity or traffic congestion, from CEQA transportation analysis. Rather, vehicle miles traveled (VMT), or other measures that promote "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses," are now used as the basis for determining significant transportation impacts in the State.

As part of a January 2018 update to the *State CEQA Guidelines,* Section 15064.3 codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. As such, LOS analysis is no longer required by *State CEQA Guidelines* and has not been prepared for the proposed project. However, future development projects located within the Transit-Oriented Development (TOD) Expansion Area will be subject to the preparation of an LOS analysis as part of the City's development review process.

Response to Comment S-1-3

This comment describes a nearby development, the Orangethorpe/Placentia Mixed Use Project, and requests its consideration within the Supplemental IS/MND in relation to the proposed project's potential traffic impacts.

As noted in the Response to Comment S-1-2 above, an LOS analysis is not required and has not been prepared for the proposed project. However, in regard to the nearby Orangethorpe/Placentia Mixed Use Project, it should be noted that the City is currently planning for a comprehensive update of the fair share traffic fees that were identified in the 2017 IS/MND to ensure that they are up-to-date in light of the proposed project. The corresponding LOS analysis that will be prepared for this comprehensive update is anticipated to take into account the potential impacts of the Orangethorpe/ Placentia Mixed-Use Project and other proposed or approved development that could have potential impacts on regional traffic circulation.

Response to Comment S-1-4

This comment requests that the Supplemental IS/MND consider the proposed project's potential contribution to AM and PM peak volumes and delay of the surrounding intersections, including the on/off-ramps.

As stated above in Response to Comment S-1-3, future development of the TOD Expansion Area enabled by the proposed project is subject to the same traffic-related fair share fees as established for the Original TOD Area in Mitigation Measure XVI-1 of the 2017 IS/MND. Mitigation Measure XVI-1 identifies relevant intersections, which includes the State Route 57 (SR-57) northbound ramps at Orangethorpe Avenue. As previously discussed, the City is planning an update to these fair share fees, which may include a re-evaluation of relevant intersections and on-/off-ramps. Therefore, the proposed project's potential contribution to AM and PM peak volumes and/or delay of surrounding intersections would be addressed through compliance with the traffic-related fair share fees set forth in Mitigation Measure XVI-1.

Response to Comment S-1-5

This comment requests that the Supplemental IS/MND contain an analysis of the merging and diverging of on- and off-ramps at Orangethorpe Avenue and Chapman Avenue to and from the SR-57 mainline.

As stated above in Response to Comment S-1-4, future development of the TOD Expansion Area enabled by the proposed project is subject to the same traffic-related fair share fees as established for the Original TOD Area in Mitigation Measure XVI-1 of the 2017 IS/MND. Mitigation Measure XVI-1 identifies relevant intersections, which includes the SR-57 northbound ramps at Orangethorpe Avenue. As previously discussed, the City is planning an update to these fair share fees, which may include a re-evaluation of relevant intersections and on-/off-ramps. Therefore, the proposed project's potential effects to merging and diverging through nearby on-/off-ramps would be addressed through compliance with the traffic-related fair share fees set forth in Mitigation Measure XVI-1.

Response to Comment S-1-6

This comment requests that the City consult with Caltrans District 12 Division of Transportation Planning and Local Assistance Local Development Review Branch to coordinate regarding potential Traffic Mitigation Agreements.

The City acknowledges this comment and will consult with Caltrans District 12 if such consultation is determined by City staff to be necessary.

Response to Comment S-1-7

This comment requests that the Supplemental IS/MND contain a discussion of existing bus route services and future transit improvement opportunities, and recommends providing signage pointing to nearby transit services near the project site. The comment also states that connectivity of first and last mile mobility options and transit services help integrate a complete multimodal transportation network.

Although the specific timing of the planned Metrolink station opening is not yet known, the Draft Supplemental IS/MND discusses the following objectives related to the goal of encouraging use of public transit by:

- Encouraging mixed-use and transit-oriented development; and
- Encouraging people to walk, ride a bicycle, or use transit.

Therefore, the proposed project aims to encourage uses of local transit, with a focus on the planned Metrolink station.

Response to Comment S-1-8

This comment states that the proposed project would bring additional development within 1–2 miles of the proposed Placentia Metrolink Station, the California State University, Fullerton campus, and the Santa Ana River Trail. The comment requests that the City consider strategies to integrate the proposed project with these and other important destinations through complete streets elements, and provides examples. The comment also provides Orange County Transportation Authority's (OCTA) 4th District Bikeways Report and the Yorba Linda-Placentia Active Transportation Plan as a resource regarding bicycle and pedestrian enhancements.

According to Section 23.111.080 of the Development Standards prepared for the TOD Packing House District, all proposed development projects under the TOD designation would be required to install public infrastructure and streetscape elements up to the curb face of the public street immediately adjacent to the project, in accordance with the adopted Public Realm Development Standards and Streetscape Master Plan. These improvements would be required in addition to the aforementioned TOD Development Impact Fees, and would benefit pedestrian and bicyclist uses.

Further, several of the objectives discussed in Section 23.111.010 of the Development Standards pertain to pedestrians and bicyclists, as listed below:

- Encourage people to walk, ride a bicycle, or use transit;
- Encourage an active, pedestrian oriented streetscape with outdoor dining and other amenities;
- Achieve a compact pattern of development that is more conducive to walking and bicycling; and
- Provide a high level of amenities that create a comfortable environment for pedestrians, bicyclists, and other users.

All future proposed development projects under the TOD designation would be designed in a consistent manner with these objectives and would therefore ensure that elements encouraging connectivity, pedestrian and bicyclist activity, and complete streets are incorporated into future development within the Original TOD Area and TOD Expansion Area. The City will consider updating its General Plan Circulation Element to incorporate additional elements related to complete streets, particularly within the Original TOD Area and TOD Expansion Area at some point in the future.

Response to Comment S-1-9

This comment states the importance of equity to Caltrans and requests that the Supplemental IS/MND include a discussion of equity.

Pursuant to *State CEQA Guidelines* Section 15131, a CEQA environmental document is not required to analyze economic or social effects, unless those social or economic effects would result in a physical impact on the environment. Because equity considerations of the proposed project would not result in physical impacts, the City is not required to include a discussion of equity in the Supplemental IS/MND.

Response to Comment S-1-10

This comment requests that the City establish freight pick up/drop off times that do not coincide with peak commute hours to reduce passenger vehicle conflicts and congestion. The comment also requests that the City consider designating on-street freight-only parking and delivery time windows to avoid congestion.

The City will consider this recommendation at the time future development is proposed within the TOD Expansion Area. No further response is required.

Response to Comment S-1-11

This comment requests that the City consider offering pick-up point services or automated parcel systems to reduce the number of stops made by delivery trucks.

The City will consider this recommendation at the time future development is proposed within the TOD Expansion Area. No further response is required.

Response to Comment S-1-12

This comment suggests that future bicycle parking design accommodate cargo bikes, such as for food delivery services or parcel delivery, to encourage active transportation and reduce the need for delivery trucks and associated greenhouse gas emissions.

According to Section 23.111.040 of the Development Standards prepared for the TOD Packing House District, both residential and non-residential uses are required to maintain a specific ratio of short- and long-term bicycle parking. While short-term bicycle parking is defined as a fixture to which one or more bicycles can be securely locked, long-term bicycle parking is defined as a larger space, generally inside a building, where multiple bicycles can be stored. Long-term bicycle storage options typically take the form of a large cage capable of storing bicycles of ranging size. Therefore, bicycle parking requirements as currently set forth in the TOD Packing House District would be able to accommodate cargo bicycles.

Response to Comment S-1-13

This comment states that any construction associated with future development within the project site that overlaps with State Right-of-Way (ROW) would require an encroachment permit and the

resolution of all environmental concerns. The comment states that additional documentation would be required in the case that the environmental documentation for the proposed project does not meet Caltrans' requirements for work done within State ROW. The comment requests coordination with Caltrans to meet the requirements and provides Caltrans' Encroachment Permits Manual as a reference.

The City acknowledges this comment and will coordinate with Caltrans to ensure that any construction associated with future TOD Expansion Area build out occurring within State ROW would obtain an encroachment permit and would not raise any environmental concerns.

Response to Comment S-1-14

This comment provides concluding remarks.

The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Supplemental Draft IS/MND. No further response is required.

2.2 LOCAL AGENCIES

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Comment Letter L-1

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

January 22, 2024

Mr. Joseph Lambert
City of Placentia, Planning Division
401 E. Chapman Avenue
Placentia, CA 92870

Via email: jlambert@placentia.org

Subject: Supplemental Initial Study/Mitigated Negative Declaration (IS/MND) for the Packing House District Expansion Project

Dear Mr. Lambert:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Supplemental Initial Study/Mitigated Negative Declaration (IS/MND) for the Packing House District Expansion Project. The following comments are provided for your consideration: L-1-1

- Based on recent discussions with BNSF railway, there are uncertainties with the disposition of the future development of a station within the Project site. We recommend the City of Placentia (City) engages OCTA on the assumptions of the station. L-1-2
- In reference to Attachment D in the IS/MND, NOCC+ VMT Screening Tool Result (page 228 of the IS/MND PDF) and Appendix C, the Trip Generation and VMT Analysis (page 13-14 of the Appendix C PDF), the project is assumed to be in a Transit Priority Area (TPA). A TPA is defined as the half mile area around an existing transit stop along a High-Quality Transit Corridor (HQTC), per the Southern California Association of Governments (SCAG). Currently, OCTA does not operate bus frequency with intervals of 15 minutes or less within a half-mile of the project area. Therefore, the project site would not be considered a HQTC as defined by SCAG. L-1-3

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net. L-1-4

Sincerely,

Dan Phu
Manager, Environmental Programs

DP:tc

2.2.1 ORANGE COUNTY TRANSPORTATION AUTHORITY (OCTA)

Letter Code: L-1
Date: January 22, 2024

Response to Comment L-1-1

This comment provides introductory remarks.

The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft Supplemental Initial Study/Mitigated Negative Declaration (IS/MND). No further response is required.

Response to Comment L-1-2

This comment notes that uncertainties exist surrounding the proposed Metrolink station and recommends that the City discuss assumptions regarding the station with OCTA.

The City of Placentia (City) has already engaged with OCTA and Metrolink leadership directly and has confirmed assumptions presented in the Draft Supplemental IS/MND regarding the planned Metrolink station. Further, the assumptions regarding the planned Metrolink station presented in the Draft Supplemental IS/MND are consistent with those utilized by the Southern California Association of Governments (SCAG) in its methodology for determining the City's Regional Housing Needs Assessment (RHNA) in its *6th Cycle Final RHNA Allocation Plan*.

According to the "High Quality Transit Areas (HQTAs; 2045; Final Connect SoCal Plan Data)" figure in SCAG's *Final RHNA Methodology Data Appendix,* portions of the City—including the Transit-Oriented Development (TOD) Expansion Area—are considered HQTAs. As shown in the High Quality Transit Areas figure, the map of HQTAs is based on the planned 2045 regional transit network that was incorporated within the Connect SoCal Plan and input from the various County transportation commissions within the SCAG region. Therefore, SCAG considers the TOD Expansion Area a High Quality Transit Area (HQTA) for the purpose of determining the City's RHNA allocation due to the site's proximity to the planned Metrolink station. According to SCAG's *Final RHNA Allocation Methodology*, 50 percent of the regional existing housing need was distributed based on a jurisdiction's share of the regional residential population within HQTAs. This generally means that jurisdictions that contain HQTAs were allocated more housing units relative to those that do not. For the 6th Cycle Planning Period, SCAG allocated 4,374 housing units to the City of Placentia. In comparison, Brea, a neighboring city similar in population and almost twice as large, has an allocation of 2,365 housing units. The City of Placentia's relatively high RHNA allocation is therefore tied to the same assumptions regarding the planned Metrolink station as the Draft Supplemental IS/MND, and the analysis remains valid.

Response to Comment L-1-3

This comment notes that the Trip Generation and Vehicle Miles Traveled (VMT) Analysis prepared for the proposed project assumed that the proposed project is located within a Transit Priority Area (TPA) and defines the term according to SCAG. The comment states that because OCTA does not operate high-quality transit within a half-mile of the TOD Expansion Area per the SCAG definition, the TOD Expansion Area does not meet the qualifications of a TPA.

The City's Traffic Impact Analysis Guidelines (January 2021) state that the North Orange County Collaborative (NOCC+) VMT Traffic Study Screening Tool can be used to identify whether a project satisfies the components of screening from project-level VMT analysis, including screenings based on location within a TPA, location within a Low VMT Area, or a generation of 110 daily trips or less. The NOCC+ tool was utilized to screen the proposed project and automatically determined that the TOD Expansion Area is located within a TPA based on its underlying Assessor's Parcel Numbers (APNs). As shown in Attachment D of Appendix C, Trip Generation and VMT Analysis, that was prepared for the proposed project, the TOD Expansion Area is located within an area of planned 2045 transit service within the SCAG region, which qualifies it under NOCC+ criteria as being located within a TPA. Also shown in Appendix C's Attachment D is that the proposed project's VMT per service population (22.8) is lower than the existing VMT per service population (29.2) as well as the Governor's Office of Planning and Research (OPR) threshold of 24.8 and the greenhouse gas (GHG) reduction target threshold of 25.1. Therefore, the proposed project would result in a lower VMT per service population (residents and employees) than existing conditions. According to the City's Traffic Impact Analysis Guidelines, mixed-use projects may qualify to be screened out through the Low VMT Area screening if they are expected to generate VMT per resident, VMT per worker, or VMT per service population that is similar to the existing land uses in the Low VMT Area. Because future development within the TOD Expansion Area enabled by the proposed project could include mixed-use aspects and would result in a lower VMT per service population than existing conditions, it may qualify for the Low VMT Area screening from VMT analysis.

Further, this comment misquotes SCAG's definition of a TPA. Chapter 3 of SCAG's 2020-2045 *Connect SoCal* (September 2020) document reads:

> Transit Priority Areas (TPAs) are Priority Growth Areas that are within one half mile of existing **or planned** 'major' transit stops in the region. A 'major' transit stop is defined as a site containing an existing or **planned rail** or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. TPAs are where TOD can be realized – where people can live, work and play in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives.

The SCAG definition of a TPA would indeed apply to the proposed project as the TOD Expansion Area is not only located within one half mile of the planned Metrolink station but it also aims to provide the type of compact, transit-oriented community described in the excerpt above. Therefore, the project site is considered to be within a TPA, regardless of the OCTA bus service frequency within one half mile of the project site.

Therefore, based on the SCAG and NOCC+ tool's definitions of a TPA, the proposed project would qualify to be screened out from additional VMT analysis based on its location within a TPA, and a project-level VMT analysis is not required by applicable regulations. This is also consistent with the project site's consideration as a High Quality Transit Area (HQTA) by SCAG as discussed in Response to Comment L-1-2 above.

Despite not being required based on the information presented above, a VMT analysis was conducted on January **[X]**, 2024, using OCTAM (Orange County Transportation Model) modeling. **[To be updated with modeling results]**

Response to Comment L-1-4

This comment provides concluding remarks.

The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft Supplemental IS/MND. No further response is required.

APPENDIX A

DRAFT SUPPLEMENTAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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DRAFT

SUPPLEMENTAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

PACKING HOUSE DISTRICT TRANSIT-ORIENTED DEVELOPMENT EXPANSION PROJECT

PLACENTIA, CALIFORNIA

LSA

December 2023

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DRAFT

SUPPLEMENTAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

PACKING HOUSE DISTRICT TRANSIT-ORIENTED DEVELOPMENT EXPANSION PROJECT PLACENTIA, CALIFORNIA

PREVIOUS SCH #2017021012

Submitted to:

City of Placentia
Development Services
401 East Chapman Avenue
Placentia, California 92870

Prepared by:

LSA
3210 El Camino Real, Suite 100
Irvine, California 92602

Project No. 20230923

LSA

December 2023

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LIST OF ABBREVIATIONS AND ACRONYMS

2017 IS/MND	*Initial Study for the General Plan Amendment (GPA) 2017-01 and Zone Change (ZC) to Establish the Packing House District Transit-Oriented Development Project*
2021 Addendum	Addendum to the 2017 IS/MND adopted in 2021
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADT	average daily trips
APN	Assessor's Parcel Numbers
AQMP	Air Quality Management Plan
BACMs	best available control measures
Basin	South Coast Air Basin
Basin Plans	Water Quality Control Plans
BMP	best management practice
BNSF	Burlington Northern Santa Fe
BTU	British Thermal Units
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERT	Community Emergency Response Team
CGP	Construction General Permit
CGS	California Department of Conservation, Geological Survey
CH_4	methane

City	City of Placentia
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalents
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
DOC	California Department of Conservation
DTSC	California Department of Toxic Substances Control
EDR	Environmental Data Resources
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
EO	Executive Order
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	greenhouse gas
GPA	General Plan Amendment
GWh	gigawatt hours
GWP	Global Warming Potential
HFCs	hydrofluorocarbons
HPLV	High Pressure Low Volume
IPaC	U.S. Fish and Wildlife Service Information for Planning and Consultation
IS/MND	Initial Study/Mitigated Negative Declaration
kWh	kilowatt-hours
LCFS	Low Carbon Fuel Standard
L_{eq}	equivalent continuous sound level
LOS	level of service
LRA	Local Responsibility Area
LST	localized significance threshold
MLD	Most Likely Descendant

MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
mpg	miles per gallon
mph	miles per hour
MRF	Materials Recovery Facility
MRZ	Aggregate and Mineral Resource Zones
MS4	municipal separate storm sewer systems
MT	metric tons
MUTCD	California Manual of Uniform Traffic Control Devices
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Committee
NOCC	North Orange County Cities
NOD	Notice of Determination
NOI	Notice of Intent
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OC San	Orange County Sanitation District
OCTA	Orange County Transportation Authority
Original TOD Area	existing Packing House District Transit-Oriented Development
Pb	lead
PFCs	perfluorocarbons
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
PRC	Public Resources Code
PRD	Permit Registration Document
proposed project	Packing House District Transit-Oriented Development Expansion Project
PYLUSD	Placentia-Yorba Linda Unified School District
REC	Recognized Environmental Condition
RHNA	Regional Housing Needs Assessment

RMS	Root Mean Square
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SARWQCB	Santa Ana Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCRRA	Southern California Regional Rail Authority
SF_6	sulfur hexafluoride
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act of 1974
SMARTs	Stormwater Multiple Application and Report Tracking System
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SR-57	State Route 57
SR-90	State Route 90
SR-91	State Route 91
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAPS	Transportation Assembly Points
TIA	Traffic Impact Analysis
TCR	tribal cultural resources
TMDL	Total Maximum Daily Load
TOD	Transit-Oriented Development
TPA	Transit Priority Area
TPD	tons per day
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
UWMP	Urban Water Management Plan

VdB	vibration velocity decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOCs	volatile organic compounds
vph	vehicles per hour
Waters of the U.S.	Waters of the United States
WDR	Waste Discharge Requirements
WQMP	Water Quality Management Plan
ZC	Zone Change

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1.0 INTRODUCTION

1.1 OVERVIEW

This Initial Study has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) and assesses the potential environmental impacts of implementing the Packing House District Transit-Oriented Development Expansion Project (proposed project) described below. The Initial Study consists of a completed environmental checklist and an explanation of the environmental topics addressed in the checklist.

Because the proposed project would expand the existing Packing House District Transit-Oriented Development (TOD) zone classification and land use designation (Original TOD Area), this Initial Study builds upon the analysis provided in the *Initial Study for the General Plan Amendment (GPA) 2017-01 and Zone Change (ZC) to Establish the Packing House District Transit-Oriented Development Project* (2017 IS/MND), which evaluated the establishment of the Original TOD Area. An Addendum to the 2017 IS/MND was adopted in 2021 (2021 Addendum), which environmentally cleared a residential development within the Original TOD Area located at 207-209 West Crowther Avenue. The subject of this Supplemental Initial Study/Mitigated Negative Declaration (IS/MND) will cover the proposed project, which involves the expansion of the Original TOD Area as it was established in the 2017 IS/MND and upheld in the 2021 Addendum.

The City of Placentia's (City) decision to expand the TOD designation area constitutes a "project" under CEQA and requires a discretionary action by the City. The City is both the project proponent and the Lead Agency for review of the proposed project under CEQA. Pursuant to the requirements of CEQA, the City must evaluate the potential for the proposed project to create adverse environmental effects. This Supplemental IS/MND has been prepared for the proposed project pursuant to the rules for supplemental environmental review under Public Resources Code (PRC) Section 21166 and *State CEQA Guidelines* Section 15163. This Initial Study analyzes whether proposed expansion of the Packing House District Transit-Oriented Development Project, referred to in this IS/MND as the Packing House District Transit-Oriented Development Expansion Project, would result in any new or substantially more severe significant environmental impacts than those analyzed in the prior CEQA documents or whether any of the other standards requiring further environmental review under CEQA are met.

1.2 PUBLIC REVIEW

Publication of this Supplemental IS/MND marks the beginning of a 32-day public review and comment period. During this period, the Supplemental IS/MND will be available to local, State, and federal agencies and to interested organizations and individuals for review. The 32-day review period begins on December 22, 2023, and ends on January 22, 2024. Written comments concerning the environmental review contained in this Supplemental IS/MND during the 30-day public review period should be sent via email to Joe Lambert, Director of Development Services, at jlambert@placentia.org or via regular mail to:

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

The Supplemental IS/MND can be reviewed and downloaded online on the City of Placentia's website (https://www.placentia.org/776/Environmental-Documents). A hardcopy version of the Draft Supplemental IS/MND is also available for review at the following locations:

City of Placentia
401 East Chapman Avenue
Placentia, CA 92870

Placentia Library
411 East Chapman Avenue
Placentia, CA 92870

Following the conclusion of the public review period, the City of Placentia will consider adoption of the Supplemental IS/MND for the proposed project together with any comments received during the public review process.

2.0 PROJECT INFORMATION

1. **Project Title:**
   Packing House District Transit-Oriented Development Expansion Project

2. **Lead Agency Name and Address:**
   City of Placentia
   Development Services Department
   401 East Chapman Avenue
   Placentia, CA 92870

3. **Contact Person:**
   Joe Lambert, Director of Development Services
   jlambert@placentia.org

4. **Project Location:**
   The Packing House District Transit-Oriented Development (TOD) Expansion Project (proposed project) would consist of approximately 14.5 acres adjacent to the existing Packing House District Transit-Oriented Development zone classification and land use designation (Original TOD Area) along Crowther Avenue in the City of Placentia, Orange County, California. Figure 3-1, provided in Chapter 3.0, shows the regional location of the proposed TOD Expansion Area.

5. **Project Sponsor's Name and Address:**
   City of Placentia
   Development Services Department
   401 East Chapman Avenue
   Placentia, CA 92870

6. **General Plan Designation: City of Placentia**
   Industrial (I)

7. **Zoning: City of Placentia**
   Manufacturing District (M)
   Combining Planned Manufacturing District (M-PMD)

8. **Description of Project:**
   The City of Placentia proposes to expand the existing Packing House District Transit-Oriented Development zone classification (City Case No. ZCA 2023-01) and land use designation (City Case No. GPA 2023-01) to encompass an additional 14.5 acres, which would allow for the development of up to 1,378 new residential units based on an allowable density of up to 95 units per acre. A full Project Description is provided in Chapter 3.0.

9. Surrounding Land Uses and Setting:

The TOD Expansion Area is located within an urban area that is developed with a mix of industrial, commercial, and residential land uses. A more detailed description of the TOD Expansion Area and existing site conditions is provided in Chapter 3.0.

10. Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):

- City of Placentia

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource 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.?**

On November 21, 2023, a Native American Heritage Committee (NAHC) Sacred Lands File (SLF) search was initiated in order to determine recipients of Senate Bill (SB) 18 outreach letters through a tribal contact notification list from the NAHC. A response was received on December 13, 2023, from Andrew Green stating that A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the project and that results were negative. A list of sixteen tribes and their contact information was also provided with the NAHC's response. These tribes were contacted pursuant to the requirements of SB 18.

On November 22, 2023, the City sent Assembly Bill (AB) 52 outreach letters to the three tribes traditionally and culturally affiliated with the City. The letters, sent via certified mail to the tribal contacts, described the project, provided maps of the TOD Expansion Area, and invited the tribes to request consultation should they have any concerns. The City followed up with the three tribes two weeks after the initial letters were sent out to confirm receipt of the AB 52 outreach letters and to inquire about any measures that could be included in this Draft Supplemental IS/MND to ensure Tribal Cultural Resources. A representative with the Gabrieleno Band of Mission Indians - Kizh Nation responded on December 6, 2023, to inform the City that the tribe approved of including tribal mitigation measures that were incorporated for the Approved Project and another previous City development project located at 777 W. Orangethorpe Avenue.

Per AB 52/SB 18 requirements, the notification period from the tribes contacted is currently ongoing. However, the City will continue to follow up with notified tribes in order to ensure any concerns or comments are captured within the tribal consultation process for the proposed project. Please refer to Section 5.18, Tribal Cultural Resources, of this Draft Supplemental IS/MND for more information regarding tribal consultation efforts conducted in association with the proposed project.

3.0 PROJECT DESCRIPTION

The following describes the proposed Packing House District Transit-Oriented Development (TOD) Expansion Project (proposed project) that would expand the Original TOD Area to encompass an additional 14.5 acres of land (TOD Expansion Area) along Crowther Avenue in Placentia, California, to allow for the development of up to 1,378 new residential units within the TOD zoning district based on an allowable density of up to 95 units per acre. The City of Placentia is both the project proponent and the Lead Agency for review of the proposed project under CEQA.

3.1 PROJECT INTRODUCTION

In 2017, the City of Placentia (City) prepared and adopted an Initial Study/Mitigated Negative Declaration (IS/MND) (2017 IS/MND; State Clearinghouse No. 2017021012) to analyze the environmental effects of creating a Packing House District Transit-Oriented Development (TOD) zone classification (Zoning Code, [ZC] 2017-01), land use designation (General Plan Amendment [GPA] 2017-01), and set of Development Standards within the City's Packing House District. The objective of establishing the Original TOD Area was to facilitate high-density transit-oriented projects in the immediate vicinity of the City's proposed Metrolink station site, thereby encouraging use of the Metrolink system and redevelopment of the area surrounding the proposed station. The TOD Development Standards in the 2017 IS/MND specified a maximum residential density of 95 units per acre with a 65 unit per acre minimum within the Original TOD Area.

The adopted 2017 IS/MND analyzed the creation of the Original TOD Area and land use designation (Approved Project) within an approximate 28.2-acre area in the southwestern portion of the City. This area is hereinafter referred to as the Original TOD Area throughout this Supplemental IS/MND.

On March 15, 2022, the City of Placentia adopted and updated Housing Element to ensure that the City's policies and programs can accommodate the estimated housing growth needs identified in the Southern California Association of Governments' (SCAG) Regional Housing Needs Assessment (RHNA) allocation for the 2021–2029 planning period. Per the RHNA, the City is allocated 4,398 dwelling units to accommodate the estimated growth needed at various income levels.

As required by State Housing law, including Assembly Bill (AB) 1397, the updated 2021–2029 Housing Element sought to identify land in the City with the ability to accommodate this estimated growth through available sites and appropriate zoning. The analysis of potential sites, attached as Appendix B to the City's 2021–2029 Housing Element Update, led to the determination that there was a shortfall in potential housing capacity compared to the identified need across income categories.

Chapter 4 of the 2021–2029 Housing Element Update contains the City's Housing Plan, which "describes Placentia's goals, policies, programs, and objectives for the 2021–2029 Planning Period related to the preservation, improvement and development of housing in the City".[1] In order to address the shortfall of lower-income sites as identified in the Housing Element's Appendix B, Goal

[1] City of Placentia. 2022. Housing Element 2021-2029. Website: https://www.placentia.org/DocumentCenter/View/9654/Placentia-6th-Housing-Element_2022-03-15_adopted (accessed December 12, 2023).

HE-1.8 of the City's Housing Plan states that the City shall identify and rezone at least 14 acres of land with allowable densities of at least 30 units/acre to accommodate this shortfall of lower-income sites.

According to Appendix B of the 2021–2029 Housing Element Update, one of the most significant opportunities for additional housing development is within the vicinity of the City's proposed Metrolink Station site. As such, the 2021–2029 Housing Element Update identified the expansion of the Original TOD Area as a potential strategy for providing new housing opportunities, creating additional capacity for up to 1,378 multi-family units. The TOD Expansion Area encompasses approximately 14.5 acres. The potential capacity for this TOD Expansion Area assumes an allowable density of 95 units/acre and an average yield of 82 units/acre based on recently approved projects in the Original TOD Area.

The proposed project aims to implement this strategy through expanding the City's Original TOD Area to include several properties adjacent to the Original TOD Area that were identified as potential housing sites. These areas (hereinafter referred to as the TOD Expansion Area) consist of approximately 11.5 acres located south of West Crowther Avenue and west of South Melrose Street and approximately 3 acres along Cameron Street south of West Crowther Avenue. The TOD Expansion Area is currently zoned for Manufacturing and Combining Planned Manufacturing District uses and designated for Industrial uses in the City's General Plan.

The proposed project is intended to facilitate the development of up to 1,378 new residential units within the TOD Expansion Area by rezoning the land to allow residential uses at densities of up to 95 units per acre, consistent with the existing Development Standards that apply to the Original TOD Area. The proposed project also includes the adoption of a streetscape plan within the Crowther Avenue right-of-way between Placentia Avenue and State Route 57 (SR-57), which would serve as a gateway into the City's Packing House District.

3.1.1 Project Objectives

As discussed in the 2017 IS/MND, the establishment of the Original TOD Area aimed to provide many benefits to the City and its residents. Many of these original objectives, listed below, would still apply to the proposed project, as follows:

- Encourage mixed-use and transit-oriented development;
- Encourage people to walk, ride a bicycle, or use transit;
- Allow for a complementary mix of land uses to create an environment that engages people at the pedestrian level;
- Achieve a compact pattern of development that is more conducive to walking and bicycling;
- Provide sufficient density of employees, residents, and recreational users to support transit;

- Promote affordable housing and provide housing for all economic segments of the community consistent with the City's housing goals;
- Generate a relatively high percentage of trips serviceable by transit;
- Encourage integrated development, including the consolidation of parcels; and
- Encourage lot and building orientation on Crowther Avenue and parcels extending from Crowther to the railroad right-of-way, to create an active streetscape.

The objectives specific to the proposed expansion of the Original TOD Area for this project are as follows:

- Implement the actions described in the City's 2021–2029 General Plan Housing Update;
- Provide 1,378 units toward the City's housing needs as identified in the Regional Housing Needs Assessment Requirement (4,398 new dwelling units); and
- Develop a streetscape plan within the Crowther Avenue right-of-way between Placentia Avenue and SR-57 to provide a gateway into the proposed TOD Expansion Area.

3.2 PROJECT BACKGROUND

3.2.1 Approved Project and 2017 IS/MND

In 2017, the City of Placentia prepared and adopted an Initial Study/Mitigated Negative Declaration (IS/MND) (2017 IS/MND; State Clearinghouse No. 2017021012) to analyze the environmental effects of creating a TOD zone classification (Municipal Code, ZC 2017-01) and land use designation (GPA 2017-01) within the City's Packing House District, as well as a set of Development Standards. The objective of establishing this Original TOD Area was to facilitate high-density transit-oriented projects in the immediate vicinity of the City's proposed Metrolink station site, thereby encouraging use of the Metrolink system and redevelopment of the area surrounding the proposed station. The Development Standards that apply to the Original TOD Area specified a maximum residential density of 95 dwelling units per acre with a 65 dwelling unit per acre minimum within the Original TOD Area.

The adopted 2017 IS/MND analyzed the creation of a TOD zoning district and land use designation (Approved Project) within an approximate 28.2-acre area in the southwestern portion of the City (the Original TOD Area). The 2017 IS/MND found that all potentially significant impacts could be mitigated to a less than significant level with the incorporation of 44 mitigation measures across the resource areas of Aesthetics, Air Quality, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Public Services, Transportation/Traffic, and Utilities and Service Systems.

3.2.2 2021 Development Project and IS/MND Addendum

In 2021, an Addendum to the 2017 IS/MND (2021 Addendum) was prepared to address the potential environmental impacts associated with the development of a five-story building with

approximately 167,260 square feet of floor space over a single subterranean parking level at a 2.13-acre site located at 207-209 West Crowther Avenue within the Original TOD Area (Assessor's Parcel Numbers [APNs] 339-402-05, 339-402-07, 339-402-08, and 339-402-11). The five-story building included 189 apartments and resident-serving amenity uses, commercial space, and parking facilities.

The 2021 Addendum described the consistency of the proposed development (2021 Development Project) with the Development Standards that applied to the Original TOD Area, as denoted in the 2017 IS/MND. The 2021 Addendum also incorporated the 2017 IS/MND's Mitigation Monitoring and Reporting Program (MMRP), modified to fit the 2021 Development Project.

3.2.3 Relationship of Proposed Project to Prior Environmental Review

Together, the 2017 IS/MND prepared for the Original TOD Area and the 2021 Addendum prepared for the multi-family residential project at 207-209 West Crowther Avenue serve as the City's CEQA compliance documents for the Packing House District. Both remain relevant and retain informational value pertaining to the proposed project.

This Supplemental IS/MND evaluates the environmental impacts of the proposed project and compares the findings with the conclusions in the prior environmental documents to identify whether the proposed project would result in any new or substantially more severe impacts than those analyzed in the 2017 IS/MND or 2021 Addendum, or whether any of the other standards requiring further environmental review under CEQA are met.

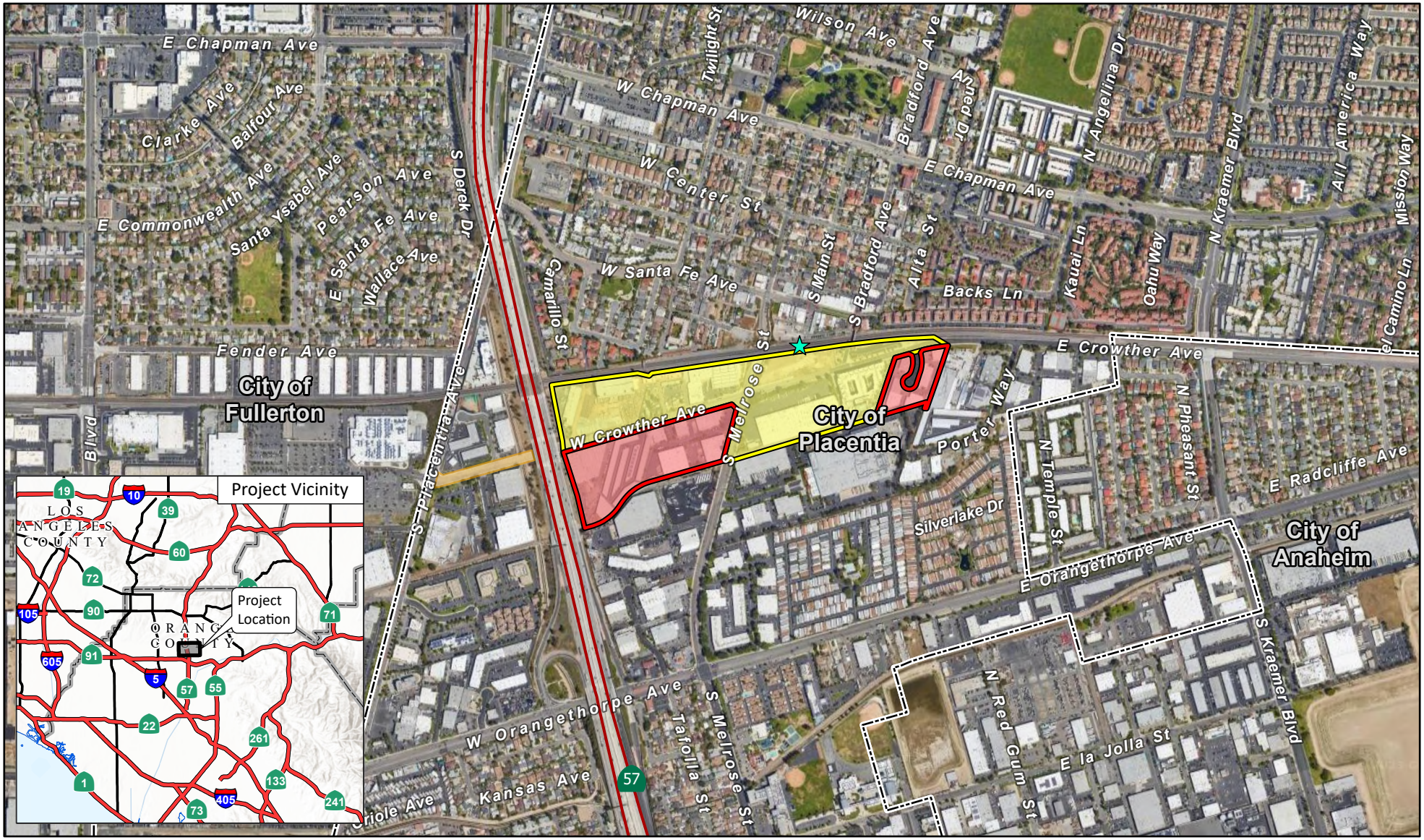
As a result, the 2017 IS/MND, the 2021 Addendum, and this Supplemental IS/MND will serve as the environmental review for the proposed project, as required by the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21000 et seq.) and the *State CEQA Guidelines* (California Code of Regulations [CCR], Title 14, Chapter 3, Sections 15070–15075).

