DRAFT

SUPPLEMENTAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

PACKING HOUSE DISTRICT TRANSIT-ORIENTED DEVELOPMENT EXPANSION PROJECT

PLACENTIA, CALIFORNIA

LSA

December 2023

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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:

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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.

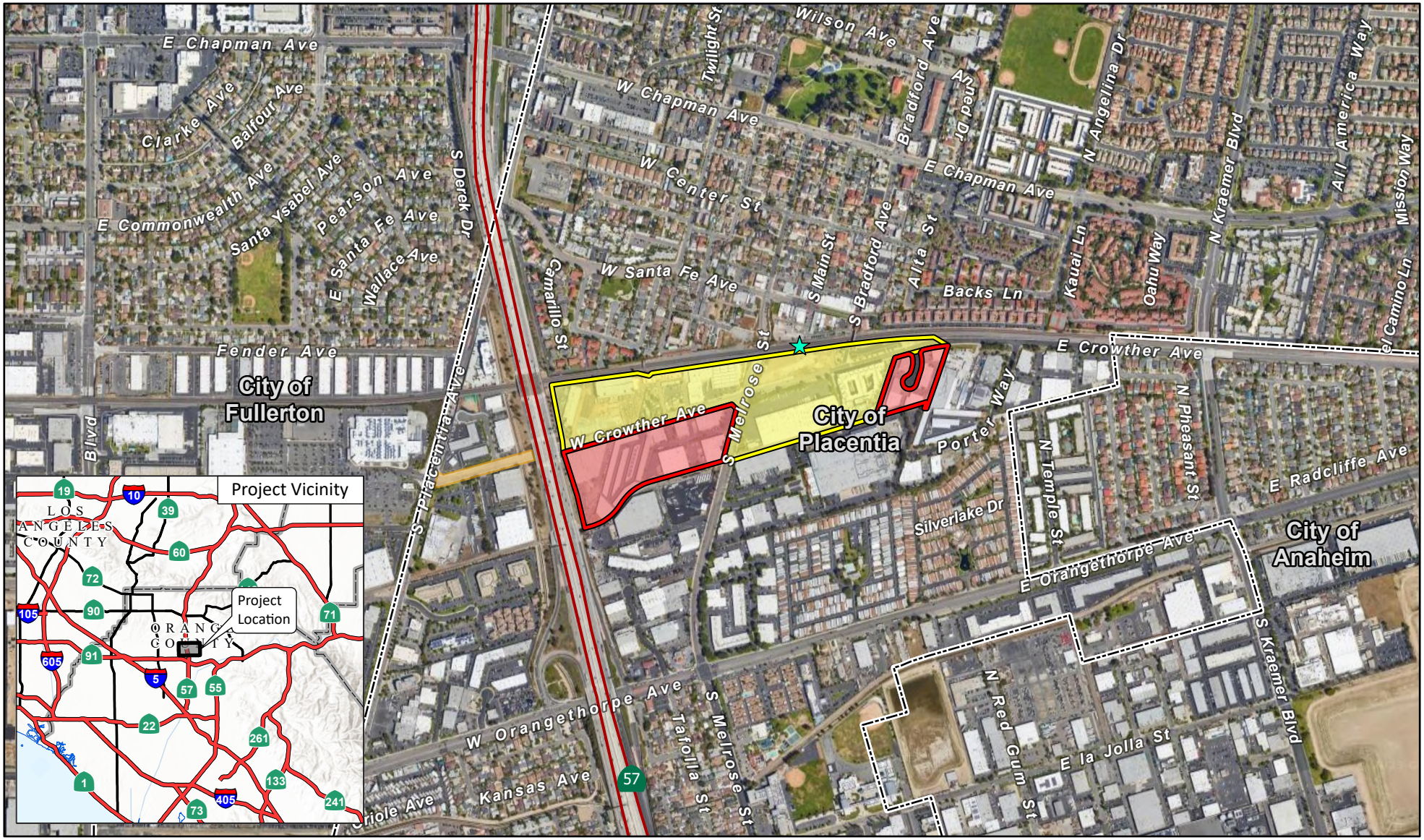
As a result, the 2017 IS/MND, the 2021 Addendum, and this Supplemental IS/MND will serve as the environmental review for the proposed project, as required by the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21000 et seq.) and the *State CEQA Guidelines* (California 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.



