901 East Katella Avenue Residential Development Project

INITIAL STUDY/MITIGATED NEGATIVE DECLARIATION NO. 1882-22

Lead Agency:
City of Orange
Community Development Department • Planning Division
300 East Chapman Avenue
Orange, CA 92866-1591
(714) 744 - 7220
(714) 744 - 7222 (Fax)
www.cityoforange.org

Prepared by:
Carlson Strategic Land Solutions
27134A Paseo Espada, Suite 323
San Juan Capistrano, CA 92675
(949) 542 - 7043

Date:
October 20, 2023

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FIGURES

TABLES

APPENDICES

Initial Study/Mitigated Negative Declaration No. 1882-22

Project Title:
901 East Katella Avenue Residential Development Project

Reference Application Numbers:
General Plan Amendment No. 0004-22, Zone Change No. 1307-22, Tentative Tract Map No. 0051-22, Major Site Plan Review No. 1111-22, and Design Review No. 5092-22

Lead Agency:
City of Orange

Contact Person and Telephone No.:
Monique Schwartz mschwartz@cityoforange.org
(714) 744-7224

Project Proponent and Address:
Intracorp SoCal-1, LLC
895 Dove Street, Suite 400
Newport Beach, CA 92660

Contact Person and Telephone No.:
Emilie Simard esimard@intracorphomes.com
(949) 724-5923

Project Location:
901 E. Katella Avenue
Orange, California 92867

Existing General Plan Designation:
General Commercial (GC)

Existing Zoning Classification:
Commercial Professional (C-P)

SECTION 1.0 INTRODUCTION

The City of Orange (City), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Initial Study (IS) for the 901 East Katella Avenue Residential Development Project (Project). The information contained in the Initial Study was used by the City of Orange to evaluate and determine potential impacts associated with the Proposed Project as required by the California Environmental Quality Act (CEQA), State CEQA Guidelines, and the City of Orange Local CEQA Guidelines.

This IS assesses the environmental effects of the proposed 901 East Katella Avenue Residential Development Project, located on approximately 2.71 acres at 901 East Katella Avenue in the City of Orange. The property is located at the northeast corner of East Katella Avenue and North Cambridge Street. The site is currently developed with one abandoned commercial building of approximately 20,000 square feet, which was formerly used as commercial use and wireless communication facility. The Project proposes a General Plan Amendment and Zone Change to redevelop the site as a for-sale residential community with 49 paired and detached small lot homes.

The preparation of an IS/MND is governed by two principal sets of documents: CEQA (Public Resources Code [PRC] Section 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Section 15000, et seq.). Specifically, State CEQA Guidelines Section 15063 (“Initial Study”) and Sections 15070–15075 (“Negative Declaration Process”) guide the process for the preparation of an IS/MND. Where appropriate and supportive to an understanding of the issues, reference is made either to the statute, the State CEQA Guidelines, or appropriate case law. As mandated by California Environmental Quality Act (CEQA) Guidelines Section 15105, affected public agencies and the interested public may submit comments on the Draft IS/MND. Comments will be responded to in writing.

This IS/MND and its appendices have been prepared in compliance with State CEQA Guidelines Section 15071. This IS/MND contains (1) a brief description of the proposed Project, (2) the proposed Project location, (3) proposed findings that the proposed Project would not have a significant effect on the environment, (4) a copy of the IS/Environmental Checklist documenting support for the findings, and (5) all mitigation measures to be implemented. When combined with the Notice of Intent to Adopt a Mitigated Negative Declaration, this serves as the environmental document for the proposed Project pursuant to the provisions of CEQA (Public Resources Code 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000, et seq.).

SECTION 2.0 EXISTING SETTING

2.1 Regional Setting

The approximately 2.71-acre site is located in the County of Orange, California, on the U.S. Geological Survey (USGS) Map Orange Quadrangle topographic map within Township 4 south, Range 9 west, and Section 20. The Project site is located on the northeast corner of Katella Avenue and Cambridge Street at 901 East Katella Avenue in the City of Orange (**Figures 1 and 2**). The Project site is surrounded by residential uses to the north, and commercial uses to the east, south across East Katella Avenue, and west across Cambridge Street.

The Project site includes Assessor's Parcel Number (APN) 375-461-41.

2.2 Existing Site Conditions

The site is generally flat and currently developed with an abandoned commercial use. Improvements made to the Project site include a two-story, approximately 27-foot-tall commercial building totaling approximately 20,621 square feet, asphalt paved parking areas (152 total stalls), and landscaping surrounding the existing building. The commercial building is currently abandoned and has had a history of homeless occupation and small fires. A 53-foot-tall wireless communications pole is situated immediately to the east of the building. Existing utility boxes and equipment are located along the East Katella Avenue frontage.