3.3 PROJECT AREA AND SITE DESCRIPTION

3.3.1 Regional Setting

The proposed TOD Expansion Area is located within the City of Placentia in Orange County, California, as shown in Figure 3-1, Regional Location. The City of Placentia is bordered by the cities of Brea to the north, Anaheim to the south, Yorba Linda to the east, and Fullerton to the west.

Regional access to the TOD Expansion Area is via SR-57 and State Route 91 (SR-91). Both freeways are within 2 miles of the TOD Expansion Area and connect the City with other areas in Orange, Riverside, and Los Angeles Counties. In addition, when the proposed Metrolink station opens for operations, it is anticipated to be served by the Metrolink 91/Perris Valley Line, which connects Riverside, Fullerton, and Downtown Los Angeles. Melrose Street and Crowther Avenue are roadways in proximity to the TOD Expansion Area and would provide vehicular access to the area.



LSA

Original TOD Area (2017)
TOD Expansion Area
Proposed Crowther Avenue Streetscape Plan
Proposed Metrolink Station
City Boundaries

0 500 1000
FEET

SOURCE: Nearmap (6/04/2023)

FIGURE 3-1

Packing House District
Transit-Oriented Development Project
Regional Location

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3.3.2 Project Vicinity and Surrounding Land Uses

The proposed TOD Expansion Area consists of two distinct subareas south of West Crowther Avenue along South Melrose Street (11.5 acres) and Cameron Street (3 acres). Figure 3-2, Existing Land Uses, illustrates current land uses within the TOD Expansion Area and in its vicinity.

The South Melrose Street subarea is bordered on the north by West Crowther Avenue and the Original TOD Area, on the south by a rail spur and industrial uses, on the east by industrial uses, and on the west by SR-57.

The Cameron Street subarea is bordered on the north by West Crowther Avenue, on the south by industrial uses, on the east by industrial uses, and on the west by multi-family residential uses.

3.3.3 Existing Site Conditions

The Original TOD Area encompasses approximately 28.2-acres and 30 parcels of land in the southwestern portion of the City of Placentia. The proposed TOD Expansion Area consists of approximately 11.5 acres located south of West Crowther Avenue and west of South Melrose Street and approximately 3 acres along Cameron Street south of West Crowther Avenue on a total of 16 parcels.

The proposed TOD Expansion Area is currently zoned for Manufacturing and Combining Planned Manufacturing District uses and designated for Industrial uses in the City's General Plan, as illustrated in Figure 3-3, Planned Land Uses, and Figure 3-4, Existing Zoning Designations. Its current uses align with these designations, including metal stamping, screen printing, plastic fabrication, storage, and other industrial businesses. These businesses are assumed to operate under standard business hours. The TOD Expansion Area also contains landscaped surface parking lots to serve the businesses in the area.

3.4 PROPOSED PROJECT

As discussed in Section 3.1, Project Introduction, the proposed project would expand the City's existing TOD zoning district (City Case No. ZCA 2023-01) and land use designation (City Case No. GPA 2023-01) to include several properties adjacent to the Original TOD Area that were identified as potential housing sites in the City's 2021–2029 Housing Element Update. These areas consist of approximately 11.5 acres located south of West Crowther Avenue and west of South Melrose Street and approximately 3 acres along Cameron Street south of West Crowther Avenue. The TOD Expansion Area is currently zoned for Manufacturing and Combining Planned Manufacturing District uses and designated for Industrial uses in the City's General Plan.

The proposed project would facilitate the development of up to 1,378 new residential units by rezoning the 14.5-acre TOD Expansion Area to allow residential uses at densities of up to 95 units per acre, as specified in applicable TOD Packing House District Development Standards designated by the City. The proposed project also includes the adoption of a streetscape plan within the Crowther Avenue right-of-way between Placentia Avenue and SR-57, which would serve as a gateway into the TOD Expansion Area.

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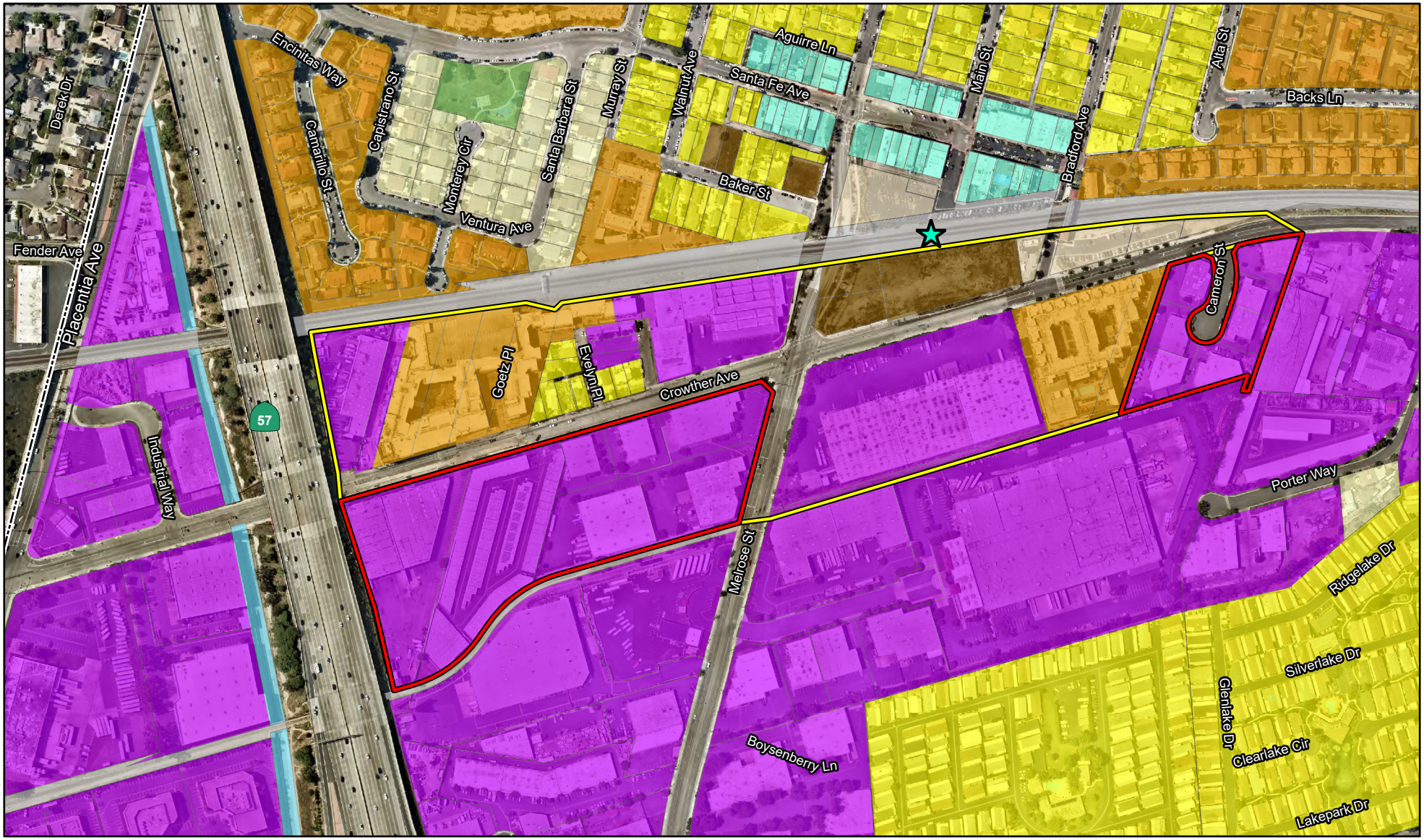

LSA

Original TOD Area (2017)
TOD Expansion Area
Proposed Metrolink Station
City Boundaries

Existing Land Use
Low Density Residential
Medium Density Residential
High Density Residential
Parks
Industrial
Storefront
Transportation
Vacant
Flood Control
Railroad

0 200 400
FEET

SOURCE: Nearmap (6/04/2023)

FIGURE 3-2

Packing House District
Transit-Oriented Development Project
Existing Land Uses

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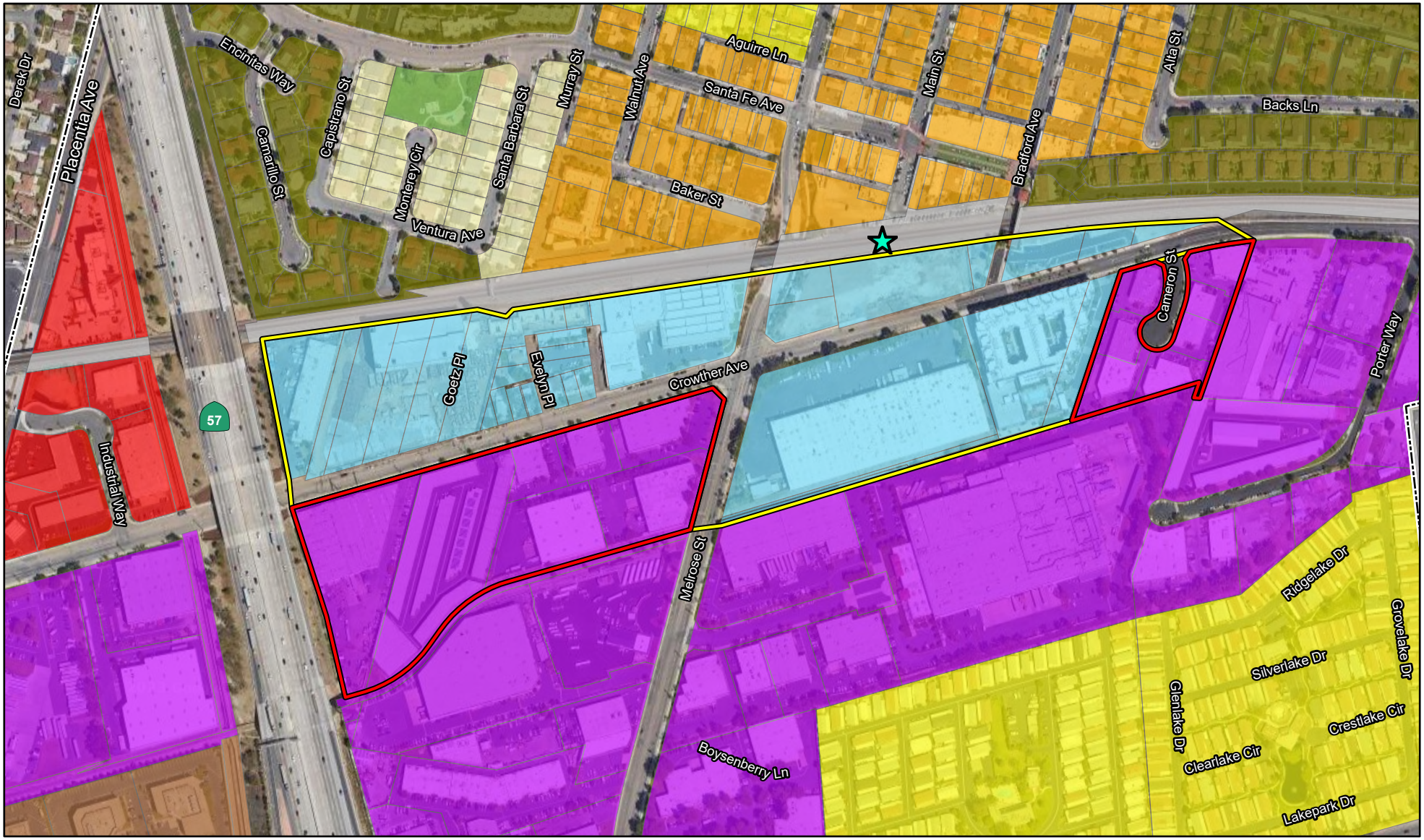

LSA

Original TOD Area (2017)
TOD Expansion Area
City Boundaries
Proposed Metrolink Station

General Plan Land Uses
Low Density Residential
Medium Density Residential
High Density Residential
Commercial
Industrial
Parks
Railroad
Specific Plan
TOD
Old Town

0 200 400
FEET

SOURCE: Google (2022); City of Placentia (2023)

J:\20230923\GIS\Pro\Packing House District Transit-Oriented Development Project\Packing House District Transit-Oriented Development Project.aprx (12/20/2023)

FIGURE 3-3

Packing House District
Transit-Oriented Development Project

Planned Land Uses

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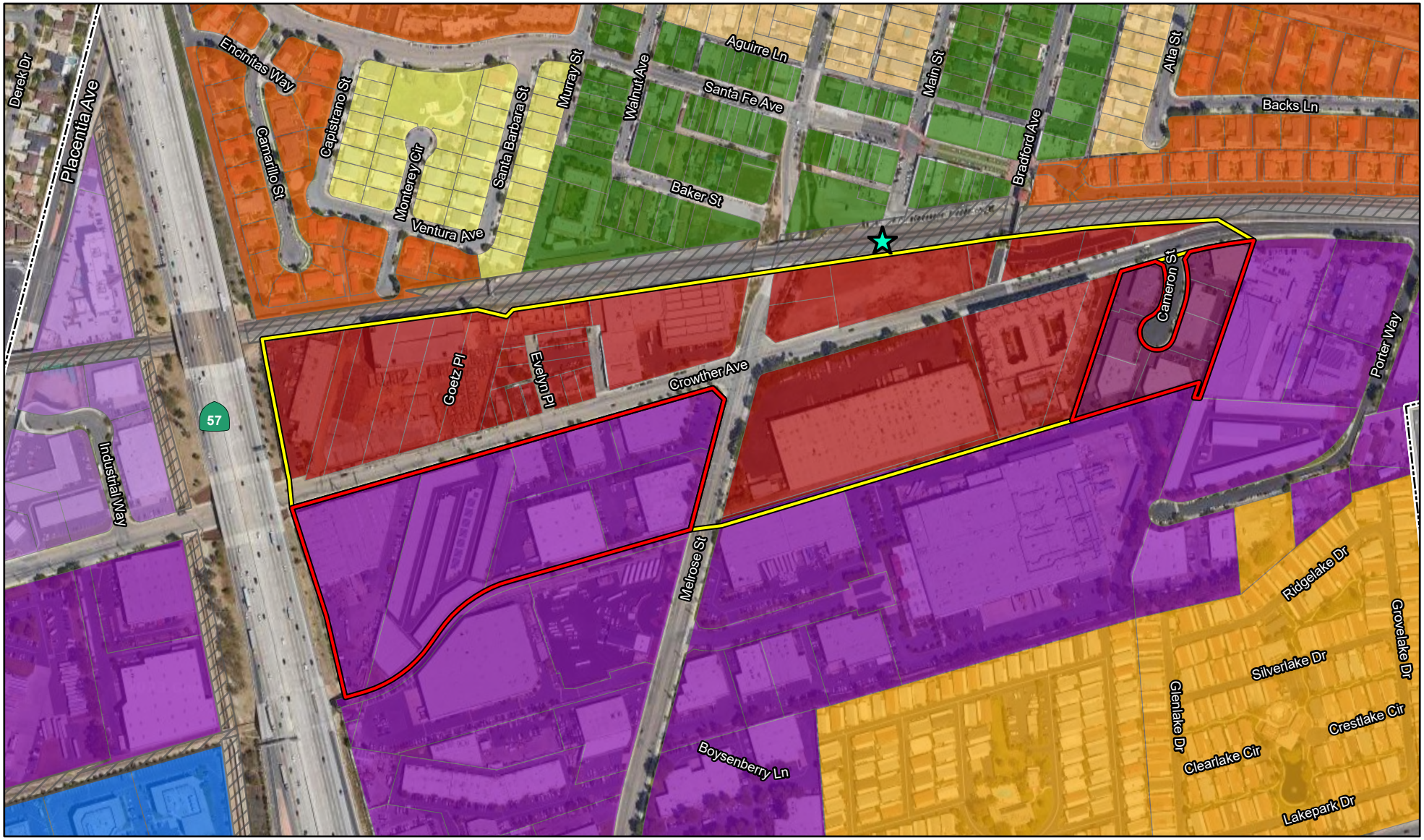

LSA

Original TOD Area (2017)
TOD Expansion Area
City Boundaries
Proposed Metrolink Station

Zoning Code

C-2-H65
M
M (PMD)
R-1
R-2
R-2 (MHP)
R-3
SP-5
TOD
Old Town
No Zoning Code

0 200 400
FEET

FIGURE 3-4

Packing House District
Transit-Oriented Development Project
Existing Zoning Designations

SOURCE: Google (2022); City of Placentia (2023)

J:\20230923\GIS\Pro\Packing House District Transit-Oriented Development Project\Packing House District Transit-Oriented Development Project.aprx (10/17/2023)

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Although the proposed project is clearly related to the TOD zoning program evaluated in the 2017 IS/MND, the 2017 IS/MND did not evaluate the potential impacts of an increased residential development capacity within the TOD Expansion Area. Therefore, new analysis must be added to the document to evaluate any potentially new impacts. The preparation of a Supplemental IS/MND also provides an opportunity to incorporate new mitigation measures to address those impacts.

The adopted 2017 IS/MND and 2021 Addendum, in conjunction with this Supplemental IS/MND, would serve as the environmental review for the proposed project, as required by the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21000 et seq.) and the *State CEQA Guidelines* (California Code of Regulations [CCR], Title 14, Chapter 3, Sections 15070–15075). This Supplemental IS/MND addresses the potential environmental impacts associated with the proposed project as compared to those identified in the 2017 IS/MND and 2021 Addendum. The mitigation measures included in these previous CEQA documents are included for reference in this Supplemental IS/MND. As necessary, the Supplemental IS/MND includes additional mitigation measures to address new impacts resulting from the proposed project.

3.5 DISCRETIONARY ACTIONS, PERMITS, AND OTHER APPROVALS

The legislative and discretionary actions to be considered by the City as a part of the proposed project include:

- **Zoning Amendment (City Case No. ZCA 2023-01):** The proposed project includes an amendment to the City's existing Zoning Code and Zoning Map to expand the TOD zoning district to include the proposed TOD Expansion Area.

- **General Plan Update/Amendment (City Case No. GPA 2023-01):** The proposed project includes updates to the City's existing General Plan Land Use Element to expand the TOD land use designation to include the proposed TOD Expansion Area.

- **Streetscape Plan:** The proposed project includes the adoption of a streetscape plan within the Crowther Avenue right-of-way between Placentia Avenue and SR-57, which would serve as a gateway into the City's Packing House District.

- **Adoption of the Supplemental IS/MND (City Case No. EA 2023-01).**

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4.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the project.

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

4.1 DETERMINATION

On the basis of this initial evaluation:

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

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

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

☐ I find that the proposed project MAY have a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature: Joe Lambert, City of Placentia

Date

4.2 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 any effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.

4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where 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 Analysis may be used where, pursuant to the tiering, program EIR, or another CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case a discussion should identify the following:

    a. Earlier analysis used. Identify earlier analyses 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 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 significant.

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5.0 CEQA ENVIRONMENTAL CHECKLIST

5.1 AESTHETICS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized 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 a 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?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

5.1.1 Background

In the 1960s and 1970s, the City of Placentia rapidly transformed from a small agricultural town to an urbanized residential community.[2] As such, the City's current visual character contains elements from both periods but is dominated by development from the rapid growth period. A majority of the City has been developed with typical features of an urbanized area.

Natural visual resources, including mountain ranges, hillsides, low-lying valley, and streams, exist both within and surrounding the City. These features are frequently experienced from various locations within the City and by travelers along SR-91 and SR-57 and City roads.

The TOD Expansion Area is located in an urbanized portion of the City of Placentia adjacent to SR-57 and is generally surrounded by older industrial development in the form of warehouses or businesses. These industrial buildings generally contain minimal parking lot landscaping features and lack other qualities of aesthetic value. The TOD Expansion Area consists of approximately 14.5 acres of land in proximity to the proposed Metrolink station and the Original TOD Area, split across two distinct subareas of 11.5 and 3 acres. The South Melrose Street subarea (11.5 acres) is bordered on the north by West Crowther Avenue and the Original TOD Area, on the south by Metrolink train tracks and an industrial park, on the east by an industrial park, and on the west by SR-57. The

[2] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

Cameron Street subarea (3 acres) is bordered on the north by West Crowther Avenue, on the south by an industrial park, on the east by an industrial park, and on the west by an apartment complex.

Based on the level of urban development surrounding the TOD Expansion Area, there are few scenic vistas, and such views are typically aligned with north-south roads providing limited views to higher topography, including the Chino Hills to the near north and east, the San Gabriel Mountains to the distant north, and the Santa Ana Mountains to the distant east.[3]

The proposed project would expand the TOD designation to allow for new structures up to five stories tall, which would be subject to the same TOD Development Standards established by the City of Placentia for the Original TOD Area, including architectural review, building placement regulations, and sign standards.

5.1.2 Prior Environmental Analysis

The 2017 IS/MND determined that the Approved Project would have a less than significant impact related to scenic vistas. Similarly, it was determined that the proposed TOD designation would result in less than significant impacts to the visual character or quality of the Original TOD Area.

However, a potentially significant impact was identified regarding substantial damage to scenic resources, specifically historic buildings, within a State scenic highway. Though there are no State scenic highways in the Original TOD Area according to the City's General Plan, the buildings built more than 50 years ago within the Original TOD Area were considered to have potential scenic value. Mitigation Measure (MM) I-1 from the 2017 IS/MND was identified to reduce potential impacts associated with damage to scenic resources to a less than significant level.

Another potentially significant impact was identified regarding the Approved Project's creation of a new source of substantial light or glare adversely affecting views. Mitigation Measures MM I-2 and MM I-3 from the 2017 IS/MND were identified to reduce potential impacts associated with the potential creation of a new source of light or glare.

MM I-1 Prior to approval of any new TOD facilities within the [Original TOD Area], the applicant shall submit an evaluation of the scenic value of structures that will be replaced by the new TOD facility. Based on the findings, the following actions may be required: no further action if no resource; recordation of the scenic values of a structure if merited; and integration of existing building scenic elements into the new building design. Implementation of these measures will avoid loss of any scenic resource values due to future TOD-related development within the [Original TOD Area].

MM I-2 Future developers shall submit an analysis of potential glare from lighting or sunlight that may impact vehicles on adjacent roadways or structures. This analysis shall demonstrate that due to building orientation or exterior treatment of

[3] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

windows, no significant light or glare impacts may be caused that could adversely impact driver safety on the adjacent roadways or occupied structures in the vicinity of the new development. This analysis shall be submitted to the City for review and approval prior to issuance of the building permit(s) for new structures within the [Original TOD Area].

MM I-3 Future developers shall submit an analysis that potential lighting from new structures does not create an adverse light impact on adjacent structures. This analysis shall demonstrate that based on an approved lighting plan for new structures, adjacent structures or areas are not exposed to intrusive or harmful amounts of light. This analysis shall be submitted to the City for review and approval prior to issuance of the final building permit(s) for new structures within the [Original TOD Area].

The 2021 Addendum determined that the 2021 Development Project would not result in new impacts or substantially more severe significant impacts relating to aesthetics than those identified in the 2017 IS/MND. No changes to the previous CEQA determinations were identified.

5.1.3 Impact Analysis

a. Would the project have a substantial effect on a scenic vista? ***(Less Than Significant Impact; No New Impact)***

The TOD Expansion Area does not contain any natural visual features or scenic resources such as landmark trees or rock outcroppings. Based on the level of development within and surrounding the TOD Expansion Area, there are few scenic vistas, and such views are typically aligned with north-south roads providing limited views to areas of higher topography. These scenic resources are generally not visible from publicly accessible viewpoints within or adjacent to the TOD Expansion Area. New structures of up to five stories integrated into the existing fully developed City would provide visual variety and would not interfere with any significant scenic vistas. Given these limited potential scenic views, the potential location of new structures outside of north/south roadway alignments, approval of the proposed project would result in less than significant impacts on any scenic vistas. Therefore, the proposed project would not result in new impacts to scenic vistas or substantially increase the severity of impacts analyzed in the prior environmental documents. No additional analysis is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

California's Scenic Highway Program was created by the State Legislature in 1963 to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways.[4] The TOD Expansion Area is not located within or in close proximity to a State-designated scenic highway designated by the City's General Plan. According to the California Department of Transportation (Caltrans), the nearest eligible State scenic highway is SR-57

[4] State of California. Streets and Highways Code, Section 260 et seq.

beginning at its intersection with State Route 90 (SR-90) and running north into the Puente Hills.[5] The beginning of this eligible stretch is located slightly more than 3 miles north of the TOD Expansion Area and, therefore, future development of the TOD Expansion Area would not fall within viewing distance. However, as previously stated, several buildings within the TOD Expansion Area have the potential to be greater than 50 years old, and as such, to be considered historic or scenic resources. Mitigation Measure (MM) I-1, requiring scenic evaluation of structures, was identified in order to reduce potential impacts within the Original TOD Area to a less than significant level. With application of MM I-1, the proposed project would result in less than significant impacts to scenic resources within a State scenic highway. Therefore, the proposed project would not result in new impacts to scenic routes or substantially increase the severity of impacts analyzed in the prior environmental documents. No additional analysis is required.

c. In non-urbanized areas, would the project 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 a 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? ***(Less Than Significant Impact; No New Impact)***

The TOD Expansion Area is located within an urbanized area and, therefore, would have an impact under CEQA if it would conflict with applicable zoning or other regulations governing scenic quality. The TOD Expansion Area is currently zoned for Manufacturing and Combining Planned Manufacturing District uses and designated for Industrial uses in the City's General Plan. These land uses typically are not associated with a cohesive or notable visual character, and as previously discussed, enabling the construction of new structures would provide visual variety within the area. Upon rezoning, the TOD Expansion Area would be subject to the City's TOD Development Standards, which are intended to improve public views of future developments within the Original TOD Area. These standards include setbacks, building height limitations, and frontage requirements to ensure that "each project along Crowther Avenue shall create an active and inviting environment for pedestrians."[6] The quality of pedestrian and other public views would be ensured by the proposed project's compliance with these development standards. As such, the proposed project would be consistent with applicable regulations governing scenic quality and would result in less than significant impacts. The proposed project would not substantially increase the severity of impacts analyzed in the prior environmental documents. No additional analysis is required.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ***(Less Than Significant with Mitigation Incorporated; No New Impact)***

The proposed project would allow new structures to be built within the TOD Expansion Area, some of which may be up to five stories high, which would equate to approximately 50-75 feet in height if a 10-

[5] California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed September 20, 2023).

[6] City of Placentia. 2017. Transit Oriented Development Packing House District Development Standards. Website: https://www.placentia.org/DocumentCenter/View/5803/TOD-Development-Standards?bidId= (accessed September 20, 2023).

15 foot per story average height is assumed. Potential new structures would require lighting, both exterior and interior. This would potentially introduce new sources of lighting and glare into the TOD Expansion Area. As described above, the 2017 IS/MND included mitigation measures that would require an analysis of lighting and glare during design review of new structures within the Original TOD Area (Mitigation Measures MM I-2 and MM I-3). These mitigation measures would also apply to new development within the TOD Expansion Area, thereby resulting in less than significant impacts with mitigation related to light and glare. The proposed project would not result in new impacts or substantially more severe significant impacts than those identified in previous environmental documents with implementation of the mitigation measures identified in the 2017 IS/MND.

5.2 AGRICULTURE AND FORESTRY RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

5.2.1 Background

A majority of the TOD Expansion Area is currently developed and is located within an urbanized area of Placentia. The TOD Expansion Area is classified as "Urban and Built-Up Land" by the State Department of Conservation,[7] which is defined as land that is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Examples of Urban and Built-Up Land include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.[8] As previously discussed, and as illustrated in Figure 3-2, Existing Land Uses, the TOD Expansion Area is currently built up with industrial uses.

The TOD Expansion Area is zoned for Manufacturing and Combining Planned Manufacturing District uses,[9] which do not allow for agricultural uses. Further, no portions of the TOD Expansion Area are currently used for agricultural or forestry purposes.

5.2.2 Prior Environmental Analysis

The 2017 IS/MND and the 2021 Addendum both determined that the Original TOD Area was located in an urbanized area, has not been used for agricultural production, and is not encumbered by a

[7] California Department of Conservation (DOC). 2016. California Important Farmland Finder. Website: maps.conservation.ca.gov/dlrp/ciff (accessed August 18, 2023).

[8] Ibid.

[9] City of Placentia. 2023. City's Most Recent Zoning Map Updated with Hamer Island. Website: https://data-placentia.opendata.arcgis.com/documents/zoning-map/explore (accessed August 18, 2023).

Williamson Act Land Conservation Agreement. Therefore, the Approved Project was determined to have no impacts related to agricultural resources in both the 2017 IS/MND and the 2021 Addendum.

5.2.3 Impact Analysis

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ***(No Impact; No New Impact)***

The TOD Expansion Area is not used for agricultural production and is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other type of farmland to non-agricultural uses. No new impacts or substantially more severe significant impacts to Farmland would occur. No additional analysis is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? ***(No Impact; No New Impact)***

The TOD Expansion Area is not currently used for agricultural purposes, and is not protected by, or eligible for, a Williamson Act contract. Therefore, the proposed project would not conflict with existing zoning or Williamson Act contracts. No new or substantially more severe significant impacts to farmland or zoning beyond what has been analyzed in the prior environmental documents would occur. No additional analysis is required.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ***(No Impact; No New Impact)***

Neither the TOD Expansion Area nor the surrounding area is zoned for forest land, timberland, or timberland production. As such, the proposed project would not conflict with existing zoning related to forest land or timberland. Therefore, no new or substantially more severe significant impacts to farmland beyond what has been analyzed in the prior environmental documents would occur. No additional analysis is required.

d. Would the project result in the loss of forest land or conversion of forestland to non-forest use? ***(No Impact; No New Impact)***

No forest or timberland exists on the TOD Expansion Area or in the surrounding area. Therefore, the proposed project would not result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, no new or substantially more severe significant impacts to forest land beyond what has been analyzed in the prior environmental documents would occur. No additional analysis is required.

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? ***(No Impact; No New Impact)***

The TOD Expansion Area is currently developed for industrial uses. No portion of this site is currently used as farmland or forest land. The proposed project would not result in the conversion of farmland on or off the TOD Expansion Area to non-agricultural uses because there are no agricultural uses on or in the immediate vicinity of the TOD Expansion Area. Likewise, the proposed project would not result in impacts related to changes in the existing environment that could result in the conversion of agricultural land to non-agricultural uses. Therefore, no new or substantially more severe significant impacts related to conversion of farmland or forest land beyond what has been analyzed in the prior environmental documents would occur. No additional analysis is required.

5.3 AIR QUALITY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

5.3.1 Background

The TOD Expansion Area is located within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the Basin. The federal Clean Air Act and the California Clean Air Act mandate the control and reduction of specific air pollutants. Under these pieces of legislation, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established ambient air quality standards for specific "criteria" pollutants, designed to protect public health and welfare. Primary criteria pollutants include carbon monoxide (CO), volatile organic compounds (VOCs), nitrogen oxides (NO_X), particulate matter (PM_{10}), sulfur dioxide (SO_2), and lead (Pb). Secondary criteria pollutants include ozone (O_3), and fine particulate matter ($PM_{2.5}$). These ambient air quality standards are levels of contaminants, which represent safe levels that avoid specific adverse health effects associated with each criteria pollutant.

The Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the PM_{10} standard and in attainment/maintenance for the federal PM_{10}, CO, and NO_2 standards. To meet these standards, the SCAQMD has established project-level thresholds for VOCs, NO_X, and $PM_{2.5}$. The SCAQMD has established thresholds of significance for criteria pollutant emissions generated during both construction and operation of projects as shown in Table 5.A, below.

The SCAQMD considers any projects in the Basin with construction- or operation-related emissions that exceed any of the emission thresholds above to have potentially significant impacts.

5.3.2 Prior Environmental Analysis

The 2017 IS/MND determined that the Approved Project would result in less than significant impacts relating to conflict with or obstruction of applicable air quality plans. It determined that the proposed TOD designation's emissions would be consistent with SCAQMD, Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), Air Quality Management Plan (AQMP), National Ambient Air Quality Standards (NAAQS), and California Ambient Air Quality Standards (CAAQS) standards.

Table 5.A: SCAQMD Construction and Operation Thresholds of Significance (lbs/day)

Threshold Type	VOCs	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Thresholds	75	100	550	150	150	55
Operation Thresholds	55	55	550	150	150	55

Source: *CEQA Air Quality Handbook* (SCAQMD 1993).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur dioxides
VOCs = volatile organic compounds

However, the 2017 IS/MND concluded that the Approved Project would result in potentially significant impacts to air quality under remaining Thresholds 5.3.3 (b) through (d). Mitigation Measures (MMs) III-1 through III-4 were identified to reduce potential impacts associated with air quality to a less than significant level.

MM III-1 For each future project implemented within the [Original TOD Area], the development shall identify project construction related emissions and specific best available control measures (BACMs) identified in Rule 403 required to ensure that fugitive dust or construction equipment exhaust emissions will not exceed SCAQMD construction thresholds of significance or emission concentrations at the nearest receptors identified by local significance thresholds. The specific BACMs identified shall be made conditions of approval to ensure implementation.

MM III-2 Only "Low-Volatile Organic Compounds" paints (no more than 100 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications consistent with South Coast Air Quality Management District Rule 1113 shall be used.

MM III-3 As individual projects are submitted for entitlements in the future, the City will maintain a record of each individual project's forecast trip generation and net area source emissions. When total trip generation (including the 1,247 existing trips) approaches 4,500, the City will not consider additional project entitlements within the [Original TOD Area], unless actual field monitoring of trips and area source verifies that actual trip generation is measured as being less than the SCAQMD thresholds when the verification is calculated. Field monitoring can consist of measuring trips and area source emissions from individual development or monitoring trips on the local roadways entering and leaving the [Original TOD Area]. Other verifiable measures may also be used to verify total trips, including interviews with residents or owners of businesses and verification of actual area source emissions. If the data indicate that the 5,000 trip ADT will be exceeded, the City will perform a new environmental evaluation in compliance with CEQA to assess whether continued development within the [Original TOD Area] will exceed the emission significance thresholds in place at the time of measurement.