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- Original TOD Area (2017)
- TOD Expansion Area
- Proposed Crowther Avenue Streetscape Plan
- Proposed Metrolink Station
- City Boundaries

FIGURE 3-1

0 500 1000
FEET

SOURCE: Nearmap (6/04/2023)

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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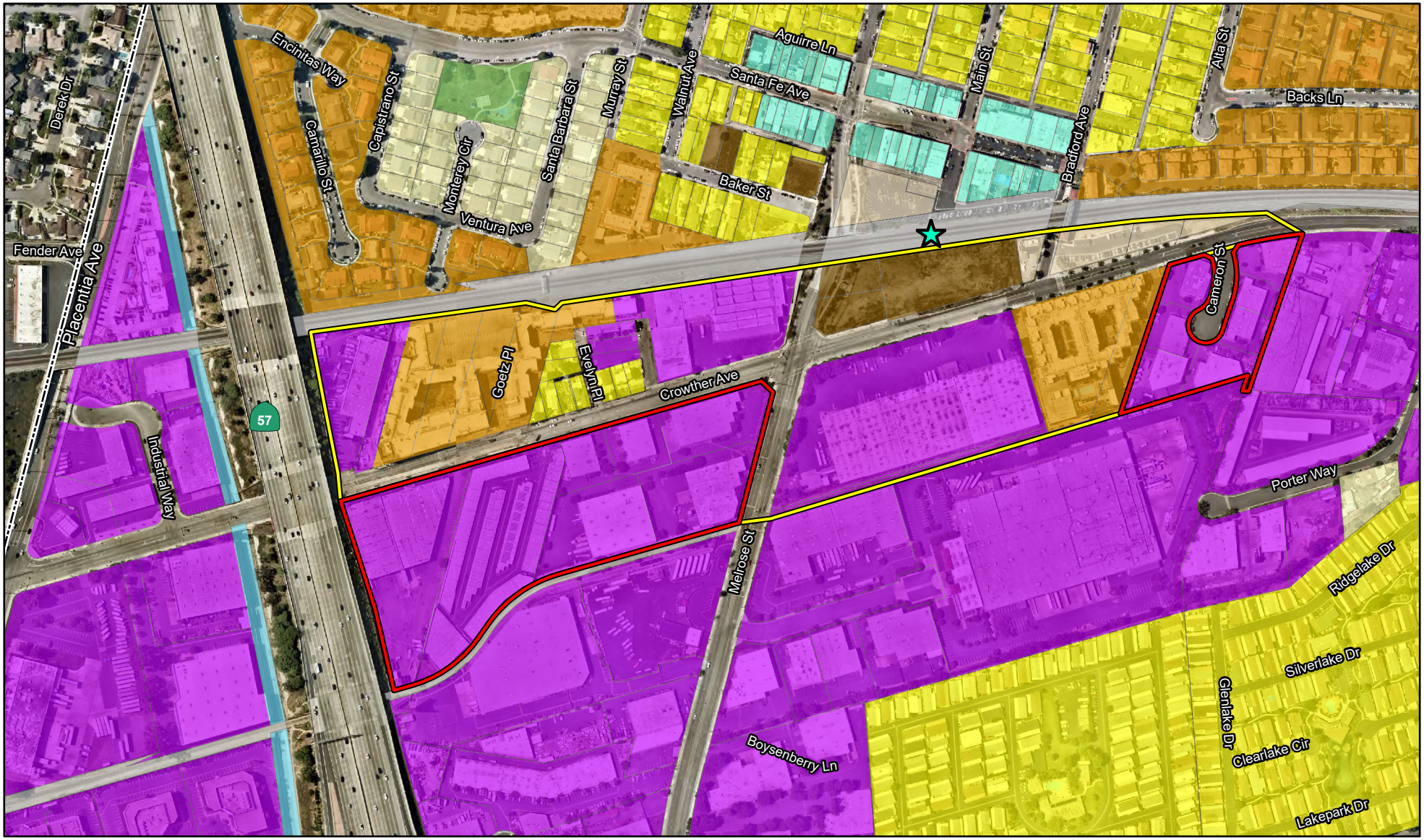