MM III-4 For each future project implemented within the [Original TOD Area] that can generate offensive odors, the development shall identify project-specific best available control measures (BACMs) for the specific odors that ensure adjacent

sensitive receptors will not be exposed to odor concentrations that would conflict with residential uses. The specific BACMs identified for odor control shall be made conditions of approval to ensure implementation.

The 2021 Addendum determined that the proposed residential development at 207-209 West Crowther Avenue would not result in new impacts or substantially more severe significant impacts relating to air quality than those identified in the 2017 IS/MND. No changes to the previous CEQA determinations were identified.

5.3.3 Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan? ***(Less Than Significant Impact; No New Impact)***

An AQMP describes air pollution control strategies to be undertaken by a city or county in a region classified as a nonattainment area to meet the requirements of the federal Clean Air Act. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State Ambient Air Quality Standards (AAQS). The applicable air quality plan is the SCAQMD's adopted 2022 AQMP. The AQMP is based on regional growth projections developed by SCAG.

Consistency with the 2022 AQMP for the Basin would be achieved if a project is consistent with the goals, objectives, and assumptions in the AQMP that were designed to achieve the federal and State air quality standards. Per the SCAQMD's *CEQA Air Quality Handbook* (April 1993, currently being revised), there are two main indicators of a project's consistency with the applicable AQMP: (1) whether the project would increase the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the 2022 AQMP; and (2) whether the project would exceed the 2022 AQMP's assumptions for the final year for the AQMP.

Consistency Criterion 1. As demonstrated below, with implementation of Mitigation Measures MM III-1, III-2, and III-3, the proposed project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by the SCAQMD. As such, the proposed project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or emission reductions in the AQMP. Therefore, the proposed project is considered consistent with Criterion 1.

Consistency Criterion 2. The SCAQMD's *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities.

The proposed project is intended to facilitate the development of up to 1,378 new residential units within the TOD Expansion Area by rezoning the land to allow residential uses at densities of up to 95 units per acre, consistent with the existing Development Standards that apply to the Original TOD Area. The proposed project also includes the adoption of a streetscape plan within the Crowther

Avenue right-of-way between Placentia Avenue and SR-57, which would serve as a gateway into the City's Packing House District. The purpose of the proposed project is to implement the actions described in the City's 2021–2029 General Plan Housing Update and meet the City's housing needs as identified in the Regional Housing Needs Assessment Requirement (4,398 new dwelling units).

Future development allowed under the proposed project would accommodate planned regional housing growth included in the SCAG's Regional Housing Needs Assessment (RHNA). Therefore, since the purpose of the proposed project is to accommodate planned regional housing growth included in the SCAG RHNA, the proposed project would not exceed the growth assumptions in the SCAG's RTP/SCS or the AQMP.

Based on the analysis presented above, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan and would result in a less than significant impact. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant impacts associated with consistency with air quality plans would occur.

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 With Mitigation Incorporated; No New Impact)***

As discussed above, the Basin is currently designated as nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the PM_{10} standard. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified SCAQMD significance thresholds identified above in Table 5.A, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The following analysis assesses the potential air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. Similar to the 2017 IS/MND project, construction activities associated with the construction of additional residential units that could occur during implementation of the project would cause short-term emissions of criteria air pollutants. The primary source of emissions is the operation of construction equipment. Before development can occur, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

Construction activities may include demolition, grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality are typically greatest during the grading phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at construction sites. Unless properly controlled, vehicles leaving construction sites would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SCAQMD has established Rule 403 (Fugitive Dust), which would require the contractor to implement measures that would reduce the amount of particulate matter generated during the construction period.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_x, VOCs and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Similar to the Approved Project, the proposed project does not include any specific projects for which construction emissions can be forecast. Due to the concept of redeveloping the TOD Expansion Area, which is already fully built out, it is too speculative for accurate construction emissions to be estimated. The proposed project would also be required to implement Mitigation Measures MMs III-1 and III-2, as included in the 2017 IS/MND, which require future projects to identify project construction related emissions and specific best available control measures (BACMs) and use only low VOC paints. Therefore, air quality impacts during project construction would be less than significant with the implementation of the above-mentioned mitigation measures. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant construction-related air quality impacts would occur.

Operational Air Quality Impacts. Similar to the Approved Project, operational activities associated with the additional residential units would result in long-term air pollutant emissions associated with mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), and area sources (e.g., architectural coatings and the use of landscape maintenance equipment). Before development can occur, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM_{10} occurs when vehicle tires pulverize small rocks and pavement and the vehicle wakes generate airborne dust. The

contribution of tire and brake wear is small compared to the other particulate matter emission processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Energy-source emissions result from activities in buildings for which natural gas is used. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. The emission factor is determined by the fuel source, with cleaner energy sources, like renewable energy, producing fewer emissions than conventional sources. Future residential uses would be required to comply with the latest California Green Building Standards Code.

Typically, area-source emissions consist of direct sources of air emissions at the TOD Expansion Area, including architectural coatings, consumer products, and use of landscape maintenance equipment.

The proposed project would expand the TOD zoning classification, land use designation, and development standards currently in use in the Original TOD Area to include an additional 14.5 acres of surrounding land (TOD Expansion Area). There is no specific development project proposed at this time, although the TOD Zone development standards envision a catalyst site that is anticipated to develop in the near future. The proposed project will be established within an area of the City that is almost 100 percent developed. Therefore, as discussed in the 2017 IS/MND, it is very difficult to forecast changes in air emissions from future development for the following reasons. First, it is not possible to know whether future development would reuse existing structures, demolish existing structures, or add on to existing structures to meet the TOD designation objectives. Second, it would be speculative to make a forecast regarding future area source emissions. For example, new development using modern building standards could add substantial additional square footage and still use less energy than existing buildings. As discussed in the 2017 IS/MND, to avoid speculation, the only viable analytical alternative is to require detailed evaluations of each specific future project, which is imposed as a mitigation measure in the following analysis.

Consistent with the analysis conducted in the 2017 IS/MND, the only available project-related emission variable to evaluate is the trip generation associated with the proposed project. Based on the project's trip generation estimates (as identified in Section 5.17, Transportation), the proposed project is estimated to generate up to 4,996 net new average daily trips (ADT). The trip generation component of the proposed project can be analyzed for air emissions and an emissions forecast is presented below that assumes buildout in 2024 (a worst-case assumption).

Long-term operation emissions associated with the proposed project's trip generation were calculated using California Emissions Estimator Model (CalEEMod). Trip generation rates used in CalEEMod for the proposed project were based on the project's trip generation estimates of 4,996 net new ADT, which was included in CalEEMod. The long-term mobile source emissions associated with the proposed project are shown in Table 5.B. Appendix A provides CalEEMod output sheets for the operational emissions of the proposed project.

Table 5.B: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Proposed Project Emissions						
Mobile Sources	14.7	12.1	139.4	0.4	40.0	10.3
SCAQMD Threshold	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Approved Project Emissions						
Mobile Sources	8.2	39.6	111.4	0.3	27.6	7.7
SCAQMD Threshold	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (November 2023).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table 5.B, mobile source VOCs, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions associated with the proposed project would be higher than those estimated for the 2017 IS/MND due to the increase in residential units and associated trip generation. However, the results shown in Table 5.B indicate mobile source emissions associated with the proposed project would still not exceed the significance criteria for daily VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. In addition, the proposed project would also be required to implement Mitigation Measure MM III-3, as included in the 2017 IS/MND, which requires field monitoring of trips and area sources to verify that actual trip generation is measured as being less than the SCAQMD thresholds. Therefore, the proposed project's operational air quality impacts would be less than significant with mitigation. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant operational air quality impacts would occur.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the TOD Expansion Area. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

Based on the trip generation described in Section 5.17, Transportation, the proposed project is estimated to generate 4,996 net new ADT, with approximately 205 net new trips occurring in the

AM peak hour and approximately 192 net new trips occurring in the PM peak hour. Anticipated traffic volumes resulting from the proposed project, as discussed in Section 5.17, Transportation, would be lower than existing conditions, and below the level at which CO hotspots would occur. Therefore, similar to the Approved Project, given the extremely low level of CO concentrations in the TOD Expansion Area and the analysis discussed above, project-related vehicles are not expected to contribute significantly to CO concentrations exceeding the State or federal CO standards. Because no CO hot spot would occur, impacts would be less than significant. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant CO hotspot impacts would occur.

c. Would the project expose sensitive receptors to substantial pollutant concentrations? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants.

The SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors such as residential land uses in the immediate vicinity of the opportunity sites as a result of construction and operational activities. The thresholds are based on standards established by the SCAQMD in its Localized Significance Thresholds (LST) Methodology[10] and are measured against construction and operational emissions that occur on a specific project site. These emissions are primarily generated from heavy-duty construction equipment and demolition, grading, and trenching activities. However, the LSTs are applicable to projects at the project-specific level and are not applicable to programmatic documents, such as the proposed project. Construction and operational emissions associated with the additional residential units, would however, have the potential to cause or contribute to significant localized air quality impacts to nearby residential land uses. Localized construction impacts of future residential development could potentially exceed the LSTs, particularly for construction of areas larger than 5 acres or areas with more intense construction activities. To address this, regulatory measures (e.g., SCAQMD Rule 201 for a permit to operate, Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, Rule 1403 for new source review, and CARB's Airborne Toxic Control Measures) are currently in place, and mitigation would be imposed at the project level, which may include use of special equipment.

Similar to the 2017 IS/MND project, the proposed project does not include any specific projects for which localized emissions can be forecast. Similar to the 2017 IS/MND project, all future discretionary projects would be reviewed in accordance with CEQA and would require further evaluation at the project level to demonstrate whether emissions would exceed SCAQMD's LSTs and require project-specific mitigation. In addition, the proposed project would also be required to

[10] SCAQMD. 2021. Localized Significance Thresholds. Website: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds (accessed November 2023).

implement Mitigation Measures MMs III-1, III-2, and III-3, as included in the 2017 IS/MND, which would require future projects to identify project-related emissions and specific BACMs. Therefore, localized air quality impacts would remain less than significant for the proposed project with the implementation of the above-mentioned mitigation measures. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant impacts to sensitive receptors would occur.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

SCAQMD Rule 402 regarding nuisances states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

Heavy-duty equipment during construction activities would emit odors, primarily from equipment exhaust. In addition, the application of asphalt and architectural coatings during construction activities may result in odors. Implementation of Mitigation Measure MM III-1, as included in the 2017 IS/MND would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant.

Examples of odor-generating projects are wastewater treatment plants, compost facilities, landfills, solid-waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project would allow for the development of up to 1,378 new residential units within the TOD Expansion Area; therefore, the proposed project would not include land uses that would be expected to generate odors.

Residential land uses could result in generation of odors such as exhaust from landscaping equipment. However, unlike the odor-generating land uses identified above, these are not considered potential generators of odor that could affect a substantial number of people. Therefore, odors associated with the proposed project construction and operations would be less than significant. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant odor impacts would occur.

5.4 BIOLOGICAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

5.4.1 Background

The City of Placentia is almost fully developed with urban uses and landscaped with non-native ornamental species. Reviews of State and Federal databases have not identified the presence of any special status plant or animal species within the City.[11] Though smaller rodents and birds may use Placentia's urban landscaping as habitat, human activity such as maintenance causes frequent disturbances in these areas.

A U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) Trust Resources Report was prepared for the Original TOD Area on October 12, 2016. This report is included as Appendix 3 to the 2017 IS/MND, and its findings are summarized below.

[11] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

5.4.1.1 Methods

In addition to a physical survey of the Original TOD Area, a list of information regarding proposed, candidate, threatened, and endangered species with the potential occur within the Original TOD Area, and therefore be affected by the Approved Project, was requested from the U.S. Fish and Wildlife Service.

5.4.1.2 Results

The list of potential species that may occur or could potentially be affected by activities in the Original TOD Area is provided in Table 5.C below.

Table 5.C: Special-Status Wildlife Species with Potential to Occur in Original TOD Area

Common Name	Scientific Name	Status in Report	Type of Habitat
Coastal California Gnatcatcher	*Polioptila californica californica*	Threatened	Final Critical
Least Bell's Vireo	*Vireo bellii pusillus*	Endangered	Final Critical
Santa Ana Sucker	*Catostomus santaanae*	Threatened	Final Critical
Ventura Marsh Milk-vetch	*Astragalus pycnostachyus var. lanosissimus*	Endangered	Final Critical

Source: U.S. Fish & Wildlife Service. *IPaC Trust Resources Report: Packing House District Transit Oriented Development. October 12, 2016.*

Migratory birds have their own distinct protective legislation, including the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Migratory bird species that may occur or could potentially be affected by activities in the Original TOD Area is provided in Table 5.D below.

The 2016 IPaC Report also determined that no wetlands existed within the Original TOD Area.

5.4.2 Prior Environmental Analysis

The 2017 IS/MND determined that despite the findings of the IPaC Report, the Original TOD area was 100 percent urbanized with no open land, no natural habitat, and no potential habitat to support any species identified as candidate, sensitive, or special-status species, and the Approved Project would result in no impacts related to biological resources under all thresholds.

The 2021 Addendum upheld the conclusion reached in the 2017 IS/MND and discussed the 2021 Development Project's compliance with the Migratory Bird Treaty Act in order to ensure that no significant impacts to migratory birds would occur. No changes to the previous CEQA determinations were identified.

Table 5.D: Migratory Birds with Potential to Occur in Original TOD Area

Common Name	Scientific Name	Season	Bird of Conservation Concern?
Bald Eagle	*Haliaeetus leucocephalus*	Wintering	Yes
Bell's Vireo	*Vireo bellii*	Breeding	Yes
Brewer's Sparrow	*Spizella breweri*	Year-round	Yes
Burrowing Owl	*Athene cunicularia*	Year-round	Yes
Cactus Wren	*Campylorhynchus brunneicapillus*	Year-round	Yes
Costa's Hummingbird	*Calypte costae*	Breeding	Yes
Fox Sparrow	*Passerella iliaca*	Wintering	Yes
Green-tailed Towhee	*Pipilo chlorurus*	Breeding	Yes
Lawrence's Goldfinch	*Carduelis lawrencei*	Year-round	Yes
Least Bittern	*Ixobrychus exilis*	Year-round	No
Lesser Yellowlegs	*Tringa flavipes*	Wintering	Yes
Lewis's Woodpecker	*Melanerpes lewis*	Wintering	Yes
Long-billed Curlew	*Numenius americanus*	Wintering	Yes
Marbled Godwit	*Limosa fedoa*	Wintering	Yes
Mountain Plover	*Charadrius montanus*	Wintering	Yes
Nuttall's Woodpecker	*Picoides nuttallii*	Year-round	Yes
Oak Titmouse	*Baeolophus inornatus*	Year-round	Yes
Olive-sided Flycatcher	*Contopus cooperi*	Breeding	Yes
Peregrine Falcon	*Falco peregrinus*	Wintering	Yes
Red-crowned Parrot	*Amazona viridigenalis*	Year-round	Yes
Rufous-crowned Sparrow	*Aimophila ruficeps*	Year-round	Yes
Short-eared Owl	*Asio flammeus*	Wintering	Yes
Snowy Plover	*Charadrius alexandrinus*	Breeding	Yes
Tricolored Blackbird	*Agelaius tricolor*	Year-round	Yes
Western Grebe	*Aechmophorus occidentalis*	Wintering	Yes
Red Knot	*Calidris canutus ssp. roselaari*	Wintering	Yes

Source: U.S. Fish & Wildlife Service. *IPaC Trust Resources Report: Packing House District Transit Oriented Development. October 12, 2016.*

5.4.3 Impact Analysis

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ***(No Impact; No New Impact)***

As with the Original TOD Area, the TOD Expansion Area is 100 percent urbanized with no open land, no natural habitat and no potential habitat to support any species identified as candidate, sensitive or special-status species identified in the 2016 IPaC Report. Although the 2016 IPaC Report states that some threatened and endangered species exist within the region of interest, this report was provided as a general overview of the Original TOD Area and its surroundings with no data specific to the TOD Expansion Area itself. Therefore, because both the Original TOD Area and the proposed TOD Expansion Area are 100 percent urbanized, there is no potential for impacts to any listed species as part of the implementation of the proposed project. With no habitat or species of concern located within the TOD Expansion Area, the expansion of the TOD designation has no

potential for impact to any native biological resources. Therefore, no new or substantially more severe significant impacts than analyzed in the previous environmental documents related to species of interest would occur.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ***(No Impact; No New Impact)***

The TOD Expansion Area is 100 percent urbanized and does not contain any riparian habitat or other sensitive natural community resources. As such, the proposed project would result in no impacts, and no new or substantially more severe significant impacts related to sensitive natural communities than analyzed in the previous environmental documents would occur.

c. Would the project 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? ***(No Impact; No New Impact)***

The TOD Expansion Area is 100 percent urbanized and does not contain any wetlands (as defined by Section 404 of the Clean Water Act) or any other sensitive natural community resources, meaning the proposed project would have no impacts. Therefore, no new or substantially more severe significant impacts related to native biological resources, including wetlands, would occur in comparison to the previous environmental documents.

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 wildlife corridors, or impede the use of native wildlife nursery sites? ***(No Impact; No New Impact)***

With no native habitat and no wildlife corridors through the TOD Expansion Area, the proposed project has no potential to interfere with the movement of native animals of any kind or to impede the use of any native wildlife nursery sites. Therefore, the proposed project would result in no impacts, and no new or substantially more severe significant impacts related to wildlife movement would occur in comparison to the previous environmental documents.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? ***(No Impact; No New Impact)***

The TOD Expansion Area is 100 percent urbanized and does not contain any native plants, including trees. Landscape plants and ornamental trees do occur sporadically throughout parking lot areas within the TOD Expansion Area, but these non-native plants are not naturally occurring, and are not covered by local policies or ordinances as there are no ordinances regarding the removal or preservation of non-native trees within the City of Placentia. As such, the proposed project would result in no impacts, and no new or substantially more severe significant impacts related to local policies and ordinances than analyzed in previous environmental documents would occur.

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; No New Impact)***

The TOD Expansion Area is 100 percent urbanized and there are no adopted plans to protect native habitats or natural communities. As previously stated, the City of Placentia does not have any Habitat Conservation Plans, Natural Community Conservation Plans, or other local, regional, or state habitat plans that would pertain to the TOD Expansion Area, meaning no impacts would occur. Therefore, no new or substantially more severe significant impacts related to habitat conservation plans than analyzed in previous environmental documents would occur.

5.5 CULTURAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

5.5.1 Background

The history of Placentia began with the granting of the Rancho San Juan Cajon De Santa Ana to Juan Ontiveros in 1837 by the governor of Mexico. This land is now comprised of the modern-day cities of Placentia, Anaheim, Brea, and Fullerton in Orange County. The first pioneer to purchase land within what would become the City of Placentia was Daniel Kraemer, who purchased 3,900 acres of land, followed by 100 acres purchased by William and Sarah Jane McFadden. As more settlers arrived, residents began to build churches and schools, and a sense of community began to form. The city name Placentia, which references the Latin term for "pleasant," was determined after Sarah Jane McFadden recommended the name for the community's growing school district.

The Santa Fe railroad was re-routed through the area in 1910, which resulted in Placentia being placed on the map. Near the newly established railroad station, packing houses began to spring up in order to keep up with the growing citrus industry. This industry owed its success to Placentia's suitability for growing various citrus fruits, walnuts, avocados, and grapes. Placentia became the center of the Valencia orange growing and packing industry. At that time, the town's streets were also under development, and the population had grown to 500 citizens, who voted to incorporate the City in 1926. From that point on, the population continued to grow: 5,000 residents by 1960, 25,000 residents by 1970,[12] and over 50,000 residents as of 2022.[13] Aerial imagery indicates that the TOD Expansion Area has been fully developed with its existing uses since at least 1995, with no exposed ground surface remaining at that time.[14]

The Original TOD Area proposed in the 2017 IS/MND was already fully developed with urban uses at the time of the proposed TOD designation. At the time, many of the existing structures within the Original TOD Area were older than 50 years, which is generally the age at which a structure is considered to have potential historical significance. One potential historic resource identified within

[12] City of Placentia. History of Placentia. Website: https://www.placentia.org/178/History-of-Placentia#:~:text=Placentia%20was%20placed%20on%20the,the%20town's%20growing%20citrus%20industry. (accessed August 18, 2023).

[13] U.S. Census Bureau. 2022. QuickFacts Placentia City, California. Website: https://www.census.gov/quickfacts/fact/csvdixoncitycalifornia,placentiacitycalifornia/INC110221 (accessed December 14, 2023).

[14] Google. (October 1995). [Historical Imagery of Crowther Avenue in Placentia from October 1995]. Retrieved November 3, 2023, from Google Earth: https://earth.google.com/web/@0,-0.447,0a,22251752.77375655d,35y,0h,0t,0r

the Original TOD Area was the Placentia Orange Growers Association packing warehouse, which was known to have historic value and was therefore planned to be retained and reused under the proposed TOD designation. It is reasonable to assume that similar conditions exist within the TOD Expansion Area.

5.5.2 Prior Environmental Analysis

The 2017 IS/MND determined that the Original TOD Area was significantly disturbed and was therefore unlikely to yield any human remains or paleontological resources of value, so impacts to these resources were found to be less than significant. Further, the Approved Project's compliance with Section 7050.5 of the California Health and Safety Code would address any accidental discovery of human remains during demolition or site grading.

Mitigation Measures (MMs) V-1 and V-2 were identified in the 2017 IS/MND to ensure that impacts to historic or Tribal cultural resources would be less than significant with mitigation incorporated under future redevelopment of properties within the Original TOD Area.

MM V-1 Prior to demolition of any structure greater than 50 years in age in support of a TOD facility, the City will require a comprehensive historical resource evaluation of the structure. If it is determined that the structure has significant historical value, specific management actions will be defined to reduce impacts to a less than significant impact level. If mitigation to a less than significant historical impact level cannot be achieved, the City will require the preparation of a second tier environmental document, most probably EIR, prior to allowing the TOD project to proceed.

MM V-2 During ground disturbing activities (including but not limited to pavement removal, pot-holing, grading, excavation, trenching and initial well site disturbance) at least one Native American Monitor will be present at the [Original TOD Area] to monitor subsurface areas as they are exposed. The monitors shall compile a monitoring log on a daily basis that will provide descriptions of daily activities, including construction activities, locations, soil characteristics and any cultural materials exposed and identified. The monitors shall photodocument the ground disturbing activities on a daily basis. If any cultural materials are exposed, the monitors shall have the authority to redirect construction activities until the extent and importance of the materials are assessed. Subsequent management of any Native American cultural materials shall be determined through consultation between the City, property owner and the Native American Band supplying the monitor. Any human remains encountered shall be handled through the County Coroner's office and if necessary, in conjunction with the Native American Heritage Commission and Native American Band supplying the monitor.

The 2021 Addendum upheld the conclusion reached in the 2017 IS/MND because the proposed development at 207-209 West Crowther Avenue would occur within the boundaries of the Original TOD Area and would adhere to mitigation identified in the 2017 IS/MND; therefore, no changes to the previous CEQA determinations were identified.

5.5.3 Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

As noted in Chapter 3.0, Project Description, of this Supplemental IS/MND, the TOD Expansion Area is 100 percent developed with urban uses. The City of Placentia's General Plan Conservation Element identifies sites within the City that are designated as historic either by the California Register of Historical Resources or by the City's standards.[15]

Although none of the structures within the TOD Expansion Area have been identified by the City as historic, given the existence of structures over 50 years old within the TOD Expansion Area, a potential does exist that such structures may have historical significance as defined in Section 15064.5 of the *State CEQA Guidelines*. Development of future TOD facilities pursuant to the proposed project would likely require the demolition of these structures. However, the proposed development would be required to comply with Mitigation Measure (MM) V-1 identified in the 2017 IS/MND, which requires comprehensive historical resource evaluations of structures prior to their demolition. If evaluation of future development proposals within the TOD Expansion Area results in positive findings, the preparation of an Environmental Impact Report could be triggered, which would require project-specific historical resource mitigation to be incorporated into the proposed development. Compliance with MM V-1 from prior environmental documents would ensure that impacts would be less than significant; as such, no new or substantially more severe significant impacts related to historical resources than analyzed in prior environmental documents would occur under the proposed project.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? ***(No Impact; No New Impact)***

As 100 percent of the TOD Expansion Area has been historically disturbed through grading, compaction, and building or infrastructure construction, the TOD Expansion Area is unlikely to contain any archaeological resources/sites with integrity or contextual value, and no impacts would occur under the proposed project. As such, no new or substantially more severe significant impacts related to archaeological resources would occur under the proposed project in comparison to previous environmental documents.

c. Would the project disturb any humans remains, including those interred outside of formal cemeteries? ***(Less Than Significant Impact; No New Impact)***

Based on historic disturbance of the TOD Expansion area, the potential for encountering human remains is very low. If human remains are accidentally exposed during demolition or site grading, Section 7050.5 of the California Health and Safety Code requires a contractor to immediately stop work in the vicinity of the discovery and notify the County Coroner. The Coroner must then determine whether the remains are human and if such remains are human, the Coroner must determine whether the remains are or appear to be of a Native American. If deemed potential Native American remains, the Coroner contacts the Native American Heritage Commission to

[15] City of Placentia. 2019. General Plan Conservation Element. Website: https://www.placentia.org/DocumentCenter/View/8725/5-Conservation?bidId= (accessed November 13, 2023).

identify the most likely affected tribe and to initiate proper recovery of such remains. Since this process is mandatory, no mitigation is required. In addition, Mitigation Measure (MM) V-2, identified in the 2017 IS/MND, contains provisions pertaining to the inadvertent discovery of human remains, though impacts would be less than significant regardless. Similarly, the proposed project would implement MM V-2, but would have less than significant impacts even without mitigation. As such, no new or substantially more significant impacts related to archaeological resources would occur under the proposed project in comparison to prior environmental documents.

5.6 ENERGY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☐	☒
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

5.6.1 Background

5.6.1.1 Regulatory Framework

Electricity is a manmade resource. The production of electricity requires the consumption or conversion of energy resources (including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into energy. Electricity is used for a variety of purposes (e.g., lighting, heating, cooling, and refrigeration, and for operating appliances, computers, electronics, machinery, and public transportation systems). The TOD Expansion Area is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile area of Central, Coastal, and Southern California.[16] According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2022 was 85,870 gigawatt hours (GWh) (or 85,869,985,679 kilowatt-hours [kWh]). Total electricity consumption in Orange County in 2022 was 20,244 GWh (20,243,721,856 kWh).[17]

Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend on out-of-state imports for nearly 90 percent of its natural gas supply.[18] The Southern California Gas Company (SoCalGas) is the natural gas service provider for the TOD Expansion Area. SoCalGas provides natural gas to approximately 21.1 million people in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border.[19] According to the CEC, total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million

16 Southern California Edison (SCE). 2023. About Us. Website: https://www.sce.com/about-us/who-we-are (accessed November 8, 2023).

17 California Energy Commission (CEC). 2023a. Electricity Consumption by County and Entity. Websites: http://www.ecdms.energy.ca.gov/elecbycounty.aspx and http://www.ecdms.energy.ca.gov/elecbyutil.aspx (accessed November 8, 2023).

18 CEC. 2023b. Supply and Demand of Natural Gas in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california (accessed December 2, 2022).

19 Southern California Gas Company (SoCalGas). 2023. About SoCalGas. Website: https://www.socalgas.com/about-us/company-profile (accessed November 8, 2023).

therms (5,026,458,755 therms). Total natural gas consumption in Orange County in 2022 was 572 million therms (572,454,744 therms).[20]

Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles. In 2021, total gasoline consumption in California was 289,918 thousand barrels (12.2 billion gallons) or 1,464.7 trillion British Thermal Units (BTU).[21] Of the total gasoline consumption, 273,289 thousand barrels (11.5 billion gallons) or 1,380.7 trillion BTU were consumed for transportation.[22] Based on fuel consumption obtained from the California Air Resources Board (CARB) California Emissions Factor Model, Version 2021 (EMFAC2021), approximately 1,230 million gallons of gasoline and approximately 155.7 million gallons of diesel are estimated to be consumed from vehicle trips in Orange County in 2023.

5.6.2 Prior Environmental Analysis

The topic of the project's energy use was not analyzed in the 2017 IS/MND or the 2021 Addendum, as both were adopted prior to the mandatory analysis of energy impacts under CEQA. However, the impact of energy use was known at the time of the certification of the 2017 IS/MND and the 2021 Addendum. Under CEQA standards, energy usage is not required to be analyzed unless it constitutes "new information of substantial importance, which was not known and could not have been known at the time the 2017 IS/MND and the 2021 Addendum were certified as complete" *(State CEQA Guidelines* Section 15162 (a) (3)). Therefore, energy use is not new information that requires analysis in a supplemental Environmental Impact Report (EIR) or Negative Declaration and no supplemental environmental analysis of the project's impacts on this issue is required under CEQA. However, the following discussion provides an evaluation of energy usage for informational purposes.

5.6.3 Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? ***(Less Than Significant Impact; No New Impact)***

The proposed project would increase the demand for electricity, natural gas, and fuel usage. The discussion and analysis provided below is based on the data included in the California Emissions Estimator Model (CalEEMod) output, which is included in Appendix B.

Construction Energy Usage. It is important to note that the proposed project would not, in and of itself entitle, propose, or otherwise require the construction of new development. The proposed

[20] CEC. 2023c. Gas Consumption by County and Entity. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx and https://ecdms.energy.ca.gov/gasbyutil.aspx (accessed November 2023).

[21] U.S. Energy Information Administration (EIA). 2023. California State Profile and Energy Estimates. Table F3: Motor gasoline consumption, price, and expenditure estimates, 2021. Website: eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed November 2023).

[22] Ibid.

project would allow for the development of up to 1,378 new residential units within the TOD Expansion Area based on an allowable density of up to 95 units per acre.

Construction activities associated with the construction of additional residential units that could occur during implementation of the project would cause fuel consumption associated with construction activities. Before development can occur, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

Construction activities would require energy for the manufacture and transportation of building materials and for preparation of the site for grading activities and building construction. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities.

Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs. Energy usage on project sites during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, construction energy impacts would be less than significant, and no mitigation would be required.

Operational Energy Usage. As previously stated, the proposed project would not, in and of itself entitle, propose, or otherwise require the construction of new development. The proposed project would allow for the development of up to 1,378 new residential units within the TOD Expansion Area based on an allowable density of up to 95 units per acre.

Operational activities associated with the additional residential units would result in energy demand associated with natural gas use, electricity consumption, and fuel used for vehicle trips. Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

As discussed in Section 5.3, Air Quality, there is no specific development project proposed at this time, although the TOD Zone development standards envision a catalyst site that is anticipated to develop in the near future. The TOD Expansion Area is within an area of the City that is almost 100 percent developed. Therefore, as discussed in the 2017 IS/MND, it is very difficult to forecast changes in energy usage from future development for the following reasons. First, it is not possible to know whether future development would reuse existing structures, demolish existing structures, or add on to existing structures to meet the TOD designation objectives. Second, it would be speculative to make a forecast regarding future energy usage. For example, new development using modern building standards could add substantial additional square footage and still use less energy than existing buildings. Therefore, to avoid speculation, the only viable analytical alternative is to require detailed evaluations of each specific future project.

The only available project-related emission variable to evaluate is the trip generation associated with the proposed project. Based on the project's trip generation estimates (as identified in Section 5.17, Transportation), the proposed project is estimated to generate 4,996 net new ADT. Based on the CalEEMod analysis, the proposed project would result in approximately 20,520,641 vehicle miles traveled (VMT) per year. The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.9 mpg in 2020.[23] The average fuel economy for heavy-duty trucks in the United States has also steadily increased, from 5.7 mpg in 2013 to a projected 8.0 mpg in 2021.[24] Therefore, based on the default vehicle fleet mix assumed in CalEEMod and using the United States Environmental Protection Agency (USEPA) fuel economy estimates for 2020, the proposed project would be estimated to result in the consumption of approximately 726,112 gallons of gasoline per year and 486,842 gallons of diesel fuel per year. Based on fuel consumption obtained from EMFAC2021, approximately 1,230 million gallons of gasoline and approximately 155.7 million gallons of diesel are estimated to be consumed from vehicle trips in Orange County in 2023. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in Orange County by approximately 0.1 percent for gasoline fuel usage and approximately 0.3 percent for diesel fuel usage. Fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Although the proposed project would result in an increase in demand for electricity, this increase would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts because the TOD Expansion Area is already served by utilities or directly adjacent to existing urban development. Similarly, natural gas infrastructure is not anticipated due to cumulative development. Transportation energy use would also increase; however, this transportation energy use would not represent a major amount of energy use when compared to the amount of existing development and to the total number of vehicle trips and VMT throughout Orange County and the region. As such, the buildout of the 1,378 additional residential units that would be allowed under the proposed project would result in a less than significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. As such, no new or substantially more significant impacts relating to energy consumption would occur under the proposed project in comparison to prior environmental documents.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ***(No Impact; No New Impact)***

As indicated above, energy usage within the TOD Expansion Area during construction would be temporary in nature. In addition, energy usage associated with operation of the development allowed under the proposed project would be relatively small in comparison to the State's available

[23] United States Department of Transportation (USDOT). 2021. Average Fuel Efficiency of Light-Duty Vehicles. Website: https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed December 12, 2023).

[24] California Energy Commission (CEC). 2015. Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026. Website: efiling.energy.ca.gov/getdocument.aspx?tn=206180 (accessed December 12, 2023).

energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impacts to regional energy supplies would be minor, the proposed project would not conflict with California's energy conservation plans as described in the CEC's 2023 Integrated Energy Policy Report[25]. In addition, any new development associated with the proposed project would comply with Title 24 and the California Green Building Standards Code (CALGreen Code) standards. Thus, as shown above, the proposed project would avoid or reduce the inefficient, wasteful, and unnecessary consumption of energy and would not result in any irreversible or irretrievable commitments of energy. Therefore, the proposed project would not conflict with any state or local plans for renewable energy or energy efficiency, and no impacts would occur. As such, no new or substantially more significant impacts relating to energy plans would occur under the proposed project in comparison to prior environmental documents.

[25] CEC. 2023d. *2023 Integrated Energy Policy Report.* Website: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2023-integrated-energy-policy-report (accessed November 2023).

5.7 GEOLOGY AND SOILS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☐	☒
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

5.7.1 Background

The City of Placentia is located in Southern California, which is generally known as a seismically active region. Alquist-Priolo (AP) Earthquake Fault Zones are defined in the California Geological Survey as active and potentially active faults, meaning they have ruptured within the last 11,000 and 1.5 million years, respectively.[26] Though no AP Earthquake Fault Zones occur within the City limits, several active AP faults are located in the City's vicinity. These faults include the Yorba Linda seismic source zone, the Puente Hills Thrust Fault system, the Peralta Hills Thrust Fault system, the Whittier Fault, the Newport-Inglewood Structural Zone, the Sierra Madre Fault, the San Jacinto Fault system, the San Andreas fault system, and the Norwalk Fault.[27] The majority of the City of Placentia has not been mapped as being within a zone susceptible to landslide as designated by the State of California Seismic Hazard Zones.[28] However, a few local slope instabilities exist in Tri-City Park, which is located in the northwest portion of the City.

[26] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

[27] Ibid.

[28] Ibid.

Fossils have previously been located within the City of Placentia, including fossil localities in Pleistocene-age sediments containing the remains of a variety of large and small animals. The City contains both young (Qyfsa) and very old (Qvofsa) alluvial fan deposits. While young alluvial fan deposits are assigned low sensitivity due to their lack of accumulated paleontological resources, very old alluvial deposits have produced multiple fossil localities and are assigned a high sensitivity.[29]

5.7.2 Prior Environmental Analysis

The 2017 IS/MND found that the TOD designation would have no impacts relating to exposure to potential adverse effects involving rupture of a known earthquake fault or landslides or relating to soils incapable of adequately supporting septic tanks or other alternatives. No impacts were identified pertaining to the destruction of a unique paleontological or geologic site, although this threshold was categorized under the Cultural Resources topic area in prior environmental documents. It was determined that the Approved Project would have less than significant impacts relating to exposure to potential adverse effects involving strong seismic ground shaking or seismic-related ground failure.

The 2017 IS/MND identified potentially significant impacts pertaining to substantial soil erosion or the loss of topsoil, unstable soil or geologic unit, and expansive soil. Mitigation Measures (MMs) VI-1 and VI-2 were identified in the 2017 IS/MND to reduce impacts to geology and soils to a less than significant level.

MM VI-1 Prior to approval of specific development projects within the [Original TOD Area] in the future, the City will require comprehensive documentation of the erosion control and water quality best management practices (BMPs) that will be implemented by a proposed site-specific project. This documentation shall demonstrate that erosion, sedimentation, and discharge of storm water from the site during construction and after development will not cause degradation of storm water runoff from the [Original TOD Area] that could cause or contribute to a violation of the beneficial uses and water quality standards downstream from the [Original TOD Area].

MM VI-2 Concurrent with accepting an application for a residential structure within the [Original TOD Area], the developer shall submit a professionally prepared geotechnical report that includes geotechnical design specifications for the proposed structure at the [Original TOD Area]. These design specifications shall demonstrate that any site-specific sources of instability can be controlled to a less than significant impact level and these requirements shall be implemented through a condition of approval imposed by the City on the proposed structure.

[29] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

The 2021 Addendum determined that the 2021 Development Project would comply with the National Pollutant Discharge Elimination Systems (NPDES) permitting regulations, implement a Stormwater Pollution Prevention Plan (SWPPP), and align with the type and scale of development analyzed in the 2017 IS/MND and that no new impacts or substantially greater impacts than previously analyzed would occur. As such, no changes to the previous CEQA determinations were identified.

5.7.3 Impact Analysis

a. Would the project 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 (AP) Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? ***(No Impact; No New Impact)***

Though several active AP faults are located in the City's vicinity, none fall within the City's boundaries, and none are located in close enough proximity to the TOD Expansion Area to pose a threat of ground rupture. The Safety Element of the City's General Plan determined that ground rupture is generally not a concern for the City.[30] As such, future residential and commercial structures constructed within the TOD Expansion Area would not be subject to surface rupture from a known earthquake fault, and no impacts would occur. As such, no new or substantially more severe significant impacts related to ground rupture than previously analyzed would occur under the proposed project.

ii. Strong seismic ground shaking? ***(Less Than Significant Impact; No New Impact)***

Due to the City's proximity to active AP faults, the City could be exposed to moderate to severe seismic shaking.[31] These levels of seismic shaking could result in some degree of structural damage. However, pursuant to the City's General Plan, future developments would be required to adhere to the current version of the California Building Code, which includes seismic design codes. As such, impacts of the proposed project would be less than significant, and no new or substantially more severe significant impacts related to strong seismic shaking would occur under the proposed project in comparison to prior environmental documents.

iii. Seismic-related ground failure, including liquefaction? ***(Less Than Significant Impact; No New Impact)***

The City's General Plan Safety Element identifies areas of high liquefaction potential in Exhibit 7-2, Potential Liquefaction and Landslide Hazard Zones. According to this figure, the TOD Expansion Area is not located within an area of high liquefaction potential; therefore, impacts would be less than significant. As such, no new or substantially more severe significant impacts related to liquefaction than previously analyzed would occur under the proposed project.

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30 City of Placentia. 2019. General Plan Safety Element. Urban Fire Hazards, Exhibit 7-5. Website: https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId= (accessed September 20, 2023).

31 Ibid.

iv. *Landslides?* ***(No Impact; No New Impact)***

The TOD Expansion Area does not have substantial slopes or steep topography located within its boundaries. The majority of the City, including the TOD Expansion Area, is not identified as having a significant landslide hazard in the City's General Plan Safety Element. With no potential for landslides, the proposed project would not expose future development in the TOD Expansion Area to such hazards, and no impact would occur. As such, no new or substantially more severe significant impacts related to landslides would occur under the proposed project than analyzed in previous environmental documents.

b. Would the project result in substantial soil erosion or the loss of topsoil? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

All future development within the TOD Expansion Area would occur within an existing urbanized area as redevelopment. The TOD Expansion Area is an engineered environment with an existing stormwater runoff system already in place. Cities within the boundaries of the Santa Ana Regional Water Quality Control Board (SARWQCB) are required to ensure that every new development implements a Storm Water Pollution Prevention Plan (SWPPP) to control soil erosion, loss of topsoil, and water pollution during construction and a Water Quality Management Plan to control soil erosion, loss of topsoil, and water pollution over the long term. With implementation of these mandatory plans and Mitigation Measure (MM) VI-1 from the 2017 IS/MND, the proposed project's impacts would be less than significant with mitigation incorporated, and no new or substantially more severe significant impacts related to soil erosion would occur under the proposed project in comparison to the analysis in prior environmental documents.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

Future structures developed within the TOD Expansion Area may be approximately 75 feet in height (five stories). Although the existing development within the TOD Expansion Area includes structures up to about 50 feet in height, the new structures may require additional geotechnical engineering to address the potential for lateral spreading, subsidence, or liquefaction issues. With implementation of Mitigation Measure (MM) VI-2 from the 2017 IS/MND, the proposed project's impacts would be less than significant with mitigation incorporated. As such, no new or substantially more severe significant impacts related to unstable geologic units than identified in prior environmental documents would occur under the proposed project.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

All future development in the TOD Expansion Area would occur within an existing, relatively flat, urbanized area as redevelopment. The City's building code addresses mandatory pre-development and design requirements for developments occurring on expansive soils. Additionally, according to the United States Department of Agriculture Web Soil Survey, the TOD Expansion Area is underlain

by Mocho loam and Myford sandy loam,[32] which have slow permeability and are well-drained and moderately well-drained, respectively. Therefore, the soils underlying the TOD Expansion Area are not considered expansive soils, but the possibility still exists for expansive soils to exist within the TOD Expansion Area. With implementation of MM VI-2 from the 2017 IS/MND, the proposed project's impacts would be less than significant with mitigation incorporated, and no new or substantially more severe significant impacts related to expansive soils would occur under the proposed project in comparison to the analysis in previous environmental documents.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? ***(No Impact; No New Impact)***

The TOD Expansion Area is presently served by a wastewater collection (sewage) system and no future structures would use septic tanks or alternative on-site disposal systems. Therefore, the potential development that would be allowed within the TOD Expansion Area under the proposed project does not rely on such soils, and no adverse impacts would result under this issue. No new or substantially more severe significant impacts related to septic tanks or alternative disposal systems than analyzed in prior environmental documents would occur under the proposed project.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ***(No Impact; No New Impact)***

As shown previously in Figure 3-2, Existing Land Uses, the TOD Expansion Area is fully developed in its existing state with industrial uses. In addition to the buildings associated with these uses, the TOD Expansion Area is paved with asphalt for parking and circulation purposes. As such, the TOD Expansion Area does not contain any undisturbed ground. The entirety of the TOD Expansion Area has been historically disturbed through grading, compaction, and building or infrastructure construction. Therefore, the TOD Expansion Area is unlikely to contain any paleontological or unique geologic resources/sites and no impacts would occur. As such, no new or substantially more severe significant impacts related to paleontological resources than determined in prior environmental documents would occur under the proposed project.

[32] United States Department of Agriculture Natural Resources Conservation Service. Web Soil Survey. Website: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx (accessed September 21, 2023).

5.8 GREENHOUSE GAS EMISSIONS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

5.8.1 Background

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2);
- Methane (CH_4);
- Nitrous oxide (N_2O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur hexafluoride (SF_6).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. While manmade GHGs include naturally occurring GHGs such as CO_2, CH_4, and N_2O, some gases, like HFCs, PFCs, and SF_6, are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

5.8.2 Prior Environmental Analysis

The 2017 IS/MND determined that since the City of Placentia had not yet developed a Greenhouse Gas Reduction Plan, the applicable GHG planning document for the GHG analysis was Assembly Bill (AB) 32, which the Approved Project would comply with. As such, the 2017 IS/MND determined that the Approved Project would have a less than significant impact regarding consistency with GHG plans, programs, and policies.

Because the Approved Project involved a planning area rather than a specific project, the GHG emissions related to construction activities could not be estimated. However, in order to control future project-specific GHG emissions to a less than significant level, Mitigation Measure (MM) VII-1 was identified in the 2017 IS/MND. Given there is no GHG threshold of significance for a planning area project compared to an individual project (3,000 metric tons [MT] of CO_2e). As a result, MM VII-2 was identified in the 2017 IS/MND to control future individual project-related GHG emissions to below the 3,000 MT CO_2e threshold (and therefore to a less than significant level).

MM VII-1 As individual projects are submitted for review in the future, the City will require a GHG emission forecast for proposed construction activities. If construction-related GHG emissions exceed regionally accepted thresholds, the City will require mitigation to offset such emissions. Mitigation may be in the form of GHG emission offsets or credits obtained from other projects or mitigation banks. If the data indicate that the construction GHG emissions will exceed thresholds of significance in place at the time of construction after application of mitigation, the City will perform a new environmental evaluation in compliance with CEQA to assess whether continued development will exceed the emission significance thresholds in place at the time of measurement.

MM VII-2 As individual projects are submitted for entitlements in the future, the City will require a GHG evaluation on each project and ensure that project-related GHG emissions do not exceed the 3,000 $MTCO_2(e)$ threshold. Where this threshold will be exceeded, the City will require the developer to provide project-related GHG emission reductions (such as higher energy conservation), use of recycled water or other GHG reduction measures. The City will also accept verifiable GHG emission offsets from projects. However, if the data indicate that the project specific GHG threshold will be exceeded, the City will perform a new environmental evaluation in compliance with CEQA to assess whether the development within the [Original TOD Area] will exceed the emission significance thresholds.

The 2021 Addendum determined that the 2021 Development Project would not increase the severity or result in new GHG emissions impacts and would not conflict with an applicable plan, policy, or regulation adopted for the purpose reducing GHG emissions. In fact, the 2021 Addendum determined that the 2021 Development Project would generate 723 fewer daily trips than analyzed under the TOD designation adopted as part of the Approved Project, indicating that operational GHG emissions would be less intensive. As such, no changes to the previous CEQA determinations were identified.

5.8.3 Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

This section describes the potential construction- and operational-related GHG emissions associated with the proposed project. The South Coast Air Quality Management District (SCAQMD) has not addressed emission thresholds for construction in its 1993 *CEQA Air Quality Handbook*; however, SCAQMD requires quantification and disclosure. Thus, this section discusses construction emissions.

Construction GHG Emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. Construction would emit GHGs through the operation of construction equipment and from worker and builder supply vendor vehicles for the duration of the construction period. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, the fueling of heavy equipment emits CH_4. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

Before development within the TOD Expansion Area can occur, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

Similar to the 2017 IS/MND project, the proposed project does not presently consist of any specific projects for which construction emissions can be forecast. Due to the concept of redeveloping the TOD Expansion Area that is already fully built out, it is too speculative for accurate construction emissions to be estimated. The proposed project would also be required to implement Mitigation Measure (MM) VII-1, as included in the 2017 IS/MND, which requires a GHG emissions forecast for proposed construction activities as individual projects within the TOD Expansion Area are submitted for review. Therefore, GHG impacts during project construction would be less than significant for the proposed project with the implementation of the above-mentioned mitigation measures. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant construction-related GHG impacts would occur.

Operational GHG Impacts. Long-term GHG emissions associated with the proposed project would typically be generated from mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle trips to and from the TOD Expansion Area. Area-source emissions would be associated with activities such as landscaping and maintenance of any new development within the TOD Expansion Area. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the development that would be allowed under the proposed project. Waste source emissions generated by the proposed project would include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project would

be generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

Before development can occur, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

As discussed in the 2017 IS/MND, there is no GHG threshold of significance for a planning area project compared to an individual project, which has a threshold of 3,000 MT CO_2e. Therefore, Mitigation Measure (MM) VII-2, as included in the 2017 IS/MND, would be required to control future individual project-related GHG emissions to the 3,000 MT CO_2e threshold, based on all GHG emissions generated by project operation/occupancy and the annualized construction emissions to address future GHG emissions and maintain them below 3,000 MT CO_2e for future project-specific impacts. Therefore, operational GHG impacts would be less than significant for the proposed project with the implementation of the above-mentioned mitigation measures. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant GHG impacts would occur than analyzed in previous environmental documents.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

An evaluation of the proposed project's consistency with the California Air Resources Board's (CARB) 2022 Scoping Plan and the 2020–2045 Regional Transportation Plan/Sustainable Communites Strategy (RTP/SCS) is provided below.

2022 Scoping Plan. The CARB Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects (i.e., the Scoping Plan does not require the City to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the State agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions from the Scoping Plan, such as transportation emissions, increases in water efficiency in the building and landscape codes, and other Statewide actions that would affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the low carbon fuel standard (LCFS) and changes in the Corporate Average Fuel Economy (CAFE) standards (e.g., Pavley I and Pavley California Advanced Clean Cars program). Although measures in the Scoping Plan apply to State agencies and not the proposed project, the project's GHG emissions would be reduced by compliance with statewide measures that have been adopted since Assembly Bill (AB) 32 and Senate Bill (SB) 32 were adopted. Therefore, the proposed project was analyzed for consistency with the goals of the 2022 Scoping Plan, Executive Order (EO) B-30-15, SB 32, and AB 197.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,[33] to reflect the

[33] California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November.

2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirmed the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and is intended to keep the State on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provided additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

The 2022 Scoping Plan assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Energy measures are intended to maximize energy efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As identified above, any new development would be required to comply with the latest Title 24 and CALGreen Code standards regarding water efficiency and energy conservation requirements. Therefore, the proposed project would comply with applicable energy measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, any new development would be required to comply with the latest Title 24 and CALGreen Code standards, which include a variety of different measures, including reduction of wastewater and water use. In addition, future projects would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. Specific regional emissions targets for transportation emissions would not directly apply to the proposed project. However, vehicles traveling to the TOD Expansion Area would comply with the Pavley II (LEV III) Advanced Clean Cars Program. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy. SCAG's 2020–2045 RTP/SCS was adopted September 3, 2020. SCAG's RTP/SCS identifies land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2020–2045 RTP/SCS is to better manage the existing transportation system by implementing transportation demand management strategies, integrating land use decisions and technological advancements, creating complete streets that are safe to all roadway users, preserving the transportation system, and expanding transit and fostering development in transit-oriented communities. The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a development forecast that is generally consistent with regional-level general plan data. The forecast development pattern, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from automobiles and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). The 2020–2045 RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the 2020–2045 RTP/SCS but provides incentives for consistency for governments and developers.

According to SCAG's 2020–2045 RTP/SCS, the City's population, households, and employment are forecast to increase by approximately 6,600 residents, 2,200 households, and 1,600 jobs, respectively, between 2016 and 2045.[34] The proposed project is intended to facilitate the development of up to 1,378 new residential units within the TOD Expansion Area by rezoning the land to allow residential uses at densities of up to 95 units per acre, consistent with the existing Development Standards that apply to the Original TOD Area. The proposed project also includes the adoption of a streetscape plan within the Crowther Avenue right-of-way between Placentia Avenue and SR-57, which would serve as a gateway into the City's Packing House District. The purpose of the proposed project is to implement the actions described in the City's 2021–2029 General Plan Housing Update and meet the City's housing needs as identified in the Regional Housing Needs Assessment (RHNA) requirement (4,398 new dwelling units).

Future development allowed under the proposed project would accommodate planned regional housing growth included in the SCAG RHNA. Therefore, since the purpose of the proposed project is

[34] Southern California Association of Governments (SCAG). 2020. *Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy.* Website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176 (accessed November 2023).

to accommodate planned regional housing growth included in the SCAG RHNA, the proposed project would not exceed the growth assumptions in the SCAG's RTP/SCS.

Implementing SCAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. Before development can take place, each discretionary development project is required to be analyzed for conformance with the General Plan, zoning requirements, and other applicable local and State requirements; to comply with the requirements of CEQA; and to obtain all necessary clearances and permits. As such, future additional residential development allowed under the proposed project would be evaluated for its potential to interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035, and whether regional mobile emissions would decrease in line with the goals of the RTP/SCS.

Based on the nature of the proposed project, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. As such, the proposed project would not conflict with an adopted plan, policy, or regulation pertaining to GHG emissions, and impacts are considered less than significant. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant impacts associated with consistency with GHG reduction plans would occur in comparison to prior environmental documents.

5.9 HAZARDS AND HAZARDOUS MATERIALS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

5.9.1 Background

Hazardous materials are chemicals that could potentially cause harm during an accidental release or mishap, and are defined as being toxic, corrosive, flammable, reactive, and irritant, or strong sensitizer.[35] Hazardous substances include all chemicals regulated under the United States Department of Transportation's (USDOT) "hazardous materials" regulations and the United States Environmental Protection Agency's (USEPA) "hazardous waste" regulations. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials is affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

Government Code Section 65962.5 states that the California Department of Toxic Substances Control (DTSC) shall compile and maintain annually a list of hazardous waste facilities subject to corrective action as part of the Health and Safety Code. This list is commonly referred to as the

[35] A "sensitizer" is a chemical that can cause a substantial proportion of people or animals to develop an allergic reaction in normal tissue after repeated exposure to a chemical (U.S. Department of Labor).

Cortese List. Cortese List data resources include EnviroStor, GeoTracker, and the Environmental Data Resources (EDR) search.

5.9.2 Prior Environmental Analysis

According to the 2017 IS/MND, the Original TOD Area was not located within the identified distances from a school, airports, or wildland fire hazard areas. As a result, no impacts were identified pertaining to these topics.

However, the 2017 IS/MND identified potentially significant impacts relating to the routine transport of hazardous materials, potential release of hazardous materials, and proximity to a site included on a list of hazardous materials sites. Mitigation Measure (MM) VIII-1 was identified to be incorporated into the Stormwater Pollution Prevention Plan (SWPPP) or erosion control plan for all future construction within the Original TOD Area to reduce these potential impacts to a less than significant level.

According to the 2017 IS/MND, based on a review of hazardous materials sites gathered from the California State Water Board's GeoTracker website, there were 23 known hazardous materials sites located within 0.5 mile or inside of the Original TOD Area. Most had been remediated and their cases were closed, but the potential still existed for future development within the Original TOD Area to expose the public to significant hazards from redeveloping property within the Original TOD Area. Mitigation Measure (MM) VIII-2 was identified in the 2017 IS/MND for implementation prior to the approval of any future projects proposed under the TOD designation.

MM VIII-1 All spills or leakage of petroleum products or other hazardous materials during construction activities will be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately licensed disposal or treatment facility. This measure will be incorporated into the SWPPP or erosion control plan prepared for site specific development within the [Original TOD Area].

MM VIII-2 Prior to approval of any project under the [Original TOD Area], a Phase I and/or Phase II Environmental Site Assessment shall be prepared to document the potential for any residual contamination at a site being developed within the [Original TOD Area]. Any identified residual contamination shall be remediated to a level that will permit residential use prior to approval of any project proposed under the TOD designation.

The 2021 Addendum references Phase I and Phase II Environmental Site Assessments prepared for the 2021 Development Project, pursuant to MM VIII-2 from the 2017 IS/MND. Recognized Environmental Condition (REC) ASTM E 1527-13 identified the presence of volatile organic compounds (VOCs) within the Original TOD Area at the site of the 2021 Development Project and recommended a comprehensive Soil Vapor Survey be conducted.

The results of the Soil Vapor Survey that was conducted for the Original TOD Area concluded that the cancer risks and non-cancer hazards estimated to result from unmitigated vapor intrusion into on-site buildings were below the regulatory threshold values for residential land use of one-in-a-million (1E-06) cancer risk and 1.0, respectively. Therefore, no significant cancer risks or non-cancer hazards were anticipated to occur as a result of exposure to detected concentrations of VOCs in soil gas at the site of the 2021 Development Project.

Because the type and scale of the 2021 Development Project was anticipated and allowed under the 2017 adopted IS/MND, and the 2021 Development Project would be required to comply with applicable regulations and mitigation identified in the 2017 IS/MND, no changes to the previous CEQA determinations were identified in the 2021 Addendum.

5.9.3 Impact Analysis

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; No New Impact)***

The proposed project would allow future residential, office, and commercial development within the existing developed TOD Expansion Area. During occupancy of the proposed project, either residential or commercial in nature, potentially hazardous materials such as fuel, paint products, solvents, and cleaning products, could be present on site once a site within the TOD Expansion Area is developed. Such materials will be present on site in small quantities for regular cleaning and maintenance activities associated with the operation of commercial uses. Residential uses do not routinely transport, use, or generate hazardous materials or wastes in a quantity that poses a hazard to individuals or the neighborhood. Minor quantities of household hazardous waste may be generated randomly by residential uses, but such generation is in small quantities and it is typically random, not routine. During the construction of future structures in the TOD Expansion Area, there could be a potential for accidental release of petroleum products in sufficient quantity to pose a significant hazard to people or the environment. Compliance with applicable regulations and Mitigation Measure (MM) VIII-1 identified in the 2017 IS/MND would ensure that impacts would remain less than significant with mitigation incorporated. As such, no new or substantially more severe significant impacts related to the transport, use, or disposal of hazardous materials would occur under the proposed project in comparison to previous environmental analysis.

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; No New Impact)***

As noted in Response 5.9.3 (a) above, residential uses have a very low potential to cause a significant hazard from release of hazardous material to the environment. Any household hazardous materials or wastes would be of such a small quantity that creation of a significant hazard due to upset or accident conditions is below a level of significant impact. Additionally, any commercial uses permitted under the TOD designation are not of a nature that would require the use of and potential release of significant quantities of hazardous materials into the environment because hazardous materials would not be present on future sites in large enough quantities to pose a threat

to the environment. However, during construction, accidental release of hazardous materials from construction equipment—particularly the accidental release of petroleum products—could occur and pose a hazard to the public or environment. Mitigation Measure (MM) VIII-1, identified in the 2017 IS/MND, would ensure that impacts under the proposed project would be less than significant with mitigation incorporated, and no new or substantially more severe significant impacts related to the release of hazardous materials than analyzed in previous environmental documents would occur under the proposed project.

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? ***(No Impact; No New Impact)***

The proposed project would not allow hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste because future site development would be limited to residential and commercial uses consistent with the TOD designation. No existing or proposed schools are located within a 0.25-mile distance of the TOD Expansion Area; therefore, no impacts would occur. As such, no new or substantially more severe significant impacts related to the release of hazardous materials in proximity to a school would occur under the proposed project in comparison to previous environmental documents.

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? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

Based on a review of hazardous materials sites gathered from the California State Water Board's GeoTracker website, there are 23 known hazardous materials sites located within 0.25 mile of the Original TOD Area (and therefore a similar distance from the TOD Expansion Area), with some occurring within the Original TOD Area. Most of these sites have been remediated (cleaned) and the cases closed. However, there is a potential for future development under the TOD Expansion Area to expose the public to significant hazards from redeveloping property within the TOD Expansion Area. Mitigation Measure (MM) VIII-2 would require the preparation of a Phase I or Phase II Environmental Site Assessment to document the potential for contamination within the Original TOD Area. Compliance with applicable regulations and application of MM VIII-2 identified in the 2017 IS/MND to the TOD Expansion Area would ensure that impacts would be less than significant with mitigation incorporated. As such, no new or substantially more severe significant impacts related to hazardous materials sites would occur under the proposed project in comparison to the analysis presented in prior environmental documents.

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 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? ***(No Impact; No New Impact)***

There are no public airports or private airstrips located within 2 miles of the TOD Expansion Area. The closest airport to the TOD Expansion Area is Fullerton Municipal Airport, located approximately 5.5 miles west of the TOD Expansion Area. The proposed project is not subject to any adopted

airstrip or airport land use plans. As such, no impact would occur, and no new or substantially more severe significant impacts related to public or public use airports would occur under the proposed project in comparison to prior environmental documents.

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; No New Impact)***

The City's Emergency Operations Plan promotes a coordinated response to emergency situations based on the City's overall mission. Placentia's Emergency and Health Services Division oversees or coordinates a variety of emergency response plans and activities including the Community Emergency Response Team (CERT), the City of Placentia Emergency Operations Center, Mass Notification, Alert, and Warning platforms, and City-wide community outreach and disaster preparedness events. The City has designated evacuation routes and Transportation Assembly Points (TAPs) throughout the City in the event of an emergency situation. According to the City's General Plan, Crowther Avenue has been designated as an evacuation (ingress) access route.[36] It is important to clarify that this route does not serve as a primary evacuation route but rather would provide access for emergency personnel entering the area. Regardless of this distinction, the proposed project is not anticipated to adversely affect the usage of this route in the event of an emergency situation.

Because the proposed project would not substantially alter or block the adjacent roadways, the proposed project would not be expected to impair the function of any emergency evacuation ingress or egress routes. Implementation of Mitigation Measures (MMs) XVI-2 through XVI-11, identified in the 2017 IS/MND, and provided in Section 5.17, Transportation, would reduce any future potential impacts associated with inadequate emergency access both during construction and operations to a less than significant level with mitigation incorporated. Therefore, no new or substantially more significant impacts related to emergency response or evacuation than analyzed in previous environmental documents would occur.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? ***(No Impact; No New Impact)***

The TOD Expansion Area is not located in a designated State Responsibility Area (SRA) for fire hazards, as mapped by the California Department of Forestry and Fire Protection (CAL FIRE). Additionally, the City of Placentia is not currently listed by CAL FIRE as a community facing high wildfire risk, based on criteria including proximity to the wildland-urban interface.[37] Though the City does contain areas along the northern perimeter of the City that are exposed to wildland fire hazards, the TOD Expansion Area is in an urbanized area within the City and is not adjacent to any wildlands. As such, the proposed project would not be subject to wildland fire risks, and no impact

[36] City of Placentia. 2019. General Plan Safety Element. Urban Fire Hazards, Exhibit 7-5. Website: https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId= (accessed September 20, 2023).

[37] California Department of Forestry and Fire Protection (CAL FIRE). 2001. Communities at Risk. Website: https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/fire-plan/communities-at-risk/#p (accessed September 20, 2023).

would occur. Therefore, no new or substantially more severe significant impacts related to wildland fire risks would occur in comparison to analysis presented in previous environmental documents.

5.10 HYDROLOGY AND WATER QUALITY

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
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 substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
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	☐	☐	☐	☒
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

5.10.1 Background

5.10.1.1 Hydrology

The TOD Expansion Area is fully developed, and with minor exceptions, is covered with impervious surfaces. For a developed area, the only three sources of potential violation of water quality standards or waste discharge requirements are from generation of municipal wastewater; from stormwater runoff; and potential discharges of pollutants, such as accidental spills.

Placentia's untreated wastewater is conveyed untreated wastewater to the Orange County Sanitation District's (OC San) trunk sewer system for treatment, which meets waste discharge requirements imposed by the Santa Ana Regional Water Quality Control Board (SARWQCB). Please refer to Section 5.19, Utilities and Service Systems, for more background information regarding Placentia's wastewater management system.

In 2009, SARWQCB adopted Order No. R8-2009-0030 (National Pollutant Discharge Elimination System [NPDES] Permit No. CAS 618030) for municipal stormwater and urban runoff discharges within Orange County, requiring the establishment of a program addressing stormwater pollution issues as part of private development projects. As such, any new project within the Santa Ana Region's jurisdiction must ensure that site development implements a Storm Water Pollution

Prevention Plan (SWPPP) or erosion control plan to control potential sources of water pollution that could violate any standards or discharge requirements during construction and a Water Quality Management Plan (WQMP) to control water pollution over the long term.

5.10.1.2 Floodplains

According to the Federal Emergency Management Agency (FEMA) Flood Map, the TOD Expansion Area is categorized as Zone X, or "Area of Minimal Flood Hazard." Zone X is defined by FEMA as the area determined to be outside the 500-year flood and protected by levees from the 100- year flood.

5.10.1.3 Water Quality Regulations

Clean Water Act. The United States Environmental Protection Agency (USEPA) adopted the Clean Water Act (CWA) in 1977 to set a framework for establishing regulations to protect the chemical, physical, and biological integrity of the nation's waters. Section 401 of the federal CWA requires an applicant for a federal license or permit to conduct any activity, which may result in a discharge to Waters of the United States (Waters of the U.S.), to obtain certification from the State that the discharge will comply with other provisions of the act. A Section 401 Water Quality Certification is also required under the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act) which predates the CWA and regulates discharges to Waters of the State. Waters of the State include more than just Waters of the U.S., like groundwater and surface waters not considered Waters of the U.S. Additionally, it prohibits discharges of "waste" as defined and this definition is broader than the CWA definition of "pollutant." Discharges under the Porter-Cologne Act are permitted by Waste Discharge Requirements (WDRs) and may be required even when the discharge is already permitted or exempt under the CWA. The applicable waste discharge requirements for the Hayward Yard are contained in the National Pollutant Discharge Elimination System (NPDES) *General Permit for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities*[38] (Industrial General Permit) and *the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*[39] (Construction General Permit), which are described further below.

The NPDES under Section 402(p) of the CWA aims to reduce the direct discharge of pollutants into waterways and manage additional pollution runoff. The SARWQCB has the authority to administer permits within its jurisdiction, including the city of Placentia.

Section 303(d) of the CWA requires that each state identify "impaired" water bodies or segments of water bodies that do not meet at least one of the listed state water-quality standards. When the water body or segment is listed as impaired, the state institutes a Total Maximum Daily Load (TMDL) for the pollutant found to be creating the impairment. The TMDL is the maximum amount of a pollutant that a water body can receive and still meet water-quality standards and is usually calculated based on the total amount of allowable loads generated by a single pollutant deriving from all of its originating point and non-point sources. The 303(d) list identifies water bodies that

[38] State Water Resources Control Board (SWRCB). 2020. Order No. 2014-0057-DWQ as amended by Order 2014-0057-DWQ and Order 2015-0122-DWQ. Industrial General Permit Order 2014-0057-DWQ as amended in 2015 and 2018 (EFFECTIVE July 1, 2020).

[39] State Water Resources Control Board (SWRCB). 2009. Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ.

will need to establish a TMDL in the future in order to abide by water-quality standards. As per 303(d), the SARWQCB has identified impaired water bodies within its authority as well as the associated pollutants causing the impairment.

National Pollutant Discharge Elimination System. As described above, the NPDES was established under the CWA to regulate municipal, industrial, and stormwater discharges to the surface Waters of the U.S., including discharges from municipal separate storm sewer systems (MS4s). All entities that discharge pollutants into an identified waterbody of the United States are required to obtain an NPDES permit.

Porter Cologne Water Quality Act. California adopted the Porter-Cologne Water Quality Act in 1969, giving the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards the authority over State water rights and policies in relation to managing and enforcing water quality. The RWQCBs adopt Water Quality Control Plans (Basin Plans) that outline their region's water quality conditions and standards as well as beneficial uses of the region's ground and surface water. The TOD Expansion Area lies within the Santa Ana Watershed in Region 8 of the California State Water Resources Control Board, which is governed by the Santa Ana SARWQCB. The most recent Water Quality Control Plan for the Santa Ana River Basin (Basin Plan)[40] was last updated by the SARWQCB in June 2019 and is revised periodically to reflect relevant ecological, technological, and political changes. The Basin Plan also includes water quality standards for groundwater.

Statewide Construction General Permit. Construction projects or activities that are one acre or more must obtain a Construction General Permit (CGP) from the SWRCB. The CGP has been developed to be protective of water quality during construction activities and covers any construction or demolition activity, including, but not limited to clearing, grading, grubbing or excavation, or any other activity that results in a land disturbance of equal to or greater than one acre. Prior to construction, the landowner or other applicable entity must submit online Permit Registration Document (PRDs) to the Stormwater Multiple Application and Report Tracking System (SMARTS) website. The PRDs include a Notice of Intent (NOI), Risk Assessment, Post-Construction Calculations, a Site Map, Stormwater Pollution Prevention Plan (SWPPP), a signed certification by the landowner or other applicable entity, and the first annual fee. Landowners are also required develop BMPs in accordance with the development of a SWPPP. The SWPPP maps the boundaries of a project site, identifying the existing and proposed structures and roads within the vicinity of the site, as well as stormwater collection and discharge points and drainage patterns. These BMPs should address strategies to prevent soil erosion and the proper treatment and discharge of other pollutants generated by construction, which could contaminate waterways on or nearby the site. A SWPPP must also include a visual chemical monitoring program of nonvisible pollutants and a sediment-monitoring program. The SARWQCB enforces compliance with the CGP through site inspections and fines. As the TOD Expansion Area is larger than one acre, it is subject to these listed requirements.

[40] Santa Ana Regional Water Quality Control Board (SARWQCB). 2019. *Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin*. Website: https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (accessed August 18, 2023).

5.10.2 Prior Environmental Analysis

The 2017 IS/MND determined that the Approved Project would have no impacts related to erosion and siltation, flooding on site or off site, flood flows, and inundation by seiche, tsunami, or mudflow. It also found that the Approved Project would have less than significant impacts related to water quality standards, polluted runoff, degraded water quality, and flooding risks. Threshold (e), relating to conflict with a water quality control or sustainable groundwater management plan, was not addressed in prior environmental documents.

The 2017 IS/MND determined a potential impact existed pertaining to the depletion of groundwater supplies. Since the 2017 IS/MND was concerned with a planning area rather than a specific project, it was not possible at the time to obtain an accurate estimate of current water consumption under future buildout. Mitigation Measure (MM) IX-1 was identified in the 2017 IS/MND to address future water consumption and potential groundwater extractions and reduce them to a less than significant level.

MM IX-1 Concurrent with individual project applications in the future, the applicant for a project in the [Original TOD Area] shall submit a review of existing water consumption on the property, and a forecast of future water consumption by the proposed development. If water consumption by the new project is less than currently occurs on the property, no further action is required. If water consumption is forecast to increase by more 25% than current water demand or 5,000 gallons per day per acre, the project applicant shall fund sufficient water conservation measures within the [Original TOD Area] (including the proposed [development site]) to offset the increase in demand on the local water purveyor. Specific conservation measures that can be funded include, but are not limited to: use of recycled water for exterior landscaping, ultra-low flush toilets; interior water fixtures that reduce water consumption, such as on-demand water heaters; replacement of existing high water demand landscaping with xeric landscaping; installation of smart landscape/irrigation management/control systems (such as drip systems); and use of onsite low water demand landscaping. To verify adequate water demand offset, the City shall consult with the local water purveyor and verify the adequacy of the offset.

The hydrology analysis included in the 2021 Addendum found that the 2021 Development Project's total water demands fell within the active design capacity of 22 million gallons per day (MGD) for regional water supplies to be delivered to the City. Therefore, impacts to groundwater resources were found to be less than significant, and it was determined that implementation of MM IX-1 would ensure that no significant groundwater impact would occur. As such, no changes to the previous CEQA determinations were identified in the 2021 Addendum.

5.10.3 Impact Analysis

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; No New Impact)***

As discussed above, the TOD Expansion Area is fully developed and a majority of this development consists of impervious surfaces. Pervious surfaces are limited to urban landscaping areas. Any future development of the TOD Expansion Area would be subject to landscaping requirements mandated in the TOD Development Standards, particularly in relation to parking areas. This would result in the incorporation of permeable surfaces into future project designs, which would likely balance out any landscaping removed during redevelopment.