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Original TOD Area (2017)
TOD Expansion Area
Proposed Metrolink Station
City Boundaries

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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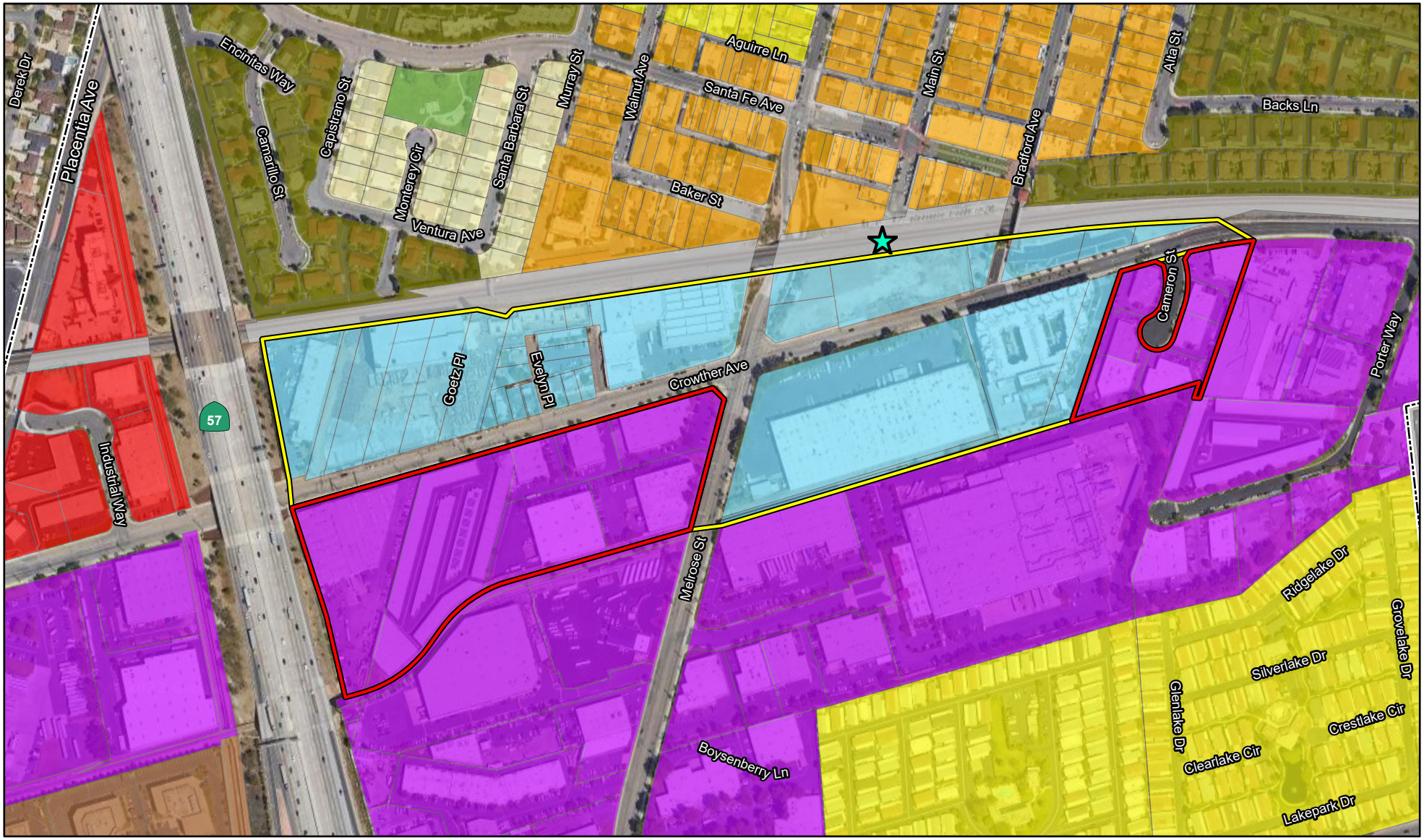

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Original TOD Area (2017)
TOD Expansion Area
City Boundaries
Proposed Metrolink Station

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)