The proposed project is programmatic in nature and does not propose any physical development. Pursuant to Order No. R8-2009-0030 (NPDES Permit No. CAS 618030), as previously discussed, any future development projects within the TOD Expansion Area must ensure that site development implements a Storm Water Pollution Prevention Plan (SWPPP) or erosion control plan to control potential sources of water pollution that could violate any standards or discharge requirements during construction and a Water Quality Management Plan (WQMP) to control water pollution over the long term. These requirements would address potential water pollution resulting from future development of the TOD Expansion Area and would ensure the incorporation of best management practices (BMPs). These BMPs would address strategies to prevent soil erosion and the proper treatment and discharge of other pollutants generated by construction, which could contaminate waterways downstream from the TOD Expansion Area. The proposed project's compliance with applicable regulations, as well as Mitigation Measures (MMs) VI-1 and VIII-1 included in the 2017 IS/MND (these mitigation measures are provided in Section 5.7, Geology and Soils, of this document), which would identify measures within future development to prevent violation of any water quality standards or waste discharge requirements, would ensure that impacts would be less than significant with mitigation incorporated. As such, no new or substantially more severe significant impacts related to groundwater quality would occur in comparison to prior analysis.

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? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

As previously discussed, the TOD Expansion Area is fully developed and with minor exceptions is covered with impervious surfaces, largely buildings and paved roadways or parking areas. Thus, the TOD Expansion Area does not presently function as a recharge area for the regional aquifer and would not serve this function after development under the TOD designation. There are no groundwater wells located within the TOD Expansion Area and the future construction of new structures has no potential to directly intercept the groundwater table within the Original TOD Area and TOD Expansion Area since, according to the 2017 IS/MND, it is at least 50 feet below the ground surface. The existing land uses in the TOD Expansion Area already consume potable water, primarily for industrial uses. However, the shift of uses to multi-family residential and commercial uses under the TOD designation may result in a substantial increase in the number of water connections, and a possible increase in actual groundwater consumption, depending on the specifics of future proposed development within the TOD Expansion Area. Pursuant to Mitigation Measure (MM) IX-1,

during the environmental review process for each future development within the TOD Expansion Area, proposed water consumption would be analyzed relative to the availability of groundwater resources, and shall incorporate water conservation design features to offset increased demand. The proposed project's implementation of MM IX-1 would ensure that impacts would be less than significant with mitigation incorporated, and no new or substantially more severe significant impacts related to groundwater supplies would occur in comparison to what was analyzed in prior environmental documents.

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; No New Impact)***

The local drainage pattern for the TOD Expansion Area is already established, as runoff from private properties enters the local streets and is transported to the regional stormwater conveyance system. As previously noted, the TOD Expansion Area is fully developed, and an estimated 95 percent or more of the rainfall leaves the area as surface runoff. There are no streams or channels within the TOD Expansion Area.

As previously stated, pursuant to Order No. R8-2009-0030 (NPDES Permit No. CAS 618030), any future development projects within the TOD Expansion Area must ensure that site development implements a Storm Water Pollution Prevention Plan (SWPPP) or erosion control plan to control potential sources of water pollution that could violate any standards or discharge requirements during construction. As such, any potential for erosion or siltation would be evaluated on an individual basis specific to each future development proposal within the TOD Expansion Area. The proposed project is not anticipated to alter the existing drainage system within and surrounding the TOD Expansion Area. As such, no impacts would occur, which also means that no new or substantially more severe significant impacts related to erosion or siltation would occur under the proposed project than determined in prior analysis.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? ***(No Impact; No New Impact)***

Please refer to the preceding discussion under Response 5.10.3(c). The drainage pattern of the TOD Expansion Area would not be altered and the existing development consists of almost 100 percent impervious surface. Redevelopment of the TOD Expansion Area under the TOD designation has no potential to cause an increase in surface runoff that could cause flooding on site or off site. In fact, by requiring additional landscaping and modern water quality management systems to be installed, less surface runoff may occur as a result of future redevelopment. No impacts would occur, meaning no new or substantially more severe significant impacts related to surface runoff than previously analyzed would occur under the proposed project.

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? ***(Less Than Significant Impact; No New Impact)***

As indicated under Responses 5.10.3(c) and (d), the TOD Expansion Area is 100 percent developed with urban uses, and runoff from the area is not forecast to increase as a result of future redevelopment of the TOD Expansion Area under the TOD designation. Potential sources of pollution within the TOD Expansion Area remain essentially the same, except as noted in preceding discussions where new SWPPPs and WQMPs must be implemented in conjunction with future development. The proposed project's compliance with applicable regulations, as well as Mitigation Measures (MMs) VI-1 and VIII-1, would reduce potential impacts to less than significant with mitigation incorporated, which would ensure that no new or substantially more severe significant impacts related to runoff would occur in comparison to the prior environmental analysis.

iv. Impede or redirect flood flows? ***(No Impact; No New Impact)***

The TOD Expansion Area is not located within an area subject to 100-year flood hazards. As previously discussed, the TOD Expansion Area is categorized as Zone X, or "Area of Minimal Flood Hazard," by the Federal Emergency Management Agency (FEMA) Flood Map. Therefore, future development under the TOD designation would not be exposed to such hazards, and has no chance of impeding or redirecting flood flows. As such, no impacts would occur, and therefore no new or substantially more severe significant impacts related to flood flows would occur under the proposed project compared to the previous analysis.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? ***(No Impact; No New Impact)***

The TOD Expansion Area is not located within a channel or area that would be exposed to any of the referenced hazards, i.e., seiche, tsunami or mudflow. As such, no adverse impacts under this issue could occur from future development within the TOD Expansion Area. Therefore, future development would not be exposed to such hazards, and has no chance of releasing pollutants as a result of inundation, meaning no impacts would occur. As such, no new or substantially more severe significant impacts related to inundation would occur under the proposed project in comparison to previous environmental analysis.

e. In flood hazard, tsunami, or seiche zones, would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

As discussed under Response 5.7.3(b) in Section 5.7, Geology and Soils, each city is required to ensure that new development implements a Storm Water Pollution Prevention Plan and a Water Quality Management Plan to control soil erosion, loss of topsoil and water pollution over the long term. The project's mandatory compliance with this requirement and relevant mitigation detailed in the 2017 IS/MND would ensure that water quality BMPs are implemented and that the proposed project would not conflict with any applicable water quality control plans.

As discussed under Response 5.10.3(b) above, there are no groundwater wells located within the TOD Expansion Area, and the future construction of new structures has no potential to directly

intercept the groundwater table within the TOD Expansion Area since it is at least 50 feet below the ground surface based on measurements conducted for the Approved Project. As such, many groundwater management plans are not applicable to the TOD Expansion Area, and future development within the TOD Expansion Area enabled by the proposed project would not conflict with any applicable sustainable groundwater management plans. The proposed project's compliance with applicable regulations, as well as Mitigation Measures (MMs) VI-1 and VIII-1 included in the 2017 IS/MND, would ensure that impacts would be less than significant with mitigation incorporated, and no new or substantially more severe significant impacts related to water quality or groundwater plans than analyzed in previous environmental documents would occur.

5.11 LAND USE AND PLANNING

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

5.11.1 Background

The Original TOD Area has previously been physically divided by the Burlington Northern Santa Fe (BNSF) railway east-west main line tracks. The rationale for considering the TOD designation was the new Metrolink passenger train station to be developed along the BNSF Railway directly north of the Original TOD Area. This new station would create an opportunity to redevelop the area surrounding the Metrolink station with a higher density, transit-oriented development (TOD) neighborhood to take advantage of this new mode of transportation that would provide transit connections throughout the southern California region. However, the City's General Plan did not previously have a mixed-use land use designation that could accommodate higher density residential development with supporting commercial and office uses. As such, the Original TOD Area was established on 28.2 acres of land between the BNSF east-west mainline rail corridor and Crowther Avenue. The proposed TOD Expansion Area would be located directly across Crowther Avenue from the Original TOD Area, which would create land use consistency within the proximity.

The proposed TOD Expansion Area is currently zoned for Manufacturing and Combining Planned Manufacturing District uses and designated for Industrial uses in the City's General Plan. Its current uses align with these designations, including metal stamping, screen printing, plastic fabrication, and storage facility businesses. These businesses are assumed to operate under standard business hours. The site also contains ample surface parking to serve the businesses and facilities in the area.

5.11.2 Prior Environmental Analysis

The proposed TOD designation was found to have a less than significant impact regarding the division of an established community in the 2017 IS/MND. The 2017 IS/MND also determined that the Approved Project would not conflict with the applicable land use designations once it was approved because all future projects within the TOD area would require consistency with the proposed new General Plan land use designation and zone classification. As such, the proposed TOD designation was found to have a less than significant impact regarding consistency with applicable land use plans, policies, and regulations. Because both Threshold (b) and (c) of the 2017 IS/MND pertain to applicable land use plans, they are both analyzed under Threshold (b) in this Supplemental IS/MND.

The 2021 Addendum found that the site plan and proposed land use of the 2021 Development Project were consistent with those of the land use and density standards identified in the 2017 IS/MND, as well as all other applicable land use regulations. The proposed number of residential

units (189 units), 2,000 square feet of leasing space, and 1,500 square feet of retail space, were found to result in less than the maximum allowed vehicle trips of 5,000. As such, no changes to the previous CEQA determinations were identified.

5.11.3 Impact Analysis

a. Would the project physically divide an established community? ***(Less Than Significant Impact; No New Impact)***

The physical division of an established community typically refers to the construction of a feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas.

The 2017 IS/MND established the TOD designation as a mixed-use land use designation that can accommodate higher density residential development with supporting commercial and office uses. The intention with the Original TOD Area was to redevelop the area around the proposed new Metrolink station to take advantage of its transportation opportunities. The proposed project would support this aim by expanding the Original TOD Area to create a more continuous cluster of transit-oriented development, bridging gaps that existed in the Original TOD Area. The area surrounding the TOD Expansion Area is already highly urbanized and contains industrial businesses as well as a residential development directly between both subareas of the TOD Expansion Area. The proposed project would not introduce any new physical barriers that would divide an established community, as no established communities exist within the TOD Expansion Area or its proximity that would be divided. In fact, the TOD Expansion Area would supplement the existing community by enabling further residential, commercial, and office development within close proximity to the Original TOD Area and creating a cohesive land use unit. Impacts would be less than significant; therefore, the proposed project would not result in new significant or substantially more severe significant impacts regarding the division of an established community than those analyzed in the prior environmental documents.

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? ***(Less Than Significant Impact; No New Impact)***

Land uses within the TOD Expansion Area are primarily oriented toward industrial-related activities associated with the area's historic proximity to the BNSF rail line. The land uses north of the TOD Expansion Area were rezoned in 2017 when they were included in the Original TOD Area. The proposed land use changes associated with the proposed project would allow for residential development with supporting office and commercial uses. The Original TOD Area already contains limited residential and commercial uses pursuant approved under the Approved Project, so the uses themselves will not be new. Future development within the TOD Expansion Area must comply with the TOD development standards and policies established in 2017. These development standards establish specific development and design standards that the City considers to be self-mitigating with regarding to consistency with the existing City's General Plan. Despite this unique designation, all existing General Plan policies and other regulations from other agencies, such as the Regional Water Quality Control Board (RWQCB), would continue to apply to the TOD Expansion Area.

Therefore, future projects within the TOD Expansion Area would not be relieved from complying and implementing any policies designed to avoid or mitigate environmental effects. The proposed project is not forecast to conflict with applicable land use designations once it is approved because all future projects within the TOD Expansion Area must be developed consistent with the TOD General Plan land use designation and zone classification. In addition, the TOD Expansion Area would be consistent with the SCAG RTP/SCS. As a result, impacts of the proposed project would be less than significant. Therefore, the proposed project would not result in new significant or substantially more severe significant impacts to land use policies than those analyzed in the prior environmental documents.

5.12 MINERAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

5.12.1 Background

Minerals are any naturally occurring chemical element or compound, or groups of elements and compounds, formed from inorganic processes and organic substances including, but not limited to, coal, peat and oil-bearing rock, but excluding geothermal resources, natural gas, and petroleum.

The California Department of Conservation, Geological Survey (CGS) and the California State Mining and Geology Board are required by the Surface Mining and Reclamation Act of 1974 (SMARA) to categorize lands into four Aggregate and Mineral Resource Zones (MRZs), described below. These MRZs classify lands that contain significant regional or Statewide mineral deposits. Lead Agencies are mandated by the State to incorporate MRZs into their General Plans.

MRZs are classified on the basis of geologic factors without regard to existing land use and land ownership. The four MRZs are categorized as follows:

- MRZ-1: An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2: An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- MRZ-3: An area containing mineral deposits, the significance of which cannot be evaluated.
- MRZ-4: An area where available information is inadequate for assignment to any other MRZ zone.

Of the four categories, lands classified as MRZ-2 are of the greatest importance because such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are present. MRZ-2 areas are designated by the State Mining and Geology Board as being “regionally significant.” Such designations require that a Lead Agency make land use decisions involving designated areas in accordance with its mineral resource management policies and that it consider the importance of the mineral resource to the region or the State as a whole, not just to the Lead Agency’s jurisdiction.

5.12.2 Prior Environmental Analysis

Neither of the prior environmental documents indicated that significant mineral resource deposits exist within the Original TOD Area. Therefore, no impacts related to mineral resources were identified.

5.12.3 Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ***(No Impact; No New Impact)***

The TOD Expansion Area is 100 percent developed with urban land uses, and there are no known mineral resources on or near the TOD Expansion Area. Further, the TOD Expansion Area is not designated for mineral resource exploitation by any zoning or land use designations. No impacts would occur; as such, the proposed project would not result in new significant or substantially more severe significant impacts to mineral resources than those analyzed in the prior environmental documents.

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ***(No Impact; No New Impact)***

As discussed under Response 5.12.3(a) above, there are no known mineral resource recovery sites located on or within close proximity to the TOD Expansion Area. No mineral resource recovery sites are designated within the City's General Plan. No impacts would occur; therefore, the proposed project would not result in new significant or substantially more severe significant impacts to mineral resource recovery sites than those analyzed in the prior environmental documents.

5.13 NOISE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
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?	☐	☐	☐	☒
b. Generation of excessive groundborne vibration or groundborne noise 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 2 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?	☐	☐	☐	☒

5.13.1 Background

The following analysis was prepared using background information obtained from a noise study completed for a project just east of the Original TOD Area. The fundamentals of noise and vibration as well as the regulatory framework for the proposed project are consistent with the Noise Impact Analysis for the Veterans Village Project,[41] which was the supporting technical report used for the analysis contained within the 2017 IS/MND.

Baseline train operations noise levels at the TOD Expansion Area is 79 decibels (dB) Community Noise Equivalent Level (CNEL) in the City of Placentia because the Burlington Northern Santa Fe (BNSF) rail line is located north and adjacent to the proposed TOD Expansion Area. An estimated 50 trains per day, or two trains per hour, travel through this corridor.

5.13.2 Prior Environmental Analysis

The following provides a summary of the analysis findings and mitigation measures from the 2017 IS/MND and the 2021 Addendum.

5.13.1.1 2017 IS/MND

It should be noted that the 2017 IS/MND utilized a set of CEQA Guidelines Appendix G thresholds that have since been condensed and absorbed from six down to three. As such, Thresholds (a), (c), and (d) of the 2017 IS/MND are analyzed in this Supplemental IS/MND as Threshold (a), and Thresholds (e) and (f) of the 2017 IS/MND are analyzed in this Supplemental IS/MND as Threshold (c).

The Approved Project was found to have no impact relating to exposure of individuals residing within an airport land use plan or within the vicinity of an airport or private airstrip since the Original TOD Area is not located within the vicinity of an airport, private airstrip, or airport land use plan.

41 Tom Dodson & Associates. 2016. *Noise Impact Analysis – Veteran's Village*. November 8.

The 2017 IS/MND found that the Approved Project would have potentially significant impacts relating to exposure to noise levels in excess of standards, exposure to excessive groundborne vibration or noise levels, a substantial permanent increase in ambient noise levels, and a substantial temporary increase in ambient noise levels.

Mitigation Measures (MMs) XII-1 through XII-12 were identified to reduce these potential impacts to a less than significant level.

MM XII-1 The City shall require a noise study for each future specific project that will identify whether noise attenuation features (such as dual-paned windows with specific sound transmission features, mechanical ventilation, balcony buffers, or street level buffers) must be installed to meet the City's noise standards. This noise study shall be submitted with the project design and noise attenuation features shall be incorporated and identified on design plans submitted to the City for review and approval. Specific measures shall be implemented that demonstrate compliance with City noise standards, or a follow-on CEQA environmental document must be prepared for a project that cannot meet the standards.

MM XII-2 The City shall require a vibration study for each future specific project that will identify whether noise attenuation features (such as dual-paned windows, spread footings, or other vibration features) must be installed to meet the 72 VdB vibration threshold recommended for the volume of train traffic. This vibration study shall be submitted with the project design and vibration attenuation features shall be incorporated and identified on design plans submitted to the City for review and approval. Specific measures shall be implemented that demonstrate compliance with the 72 VdB threshold, or a follow-on CEQA environmental document must be prepared for a project that cannot meet the standards.

MM XII-3 Future projects that may adversely impact noise sensitive uses shall use noise reducing barriers and other devices to reduce exterior noise levels at the nearest sensitive receptor to 65 CNEL or less during the daytime construction hours. This shall include installation of a temporary construction barrier around the source of construction noise.

MM XII-4 No construction activities shall occur during the hours of 7 PM through 7 AM, Monday through Saturday and at no time shall construction activities occur on Sundays or holidays, unless a declared emergency exists. Stated differently, construction activities shall be limited to 7 AM to 7 PM on weekdays; and no construction activities on Sunday or federal holidays.

MM XII-5 Stationary construction equipment that generates noise above the 65 dB threshold at the nearest sensitive receptor shall be placed behind a temporary noise construction barrier while in use.

MM XII-6 The project developer shall establish a noise complaint response program and shall respond to any noise complaints received for future specific project by measuring

noise levels at the affected receptor site. If the noise level exceeds an CNEL of 60 dBA exterior or an CNEL of 45 dBA interior at the sensitive receptor, the applicant will implement adequate measures (which may include portable sound attenuation walls, use of quieter equipment, shift of construction schedule to avoid the presence of sensitive receptors, etc.) to reduce noise levels to the greatest extent feasible.

MM XII-7 Project developer will require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by applicant personnel during construction activities.

MM XII-8 Equipment not in use for five minutes shall be shut off.

MM XII-9 Equipment shall be maintained and operated such that loads are secured from rattling or banging.

MM XII-10 Where available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.

MM XII-11 Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment.

MM XII-12 No radios or other sound equipment shall be used at this site unless required for emergency response by the contractor.

MM XII-13 Public notice shall be given 10 days prior to initiating construction. This notice shall be provided to all property owners and residents within 300 feet of the [Original TOD Area] and shall be provided to property owners/residents at least one week prior to initiating construction. The notice shall identify the dates of construction and the name and phone number of a construction supervisor (contact person) in case of complaints. One contact person shall be assigned to the project. The public notice shall encourage the adjacent residents to contact the supervisor in the case of a complaint. Residents would be informed if there is a change in the construction schedule. The supervisor shall be available 24/7 throughout construction by mobile phone. If a complaint is received, the contact person shall take all feasible steps to remove or attenuate the sound source causing the complaint.

5.13.1.2 2021 Addendum

The 2021 Addendum found that since traffic generated by the proposed development was within the 5,000 daily trip limit and would generate 723 fewer daily trips than what was analyzed in the Approved Project, less traffic noise would be generated than previously analyzed.

A Title 24 Acoustical Study and Vibration Study were prepared in compliance with 2017 IS/MND's MMs XII-1 and XII-2, which found that the 2021 Development Project would be consistent with the City's noise and vibration standards. Therefore, implementation of the 2021 Development Project were found to not result in greater operational noise and vibration impacts compared to the Approved Project and given the project's adherence to applicable regulations and mitigation identified in the 2017 IS/MND, no new impacts or substantially greater impacts than previously analyzed were identified in the 2021 Addendum.

5.13.3 Impact Analysis

a. Would the project result in 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; No New Impact)***

Short-Term Construction Noise Impacts. Similar to the 2017 IS/MND project, the proposed project would also result in noise generated during site preparation, grading, building construction, architectural coating, and paving on the TOD Expansion Area. The 2017 IS/MND determined that noise levels during construction would range from 80 equivalent continuous sound level measured in A-weighted decibels (dBA L_{eq}) to 90 dBA L_{eq} at a distance of approximately 50 feet.

The proposed project would utilize similar construction techniques with similar construction equipment, and, therefore, would not result in additional noise impacts due to noise generated during construction activities on the TOD Expansion Area. The proposed project would also be required to implement MMs XII-3 through XII-13, as included in the 2017 IS/MND, which outlines best management practices (BMPs) to be implemented on site, such as equipping construction equipment with properly operating noise mufflers and locating construction staging areas away from off-site sensitive uses. In addition, the proposed project is also required to comply with the construction hours specified in the City's Noise Ordinance. Therefore, noise impacts during project construction would remain less than significant for the proposed project with the implementation of the above-mentioned mitigation measures.

Long-Term Off-Site Traffic Noise Impacts. The 2017 IS/MND determined that project-related traffic would have imperceptible (0.5 dBA or less) noise level increases along roadway segments in the project vicinity for the future year (Year 2035) scenarios. The proposed project would add approximately 5,000 average daily trips (ADT) to the Year 2035 volume of 16,000 along Melrose Street as presented in Table 4-5 of the Traffic Study supporting the 2017 IS/MND. The following equation was used to determine the potential impacts of the project:

$$\text{Change in CNEL} = 10\ log_{10}[V_{e+p}/V_{existing}]$$

where: $V_{existing}$ = existing daily volumes
V_{e+p} = existing daily volumes plus project
Change in CNEL = increase in noise level due to the project

The results of the calculations show that an increase of approximately 1.2 dBA CNEL is expected along the streets adjacent to the TOD Expansion Area. A noise level increase of less than 3 dBA would not be readily perceptible to the human ear; therefore, the traffic noise increase in the vicinity of the TOD Expansion Area resulting from the proposed project would be less than significant. No mitigation is required. This determination is consistent with the 2017 IS/MND, and therefore no new or substantially more significant noise impacts would occur.

Long-Term On-Site Traffic Noise Impacts. As described in the 2017 IS/MND, the 79 dBA CNEL from the BNSF rail corridor would create a high background noise environment. While the proposed project would be further away from the rail corridor as compared to the 2017 IS/MND, exterior noise levels are still likely to exceed the City's 65 dBA CNEL noise level standard. Although the specific site plans have not yet been designed, the proposed project would implement Mitigation Measure (MM) XII-1, which requires a site-specific noise study to be completed once plans are available. Consistent with the 2017 IS/MND, with the implementation of MM XII-1, on-site noise impacts would be reduced to a less than significant level. As such, no new or substantially more severe significant noise impacts would occur under the proposed project than those analyzed in previous environmental documents.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

As described in the 2017 IS/MND, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by vibration of room surfaces is called structure borne noise. Vibration sources may be continuous or transient. Vibration is often described in units of velocity (inches per second), and discussed in decibel (dB) units in order to compress the range of numbers required to describe vibration.

Due to the presence of the BNSF railway corridor just north of the proposed project, groundborne vibration is present within the area and may occur throughout the TOD Expansion Area during construction of future development. Train vibration depends upon a variety of factors. The weight of the train, the travel speed, the condition of the track and the character of the subsoil all affect the observed vibration level. The Federal Transit Administration (FTA) guidance suggests a significance threshold of 80 vibration velocity decibels (VdB) for train vibrations if there are currently approximately 30 train movements per day, 75 VdB for between 30–70 events and 72 VdB for more than 70 events per day[42].

The closest part of the proposed project is approximately 100 feet to the track centerline. Vibration levels from heavy rail systems depend upon train travel speed. Freight trains are restricted to a 30–35 mile per hour (mph) speed limit in areas of at-grade crossings. The Root Mean Square (RMS) vibration level at 30 mph is approximately 3 VdB less than at 50 mph. A

[42] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed November 17, 2023).

reference vibration level of 74 VdB has therefore been assumed at the closest building façade to the tracks. Vibration generally reduces as it propagates through a building.

Freight train vibration levels of 74 VdB at 115 feet from the track for a locomotive-powered freight train traveling at 30 mph would marginally exceed the VdB annoyance threshold without the effects of coupling losses if there are more than 70 train movements per day of which there are. Vibration mitigation for specific projects will vary in the future and would need to be identified for each specific development within the TOD Expansion Area. Therefore, consistent with the 2017 IS/MND, with the implementation of Mitigation Measure (MM) XII-2, on site vibration impacts would be reduced to a less than significant level and would ensure that future residential uses do not experience any significant vibration impacts. As such, no new or substantially more severe significant noise impacts related to vibration than analyzed in previous environmental documents would occur under the proposed project.

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 2 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; No New Impact)***

There are no public airports or private airstrips located within 2 miles of the TOD Expansion Area. The closest airport to the TOD Expansion Area is Fullerton Municipal Airport, located approximately 5.5 miles west of the TOD Expansion Area. The proposed project is not subject to any adopted airstrip or airport land use plans. Therefore, no impacts would occur under the proposed project. No new or substantially more severe significant noise impacts related to public or public use airports would occur under the proposed project in comparison to prior environmental analysis.

5.14 POPULATION AND HOUSING

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

5.14.1 Background

According to population and housing estimates prepared by the California Department of Finance, Placentia's total population as of January 1, 2023 was 52,507[43] individuals, or 1.7 percent of Orange County's total population.[44] As of the most recent year available, 2019, Placentia had 17,170 housing units, which amounted to 1.6 percent of the total amount of housing units in Orange County.[45]

On March 15, 2022, the City of Placentia's Housing Element was updated for the 2021–2029 time period to ensure the City's policies and programs could accommodate the estimated housing growth needs identified in the Southern California Association of Governments' (SCAG) Regional Housing Needs Assessment (RHNA) allocation for the Planning Period. Per the RHNA, the City is allocated 4,398 dwelling units to accommodate the estimated growth needed at various income levels.

As required by State Housing law, including Assembly Bill (AB) 1397, the updated 2021–2029 Housing Element sought to identify land in the City with the ability to accommodate this estimated growth through available sites and appropriate zoning. Analysis of potential sites, attached as Appendix B to the City's 2021–2029 Housing Element Update, led to the determination that there was a shortfall in potential housing capacity compared to the identified need across income categories.

Chapter 4 of the 2021–2029 Housing Element Update contains the City's Housing Plan, which "describes Placentia's goals, policies, programs, and objectives for the 2021–2029 Planning Period related to the preservation, improvement and development of housing in the City" (City of Placentia 2022). In order to address the shortfall of lower-income sites as identified in Appendix B of the Housing Element, Goal HE-1.8 of the City's Housing Plan states that the City shall identify and rezone

43 State of California Department of Finance. 2023. Population and Housing Estimates for Cities, Counties, and the State, January 1, 2022, and 2023. Website: https://dof.ca.gov/forecasting/demographics/estimates-e1/ (accessed December 4, 2023).

44 52,507 / 3,137,164 = 0.0167 = 1.7 percent

45 Southern California Association of Governments (SCAG). 2019. Profile of the City of Placentia. Website: https://scag.ca.gov/sites/main/files/file-attachments/placentia_localprofile.pdf?1606012689 (accessed August 18, 2023).

at least 14 acres of land with allowable densities of at least 30 units per acre to accommodate this shortfall of lower-income sites.

The proposed project would facilitate the development of up to 1,378 new residential units within the TOD Expansion Area by rezoning 14.5 acres of land to allow residential uses at densities of up to 95 units per acre, as specified by the 2017 IS/MND's TOD Development Standards.

5.14.2 Prior Environmental Analysis

The 2017 IS/MND found that the proposed TOD designation would have less than significant impacts pertaining to inducing substantial population growth in an area and displacing substantial numbers of people or existing housing. As such, no mitigation measures were imposed. It should be noted that Thresholds (b) and (c) in the 2017 IS/MND have since been condensed into what is analyzed as Threshold (b) in this Supplemental IS/MND.

The 2021 Addendum determined that because the size and projected trip generation of the proposed residential development at 207-209 West Crowther Avenue would be consistent with the worst-case assumptions analyzed in the 2017 IS/MND, no new impacts or substantially more severe significant impacts relating to population and housing were identified. No changes to the previous CEQA determinations were identified.

5.14.3 Impact Analysis

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; No New Impact)***

As previously discussed, the City had a population of 52,507 individuals as of January 1, 2023.[46] U.S. Census Bureau 5-year American Community Survey (ACS) Estimates indicate that between 2017 and 2021, the average household size was 3.1 persons per household.[47] A worst-case assumption if the entire approximately 14.5-acre TOD Expansion Area was developed at the maximum allowable dwelling unit per acre (du/ac) threshold of 95 would yield approximately 1,378 residential units. Given this average household size, and under the worst-case assumption if the entire approximately 14.5-acre TOD Expansion Area was developed with 1,378 units, the population increase within the City under the proposed project could be approximately 4,272 persons.[48] This would equate to an estimated 8.1 percent increase in the City's overall population.[49] This increase in population is not considered a substantial direct increase, given that this area of the City has sufficient existing infrastructure to serve the future development envisioned for the TOD Expansion Area. Further, this increase in housing units is both planned and anticipated pursuant to the City's RHNA allocation of 4,398 dwelling units. The rezoning under the proposed project would allow for residential

46 State of California Department of Finance. 2023. Population and Housing Estimates for Cities, Counties, and the State, January 1, 2022, and 2023. Website: https://dof.ca.gov/forecasting/demographics/estimates-e1/ (accessed December 4, 2023).

47 United States Census Bureau. 2022. QuickFacts Placentia City, California. Website: https://www.census.gov/quickfacts/placentiacitycalifornia#qf-flag-X (accessed December 4, 2023).

48 1,378 * 3.1 = 4,271.8 persons

49 4,272 / 52, 507 = 0.0814 = 8.1 percent

development that was previously not permitted in response to the identified shortfall in potential housing capacity compared to the identified need across income categories; therefore, impacts would be less than significant. No new or substantially more significant impacts than identified in previous environmental documents would occur.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ***(Less Than Significant Impact; No New Impact)***

The TOD Expansion Area encompasses approximately 14.5 acres across two distinct subareas currently occupied by industrial businesses and associated surface parking lots. No residential uses exist on either site, and as such, the proposed project is not anticipated to result in the displacement of any individuals or housing units. Business displacements would be anticipated to occur, but since future development that may occur within the TOD area would be driven by private development, it is assumed that property owners will agree to the property purchase and will find alternative locations for their businesses. Based on these facts and assumptions, the proposed project would not displace any existing housing or people, and no replacement housing would need to be constructed elsewhere. Therefore, the proposed project would have less than significant impacts, and would not result in new significant or substantially more severe significant housing impacts than those that were analyzed in the prior environmental documents.

5.15 PUBLIC SERVICES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
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?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

5.15.1 Background

The proposed TOD Expansion Area is located within the City of Placentia and is served by the following existing public services.

Fire Protection. Prior to 2019, the City of Placentia was served by the Orange County Fire Authority and re-established its own fire department, the Placentia Fire and Life Safety Department. The department provides 24-hour emergency response to a wide variety of critical situations, including fires, medical emergencies, accidents, and miscellaneous public assistance requests.[50] The Fire and Life Safety Department is currently served by two fire stations: Fire Station 1 located approximately 0.5 mile northeast of the TOD Expansion Area at 110 South Bradford Avenue, and Fire Station 2 located approximately 2.1 miles northeast of the TOD Expansion Area at 1530 North Valencia Avenue.

Police Protection. The City of Placentia Police Department provides police protection and assists with emergency responses to the TOD Expansion Area. The Police Department's headquarters are located within the City of Placentia Civic Center at 401 East Chapman Avenue, approximately 0.7 mile northeast of the TOD Expansion Area. The Police Department is made up of a mixture of sworn police officers, non-sworn civilian members, and volunteers.[51] Specifically, the Police Department is allocated 54 sworn positions and 46 civilian staff positions.[52] The approximately 1,378 residential

[50] City of Placentia. Placentia Fire and Life Safety Department. Website: https://www.placentia.org/24/Fire (accessed August 18, 2023).

[51] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

[52] Placentia Police Department. Strategic Plan 2021-2023. Website: https://placentia.org/DocumentCenter/View/8879/PlacentiaPD-Strategic-Plan (accessed September 13, 2023).

units that could be developed within the TOD Expansion Area, if the proposed project is approved, could add approximately 4,272 new City residents, assuming a density of 3.1 persons per unit.

Schools. The Placentia-Yorba Linda Unified School District (PYLUSD) contains 30 schools, including elementary (K-6), middle (7-8), high (9-12), and alternative schools, between the cities of Placentia and Yorba Linda.[53] The TOD Expansion Area is located within the attendance area boundaries of Morse Elementary School (approximately 1.6 miles northeast of the TOD Expansion Area), Kraemer Middle School (approximately 0.9 mile northeast of the TOD Expansion Area), and Valencia High School (approximately 1 mile northeast of the TOD Expansion Area).

Several higher education institutions have campuses near the City of Placentia, including Cal State Fullerton, Fullerton College, and Pacific Christian College.

The State of California has mandated (SB 50) that payment of fees established for each new residential unit is sufficient to offset potential impacts to the affected school system(s). The City of Placentia imposed a fee of $3.48 per square feet for new or additional residential development,[54] which would apply to future developments within the TOD Expansion Area. This fee is subject to change over time as a result of changing circumstances and valuation.

Parks. Placentia's parks are managed by either the City of Placentia Community Services Department or Orange County Parks (OC Parks). A total of seven parks are managed by the City of Placentia, along with many community parks, while OC Parks manages two parks: Tri-City Regional Park and George Key Ranch Historic Park.

5.15.2 Prior Environmental Analysis

The 2017 IS/MND found that the Approved Project would result in less than significant impacts to fire protection and schools. No impacts were identified to other public facilities. Potentially significant impacts were identified relating to police protection and recreation/parks. Mitigation Measure (MM) XIV-1 was identified to reduce the Approved Project's potential impacts associated with police protection and recreation/parks to a less than significant level.

MM XIV-1 Future projects implemented [within the Original TOD Area] shall submit a fiscal impact analysis focused on law enforcement and recreation demand and costs to evaluate the need for additional fees to support these two City services. The documentation shall be reviewed and approved by the City and if additional fees must be paid, the City shall impose them as conditions of approval for the future projects either directly or through creation of a community facilities district.

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53 Placentia-Yorba Linda Unified School District ((PYLUSD). Boundary Maps. Website: https://www.pylusd.org/apps/pages/index.jsp?uREC_ID=206487&type=d&pREC_ID=453794&afterText=true&dir=District%20Boundary&includePage=%2Fpages_inc%2Fboundary_maps.jsp (accessed August 18, 2023).

54 City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

Alternatively, if the City imposes a Public Safety Impact Fee, this fee shall provide sufficient funding for the increased demand for these services.

The 2021 Addendum found that since the City adopted Ordinances O-2017-09 and O-2017-11, which established new development fees in the Original TOD Area to finance measures that mitigate impacts to parks and recreational facilities, sewer facilities, traffic and transportation infrastructure and streetscape infrastructure in the TOD Area, MM XIV-1 was no longer necessary and was deleted.

5.15.3 Impact Analysis

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

i. Fire protection? ***(Less Than Significant Impact; No New Impact)***

The nearest Placentia Fire and Life Safety Department Fire Station to the TOD Expansion Area is Fire Station 1, located approximately 0.5 mile northeast of the TOD Expansion Area at 110 South Bradford Avenue. The TOD Expansion Area is already fully developed with industrial manufacturing uses. The proposed project would allow redevelopment in the TOD Expansion Area to proceed with high density residential and other transit-oriented uses. Some existing structures within the TOD Expansion Area were built prior to the mandatory inclusion of modern fire protection designs such as fire sprinklers. New structures built within the TOD Expansion Area would be required to incorporate all current fire protection measures included in the current applicable building code. Compliance with this requirement along with the increased value of the developed land, which would generate additional property tax to fund the provision of fire protection services, is considered sufficient to control impacts on the fire protection and emergency response system, including the need for additional personnel, to a less than significant impact level. Therefore, the proposed project would not result in new significant or substantially more severe significant impacts to fire protection services than those analyzed in the prior environmental documents.

*ii. Police protection? (**Less Than Significant With Mitigation Incorporated; No New Impact)***

As noted in the above discussion of fire protection impacts, the TOD Expansion Area is already fully developed with industrial land uses. The proposed project would allow for the possibility of up to 1,378 new residential units at high density in accordance with TOD Development Standards. Based on the calculations provided previously in Section 5.14, Population and Housing, the development of these residential units could add approximately 4,272 new City residents. The addition of these potential residents would potentially require the addition of new sworn officers to accommodate the increased population. The 2017 IS/MND contained Mitigation Measure (MM) XIV-1 in order to mitigate potential impacts to a less than significant level. Since then, the City's adoption of Ordinances O-2017-09 and O-2017-11 established Transit Oriented District development impact fees for new developments to finance measures mitigating impacts to public services and similar infrastructure needs that arise based on new development in the Original TOD Area. These Ordinances would apply to the TOD Expansion Area in a similar manner to the application of the 2017 TOD Development Standards to the TOD Expansion Area. Moreover, the Ordinances adopting

the TOD Impact Fees are codified in the Placentia Municipal Code, Chapter 5.03. Citywide and TOD Impact Fees are generally updated annually effective July 1st. The next annual update of TOD Development Impact Fees will capture and apply to properties within the TOD Expansion Area. These development impact fees, in lieu of MM XIV-1, would ensure that adequate facilities are available to meet demand generated by future TOD Expansion Area development, and impacts of the proposed project would be less than significant. As such, the proposed project would not result in new significant or substantially more severe significant impacts to fire protection services than those analyzed in the prior environmental documents.

iii. Schools? ***(Less Than Significant Impact; No New Impact)***

The proposed project includes the possibility of developing up to 1,378 new residential units at high density within the TOD Expansion Area. Assuming an average generation of 1.1 new students per unit, which is consistent with what was assumed in the 2017 IS/MND, a worst-case scenario of residential development would result in the generation of approximately 1,516 new students within the TOD Expansion Area. California has mandated (Senate Bill [SB] 50) that payment of fees established for each new residential unit is sufficient to offset potential impacts to the affected school system(s). Based on this finding and the mandatory requirements for developers to pay fees per residential unit as well as the required development impact fees for future office and commercial development, the proposed project would have less than significant impacts resulting from generation of new students. Therefore, the proposed project would not result in new significant or substantially more severe significant impacts to school services than those analyzed in the prior environmental documents.

iv. Parks? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

As discussed in Response 5.15 (a)(ii), the proposed project may generate approximately 3,410 new residents in the City of Placentia. These residents would increase the demand for City parks and recreation facilities by an unquantifiable amount. However, the City's adoption of Ordinances O-2017-09 and O-2017-11 established Transit Oriented District development impact fees for new developments to finance measures mitigating impacts to parks and recreational facilities, among other services. These development impact fees required under Ordinances O-2017-09 and O-2017-11 would ensure that adequate facilities are available to meet demand generated by future TOD Expansion Area development, and impacts would be less than significant with mitigation incorporated. Therefore, the proposed project would not result in new significant or substantially more severe significant impacts to park facilities than those analyzed in the prior environmental documents.

v. Other public facilities? ***(No Impact; No New Impact)***

Because no other public facilities have been identified that might be impacted by the proposed project, no impacts would occur. Therefore, the proposed project would not result in new significant or substantially more severe significant impacts to other facilities than those analyzed in the prior environmental documents.

5.16 RECREATION

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

5.16.1 Background

As of 2018, there were 334.2 acres of parks distributed throughout the City of Placentia, including open space as well as neighborhood, community, and sub-regional parks.[55] Specifically, Placentia has two parkettes (small areas of passive, landscaped land), seven neighborhood parks, three community parks, three special use facilities (specific recreation), one sub-regional park, and five recreational/community buildings.

The largest park in the City is the 40-acre Tri-City Regional Park, which is maintained by the County and is bordered by the City of Fullerton and near the City of Brea's border. Recreational facilities and regional parks within proximity to the TOD Expansion Area include Santa Fe Park approximately 0.2 mile west of the TOD Expansion Area, Kraemer Memorial Park approximately 0.3 mile north of the TOD Expansion Area, and McFadden Park approximately 0.5 mile south of the TOD Expansion Area.

5.16.2 Prior Environmental Analysis

Potentially significant impacts were identified in the 2017 IS/MND relating to an increase in the use of existing parks/recreational facilities and the construction/expansion of recreational facilities. The 2017 IS/MND indicated that Mitigation Measure (MM) XIV-1 would reduce potential impacts associated with recreation and parks to a less than significant level.

The 2021 Addendum determined that the 2021 Development Project's compliance with Ordinances O-2017-09 and O-2017-11 would require the payment of a TOD Development impact fee that would eliminate the need for adoption of MM XIV-1. As such, the 2021 Addendum concluded that MM XIV-1 would not apply to the 2021 Development Project and would not be warranted.

[55] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

5.16.3 Impact Analysis

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 With Mitigation Incorporated; No New Impact)***

Implementation of new residences, as well as jobs generated from the commercial and office development, within the TOD Expansion Area can increase the use of public recreation and park facilities to the point that substantial physical deterioration could occur or could be accelerated. However, the future developers' mandatory payment of development fees established by Ordinances O-2017-09 and O-2017-11, which would finance measures mitigating impacts to parks and recreational facilities, among other services. These development impact fees required under Ordinances O-2017-09 and O-2017-11 would ensure that adequate park facilities are available to meet demand generated by future TOD Expansion Area development, and impacts would be less than significant with mitigation incorporated. Therefore, the proposed project would not result in new significant or substantially more severe significant impacts to park facilities than those analyzed in the prior environmental documents.

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 With Mitigation Incorporated; No New Impact)***

Though the proposed project does not directly propose any development, it enables future development within the TOD Expansion Area. According to the TOD Development Standards established by the City, Parks and Playgrounds are both permitted recreational uses within the Original TOD Area, which would also apply to the TOD Expansion Area if the proposed project is approved. As such, it is possible that the proposed project would enable the construction of recreational facilities, although exact development designs for the TOD Expansion Area are not yet known. Potential physical impacts of recreational development within the TOD Expansion Area would be evaluated at the time plans are proposed.

As discussed above under Response 5.16.3(a), mandated TOD development impact fees would ensure that adequate park facilities are available to meet demand generated by future development within the TOD Expansion Area, resulting in less than significant impacts with mitigation incorporated. Therefore, the proposed project would not result in new significant or substantially more severe significant impacts to park facilities than those analyzed in the prior environmental documents.

5.17 TRANSPORTATION

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines §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)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

5.17.1 Background

Major highways in the vicinity of Placentia include SR-91, approximately 1 mile south of the TOD Expansion Area; SR-57, directly adjacent to the TOD Expansion Area on the west; and SR-90, approximately 3 miles north and northeast of the TOD Expansion Area. The TOD Expansion Area is situated on approximately 14.5 total acres in the City of Placentia within two subareas: an 11.5-acre subarea located south of West Crowther Avenue and west of South Melrose Street and a 3-acre subarea located along Cameron Street south of West Crowther Avenue.

North-south major arterial roadways that extend through and beyond the City include Placentia Avenue, Kramer Boulevard, and Rose Drive. East-west major arterial roadways that extend through and beyond the City include Imperial Highway, Bastanchury Road, Yorba Linda Boulevard, Chapman Avenue, and Orangethorpe Avenue.[56] In addition, Placentia also has a major transit provider, the Orange County Transportation Authority (OCTA), and one freight rail line (BNSF), on which the Southern California Regional Rail Authority (SCRRA, or Metrolink) operates a commuter rail line.[57] When Placentia's Metrolink station opens for operations on a date yet to be determined, it will serve the Metrolink 91/Perris Valley Line, which connects Riverside, Fullerton, and Downtown Los Angeles.

Vehicle access to the TOD Expansion Area is currently provided by East Crowther Avenue, South Melrose Street, and Cameron Street. Crowther Avenue would serve as a gateway into the TOD Expansion Area.

California's Senate Bill (SB) 743, which passed in 2013, marked a transition away from Level of Service (LOS) standards as the metric for measuring transportation impacts of development projects

[56] City of Placentia. 2004. General Plan Circulation Element. Website: https://www.placentia.org/DocumentCenter/View/3441 (accessed August 18, 2023).

[57] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

under CEQA in favor of Vehicle Miles Traveled (VMT).[58] This metric, which has a stronger nexus to carbon emissions and air quality concerns, was deemed more consistent with State climate goals and policies.

On December 28, 2018, the California Office of Administrative Law cleared the revised California Environmental Quality Act (CEQA) Guidelines to remove LOS as the sole basis of determining transportation impacts under CEQA. With the adopted *State CEQA Guidelines*, transportation impacts must be evaluated by a project's effect on VMT, consistent with the provisions of SB 743, by July 2020. Since the 2017 IS/MND was adopted prior to SB 743 taking effect on July 1, 2020, its transportation impact analysis did not consider the VMT metric and instead relied upon LOS.

In response to the passage of SB 743, Placentia joined six other cities to pursue the North Orange County Cities (NOCC) SB 743 Implementation Study, which includes evaluation of potential thresholds, mitigation measures, and other tools for incorporating the bill into the cities' transportation work. One such tool is the NOCC+ spreadsheet tool, which can be used to determine whether a proposed project could be considered from screening from project-generated VMT impacts.

The following analysis is based on the *Trip Generation and Vehicle Miles Traveled Analysis* prepared for the proposed project on November 10, 2023, included as Appendix C to this Supplemental IS/MND.

5.17.2 Prior Environmental Analysis

The 2017 IS/MND was based upon CEQA Guidelines Appendix G thresholds that have since been condensed and modified in light of the enactment of Senate Bill (SB) 743, which marked the transition of CEQA transportation impacts from the LOS metric to the VMT metric. As such, no prior analysis was conducted relating to Threshold 5.17.3(b), consistency with *State CEQA Guidelines* Section 15064.3, subdivision (b). It should also be noted that Thresholds (c) and (f) of the 2017 IS/MND are no longer applicable under CEQA and have therefore not been included in this Supplemental IS/MND. In addition, Thresholds (b) and (g) of the 2017 IS/MND have been condensed into Threshold (a) of the Supplemental IS/MND and will be analyzed as such. The 2017 IS/MND determined that the Approved Project would have less than significant impacts related to parking capacity and no impact related to changes in air traffic patterns, although these issues will not be addressed in this IS/MND as they are no longer required as part of the CEQA environmental review process. Potentially significant impacts were identified relating to conflicting with an applicable circulation plan, conflicting with an applicable congestion management program, substantially increasing hazards, inadequate emergency access, and conflicting with adopted policies regarding alternative forms of transportation. Mitigation Measures (MMs) XVI-1 through XVI-12 were identified to reduce the Approved Project's potentially significant transportation impacts to a less than significant level.

[58] Caltrans Division of Research, Innovation, and System Information. 2017. Shifting from LOS to MVT as the Measure of Transportation Impact Assessment. Website: https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/research-results/2886-rr-a11y.pdf (accessed October 23, 2023).

MM XVI-1 Each future TOD project [in the Original TOD Area] shall pay fair share fees for the intersection improvement costs at the time of entitlement based on the percentage of trips contributed at each intersection. A high level "order of magnitude" cost estimate is also provided in subsequent mitigation identified in the Traffic Impact Study. These are rough estimate costs for engineering and construction and will need to be refined during future preliminary engineering phase. The mitigation measures should be re-evaluated for any refinement of the Draft General Plan Update and/or additional development of the TOD project over and beyond 5,000 trips. All significantly impacted intersections require mitigation prior to Future Buildout. Mitigation for each intersection and estimated costs are listed below [note: values provided in 2017 dollars]:

- Placentia/Crowther Avenue: Upgrade left turn signal phasing for all movements from permissive left turns to protected/permissive Left Turn Phasing. Estimated Cost - $100,000;

- Orangethorpe Avenue/Placentia Avenue: Provide eastbound/westbound dual Left-Turn Lanes at Orangethorpe Avenue/Placentia Avenue. Estimated Cost - $450,000;

- Orangethorpe Avenue/SR-57 Northbound Ramps: Restripe Northbound Off-Ramp middle lane as shared Left-Turn/Thru/Right-Turn Lane. Estimated Cost - $50,000;

- Orangethorpe Avenue/SR-57 Northbound Ramps: The westbound right-turn movement is expected to increase from 550 vehicles per hour (vph) to 800 vph during the PM period for year 2035. This movement should be closely monitored and may require additional improvements to reduce congestion and queuing. An additional improvement would be to modify the existing median on Orangethorpe Avenue to add an exclusive westbound Right-Turn Lane. Estimated Cost - $200,000;

- Orangethorpe Avenue/Melrose Street: Provide an exclusive southbound Right-Turn Lane without overlap signal phasing and northbound dual Left-Turn Lanes at Orangethorpe Avenue/Melrose Street. Estimated Cost - $100,000;

- Kraemer Boulevard/Orangethorpe Avenue: Restripe Orangethorpe Avenue to provide eastbound dual Left-Turn Lanes. Add additional north/south thru lane (three lanes each) by restriping the northbound and southbound right-turn lanes to thru lanes. Consider modifying the north/south left-turn movements from protected-only left-turn phasing to protected permissive left-turn phasing. Restripe the southbound left-turn approach to provide a positive offset for better sight distance between the north/south left turn movements. Estimated Cost - $100,000.

MM XVI-2 Truck access for the parcel on the southwest corner of Melrose Street and Crowther Avenue must be maintained to and from this site.

MM XVI-3 Construction hours should be five days a week, and in accordance with the City of Placentia Municipal Code, limited to the hours of 7 AM and 7 PM on working days (Monday through Friday).

MM XVI-4 Construction truck and worker automobile traffic will utilize the proposed driveways along Melrose Street and Crowther Avenue for access to and from [a development site].

MM XVI-5 Trucks transporting materials to and from [a development site] must utilize the designated truck routes along Placentia Avenue, Crowther Avenue, Melrose Street, and Orangethorpe Avenue.

MM XVI-6 Trucks entering or exiting the construction site will need to yield to public traffic at all times.

MM XVI-7 It is unlikely that street traffic will be impacted by on-site construction activities; however, should it be necessary for temporary lane closures and/or detour routes for utility work or other such work in the public right-of-way those temporary traffic control activities are to be conducted in compliance with the requirements and guidelines outlined in the California Manual of Uniform Traffic Control Devices (MUTCD).

MM XVI-8 Construction staging should be conducted on-site and under no circumstances will be allowed on local or residential streets.

MM XVI-9 Construction work within the public right-of-way needs to be in compliance with City standards and the construction site shall be posted with the name, company and a phone number of a person to call for complaints.

MM XVI-10 The applicant will be fully responsible for the repair of damages to any public facility due to the hauling or transporting of construction related materials.

MM XVI-11 Parking for the construction trucks and worker trucks will be on-site, away from the adjacent public roadways and existing active businesses.

MM XVI-12 The City shall coordinate with OCTA to ensure that one or more bus routes to the future Placentia Metrolink Station will serve the [Original TOD Area].

The 2021 Addendum found that the 2021 Development Project, in combination with other approved projects in the Original TOD Area, would generate less than the 5,000 daily trips permitted under the 2017 IS/MND. No new impacts or substantially greater impacts than previously analyzed were identified. As such, no changes to the previous CEQA determinations were identified.

5.17.3 Impact Analysis

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

The maximum possible buildout of the TOD Expansion Area under the proposed residential density cap of 95 dwelling units per acre would yield an estimated 1,378 dwelling units. This buildout was analyzed as a worst-case development scenario for trip generation calculations. Under this buildout scenario, the proposed TOD designation expansion is estimated to generate a gross total of 6,544 average daily trips (ADT), which would represent a 4,996-trip increase from the 1,548 ADT generated by existing light industrial uses within the TOD Expansion Area. No further trip generation or LOS analysis is required for the proposed project.

The City of Placentia approved and adopted Traffic Impact Analysis (TIA) Guidelines in June 2021, which provide details on appropriate screening thresholds that can be used to identify when a proposed land use project is anticipated to result in a less than significant transportation impact without conducting a more detailed analysis. Screening thresholds include Transit Priority Area (TPA) Screening, Low VMT Area Screening, and Project Type Screening.

Projects within a TPA may be presumed to have a less than significant transportation impact. A TPA is defined as a 0.5-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor. “Major transit stop” is defined as a site containing an existing rail station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and evening peak commute periods. A “high-quality transit corridor” means a corridor with a fixed route bus service with service intervals no longer than 15 minutes during the peak commute hours.

However, the presumption of a less than significant for a project within a TPA may not be applicable under the following conditions:

- If the project has a floor area ratio of less than 0.75.
- If the project includes more parking for use by residents, customers, or employees than required by the jurisdiction.
- If the project is inconsistent with the applicable Sustainable Communities Strategy.
- If the project replaces affordable residential units with a smaller number of moderate or high-income residential units.

A *Trip Generation and Vehicle Miles Traveled Analysis* Memorandum (Memorandum) was prepared for the proposed project on November 10, 2023.[59] This Memorandum evaluated the potential for the proposed project to be screened from further transportation analysis based on the criteria above. The NOCC+ VMT Screening Tool was also utilized, assuming a buildout year of 2045. This

[59] LSA Associates, Inc. (LSA). 2023. *Trip Generation and Vehicle Miles Traveled Analysis.* November 10.

analysis determined that the proposed TOD Expansion Area is within 0.5 mile of the proposed Placentia Metrolink station, which further supports the conclusion that the TOD Expansion Area is within a TPA. Further, none of the disqualifying conditions for presumption of less than significance apply to the proposed project at this time. However, the City will need to ensure that future development proposals within the TOD Expansion Area do not include any of the disqualifying conditions stated above. The proposed project did not qualify for a Low VMT Area screening or a Project Type Screening.

Evaluation of the proposed project, as described in the Memorandum, was conducted pursuant to applicable plans and policies including SB 743 and the City's TIA Guidelines. The proposed project also has the potential to impact the flow of traffic during the construction within the TOD Expansion Area. In order to minimize any short-term construction impacts, the developer of each project shall be subject to Mitigation Measures (MMs) XVI-2 through XVI-12, as identified in the 2017 IS/MND, which would mitigate any future potential impacts resulting from construction or operations of the proposed project to a less than significant level with mitigation. As such, no new or substantially more significant impacts relating to conflict with plans or policies would occur in comparison to previous environmental analysis.

b. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)? ***(Not Previously Analyzed; No New Impact)***

Section 15064.3, subdivision (b), of the *State CEQA Guidelines* describes specific considerations in determining the significance of transportation impacts from land use projects pursuant to SB 743. This subdivision reads, "Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." As discussed earlier, a new Metrolink train station is planned across Crowther Avenue from the TOD Expansion Area. This station would be the County's 13th train station and would serve the Metrolink 91 Line with service to Riverside, Fullerton, and Downtown Los Angeles.[60] This planned Metrolink Station was the inspiration for the establishment of the Original TOD Area, as the Transit Oriented Development Packing House District was established "to encourage an appropriate mixture and density of activity around the Metrolink station to increase ridership and promote alternative modes of transportation to the automobile".[61] Based on research conducted for the Memorandum using the NOCC+ VMT Screening Tool, the proposed project would be located within a TPA. As discussed above in Response 5.17.3(a), the proposed TOD Expansion Area is within 0.5 mile of the planned Metrolink station, which further supports that the TOD Expansion Area is within a TPA. At this time, none of the disqualifying conditions for presumption of less than significance apply to the proposed project. However, the City will need to ensure that future development proposals within the TOD Expansion Area do not include any of the disqualifying conditions stated above.

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60 Orange County Transportation Authority (OCTA). 2023. Placentia Metrolink Station and Parking Structure. Website: https://www.octa.net/programs-projects/projects/rail-projects/placentia-metrolink-station-and-parking-structure/ (accessed October 23, 2023).

61 City of Placentia. 2017. Transit Oriented Development Packing House District Development Standards. Website: https://www.placentia.org/DocumentCenter/View/5803/TOD-Development-Standards?bidId= (accessed September 20, 2023).

Pursuant to Section 15064.3, subdivision (b), and the City's TIA Guidelines, because the proposed project is within 0.5 mile of the planned Metrolink Station along Crowther Avenue, the proposed project is presumed to have a less than significant transportation impact. As such, no new or substantially more significant impacts relating to consistency with Section 15064.3, subdivision (b), would occur in comparison to the prior analyses.

c. Would the project 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; No New Impact)***

The proposed project is located within a developed area containing existing development. The proposed project involves land use changes and does not include any physical development, including development of any sharp curves or dangerous intersections along existing roadways. To ensure compliance with applicable City design standards, future projects will not include the construction of any structure or feature that will create a substantial increase in hazards due to a design feature. As with the conclusion reached in the 2017 IS/MND, Mitigation Measure (MM) XVI-I would serve as sufficient mitigation for future development within the TOD Expansion Area to offset potential future impacts under this issue, and impacts would be less than significant with mitigation incorporated. As such, no new or substantially more significant impacts relating to increased transportation hazards would occur in comparison to prior environmental analysis.

d. Would the project result in inadequate emergency access? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

Please see Response 5.17.3(a). Implementation of Mitigation Measures (MMs) XVI-2 through XVI-11, identified in the 2017 IS/MND, would reduce any future potential impacts associated with inadequate emergency access both during construction and operations to a less than significant level with mitigation incorporated. As such, no new or substantially more significant impacts relating to increased transportation hazards would occur under the proposed project in comparison to previous environmental analysis.

5.18 TRIBAL CULTURAL RESOURCES

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. 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	☐	☐	☐	☒
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.	☐	☐	☐	☒

5.18.1 Background

Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources," which are:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are one of the following:
    - Included or determined to be eligible for inclusion in the California Register of Historical Resources.
    - Included in a local register of historical resources as defined in subdivisions (k) of Public Resources Code (PRC) Section 5020.1.
    - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivisions (c) of PRC Section 5024.1. In applying the criteria set forth in subdivisions (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

A "historical resource" (PRC Section 21084.1), a "unique archaeological resource" (PRC Section 21083.2(g)), or a "nonunique archaeological resource" (PRC Section 21083.2 (h)) may also be a tribal cultural resource if it is included or determined to be eligible for inclusion in the California Register of Historical Resources. AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource."

The consultation provisions of the law require that a public agency consult with local Native American tribes that have requested placement on that agency's notification list for CEQA projects. Within 14 days of determining that a project application is complete, or a decision by a public agency to undertake a project, the Lead Agency must notify tribes of the opportunity to consult on the project, should a tribe have previously requested to be on the agency's notification list. California Native American tribes must be recognized by the California Native American Heritage Commission (NAHC) as traditionally and culturally affiliated with the project site and must have previously requested that the Lead Agency notify them of projects. Tribes have 30 days following notification of a project to request consultation with the Lead Agency.

The purpose of the consultation is to inform the Lead Agency in its identification and determination of the significance of tribal cultural resources. If a project is determined to result in a significant impact on an identified tribal cultural resource, the consultation process must occur and conclude prior to the adoption of a Negative Declaration or Mitigated Negative Declaration, or certification of an Environmental Impact Report (PRC Sections 21080.3.1., 21080.3.2, and 21080.3).

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a General or Specific Plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the NAHC. As noted in the Governor's Office of Planning and Research's Tribal Consultation Guidelines, Supplement to General Plan Guidelines (2005), "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

In compliance with AB 52, on November 22, 2023, letters were distributed to the three local Native American tribes that have previously requested to be notified of future projects within the City. The letters provided each tribe with an opportunity to request consultation with the City regarding the proposed project. In compliance with AB 52, tribes have 30 days from the date of receipt of notification to request consultation on the proposed project. Information provided through the AB 52 tribal consultation process will inform the assessment as to whether tribal cultural resources are present and the significance of any potential impacts to such resources. A representative with the Gabrieleno Band of Mission Indians - Kizh Nation responded on December 6, 2023 to inform the City that the tribe approved of including tribal mitigation measures that were incorporated for the Approved Project and another previous City development project located at 777 W. Orangethorpe Avenue. These mitigation measures shall therefore be included under the proposed project and are discussed in further detail in Section 5.18.3, Impact Analysis, below.

In compliance with SB 18, a review of the NAHC Sacred Lands File was requested on November 21, 2023, for any Native American cultural resources located within the TOD Expansion Area. The NAHC is a State agency that maintains the Sacred Lands File, an official list of sites that are of cultural and religious importance to California Native American tribes. A list of 16 tribes and their contact information was provided with the NAHC's response, as well as negative SLF search findings. These tribes were contacted through letters sent via certified mail pursuant to the requirements of SB 18 on December 14, 2023. The letters provided each tribe with an opportunity to request consultation with the City regarding the proposed project. In compliance with SB 18, the tribes have 90 days from

the date of receipt of notification to request consultation on the proposed project. To date, no responses have been received.

5.18.2 Prior Environmental Analysis

The prior environmental documents were completed before Tribal Cultural Resources became a specific resource area under the CEQA Guidelines Appendix G checklist. However, the Cultural Resources section of the prior environmental documents addresses the equivalent of the Tribal Cultural Resources thresholds in this Supplemental IS/MND. The 2017 IS/MND found the Approved Project's impacts to Tribal Cultural Resources to be less than significant with the incorporation of Mitigation Measure V-2, presented under the Cultural Resources issue area in the 2017 IS/MND and introduced in Section 5.5, Cultural Resources, of this IS/MND. Further, the 2017 IS/MND stated that AB 52 procedures were followed and yielded no requests for Tribal consultation, indicating that no Tribal Cultural Resources existed within the Original TOD Area.

As discussed in Section 5.5.2, Prior Environmental Analysis, in Section 5.5, Cultural Resources, no changes to the previous CEQA determinations were identified in the 2021 Addendum that pertained to Cultural Resources, which at the time included a threshold addressing Tribal Cultural Resources.

5.18.3 Impact Analysis

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; No New Impact)***

Or

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; No New Impact)***

Native American Heritage Commission. A review of the NAHC Sacred Lands File was requested on November 21, 2023, for any Native American cultural resources located within the TOD Expansion Area. The NAHC is a State agency that maintains the Sacred Lands File, an official list of sites that are of cultural and religious importance to California Native American tribes.

A response was received on December 13, 2023, from Andrew Green stating that "A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area." A list of sixteen tribes and their contact information was also provided with the NAHC's response. These tribes were contacted pursuant to the requirements of SB 18.

AB 52 Tribal Consultation. As noted above, AB 52 Native American consultation was conducted for the proposed project. The purpose of this effort was to provide Native American tribes with the opportunity for meaningful participation and to identify known Tribal Cultural Resources within or near the TOD Expansion Area. Letters were sent to the tribes who have an existing consultation relationship with the City on November 22, 2023. The letters, sent via certified mail to the individuals listed in Table 5.E, described the proposed project, provided maps of the TOD Expansion Area, and invited the tribes to request consultation should they have any concerns.

Table 5.E: Assembly Bill 52 and Senate Bill 18 Tribal Outreach Recipients

AB 52 Tribal Outreach Recipients	
Recipient	**Contact Information**
Gabrieleno Band of Mission Indians – Kizh Nation Andrew Salas, Chairperson	P.O. Box 393 Covina, CA 91723
Gabrielino-Tongva Tribe Sam Dunlap, Cultural Resources Director	80839 Camino Santa Juliana Indio, CA 92203
Juaneno Band of Mission Indians – Acjachemen Nation Joyce Stanfield Perry, Tribal Manager	4955 Paseo Segovia Irvine, CA 92603
SB 18 Tribal Outreach Recipients	
Gabrieleno Band of Mission Indians - Kizh Nation Andrew Salas, Chairperson	P.O. Box 393 Covina, CA 91723
Gabrieleno Band of Mission Indians - Kizh Nation Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA 91723
Gabrieleno/Tongva San Gabriel Band of Mission Indians Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA 91778
Gabrielino /Tongva Nation Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA 90012
Gabrielino Tongva Indians of California Tribal Council Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA 90707
Gabrielino Tongva Indians of California Tribal Council Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA 93094
Gabrielino-Tongva Tribe Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA 91307
Gabrielino-Tongva Tribe Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA 90740
Juaneno Band of Mission Indians Acjachemen Nation - Belardes Joyce Perry, Cultural Resource Director	4955 Paseo Segovia Irvine, CA 92603
Juaneno Band of Mission Indians Acjachemen Nation 84A Heidi Lucero, Chairperson, THPO	31411-A La Matanza Street San Juan Capistrano, CA 92675
Pala Band of Mission Indians Shasta Gaughen, Tribal Historic Preservation Officer	PMB 50, 35008 Pala Temecula Road Pala, CA 92059
Pala Band of Mission Indians Christopher Nejo, Legal Analyst/Researcher	PMB 50, 35008 Pala Temecula Road Pala, CA 92059
Pala Band of Mission Indians Alexis Wallick, Assistant THPO	PMB 50, 35008 Pala Temecula Road Pala, CA 92059
Santa Rosa Band of Cahuilla Indians Lovina Redner, Tribal Chair	P.O. Box 391820 Anza, CA 92539
Soboba Band of Luiseno Indians Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA 92581
Soboba Band of Luiseno Indians Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA 92581

AB = Assembly Bill
SB = Senate Bill

SB 18 Tribal Consultation. As noted above, in addition to AB 52 Native American consultation, consultation pursuant to SB 18 was conducted for the proposed project. The purpose of this effort was to provide Native American tribes with the opportunity for meaningful participation in a matter affecting the land uses within a place that could be considered their traditional cultural land. Letters were sent via certified mail to the 16 tribes identified by the NAHC on December 14, 2023. The letters, to the individuals listed in Table 5.E, described the proposed project, provided maps of the TOD Expansion Area, and invited the tribes to request consultation should they have any concerns. The 90-day notification period is currently ongoing and the City will continue to follow up with notified tribes in order to ensure any concerns or comments are captured within the tribal consultation process for the proposed project.

City correspondence with the Gabrieleno Band of Mission Indians - Kizh Nation suggested that tribal cultural resources, including potential human remains, could be encountered during construction activities within the TOD Expansion Area. However, a representative with the Gabrieleno Band of Mission Indians - Kizh Nation informed the City on December 6, 2023, that the tribe approved of including cultural mitigation measures that were incorporated for the Approved Project (MMs V-1 and V-2) and another previous City development project located at 777 W. Orangethorpe Avenue. The following Mitigation Measures from the development project at 777 W. Orangethorpe Avenue shall apply to the proposed project:

MM XVIII-1 Prior to issuance of a grading permit, the Applicant shall retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities:

A. The project Applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural

resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the TOD Expansion Area or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/ construction phase at the TOD Expansion Area possesses the potential to impact Kizh TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM XVIII-2 Prior to issuance of grading permit, the following notes shall be listed on the grading plans for the proposed project:

Unanticipated Discovery of Human Remains and Associated Funerary Objects

A. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code, Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods discovered or recognized on the TOD Expansion Area, then all construction activities shall immediately cease. Health and Safety Code, Section 7050.5, dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code, Section 5097.98, shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code, Section 5097.98(d)(1) and (2).

D. Construction activities may resume in other parts of the TOD Expansion Area at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines, Section 15064.5(f))

E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM XVIII-3 Prior to issuance of grading permit, the following notes shall be listed on the grading plans for the project:

Procedures for Burials and Funerary Remains

A. As the Most Likely Descendant ("MLD"), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.

E. In the event preservation in place is not possible despite good faith efforts by the project Applicant/developer and/or landowner, before ground-disturbing activities may resume on the TOD Expansion Area, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.

F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within 6 months of recovery. The site of reburial/repatriation shall be on the TOD Expansion Area but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe will work closely with the project's qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Although no human remains are known to be within the TOD Expansion Area or are anticipated to be discovered during project construction, the potential still exists for unanticipated human remains to be encountered during construction activities associated with the proposed project. If human remains are Native American in origin, the remains may be considered a tribal cultural resource. The proposed project would be subject to Mitigation Measures (MMs) V-1 and V-2, identified in the Cultural Resources section of the 2017 IS/MND, and would also incorporate the new Mitigation Measures XVIII-1 through XVIII-3, inspired by those included in another development project within the City, which were recognized by a representative of the Gabrieleno Band of Mission Indians - Kizh Nation as appropriate to address potential impacts to tribal cultural resources.

As such, the proposed project's implementation of MMs V-1 and V-2 as identified in the 2017 IS/MND and new mitigation measures MM XVIII-1 through XVIII-3 would reduce potential impacts to tribal cultural resources to a less than significant level with mitigation incorporated. Therefore, no new impacts to tribal cultural resources would occur under the proposed project.

5.19 UTILITIES AND SERVICE SYSTEMS

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

5.19.1 Background

Wastewater Treatment. Sewer lines maintained by the City of Placentia run directly underneath Crowther Avenue and Cameron Street, two of the main roads providing access to the TOD Expansion Area.[62] Overall, the City of Placentia operates 84 miles of gravity sanitary sewer lines. This sewage system conveys untreated wastewater to the Orange County Sanitation District's (OC San) trunk sewer system for treatment via 35 connections. OC San treatment plants then treat and dispose of the City's wastewater flows.[63] OC San has two types of operating facilities to treat wastewater from cities in Orange County, including Placentia: Orange County Sanitation District (OC San) Plant No.1 in Fountain Valley, and OC San Plant No.2 in Huntington Beach. The estimated average daily flow of wastewater received in MGD (million gallons per day) for the 2021–2022 time period was 120 MGD for Plant No.1 and 59 MGD for Plant No.2, for a combined total of 179 MGD.[64] Once wastewater received by OC San has been treated, a portion of it is released into the ocean through a 10-foot diameter offshore pipeline extending 5 miles from the coast and 200 feet below the surface of the ocean. OC San monitors this area as well as 185 square miles of the surrounding ocean.

62 City of Placentia GIS Open Data. Sewer Pipes. Published April 2, 2015. Last Updated August 3, 2023. Website: https://data-placentia.opendata.arcgis.com/datasets/placentia::sewer-pipes/explore?location=33.867081%2C-117.874288%2C16.75 (accessed August 17, 2023).

63 City of Placentia. Sanitary Sewer Maintenance. Website: https://www.placentia.org/259/Sanitary-Sewer-Maintenance (accessed August 17, 2023).

64 Orange County Sanitation District (OC San). Facts and Key Statistics. Website: https://www.ocsan.gov/services/regional-sewer-service (accessed August 17, 2023).

OC San generates an average of 7.1 million kilowatt hours (kWh) of energy per month as a result of burning wastewater treatment byproducts including natural gas and methane gas.[65] OC San also reclaims 130 million gallons a day of treated wastewater and supplies it to Orange County Water District to reuse for landscaping, treatment processes, and other uses.[66]

Water Service and Supply. The City of Placentia receives water from both the Golden State Water Company and Yorba Linda Water District. A majority of the City, including the TOD Expansion Area, is served by the Golden State Water Company, which has served Placentia since 1929. The water provided to Placentia by Golden State Water Company is sourced from the Orange County Groundwater Basin, the Colorado River Aqueduct, and the State Water Project (imported and distributed by Metropolitan Water District of Southern California).[67]

On October 19, 2021, Governor Newsom issued a proclamation declaring a State of Emergency relating to the State's ongoing drought. Water conservation regulations were issued along with this proclamation, some of which have since been rolled back as conditions improved. However, the following State Water Board water emergency regulations currently remain in place:

- Emergency Regulation to Ban Decorative Grass Watering: decorative grass watering is banned for commercial, institutional, and HOA common areas (set to expire in June 2024).

- Emergency Regulation to Prohibit Wasteful Water Uses: certain actions considered to be wasteful uses of water are banned (set to expire in December 2023).