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FIGURE 3-3

Packing House District
Transit-Oriented Development Project

Planned Land Uses

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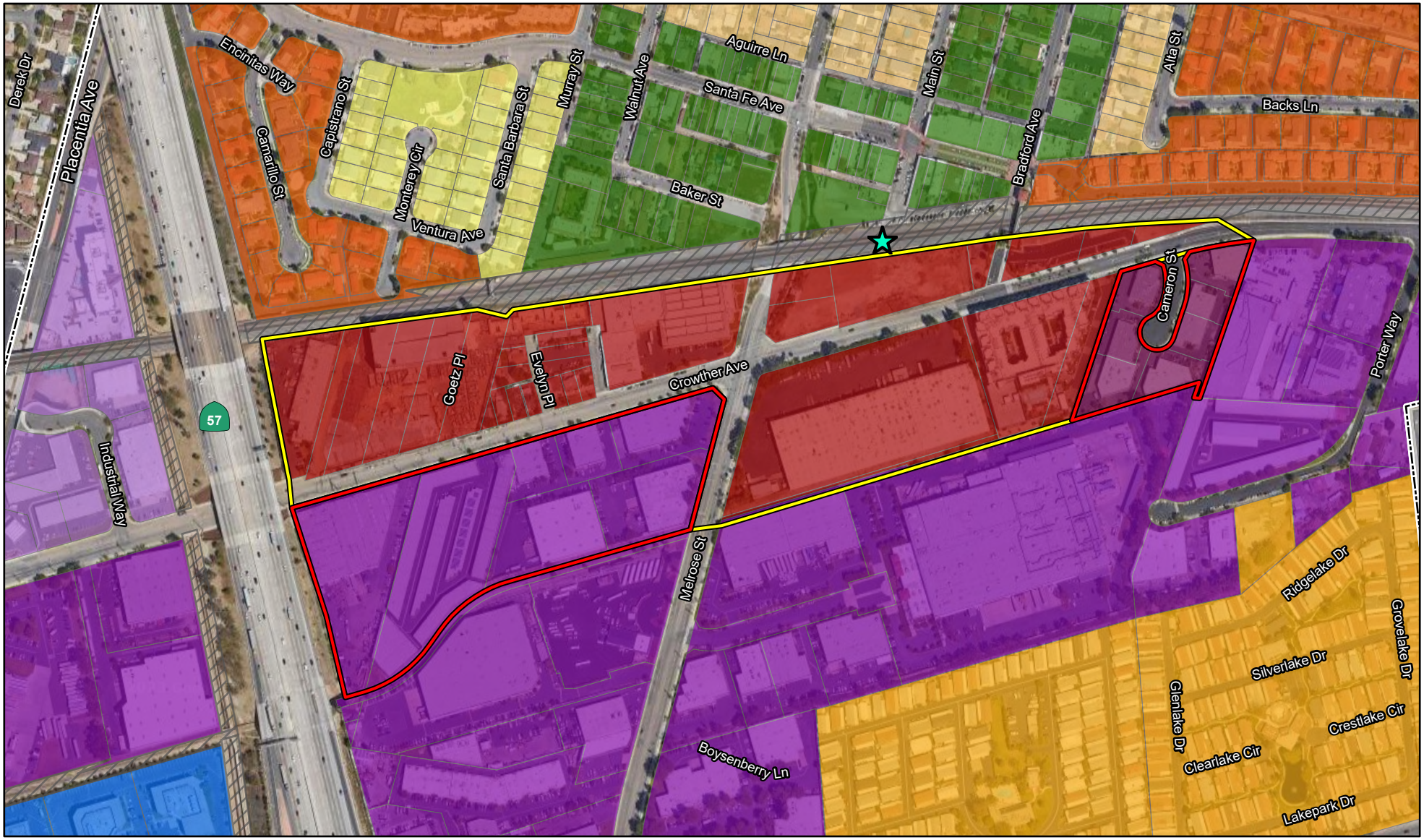

LSA

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

SOURCE: Google (2022); City of Placentia (2023)

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FIGURE 3-4

Packing House District
Transit-Oriented Development Project
Existing Zoning Designations

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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

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:

- Joe Lambert, Director of Development Services
- Kyra Tao, City Transportation Manager

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The following individuals were involved in the preparation of the Draft Supplemental IS/MND:

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The following individuals were involved in the preparation of the Trip Generation and Vehicle Miles Traveled Analysis:

- 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	

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-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

Table of Contents

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

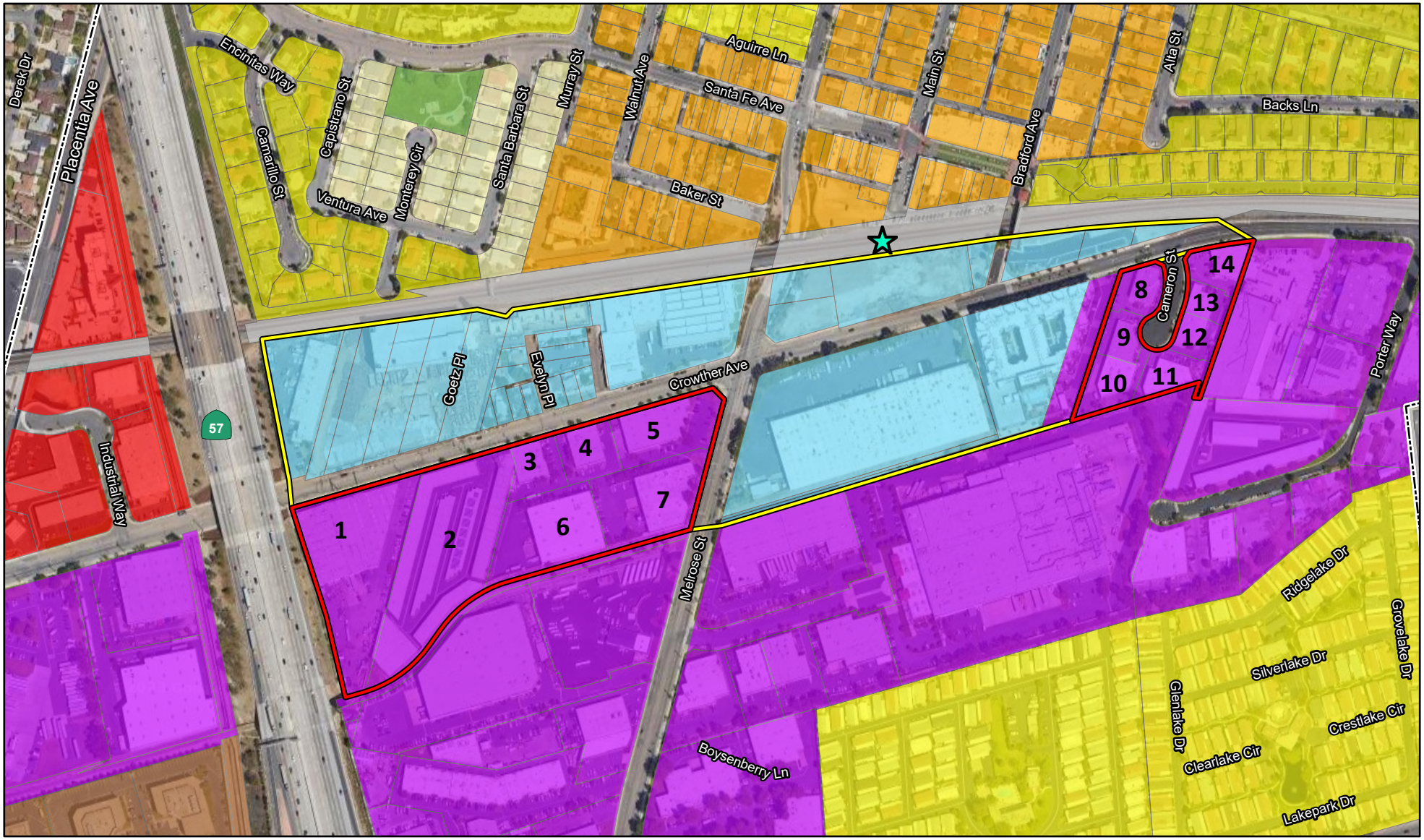
LSA

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