Golden State Water Company has aligned its policies with State drought guidance, including adopting and modifying emergency drought provisions set forth by Governor Newsom. In response to Governor Newsom's reduction of certain emergency measures on March 24, 2023, Golden State Water Company began to allow outdoor watering up to three days per week.

Both water service providers serving the City of Placentia prepare Urban Water Management Plans (UWMPs) that include demand forecasts and supply reliability forecasts for normal, dry, and multiple year dry conditions. The Golden State Water Company 2020 UWMP predicts 100 percent reliability for normal year and dry year demands from 2025 through 2045 for the Placentia-Yorba Linda Service Area.[68] As such, available water supply is expected to readily accommodate the potential water demand associated with new development in the TOD Expansion Area under the proposed project and the City's water needs through the year 2045. However, in the event of an unforeseen water shortage, the Golden State Water Company's UWMP includes a Water Shortage

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65 Orange County Sanitation District (OC San). 2023. Facts and Key Statistics. Website: https://www.ocsan.gov/services/regional-sewer-service (accessed August 17, 2023).

66 Ibid.

67 Golden State Water Company. Placentia. Website: https://www.gswater.com/placentia (accessed August 17, 2023).

68 Golden State Water Company. 2021. Placentia-Yorba Linda Service Area 2020 Urban Water Management Plan. Website: https://wuedata.water.ca.gov/getfile?filename=/public%2Fuwmp_attachments%2F2971326529%2FGSWC-Placentia-Yorba%20Linda%20Final.pdf (accessed August 17, 2023).

Contingency Plan containing shortage response actions including conservation and demand reduction measures.

Stormwater. The City of Placentia has implemented a comprehensive stormwater program as required by the federal Clean Water Act. Goals of the program include:

- Reducing stormwater pollutants that enter the storm drain system, and
- Minimizing potential water quality impacts to nearby creeks, channels, and rivers.

The City has a storm drainage system which is designed to prevent flooding by carrying excess rainwater away from streets and releases it into channels, rivers, and ultimately the ocean.[69]

According to the Federal Emergency Management Agency (FEMA) Flood Map, the TOD Expansion Area is categorized as Zone X, or "Area of Minimal Flood Hazard."[70]

In 2009, the Santa Ana Regional Water Quality Control Board (SARWQCB) adopted Order No. R8-2009-0030 (NPDES Permit No. CAS618030) for municipal stormwater and urban runoff discharges within Orange County, requiring the establishment of a program addressing stormwater pollution issues as part of private development projects.[71]

Solid Waste. The City of Placentia provides weekly residential, multi-family, and commercial garbage collection and disposal services through a Franchise Agreement with Republic Services, a private company.[72] The Franchise Agreement became effective on July 20, 2010, and expires on November 19, 2037. Republic Services provides waste, green waste, e-waste, bulky item, and recycling services to the City, as well as other optional services.

Republic Services' trash and recycling facilities are both located in the City of Anaheim, just south of the City of Placentia. Republic Services' Materials Recovery Facility (MRF) in Anaheim is located approximately 1 mile south of the TOD Expansion Area, adjacent to the general Republic Services facility. The MRF processes recyclables and organics from both curbside and commercial recycling programs.[73]

Under the California Integrated Waste Management Act of 1989 (AB 939), cities in California are required to divert a minimum of 50 percent of the solid waste that would otherwise go to a

69 City of Placentia. Stormwater Program. Website: https://www.placentia.org/262/Stormwater-NPDES (accessed August 17, 2023).

70 Federal Emergency Management Agency (FEMA). 2021. FEMA Flood Map Service Center: Search by Address. Website: https://msc.fema.gov/portal/search?AddressQuery=208%20west%20crowther%20avenue%20placentia (accessed August 18, 2023).

71 City of Placentia. Water Quality Management Plans (WQMP). Website: https://www.placentia.org/DocumentCenter/View/3157/WQMP-Brochure?bidId= (accessed August 17, 2023).

72 City of Placentia. Trash, Recycling, and Organics. Website: https://www.placentia.org/149/Trash-Recycling-and-Organics (accessed August 18, 2023).

73 City of Placentia. Recycle. Website: https://www.placentia.org/147/Recycle (accessed August 18, 2023).

landfill.[74] California Assembly Bill (AB) 341 increased this goal to 75 percent. The Anaheim MRF facility is in attainment with these goals, as well as other State recycling goals, and ensures that recyclable materials are diverted from the City's waste stream. Further, the City's website contains information and tips encouraging citizens to reduce, reuse, and recycle.

Trash collected from the City is ultimately disposed of across several landfills in Southern California, including the Olinda Alpha Landfill, 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.[75] However, a majority of the City's waste is processed at the Olinda Alpha Landfill.

5.19.2 Prior Environmental Analysis

The 2017 IS/MND found that the Approved Project would have less than significant impacts relating to Regional Water Quality Control Board wastewater treatment requirements, landfill capacity, and solid waste statutes. Potentially significant impacts were identified in the areas of wastewater treatment facilities, stormwater drainage facilities, water supply, and wastewater treatment providers. It should be noted that Thresholds (a), (b) and (c) of the 2017 IS/MND have been combined and are analyzed as Threshold (a) of this Supplemental IS/MND. Mitigation Measures (MMs) XVII-1 and XVII-2 were identified to reduce these potentially significant impacts to a less than significant level.

MM XVII-1 Future projects implemented under the TOD district shall submit a detailed evaluation of water demand and wastewater generation based on the fixtures that will be installed. This information shall be compared to the current demand by existing development and a net impact determination made. This net impact shall be compared to available water supply capacity and wastewater treatment capacity of the serving utility systems. If the demand/generation exceeds the capacity of either utility system, the modifications to the system(s) shall be evaluated and a determination of indirect impact reached in a second-tier environmental document. The documentation shall be reviewed and approved by the City and if specific measures must be implemented, the City shall impose them as conditions of approval for the future projects. In no instance shall a project be approved that would cause significant environmental effects on either the water or wastewater system, including adequacy of water supplies and treatment capacity. Mitigation in the form of offsets, such as funding water conservation or wastewater generation reductions at other location, shall be implemented where deemed necessary.

MM XVII-2 Future projects implemented under the TOD district shall submit a detailed evaluation of stormwater drainage from the new project relative to the existing

[74] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. July. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

[75] City of Placentia. 2019. Draft Environmental Report for the City of Placentia. July. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

development. If the future project will generate stormwater runoff that exceeds the existing volume or time of accumulation, onsite stormwater detention shall be installed as part of the site development of offset any increase that would exceed the capacity of the existing stormwater collection and transport systems. In no instance shall a project be approved that would cause significant environmental effects on either the existing drainage system, unless the system incremental stormwater increase is detained onsite or the drainage system altered to accommodate any change.

The 2021 Addendum determined that since the 2021 Development Project was consistent with the analysis provided in the 2017 IS/MND, no new impacts or substantially greater impacts than previously analyzed would occur. As such, no changes to the previous CEQA determinations were identified.

5.19.3 Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

As discussed in the Background section above, both of Placentia's water suppliers expect to readily accommodate the City's water needs through the year 2045, and future redevelopment of the TOD Expansion Area would not affect these forecasts. The various industrial developments are served by existing water conveyance facilities. Sewer lines maintained by the City run directly underneath Crowther Avenue and Cameron Street, two of the main roads providing access to the TOD Expansion Area, and convey untreated wastewater to the Orange County Sanitation District's (OC San) trunk sewer system for treatment. Placentia has implemented a comprehensive stormwater program, which includes a drainage system designed to prevent flooding by carrying excess rainwater away from streets and releases it into channels, rivers, and ultimately the ocean. Future redevelopment enabled by the proposed project is not anticipated to overwhelm these facilities and would therefore not require the construction of new or expanded facilities. Because the TOD Expansion Area's existing industrial uses consume electric power, natural gas, and telecommunications services, the TOD Expansion Area is already served by sufficient facilities to serve future redevelopment of the TOD Expansion Area and would not require relocations or construction of new facilities. Further, Mitigation Measure (MMs) XVII-1 and XVII-2, identified in the 2017 IS/MND, would require detailed evaluation of the capacity of water and stormwater drainage facilities and evaluate proposed developments in the Original TOD Area accordingly. Application of these measures to the TOD Expansion Area would reduce potential impacts to a less than significant level with mitigation incorporated. Therefore, the proposed project would not result in new significant or substantially more severe significant impacts related to expanded utility facilities than those analyzed in the prior environmental documents.

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 With Mitigation Incorporated; No New Impact)***

The Golden State Water Company 2020 UWMP predicts 100 percent reliability for normal year and dry year demands from 2025 through 2045 for its water service delivery area, which includes the TOD Expansion Area.

Although the proposed project would increase the intensity of water usage within the TOD Expansion Area, it would add only minimal outdoor (landscape) water demand, and multi-family residences generally use less water than new single-family residences. The scope of these changes in the existing water consumption would, to a large extent, depend on the efficiency of the fixtures incorporated into the design of new facilities when compared to the water consumption of existing development within the TOD Expansion Area. With implementation of MM XVII-1 identified in the 2017 IS/MND, impacts of the proposed project would be less than significant with mitigation incorporated. The proposed project would not result in new impacts or substantially more severe significant impacts than those identified previous environmental documents.

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 With Mitigation Incorporated; No New Impact)***

As discussed in the Background section above, Placentia's untreated wastewater is conveyed to the Orange County Sanitation District's (OC San) trunk sewer system for treatment, which meets waste discharge requirements imposed by the Santa Ana Regional Water Quality Control Board (SARWQCB). Residential and commercial wastewater, which would be generated by the proposed project, rarely contains constituents that would cause a wastewater treatment plant to exceed SARWQCB requirements as established in Waste Discharge Requirements (WDR). Although not considered "wastewater," the SARWQCB requires management of stormwater runoff to prevent indirect source (non-point source) contamination of surface runoff in the Santa Ana River Basin. The proposed project would implement stormwater quality controls that will meet the current requirements of the SARWQCB. With these stormwater quality controls as well as implementation of MM XVII-1 identified in the 2017 IS/MND, impacts of the proposed project would be less than significant with mitigation incorporated. The proposed project would not result in new impacts or substantially more severe significant impacts than those identified previous environmental documents.

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; No New Impact)***

The City of Placentia is primarily served by the Olinda Landfill, operated by Orange County Waste & Recycling and located in Brea, California, approximately 5 miles northeast of the TOD Expansion Area. This facility is permitted to operate through 2030 and can process a maximum of 8,000 tons

per day (TPD).[76] The Olinda landfill has a maximum permitted capacity of 148,800,000 cubic yards and a remaining capacity of 17,500,000 cubic yards.[77] Due to the large available daily and long-term capacity at this landfill, the proposed project is not forecast to hinder continued operation because it has sufficient permitted capacity to accept the project's solid waste disposal needs. Impacts of the proposed project would be less than significant; therefore, the proposed project would not result in new significant or substantially more severe significant impacts related to solid waste generation than those analyzed in the prior environmental documents.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? ***(Less Than Significant Impact; No New Impact)***

As discussed above in the Background section, under the California Integrated Waste Management Act of 1989 (AB 939), cities in California are required to divert a minimum of 50 percent of the solid waste that would otherwise go to a landfill. California Assembly Bill 341 (AB 341) increased this goal to 75 percent. The Anaheim MRF facility, which would serve redevelopment that would occur within the TOD Expansion Area, is in attainment with AB 939, AB 341, and other applicable County and State waste and recycling goals. Implementation of the proposed project is not anticipated to change the attainment status of any relevant goals or regulations. The proposed project would also be subject to AB 1327, Chapter 18, Solid Waste Reuse and Recycling Access Act of 1991. This act requires that adequate areas be provided for collecting and loading recyclable materials such as paper products, glass, and other recyclables, which the proposed project would conform with. Impacts would be less than significant; therefore, the proposed project would not result in new significant or substantially more severe significant impacts related to solid waste regulations than those analyzed in the prior environmental documents.

[76] Orange County Waste & Recycling. Olinda Customer Information. Website: https://oclandfills.com/page/olinda-customer-information-0#:~:text=Olinda%20Landfill%20opened%20in%201960,state%20and%20local%20regulatory%20agencies. (accessed November 13, 2023).

[77] California Department of Resources Recycling and Recovery (CalRecycle). SWIS Facility/Site Activity Details: Olinda Alpha Landfill (30-AB-0035). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2757?siteID=2093 (accessed November 13, 2023).

5.20 WILDFIRE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

5.20.1 Background

The TOD Expansion Area and the surrounding areas are developed with urban and suburban uses and do not include brush- and grass-covered areas typically found in areas susceptible to wildfires. Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed campfires, cigarettes, sparks from automobiles, and other ignition sources. According to mapping by the California Department of Forestry and Fire Protection (CAL FIRE), the TOD Expansion Area is not located within a Very High Fire Hazard Severity Zone (VHFHSZ), in a State Responsibility Area (SRA), or a Local Responsibility Area (LRA).[78]

The City of Placentia contains areas (along the northern perimeter of the City) that are exposed to wildland fire hazards. However, the City of Placentia is almost completely urbanized and as such, the risk of Wildland-Urban Interface fires in the City is relatively low.[79] The CAL FIRE Fire and Resources Assessment Program Fire Hazard Severity Zones Map, contained in the City's General Plan EIR, illustrates the absence of any fire hazard severity zones within the City's boundaries. Further, the TOD Expansion Area do not contain any wildland fire hazards areas.

[78] California Department of Forestry and Fire Protection (CAL FIRE). 2022. California Fire Hazard Severity Zone Viewer. Website: egis.fire.ca.gov/FHSZ/ (accessed August 24, 2023).

[79] City of Placentia. Draft Environmental Report for the City of Placentia. July 2019. Website: https://www.placentia.org/DocumentCenter/View/8284/1Placentia-GP-Draft-EIR-Vol-1?bidId= (accessed August 18, 2023).

5.20.2 Prior Environmental Analysis

The 2017 IS/MND was adopted prior to the mandatory analysis of wildfire impacts under CEQA. However, evacuation interference similar to Threshold (a) of this Supplemental IS/MND was addressed under Threshold (g) of Section 8, Hazards and Hazardous Materials, of the 2017 IS/MND. Other wildfire risks were discussed Under Threshold (h) of Section 8, Hazards and Hazardous Materials, of the 2017 IS/MND. The 2017 IS/MND determined that the Approved Project would have no impact related to wildland fire risk.

The 2021 Addendum determined that the 2021 Development Project would not result in new impacts or substantially more severe significant impacts than those identified in the 2017 IS/MND.

5.20.3 Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

The TOD Expansion Area is not located in an SRA for fire hazards, as mapped by CAL FIRE. Additionally, as noted in Section 5.9, Hazards and Hazardous Materials, the TOD Expansion Area is not located within an area identified by CAL FIRE as a community at risk for wildland fire (see Response 5.9.3(g)).

The City's Emergency Operations Plan promotes a coordinated response to emergency situations based on the city's overall mission. Placentia's Emergency and Health Services Division oversees or coordinates a variety of emergency response plans and activities including the Community Emergency Response Team (CERT), the City of Placentia Emergency Operations Center, Mass Notification, Alert, and Warning platforms, and City-wide community outreach and disaster preparedness events.[80] The City has designated evacuation routes and Transportation Assembly Points (TAPs) throughout the City in the event of an emergency situation. According to the General Plan, Crowther Avenue has been designated as an evacuation (ingress) access route.[81] It is important to clarify that this route does not serve as a primary evacuation route for the City but rather would provide access for emergency personnel entering the area. Regardless of this distinction, the proposed project is not anticipated to adversely affect the usage of this route in the event of an emergency situation.

As described in Response 5.9.3 (f), in Section 5.9, Hazards and Hazardous Materials, because the proposed project would not substantially alter or block the adjacent roadways, the proposed project would not be expected to impair the function of nearby emergency evacuation routes. Further, implementation of Mitigation Measures (MMs) XVI-2 through XVI-11, identified in the 2017 IS/MND, would reduce any future potential impacts associated with inadequate emergency access and response both during construction and operations to a less than significant level. No new or

80 City of Placentia. Emergency and Health Services Division. Website: https://www.placentia.org/82/Emergency-Preparedness (accessed September 20, 2023).

81 City of Placentia. 2019. General Plan Safety Element. Website: https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId= (accessed September 20, 2023).

substantially more significant impacts related to emergency response or evacuation would occur in comparison to the previous environmental analysis.

b. Would the project, 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? ***(Not Previously Analyzed; No New Impact)***

As discussed previously in Section 5.7, Geology and Soils, the TOD Expansion Area is generally flat and does not have substantial slopes or steep topography located within its boundaries (see Response 5.7.3 (a–iv)). Prevailing winds at and near the TOD Expansion Area originate from the west and southwest, including offshore winds during nighttime, but do not reach high speeds. Because the TOD Expansion Area is already developed with urban uses, there are no substantial fuel loads at the TOD Expansion Area that would exacerbate wildfire risks of the proposed project. Though the proposed project would enable future high-density residential development on the TOD Expansion Area, this land use change is not anticipated to expose occupants or nearby residents to pollutants from a wildfire or the uncontrolled spread of wildfire, and impacts would be less than significant. As such, no new or substantially more significant impacts would occur in comparison to previous environmental analysis.

c. Would the project 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? ***(Not Previously Analyzed; No New Impact)***

Because the TOD Expansion Area is already served by existing roads including Crowther Avenue and Cameron Street, the proposed project would not involve the installation of any additional major roadways or roadway infrastructure. Water resources used to combat fires within the City are provided by citywide fire hydrant systems served by the Yorba Linda Water District and Golden State Water Company. According to the City's general plan, these emergency fire resources are "well-developed" and allow fire response personnel to "adequately respond to large-scale, multi-alarm fires that may occur within the city."[82] As such, adequate emergency water sources already exist to serve the TOD Expansion Area. Further, the TOD Expansion Area's existing uses are already served by power lines running along Crowther Avenue. This area of Placentia is already served by sufficient infrastructure to accommodate the land use changes enabled by the proposed project, and would not require the installation or maintenance of associated infrastructure that would result in adverse impacts or an increase in fire risk. Impacts would be less than significant, and therefore no new or substantially more significant impacts would occur in comparison to previous environmental analysis.

[82] City of Placentia. 2019. General Plan Safety Element. Website: https://www.placentia.org/DocumentCenter/View/8402/7-Safety-updated?bidId= (accessed September 20, 2023).

d. Would the project 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? ***(Not Previously Analyzed; No New Impact)***

Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking but can also occur as a result of erosion and downslope runoff caused by rain following a fire. As discussed in Section 5.7, Geology and Soils, the TOD Expansion Area is generally flat and does not have substantial slopes or steep topography located within its boundaries (see Response 5.7.3 (a, iv)). The majority of the City, including the TOD Expansion Area, is not identified as having a significant landslide hazard. With no potential for landslides, the proposed project would not expose future development in the TOD Expansion Area to such hazards. Additionally, the TOD Expansion Area does not lie within a designated Landslide Hazard Zone. Further, as stated previously, the TOD Expansion Area is not located in or near a VHFHSZ nor is it located in an SRA, making post-fire slope instability unlikely.

The TOD Expansion Area is already fully developed with urban uses and impervious materials including pavement. The only impervious surfaces within the TOD Expansion Area exist within minimal urban landscaping areas. Any future development of the TOD Expansion Area would be subject to landscaping requirements mandated in the TOD Development Standards, particularly concerning parking areas.[83] This would result in the incorporation of permeable surfaces into future project designs, which would likely balance out any landscaping removed during redevelopment. Therefore, the proposed project would not 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. Impacts would be less than significant; therefore, no new or substantially more significant impacts would occur in comparison to previous environmental analysis.

[83] City of Placentia. 2017. Transit Oriented Development Packing House District Development Standards. Website: https://www.placentia.org/DocumentCenter/View/5803/TOD-Development-Standards?bidId= (accessed September 20, 2023).

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

	New Potentially Significant Impact	New Mitigation Required	Reduced Impact	No New 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 endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
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.)	☐	☐	☐	☒
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

5.21.1 Impact Analysis

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 endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? ***(Less Than Significant with Mitigation Incorporated; No New Impact)***

The 2017 IS/MND determined that impacts to biological and cultural resources would be less than significant with implementation of the mitigation measures identified in Section V, Cultural Resources, of the document. It should be noted that Threshold (b) of the 2017 IS/MND is no longer required under CEQA and, as such, is not included in this Supplemental IS/MND. The 2021 Addendum did not address Mandatory Findings of Significance.

The proposed project has no potential to adversely impact biological resources, and as such, no mitigation measures pertaining to biological resources have been identified in this Supplemental IS/MND. The proposed project has been identified as having no potential to degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The TOD Expansion Area is in a fully urbanized area containing developed structures and infrastructure and no natural biological habitat exists within the TOD Expansion Area. Based on the historic disturbance of the site, and its current disturbed conditions, the potential for impacting archaeological resources is low, but mitigation is required to address the potential for historic resources due to the age of many of the structures within the TOD Expansion Area. Please see

Section 5.4, Biological Resources, and Section 5.5, Cultural Resources, for more information about the proposed project's relationship with these topics. With mitigation incorporated, impacts would be less than considerable, meaning no new impacts or substantially more severe significant adverse impacts to the quality of the environment would occur.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) ***(Less Than Significant With Mitigation Incorporated; No New Impact)***

Based on the analysis in this Supplemental IS/MND, the proposed expansion of the TOD designation does not have the potential to cause impacts that are individually or cumulatively considerable. It is possible that the construction periods of future residential developments within the Original TOD Area and/or TOD Expansion Area may have brief overlaps. However, the issues of Aesthetics, Air Quality, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Public Services, Transportation, Tribal Cultural Resources, and Utilities and Service Systems require the continuation of mitigation measures identified in prior environmental documents and identified in this document to reduce impacts to a less than significant level and ensure that cumulative effects do not rise to a level of cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable. As such, no new impacts or substantially more severe cumulatively considerable impacts would occur.

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; No New Impact)***

The 2017 IS/MND determined that the Approved Project's potential to adversely affect human beings would be less than significant with implementation of mitigation measures applied to the Aesthetics, Air Quality/GHG, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Public Services, Recreation, and Transportation and Utilities sections of the 2017 IS/MND. The 2021 Addendum did not address Mandatory Findings of Significance.

The proposed project includes activities that have a potential to cause direct substantial adverse effects on humans. The issues of Aesthetics, Air Quality, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Public Services, Transportation, Tribal Cultural Resources, and Utilities and Service Systems require the implementation of mitigation measures identified in the prior environmental documents and identified in this Supplemental IS/MND in order to reduce human impacts to a less than significant level. All other environmental issues were found to have no impacts to humans without implementation of mitigation. With implementation of applicable mitigation measures identified in previous environmental documents, the proposed project would have less than considerable impacts to human beings with mitigation incorporated. As such, no new impacts or substantially more severe significant adverse impacts to human beings would occur.

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6.0 LIST OF PREPARERS

6.1 CITY OF PLACENTIA

The following individuals reviewed and provided input on the Draft Supplemental Initial Study/ Mitigated Negative Declaration (IS/MND) and technical reports:

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- Ken Wilhelm, Mobility Principal
- Shuqi Hao, Transportation Engineer

6.3 OTHER PREPARERS

Please refer to the 2017 IS/MND and/or the 2021 Addendum to view the preparers of studies and reports utilized in each environmental document.

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APPENDIX A

2021 MITIGATION MONITORING AND REPORTING PLAN

Attachment A.
Mitigation Monitoring and Reporting Program

Attachments

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CITY OF PLACENTIA
207-208 WEST CROWTHER AVENUE (PACKING HOUSE DISTRICT TOD PROJECT)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Implementation Schedule	Verification
Air Quality		
III-1 For each future project implemented within the TOD project area, the development shall identify project construction related emissions and specific best available control measures (BACMs) identified in Rule 403 required to ensure that fugitive dust or construction equipment exhaust emissions will not exceed SCAQMD construction thresholds of significance or emission concentrations at the nearest receptors identified by local significance thresholds. The specific BACMs identified shall be made conditions of approval to ensure implementation.	The construction emission report shall be submitted to the City and approved prior to approval of the project. The BACMs identified in the report shall be implemented as project conditions of approval during construction.	The City shall review the report of findings submitted by the applicant and document the measures required (if any) to reduce construction emission to a less than significant level. This report shall be approved by the City and a copy of the approved report shall be retained in the project file. The BACMs to reduced construction emissions shall be implemented during construction and verified by City inspectors.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Air Quality III-2 Only "Low-Volatile Organic Compounds" paints (no more than 100 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications consistent with South Coast Air Quality Management District Rule 1113 shall be used.	This measure shall be included as a condition of approval and implemented during construction.	A copy of this condition of approval shall be retained in the project file. The use of Low-Volatile Organic Compounds shall be verified by City inspectors.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Air Quality III-3 Prior to approval of a specific development project within the new TOD project area, as part of the required air quality study, a health risk assessment (HRA) shall be provided to the City indicating what measures will need to be implemented to reduce exposure to any toxics to less than significant impact. Also, as part of the mitigation, the City shall require that a permanent funding source be identified to ensure that the mitigation systems are maintained and do not degrade to the point of being ineffective at controlling exposure to potential toxics to a less than significant exposure level.	This measure shall be submitted to the City and prior to approval of the final site plan.	The City shall review the findings and include the recommendations as part of conditions of approval.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Cultural Resources		
V-2 During ground disturbing activities (including but not limited to pavement removal, pot-holing, grading, excavation, trenching and initial well site disturbance) at least one Native American Monitor will be present at the project site to monitor subsurface areas as they are exposed. The monitors shall compile a monitoring log on a daily basis that will provide descriptions of daily activities, including construction activities, locations, soil characteristics and any cultural materials exposed and identified. The monitors shall photodocument the ground disturbing activities on a daily basis. If any cultural materials are exposed, the monitors shall have the authority to redirect construction activities until the extent and importance of the materials are assessed. Subsequent management of any Native American cultural materials shall be determined through consultation between the City, property owner and the Native American Band supplying the monitor. Any human remains encountered shall be handled through the County Coroner's office and if necessary, in conjunction with the Native American Heritage Commission and Native American Band supplying the monitor.	A Native American Monitor shall be provided during ground disturbing activities beyond artificial fill materials based on the geotechnical report. Where applicable, the monitors shall compile a monitoring log on a daily basis that will provide descriptions of daily activities.	A copy of the monitoring log shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Hazards and Hazardous Materials		
VIII-1 All spills or leakage of petroleum products or other hazardous materials during construction activities will be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately licensed disposal or treatment facility. This measure will be incorporated into the SWPPP or erosion control plan prepared for site specific development within the project area.	These measures shall be identified in the project Stormwater Pollution Prevention Plan (SWPPP) and implemented during construction.	A copy of the SWPPP shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify the SWPPP BMPs have been implemented as required in this measure. Field notes documenting verification shall be retained in the project file.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Hazards and Hazardous Materials		
VIII-2 Prior to approval of any project under the TOD designation, a Phase I and/or Phase II Environmental Site Assessment shall be prepared to document the potential for any residual contamination at a site being developed within the TOD area. Any identified residual contamination shall be remediated to a level that will permit residential use prior to approval of any project proposed under the TOD designation.	A copy of the ESA's shall be submitted to the City prior to approval. Proof of remediation to a level that will support the type of use proposed shall be submitted to the City prior to occupancy.	A copy of the ESA's shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify that any recognized environmental conditions have been remediated as required in this measure. Field notes documenting verification shall be retained in the project file.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Hydrology and Water Quality		
IX-1 Concurrent with individual project applications in the future, the applicant for a project in the TOD area shall submit a review of existing water consumption on the property, and a forecast of future water consumption by the proposed development. If water consumption by the new project is less than currently occurs on the property, no further action is required. If water consumption is forecast to increase by more 25% than current water demand or 5,000 gallons per day per acre, the project applicant shall fund sufficient water conservation measures within the project area (including the proposed project) to offset the increase in demand on the local water purveyor. Specific conservation measures that can by funded include, but are not limited to: use of recycled water for exterior landscaping, ultra low flush toilets; interior water fixtures that reduce water consumption, such as ondemand water heaters; replacement of existing high water demand landscaping with xeric landscaping; installation of smart landscape/irrigation management/control systems (such as drip systems); and use of onsite low water demand landscaping. To verify adequate water demand offset, the City shall consult with the local water purveyor and verify the adequacy of the offset.	A copy of the water use report shall be provided to the City with recommendations on the need for offsets. If required, the recommended water consumption reduction measures shall be installed during construction and implemented during operations/occupancy.	A copy of the approved water use report shall be retained in the project file. If offset measures must be implemented, City inspectors shall verify and document that they are installed and operational.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-3 Future projects that may adversely impact noise sensitive uses shall use noise reducing barriers and other devices to reduce exterior noise levels at the nearest sensitive receptor to 65 CNEL or less during the daytime construction hours. This shall include installation of a temporary construction barrier around the source of construction noise.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that the noise attenuation measures are implemented during construction where required.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-4 No construction activities shall occur during the hours of 7 PM through 7 AM, Monday through Saturday and at no time shall construction activities occur on Sundays or holidays, unless a declared emergency exists. Stated differently, construction activities shall be limited to 7 AM to 7 PM on weekdays; and no construction activities on Sunday or federal holidays.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-5 Stationary construction equipment that generates noise above the 65 dB threshold at the nearest sensitive receptor shall be placed behind a temporary noise construction barrier while in use.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-6 The project developer shall establish a noise complaint response program and shall respond to any noise complaints received for future specific project by measuring noise levels at the affected receptor site. If the noise level exceeds an CNEL of 60 dBA exterior or an CNEL of 45 dBA interior at the sensitive receptor, the applicant will implement adequate measures (which may include portable sound attenuation walls, use of quieter equipment, shift of construction schedule to avoid the presence of sensitive receptors, etc.) to reduce noise levels to the greatest extent feasible.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-7 Project developer will require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by applicant personnel during construction activities.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-8 Equipment not in use for five minutes shall be shut off.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-9 Equipment shall be maintained and operated such that loads are secured from rattling or banging.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-10 Where available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-11 Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-12 No radios or other sound equipment shall be used at this site unless required for emergency response by the contractor.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Noise XII-13 Public notice shall be given 10 days prior to initiating construction. This notice shall be provided to all property owners and residents within 300 feet of the project site and shall be provided to property owners/residents at least one week prior to initiating construction. The notice shall identify the dates of construction and the name and phone number of a construction supervisor (contact person) in case of complaints. One contact person shall be assigned to the project. The public notice shall encourage the adjacent residents to contact the supervisor in the case of a complaint. Resident's would be informed if there is a change in the construction schedule. The supervisor shall be available 24/7 throughout construction by mobile phone. If a complaint is received, the contact person shall take all feasible steps to remove or attenuate the sound source causing the complaint.	This measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction noise measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic		
XVI-1 Each future TOD project shall pay fair share fees for the intersection improvement costs at the time of entitlement based on the percentage of trips contributed at each intersection. A high level "order of magnitude" cost estimate is also provided in subsequent mitigation identified in the Traffic Impact Study. These are rough estimate costs for engineering and construction and will need to be refined during future preliminary engineering phase. The mitigation measures should be re-evaluated for any refinement of the Draft General Plan Update and/or additional development of the TOD project over and beyond 5,000 trips. All significantly impacted intersections require mitigation prior to Future Buildout. Mitigation for each intersection and estimated costs are listed below: • Placentia/Crowther Avenue: Upgrade left turn signal phasing for all movements from permissive left turns to protected/permissive left turn phasing. Estimated Cost - $100,000; • Orangethrope Avenue/Placentia Avenue: Provide eastbound/westbound dual left-turn Lanes at Orangethorpe Avenue/Placentia Avenue. Estimated Cost - $450,000; • Orangethorpe Avenue/SR-57 Northbound Ramps: Restripe • Northbound Off-Ramp middle lane as shared LeftTurn/Thru/Right-Turn Lane. Estimated Cost - $50,000; • Orangethorpe Avenue/SR-57 Northbound Ramps: The westbound right turn movement is expected to	Fair share circulation system fees shall be paid when entitlements are issued, or prior to occupancy.	Fees imposed and paid shall be documented in the project file.

increase from 550 vehicles per hour (vph) to 800 vph during the PM period for year 2035. This movement should be closely monitored and may require additional improvements to reduce congestion and queuing. An additional improvement would be to modify the existing median on Orangethorpe Avenue to add an exclusive Westbound Right-Turn Lane. Estimated Cost - $200,000; • Orangethorpe Avenue/Melrose Street: Provide an exclusive southbound right-turn lane without overlap signal phasing and northbound dual left-turn lanes at Orangethorpe Avenue/Melrose Street. Estimated Cost - $100,000; Kraemer Boulevard/Orangethorpe Avenue: Restripe Orangethrope Avenue to provide eastbound dual left-turn lanes. Add additional north/south thru lane (three lanes each) by restriping the northbound and southbound right turn lanes to thru lanes. Consider modifying the north/south leftturn movements from protected-only left-turn phasing to protected- permissive left-turn phasing. Restripe the southbound left-turn approach to provide a positive offset for better sight distance between the north/south left turn movements. Estimated Cost - $100,000.			
	Source	**Responsible Party**	**Status / Date / Initials**
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-2 Truck access for the parcel on the southwest corner of Melrose Street and Crowther Avenue must be maintained to and from this site.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-3 Construction hours should be five days a week, and in accordance with the City of Placentia Municipal Code, limited to the hours of 7 AM and 7 PM on working days (Monday through Friday).	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-4 Construction truck and worker automobile traffic will utilize the proposed driveways along Melrose Street and Crowther Avenue for access to and from the project site.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-5 Trucks transporting materials to and from the project site must utilize the designated truck routes along Placentia Avenue, Crowther Avenue, Melrose Street, and Orangethorpe Avenue.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-6 Trucks entering or exiting the construction site will need to yield to public traffic at all times.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-7 It is unlikely that street traffic will be impacted by on-site construction activities; however, should it be necessary for temporary lane closures and/or detour routes for utility work or other such work in the public right-of-way those temporary traffic control activities are to be conducted in compliance with the requirements and guidelines outlined in the California Manual of Uniform Traffic Control Devices (MUTCD).	When applicable, his measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-8 Construction staging should be conducted on-site and under no circumstances will be allowed on local or residential streets.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-9 Construction work within the public right-of-way needs to be in compliance with City standards and the construction site shall be posted with the name, company and a phone number of a person to call for complaints.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-10 The applicant will be fully responsible for the repair of damages to any public facility due to the hauling or transporting of construction related materials.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-11 Parking for the construction trucks and worker trucks will be on-site, away from the adjacent public roadways and existing active businesses.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Transportation / Traffic XVI-12 The City shall coordinate with OCTA to ensure that one or more bus routes to the future Placentia Metrolink Station will serve the TOD project area.	When applicable, this measure shall be included as a condition of approval and implemented during construction.	City inspectors shall verify and document that construction traffic measures are implemented during construction.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

Mitigation Measure	Implementation Schedule	Verification
Utilities and Service Systems XVII-2 Future projects implemented under the TOD district shall submit a detailed evaluation of stormwater drainage from the new project relative to the existing development. If the future project will generate stormwater runoff that exceeds the existing volume or time of accumulation, onsite stormwater detention shall be installed as part of the site development of offset any increase that would exceed the capacity of the existing stormwater collection and transport systems. In no instance shall a project be approved that would cause significant environmental effects on either the existing drainage system, unless the system incremental stormwater increase is detained onsite or the drainage system altered to accommodate any change.	A copy of the stormwater generation report shall be provided to the City with recommendations on the need for offsets. If required, the recommended water consumption reduction measures shall be installed during construction and implemented during operations/occupancy.	A copy of the approved stormwater generation report shall be retained in the project file. If offset measures must be implemented, City inspectors shall verify and document that they are installed and operational.

	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Placentia	

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APPENDIX B

AIR QUALITY MODELING RESULTS

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Packing House District Transit-Oriented Development Expansion Project Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Packing House District Transit-Oriented Development Expansion Project
Operational Year	2029
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	1.80
Precipitation (days)	21.2
Location	S Melrose St & W Crowther Ave, Placentia, CA 92870, USA
County	Orange
City	Placentia
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5761
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.20

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	1,378	Dwelling Unit	14.5	1,322,880	68,900	—	4,272	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Area Sources	LL-1	Replace Gas Powered Landscape Equipment with Zero-Emission Landscape Equipment
Area Sources	E-14	Limit Wood Burning Devices and Natural Gas/Propane Fireplaces in Residential Development

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	375	40.0	583	1.12	50.8	39.8	90.6	50.8	10.1	60.9	5,446	79,491	84,936	70.3	2.23	87,469
Mit.	368	39.3	505	1.11	50.8	39.8	90.6	50.8	10.1	60.9	5,446	79,336	84,782	70.2	2.23	87,314
% Reduced	2%	2%	13%	< 0.5%	< 0.5%	—	< 0.5%	< 0.5%	—	< 0.5%	—	< 0.5%	< 0.5%	< 0.5%	< 0.5%	< 0.5%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	368	40.2	494	1.10	50.8	39.8	90.6	50.8	10.1	60.9	5,446	77,729	83,175	70.3	2.29	85,628
Mit.	368	40.2	494	1.10	50.8	39.8	90.6	50.8	10.1	60.9	5,446	77,729	83,175	70.3	2.29	85,628
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	72.0	18.3	212	0.46	3.99	39.2	43.2	3.97	9.96	13.9	997	53,970	54,967	69.8	1.86	57,322

Mit.	67.4	17.8	158	0.46	3.97	39.2	43.2	3.95	9.96	13.9	997	53,864	54,862	69.8	1.86	57,216
% Reduced	6%	3%	25%	1%	1%	—	< 0.5%	< 0.5%	—	< 0.5%	—	< 0.5%	< 0.5%	< 0.5%	—	< 0.5%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	13.1	3.34	38.7	0.08	0.73	7.16	7.89	0.72	1.82	2.54	165	8,935	9,100	11.6	0.31	9,490
Mit.	12.3	3.25	28.9	0.08	0.72	7.16	7.89	0.72	1.82	2.54	165	8,918	9,083	11.6	0.31	9,473
% Reduced	6%	3%	25%	1%	1%	—	< 0.5%	< 0.5%	—	< 0.5%	—	< 0.5%	< 0.5%	< 0.5%	< 0.5%	< 0.5%

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	14.7	11.2	139	0.40	0.21	39.8	40.0	0.20	10.1	10.3	—	40,383	40,383	1.57	1.45	40,956
Area	360	25.0	442	0.70	50.3	—	50.3	50.3	—	50.3	4,775	26,318	31,093	0.50	0.47	31,247
Energy	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	12,268	12,268	0.89	0.06	12,309
Water	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Waste	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	375	40.0	583	1.12	50.8	39.8	90.6	50.8	10.1	60.9	5,446	79,491	84,936	70.3	2.23	87,469
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	14.6	12.1	128	0.38	0.21	39.8	40.0	0.20	10.1	10.3	—	38,831	38,831	1.62	1.51	39,325
Area	353	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Energy	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	12,268	12,268	0.89	0.06	12,309
Water	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949

Waste	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	368	40.2	494	1.10	50.8	39.8	90.6	50.8	10.1	60.9	5,446	77,729	83,175	70.3	2.29	85,628
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	14.5	12.3	132	0.38	0.21	39.2	39.5	0.20	9.96	10.2	—	39,249	39,249	1.61	1.52	39,786
Area	57.3	2.16	78.6	0.05	3.47	—	3.47	3.46	—	3.46	327	1,931	2,259	0.04	0.03	2,269
Energy	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	12,268	12,268	0.89	0.06	12,309
Water	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Waste	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	72.0	18.3	212	0.46	3.99	39.2	43.2	3.97	9.96	13.9	997	53,970	54,967	69.8	1.86	57,322
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.64	2.24	24.0	0.07	0.04	7.16	7.20	0.04	1.82	1.85	—	6,498	6,498	0.27	0.25	6,587
Area	10.5	0.39	14.3	0.01	0.63	—	0.63	0.63	—	0.63	54.1	320	374	0.01	0.01	376
Energy	0.04	0.71	0.30	< 0.005	0.06	—	0.06	0.06	—	0.06	—	2,031	2,031	0.15	0.01	2,038
Water	—	—	—	—	—	—	—	—	—	—	16.4	86.3	103	1.69	0.04	157
Waste	—	—	—	—	—	—	—	—	—	—	94.6	0.00	94.6	9.45	0.00	331
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.57
Total	13.1	3.34	38.7	0.08	0.73	7.16	7.89	0.72	1.82	2.54	165	8,935	9,100	11.6	0.31	9,490

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	14.7	11.2	139	0.40	0.21	39.8	40.0	0.20	10.1	10.3	—	40,383	40,383	1.57	1.45	40,956

Area	353	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Energy	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	12,322	12,322	0.89	0.07	12,364
Water	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Waste	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	368	39.3	505	1.11	50.8	39.8	90.6	50.8	10.1	60.9	5,446	79,336	84,782	70.2	2.23	87,314
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	14.6	12.1	128	0.38	0.21	39.8	40.0	0.20	10.1	10.3	—	38,831	38,831	1.62	1.51	39,325
Area	353	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Energy	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	12,268	12,268	0.89	0.06	12,309
Water	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Waste	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	368	40.2	494	1.10	50.8	39.8	90.6	50.8	10.1	60.9	5,446	77,729	83,175	70.3	2.29	85,628
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	14.5	12.3	132	0.38	0.21	39.2	39.5	0.20	9.96	10.2	—	39,249	39,249	1.61	1.52	39,786
Area	52.7	1.66	24.9	0.05	3.44	—	3.44	3.44	—	3.44	327	1,788	2,115	0.03	0.03	2,126
Energy	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	12,305	12,305	0.89	0.06	12,347
Water	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Waste	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	67.4	17.8	158	0.46	3.97	39.2	43.2	3.95	9.96	13.9	997	53,864	54,862	69.8	1.86	57,216
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.64	2.24	24.0	0.07	0.04	7.16	7.20	0.04	1.82	1.85	—	6,498	6,498	0.27	0.25	6,587
Area	9.62	0.30	4.54	0.01	0.63	—	0.63	0.63	—	0.63	54.1	296	350	0.01	0.01	352
Energy	0.04	0.71	0.30	< 0.005	0.06	—	0.06	0.06	—	0.06	—	2,037	2,037	0.15	0.01	2,044

Water	—	—	—	—	—	—	—	—	—	—	16.4	86.3	103	1.69	0.04	157
Waste	—	—	—	—	—	—	—	—	—	—	94.6	0.00	94.6	9.45	0.00	331
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.57
Total	12.3	3.25	28.9	0.08	0.72	7.16	7.89	0.72	1.82	2.54	165	8,918	9,083	11.6	0.31	9,473

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	14.7	11.2	139	0.40	0.21	39.8	40.0	0.20	10.1	10.3	—	40,383	40,383	1.57	1.45	40,956
Total	14.7	11.2	139	0.40	0.21	39.8	40.0	0.20	10.1	10.3	—	40,383	40,383	1.57	1.45	40,956
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	14.6	12.1	128	0.38	0.21	39.8	40.0	0.20	10.1	10.3	—	38,831	38,831	1.62	1.51	39,325
Total	14.6	12.1	128	0.38	0.21	39.8	40.0	0.20	10.1	10.3	—	38,831	38,831	1.62	1.51	39,325
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	2.64	2.24	24.0	0.07	0.04	7.16	7.20	0.04	1.82	1.85	—	6,498	6,498	0.27	0.25	6,587
Total	2.64	2.24	24.0	0.07	0.04	7.16	7.20	0.04	1.82	1.85	—	6,498	6,498	0.27	0.25	6,587

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	14.7	11.2	139	0.40	0.21	39.8	40.0	0.20	10.1	10.3	—	40,383	40,383	1.57	1.45	40,956
Total	14.7	11.2	139	0.40	0.21	39.8	40.0	0.20	10.1	10.3	—	40,383	40,383	1.57	1.45	40,956
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	14.6	12.1	128	0.38	0.21	39.8	40.0	0.20	10.1	10.3	—	38,831	38,831	1.62	1.51	39,325
Total	14.6	12.1	128	0.38	0.21	39.8	40.0	0.20	10.1	10.3	—	38,831	38,831	1.62	1.51	39,325
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	2.64	2.24	24.0	0.07	0.04	7.16	7.20	0.04	1.82	1.85	—	6,498	6,498	0.27	0.25	6,587
Total	2.64	2.24	24.0	0.07	0.04	7.16	7.20	0.04	1.82	1.85	—	6,498	6,498	0.27	0.25	6,587

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartment Mid Rise	—	—	—	—	—	—	—	—	—	—	—	7,363	7,363	0.46	0.06	7,390
Total	—	—	—	—	—	—	—	—	—	—	—	7,363	7,363	0.46	0.06	7,390
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	7,363	7,363	0.46	0.06	7,390
Total	—	—	—	—	—	—	—	—	—	—	—	7,363	7,363	0.46	0.06	7,390
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	1,219	1,219	0.08	0.01	1,224
Total	—	—	—	—	—	—	—	—	—	—	—	1,219	1,219	0.08	0.01	1,224

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	7,417	7,417	0.46	0.06	7,445
Total	—	—	—	—	—	—	—	—	—	—	—	7,417	7,417	0.46	0.06	7,445
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	7,363	7,363	0.46	0.06	7,390
Total	—	—	—	—	—	—	—	—	—	—	—	7,363	7,363	0.46	0.06	7,390

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	1,225	1,225	0.08	0.01	1,230
Total	—	—	—	—	—	—	—	—	—	—	—	1,225	1,225	0.08	0.01	1,230

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	4,905	4,905	0.43	0.01	4,919
Total	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	4,905	4,905	0.43	0.01	4,919
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	4,905	4,905	0.43	0.01	4,919
Total	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	4,905	4,905	0.43	0.01	4,919
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.04	0.71	0.30	< 0.005	0.06	—	0.06	0.06	—	0.06	—	812	812	0.07	< 0.005	814
Total	0.04	0.71	0.30	< 0.005	0.06	—	0.06	0.06	—	0.06	—	812	812	0.07	< 0.005	814

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	4,905	4,905	0.43	0.01	4,919
Total	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	4,905	4,905	0.43	0.01	4,919
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	4,905	4,905	0.43	0.01	4,919
Total	0.23	3.86	1.64	0.02	0.31	—	0.31	0.31	—	0.31	—	4,905	4,905	0.43	0.01	4,919
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.04	0.71	0.30	< 0.005	0.06	—	0.06	0.06	—	0.06	—	812	812	0.07	< 0.005	814
Total	0.04	0.71	0.30	< 0.005	0.06	—	0.06	0.06	—	0.06	—	812	812	0.07	< 0.005	814

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	323	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Consumer Products	28.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectu Coatings	2.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscap e Equipmen t	6.78	0.73	78.4	< 0.005	0.04	—	0.04	0.03	—	0.03	—	209	209	0.01	< 0.005	210
Total	360	25.0	442	0.70	50.3	—	50.3	50.3	—	50.3	4,775	26,318	31,093	0.50	0.47	31,247
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	323	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Consumer Products	28.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectu ral Coatings	2.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	353	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.04	0.30	4.54	0.01	0.63	—	0.63	0.63	—	0.63	54.1	296	350	0.01	0.01	352
Consumer Products	5.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectu ral Coatings	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscap e Equipmen t	0.85	0.09	9.80	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23.7	23.7	< 0.005	< 0.005	23.8
Total	10.5	0.39	14.3	0.01	0.63	—	0.63	0.63	—	0.63	54.1	320	374	0.01	0.01	376

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	323	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Consumer Products	28.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	2.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	353	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	323	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Consumer Products	28.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	2.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	353	24.2	364	0.69	50.3	—	50.3	50.3	—	50.3	4,775	26,109	30,884	0.49	0.47	31,037
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.04	0.30	4.54	0.01	0.63	—	0.63	0.63	—	0.63	54.1	296	350	0.01	0.01	352
Consumer Products	5.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	9.62	0.30	4.54	0.01	0.63	—	0.63	0.63	—	0.63	54.1	296	350	0.01	0.01	352

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Total	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Total	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	16.4	86.3	103	1.69	0.04	157
Total	—	—	—	—	—	—	—	—	—	—	16.4	86.3	103	1.69	0.04	157

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Total	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Total	—	—	—	—	—	—	—	—	—	—	99.1	521	621	10.2	0.25	949
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	16.4	86.3	103	1.69	0.04	157
Total	—	—	—	—	—	—	—	—	—	—	16.4	86.3	103	1.69	0.04	157

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Total	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Total	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartment Mid Rise	—	—	—	—	—	—	—	—	—	—	94.6	0.00	94.6	9.45	0.00	331
Total	—	—	—	—	—	—	—	—	—	—	94.6	0.00	94.6	9.45	0.00	331

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Total	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Total	—	—	—	—	—	—	—	—	—	—	571	0.00	571	57.1	0.00	1,999
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	94.6	0.00	94.6	9.45	0.00	331
Total	—	—	—	—	—	—	—	—	—	—	94.6	0.00	94.6	9.45	0.00	331

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.57
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.57

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	9.47
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.57
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.57

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequester	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	5,002	5,002	5,002	1,825,781	56,221	56,221	56,221	20,520,641

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	5,002	5,002	5,002	1,825,781	56,221	56,221	56,221	20,520,641

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	69
Gas Fireplaces	1240
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	138
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.1.2. Mitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	69
Gas Fireplaces	1240
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	138
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
2678832	892,944	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00

Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	5,051,519	532	0.0330	0.0040	15,305,230

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	5,051,519	532	0.0330	0.0040	15,305,230

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	51,710,346	1,091,407

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	51,710,346	1,091,407

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	1,060	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	1,060	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

8. User Changes to Default Data

Screen	Justification
Land Use	The proposed project would facilitate the development of up to 1,378 new residential units within the TOD Expansion Area by rezoning the 14.5-acre project site to allow residential uses.
Construction: Construction Phases	Assuming a buildout consistent with the Housing Element buildout of 2029 and that architectural coating would overlap with building construction.
Construction: Off-Road Equipment	Assuming default construction equipment and use of Tier 2 equipment.
Operations: Vehicle Data	Based on the trip generation prepared for the proposed project, the project would generate approximately 4,996 net new average daily trips.
Operations: Hearths	Assuming that the project would not include any wood-burning fireplaces or wood stoves.

APPENDIX C

TRIP GENERATION AND VEHICLE MILES TRAVELED ANALYSIS

LSA

CARLSBAD
CLOVIS
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: November 10, 2023

TO: Joseph Lambert, Director of Development Services, City of Placentia

FROM: Ken Wilhelm, Principal, LSA

SUBJECT: Trip Generation and Vehicle Miles Traveled Analysis for the Packing House District Transit-Oriented Development Expansion Project for the City of Placentia (LSA Project No. 20230923)

LSA has prepared this trip generation and vehicle miles traveled (VMT) analysis for the proposed Packing House District Transit-Oriented Development (TOD) Expansion Project (project) in Placentia, Orange County, California. The City of Placentia (City) proposes to expand the City's existing TOD zoning district and land use designation to include several properties adjacent to the Original TOD Area identified in the City's recently adopted Housing Element. The proposed project site (the TOD Expansion Area) consists of approximately 14.5 acres of land (containing 317,866 square feet [sf] of existing industrial-use buildings) near a proposed Metrolink station. Table A (provided as Attachment A) provides a detailed summary of existing and proposed land uses for each parcel within the project site. Figure 1 (provided as Attachment B) depicts the location of the original TOD area, the proposed TOD expansion area, and the proposed Metrolink station.

As shown in Table A and Figure 1, the South Melrose Street site (11.5 acres) includes 259,497 sf of existing industrial-use buildings. This site is bordered on the north by West Crowther Avenue and the Original TOD Area, on the south by Metrolink train tracks and an industrial park, on the east by an industrial park, and on the west by State Route 57. The Cameron Street site (3 acres) includes 58,369 sf of existing industrial-use buildings and is bordered on the north by West Crowther Avenue, on the south by an industrial park, on the east by an industrial park, and on the west by an apartment complex (multifamily residential uses). The proposed project site (the TOD Expansion Area) is designated for Industrial uses in the City's General Plan.

The proposed project would facilitate the development of 1,378 new residential units within the TOD Expansion Area by rezoning the 14.5-acre project site to allow residential uses at the maximum allowable density of 95 units per acre, as specified in applicable Packing House District Development Standards designated by the City.

The purpose of this analysis is to identify the trip generation of the proposed project and determine whether the proposed project requires a VMT analysis per *the City of Placentia Traffic Impact Analysis Guidelines* (TIA Guidelines) *for Vehicle Miles Traveled and Level of Service Assessment* (January 2021).

TRIP GENERATION

The daily and peak-hour trips of the current industrial uses and the proposed residential project were calculated using trip rates from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*, 11th Edition (2021) for Land Use 110 (General Light Industrial) and Land Use 221 (Multifamily Housing [Mid-Rise] Close to Rail Transit). Table B (provided as Attachment C) presents the ITE trip generation summary for the current uses and the proposed project of 1,378 new residential units based on the maximum allowable density of 95 units per acre.

As shown in Table B, the current 14.5 acres of land (containing 317,866 sf of industrial-use buildings) generates 1,548 daily trips, including 236 trips (207 inbound and 29 outbound) in the a.m. peak hour and 207 trips (29 inbound and 178 outbound) in the p.m. peak hour.

The proposed project would generate 6,544 daily trips, including 441 trips (248 inbound and 193 outbound) in the a.m. peak hour and 399 trips (165 inbound and 234 outbound) in the p.m. peak hour.

The proposed project represents a net increase of 4,996 daily trips, including a net increase of 205 a.m. and 192 p.m. peak-hour trips, compared to the current uses.

VEHICLE MILES TRAVELED ANALYSIS

Vehicle Miles Traveled Background

On December 28, 2018, the California Office of Administrative Law cleared the revised California Environmental Quality Act (CEQA) Guidelines for use. Among the changes to the guidelines were removal of vehicle delay and level of service as the sole basis of determining CEQA impacts. With the adopted *State CEQA Guidelines*, transportation impacts are to be evaluated based on a project's effect on VMT. The VMT screening evaluation for the proposed project was prepared based on the City's TIA Guidelines (January 2021).

Vehicle Miles Traveled Screening

The City's TIA Guidelines provide details on appropriate screening thresholds that can be used to identify when a proposed land use project is anticipated to result in a less than significant transportation impact without conducting a more detailed analysis. Screening thresholds are as follows:

1. Transit Priority Area (TPA) Screening
2. Low VMT Area Screening
3. Project Type Screening

Transit Priority Area Screening

Projects within a TPA may be presumed to have a less than significant transportation impact. A TPA is defined as a 0.5-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor. "Major transit stop" means a site containing an existing rail station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus

routes with a frequency of service interval of 15 minutes or less during the morning and evening peak commute periods. A "high-quality transit corridor" means a corridor with a fixed route bus service with service intervals no longer than 15 minutes during the peak commute hours.

The presumption of a less than significant transportation impact for a project within a TPA may not be applicable under the following conditions:

- If the project has a floor area ratio (FAR) of less than 0.75
- If the project includes more parking for use by residents, customers, or employees than required by the jurisdiction
- If the project is inconsistent with the applicable Sustainable Communities Strategy
- If the project replaces affordable residential units with a smaller number of moderate or high-income residential units

Per City's TIA Guidelines, the North Orange County Collaborative (NOCC+) VMT Traffic Study Screening Tool was used to identify if the project is in a TPA. The NOCC+ VMT Screening Tool result is included as Attachment D. Based on the NOCC+ VMT Screening Tool, the proposed project would be within a planned TPA because of the proposed Metrolink station. Based on the project description mentioned above, the proposed project is consistent with the applicable Sustainable Communities Strategy and will not replace affordable residential units with a smaller number of moderate or high-income residential units. To meet the screening criteria, the City will need to ensure, as part of future site plans, that the proposed project FAR be equal to or greater than 0.75 and the project should not provide more parking for use by residents, customers, or employees than the city code requires.

Evaluation: The TPA screening is met for the proposed project.

Low Vehicle Miles Traveled Area Screening

According to the City's TIA Guidelines, residential and office projects in a low VMT generating area may be presumed to have a less than significant VMT impact absent substantial evidence to the contrary. Additionally, employment-related and mixed-use projects may also qualify to be screened out based on this criterion if they are expected to generate VMT per resident, VMT per worker, or VMT per service population that is similar to the existing land uses in the low VMT area.

Per City's TIA Guidelines, the NOCC+ VMT Traffic Study Screening Tool was used to identify whether the project is in a low VMT-generating area. The NOCC+ VMT Screening Tool result is included as Attachment D. Based on the NOCC+ VMT Screening Tool, the proposed project is not in a low VMT-generating area. In addition, the proposed project changes the existing land use type from industrial to residential uses.

Evaluation: Low VMT Area screening is not met for the proposed project.

Project Type Screening

According to the City's TIA Guidelines, a project generating less than 110 daily vehicle trips may be presumed to have a less than significant VMT impact absent substantial evidence to the contrary.

Per City's TIA Guidelines, the NOCC+ VMT Traffic Study Screening Tool was used to confirm if the project generates 110 daily trips or less. The NOCC+ VMT Screening Tool result is included as Attachment D. Based on the NOCC+ VMT Screening Tool, the proposed project is expected to generate 10,313 daily trips assuming a worst-case scenario buildout of the TOD Expansion area at the maximum allowable density of 95 dwelling units per acre.

As described earlier, the proposed project is anticipated to generate 6,544 ITE daily trips and a net increase of 4,996 ITE daily trips compared to the existing land uses on site. This also confirms that the proposed project would exceed the daily trip threshold, per the city screening criteria.

Evaluation: Project Type screening is not met for the proposed project.

CONCLUSIONS

Based on review and evaluation of the City's VMT screening thresholds, the proposed project meets the TPA Screening because the project would be within a planned TPA (near the proposed Metrolink station). Therefore, the proposed project is screened out from a VMT analysis and no additional VMT analysis is required. The proposed project is presumed to have a less than significant VMT impact. It should be noted that the City will need to ensure as part of future site plans that the proposed project FAR be equal to or greater than 0.75 and the project should not provide more parking for use by residents, customers, or employees than required by the city code.

If you have any questions, please contact me at (949) 553-0666 or at ken.wilhelm@lsa.net.

Attachments: A – Table A: Project Parcel Land Use Summary
B – Figure 1: Project Location
C – Table B: Project Trip Generation
D – NOCC+ VMT Screening Tool Result

ATTACHMENT A

TABLE A: PROJECT PARCEL LAND USE SUMMARY

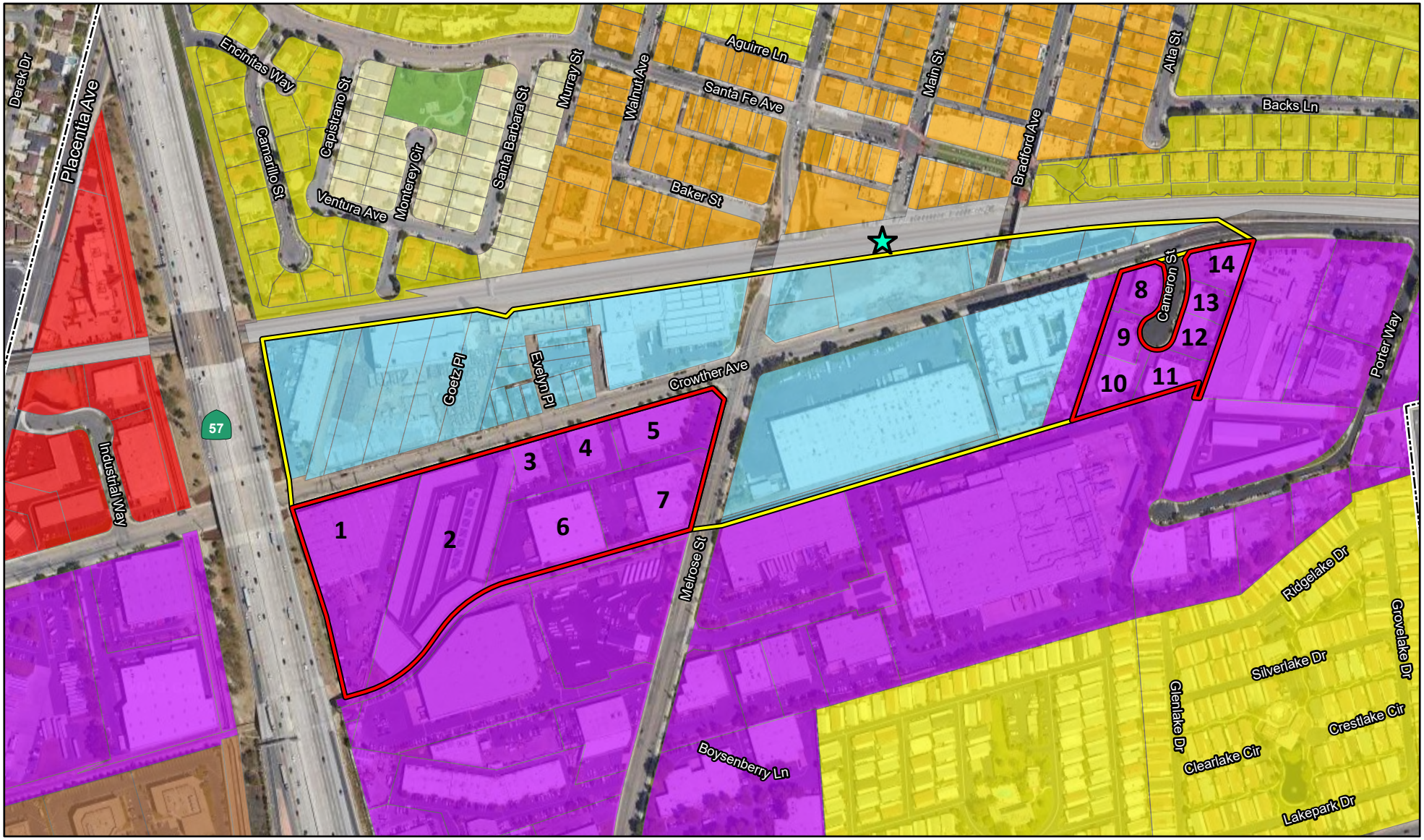
LSA

Table A: Project Parcel Land Use Summary

TOD Expansion Area		APN	Address	Square Feet (SF)	Existing Use	Calculated Acres (AC)	DU/AC	Dwelling Units (DU)
South Melrose Street Site (11.5 Acres)	1	339-101-06	550 W. Crowther Avenue	55,210	Industrial	2.87	95	273
	2	339-101-07	480 W. Crowther Avenue	109,323	Industrial	3.34	95	317
	3	339-101-10	440 W. Crowther Avenue	9,200	Industrial	0.53	95	50
	4	339-101-11	330 W. Crowther Avenue	9,391	Industrial	0.59	95	56
	5	339-101-12	505 S. Melrose Street	19,284	Industrial	1.12	95	107
	6	339-101-14	420 W. Crowther Avenue	33,107	Industrial	1.55	95	147
	7	339-101-13	515 S. Melrose Street	23,982	Industrial	1.54	95	146
			Subtotal Existing Land Use SF:	**259,497**	Industrial		**Subtotal Proposed DU:**	**1,097**
Cameron Street Site (3 Acres)	8	339-451-01	511 Cameron Street	6,449	Industrial	0.43	95	41
	9	339-451-02	521 Cameron Street	6,925	Industrial	0.37	95	35
	10	339-451-03	531 Cameron Street	9,296	Industrial	0.58	95	55
	11	339-451-05	530 Cameron Street	9,151	Industrial	0.49	95	47
	12	339-451-06	516 Cameron Street	12,898	Industrial	0.34	95	33
	13	339-451-14	510 Cameron Street	5,350	Industrial	0.29	95	27
	14	339-451-12,15	500 Cameron Street	8,300	Industrial	0.46	95	44
			Subtotal Existing Land Use SF:	**58,369**	Industrial		**Subtotal Proposed DU:**	**281**
			Total Existing Land Use SF:	**317,866**	Industrial		**Total Proposed DU:**	**1,378**

ATTACHMENT B

FIGURE 1: PROJECT LOCATION



LSA

Original TOD Area (2017)
TOD Expansion Area
City Boundaries
Proposed Metrolink Station
1 TOD Expansion Area Number

General Plan Land Uses
Low Density Residential
Medium Density Residential
High Density Residential
Commercial
Industrial
Parks
Railroad
Specific Plan
TOD
Old Town

0 200 400
FEET

SOURCE: Google (2022); City of Placentia (2023)

J:\20230923\GIS\Pro\Packing House District Transit-Oriented Development Project\Packing House District Transit-Oriented Development Project.aprx (10/6/2023)

FIGURE 1

Packing House District
Transit-Oriented Development Project

Project Location

ATTACHMENT C

TABLE B: PROJECT TRIP GENERATION

Table B: Project Trip Generation

Land Use	Size	Unit	ADT	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates[1]									
General Light Industrial		TSF	4.87	0.65	0.09	0.74	0.09	0.56	0.65
Multifamily (Mid-Rise)		DU	4.75	0.18	0.14	0.32	0.12	0.17	0.29
Existing Trip Generation									
General Light Industrial	317.866	TSF	1,548	207	29	236	29	178	207
Proposed Project Trip Generation									
Multifamily (Mid-Rise)	1,378	DU	6,544	248	193	441	165	234	399
Net Trip Generation									
Net New Trips (Proposed Project - Existing)			4,996	41	164	205	136	56	192

[1] Trip rates referenced from the Institute of Transportation Engineers (ITE) *Trip Generation* Manual, 11th Edition (2021).

Land Use 110 - General Light Industrial

Land Use 221 - Multifamily Housing (Mid-Rise) Close to Rail Transit

TSF = Thousand Square Feet

DU = Dwelling Units

ATTACHMENT D

NOCC+ VMT SCREENING TOOL RESULT

NOCC+

North Orange County Collaborative VMT Traffic Study Screening Tool

Project Information

Project Name	Opening Year
Placentia TOD Expansion Project	2045

Parcel Number (OCTAM TAZ#160)

339-101-06, 339-101-07, 339-101-10, 339-101-11, 339-101-12, 339-101-14, 339-101-13, 339-451-01, 339-451-02, 339-451-03, 339-451-05, 339-451-06, 339-451-14, 339-451-12, 339-451-15

Screening Criteria for Placentia

Is the project location in a Transit Priority Area?	Yes
Is the project location in a low VMT generating zone?	No
Is the Project one of these land use types? (show land use types)	Yes
Does the project generate fewer than 110 daily trips? (enter project land use in the section below)	No

The Project can be considered for screening from additional analysis.
Please refer to the 'secondary screening checks' table in the User Guide.

Project Land Use Information

		Unit
Residential : Single Family Homes	0	Dwelling Units
Residential : MultiFamily Homes	1378	Dwelling Units
Office	0.000	1,000 Sqaure Feet
Retail	0.000	1,000 Sqaure Feet
Industrial	0.000	1,000 Sqaure Feet
Private School	0	Students
University	0	Students
Entertainment	0.000	1,000 Sqaure Feet
Hotel	0	Rooms

Project Trips and VMT Information

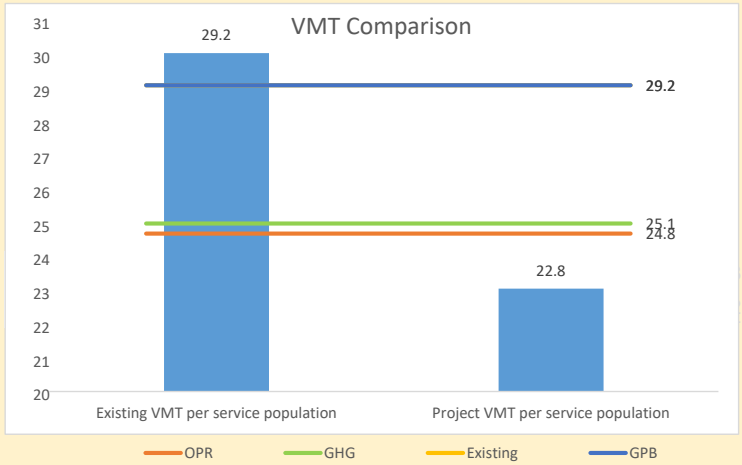
VMT Methodology: Origin Destination (OD)

Daily Trips: 10313 Average Trip Length: 7.6 Service Population: 3445

VMT per service population 22.8

Project VMT Thresholds Comparison

- ☑ OPR Guidance (15% Below Existing)
- ☑ GHG Reduction Targets (14.3% Below Existing)
- ☑ Below Existing
- ☑ Better than General Plan Buildout



FEHR PEERS

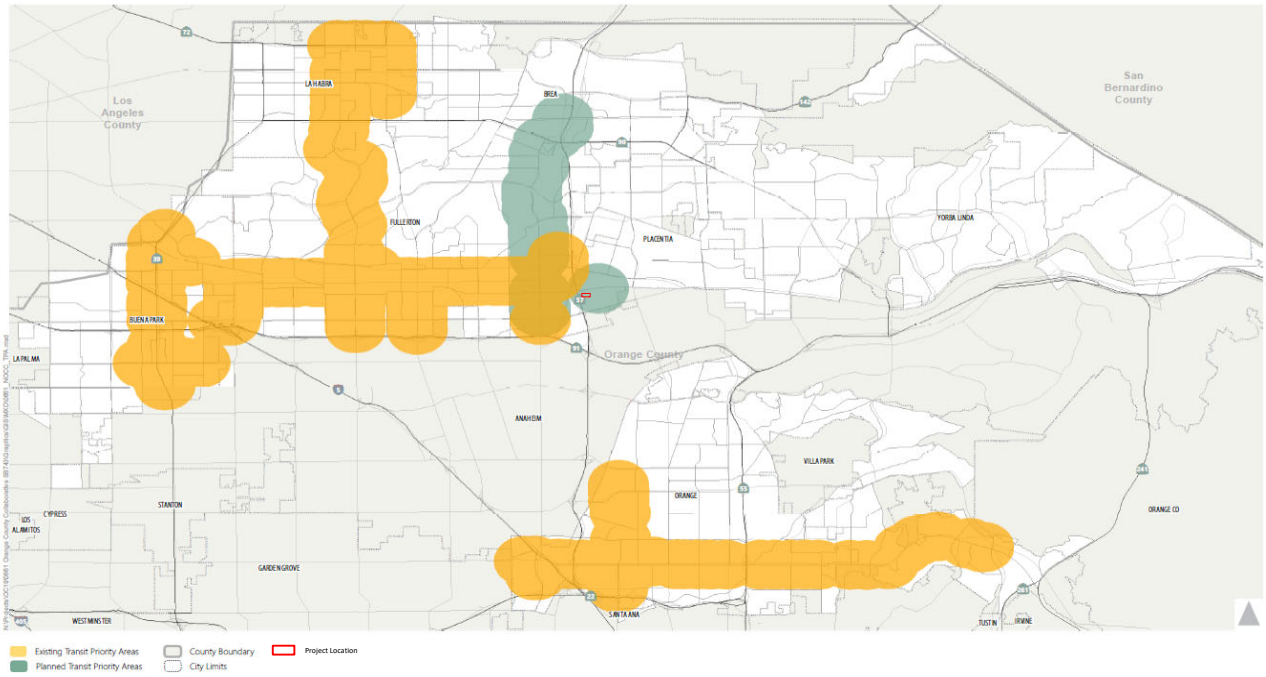


Figure X

North Orange County Cities
Transit Priority Areas (TPA)

Note: Reflective of existing and planned transit service in late 2019. Temporary changes in transit service due to COVID-19 are considered temporary in nature and are not reflected in this figure.

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