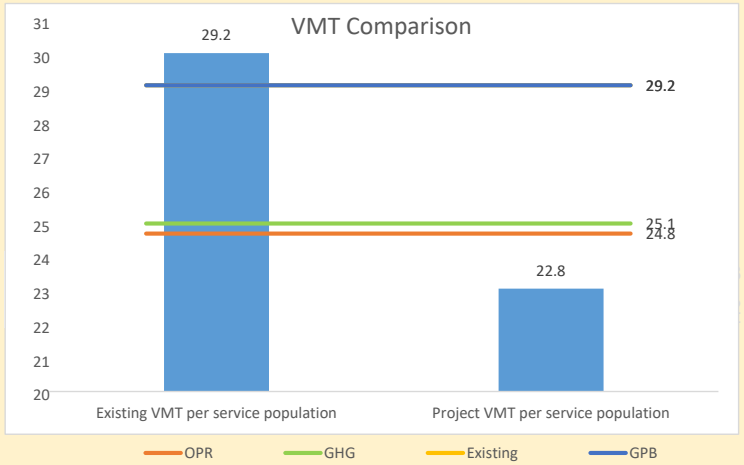
VMT Methodology: Origin Destination (OD)

Daily Trips: 10313 Average Trip Length: 7.6 Service Population: 3445

VMT per service population 22.8

Project VMT Thresholds Comparison

- [x] OPR Guidance (15% Below Existing)
- [x] GHG Reduction Targets (14.3% Below Existing)
- [x] Below Existing
- [x] Better than General Plan Buildout



FEHR PEERS

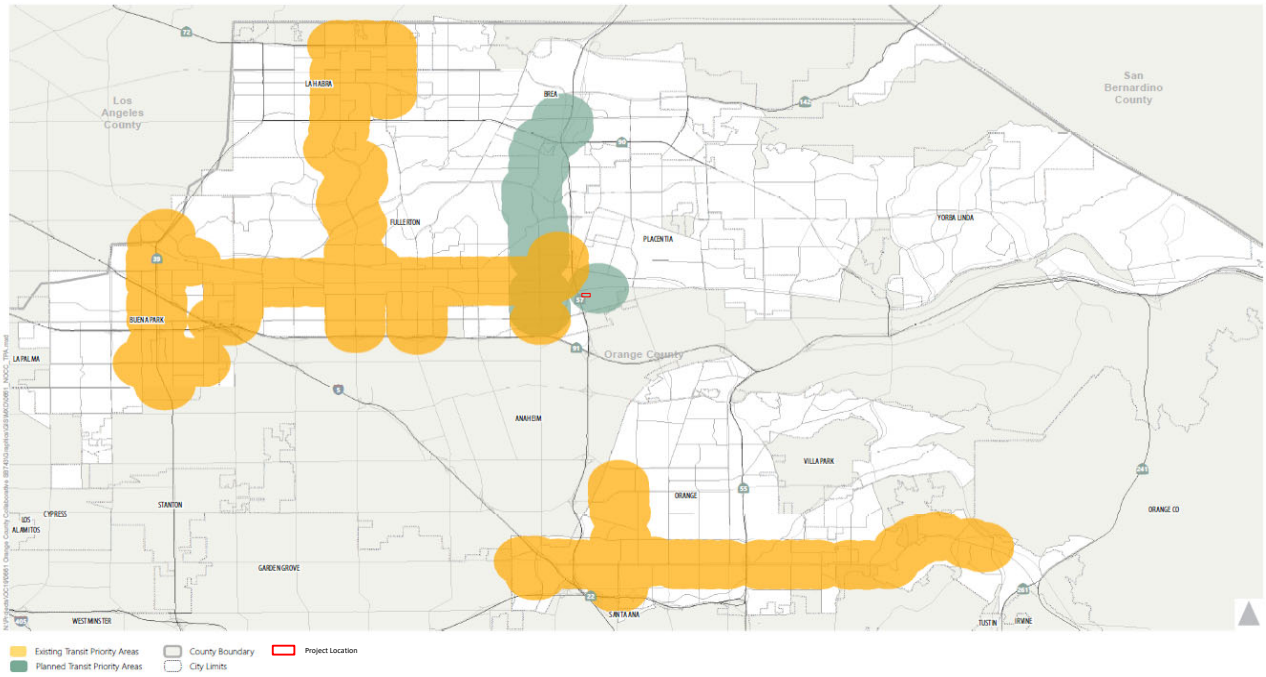


Figure X

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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