There are two existing access points to the Project site. Gated driveway entrances are located off East Katella Avenue and Cambridge Street.

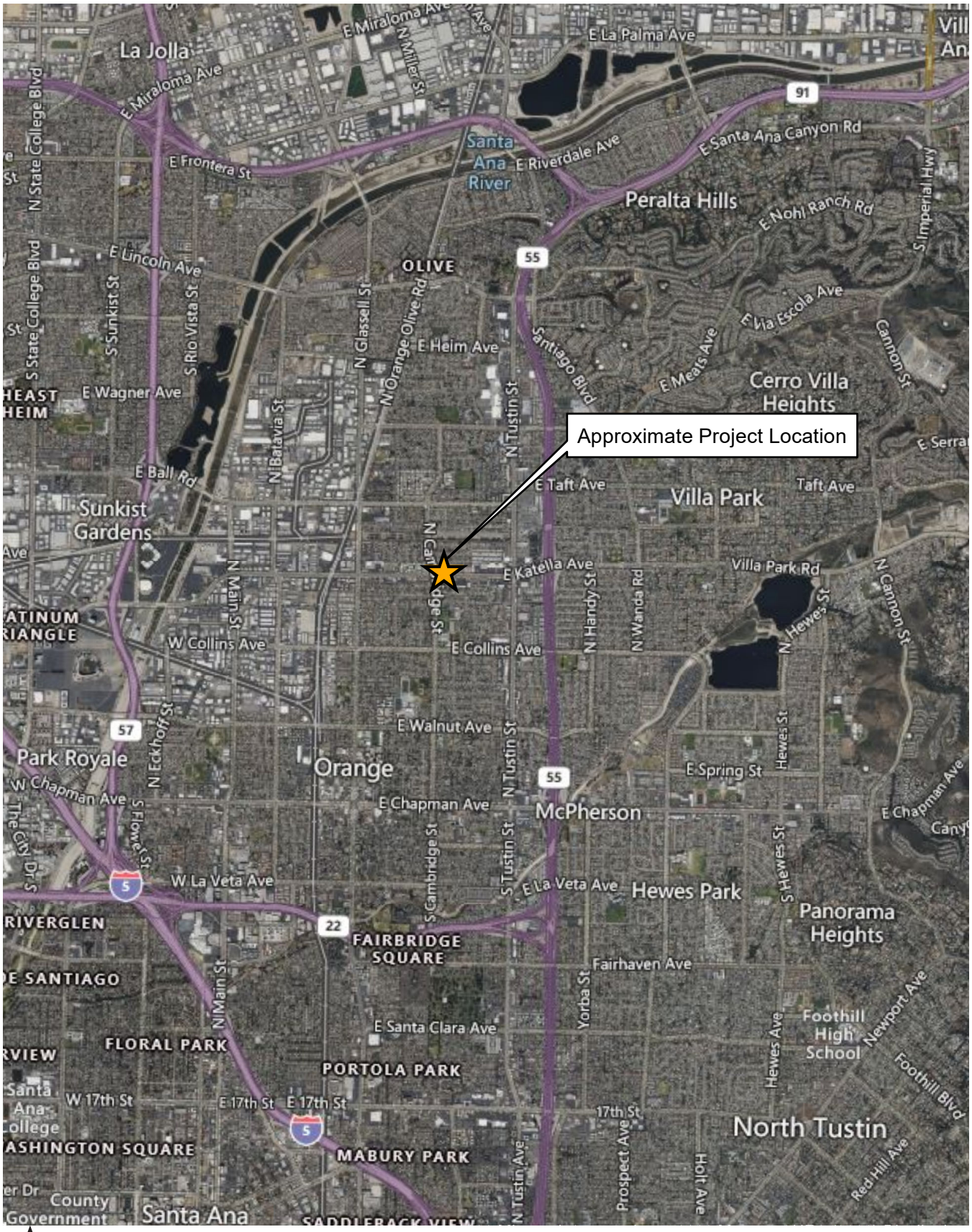
Sidewalks and street trees exist along the East Katella Avenue and Cambridge Street frontages.

Above ground transmission (22.5 kv) electric lines extend along the Cambridge Street frontage to the corner of Cambridge Street and East Katella Avenue. The electric lines turn west along East Katella Avenue away from the Project site.

The entire Project site is surrounded by an existing block wall, approximately six feet tall. The block wall extends along the northern property line separating the Project site from existing residential uses, along the east property line separating the Project site from existing commercial uses, and along both the East Katella Avenue and Cambridge Street frontages.

An existing bus stop is located along East Katella Avenue near the intersection with Cambridge Street.

The existing General Plan land use designation for the Project site is General Commercial (GC) (**Figure 3**). The existing Zoning classification is Commercial Professional (C-P) (**Figure 4**).



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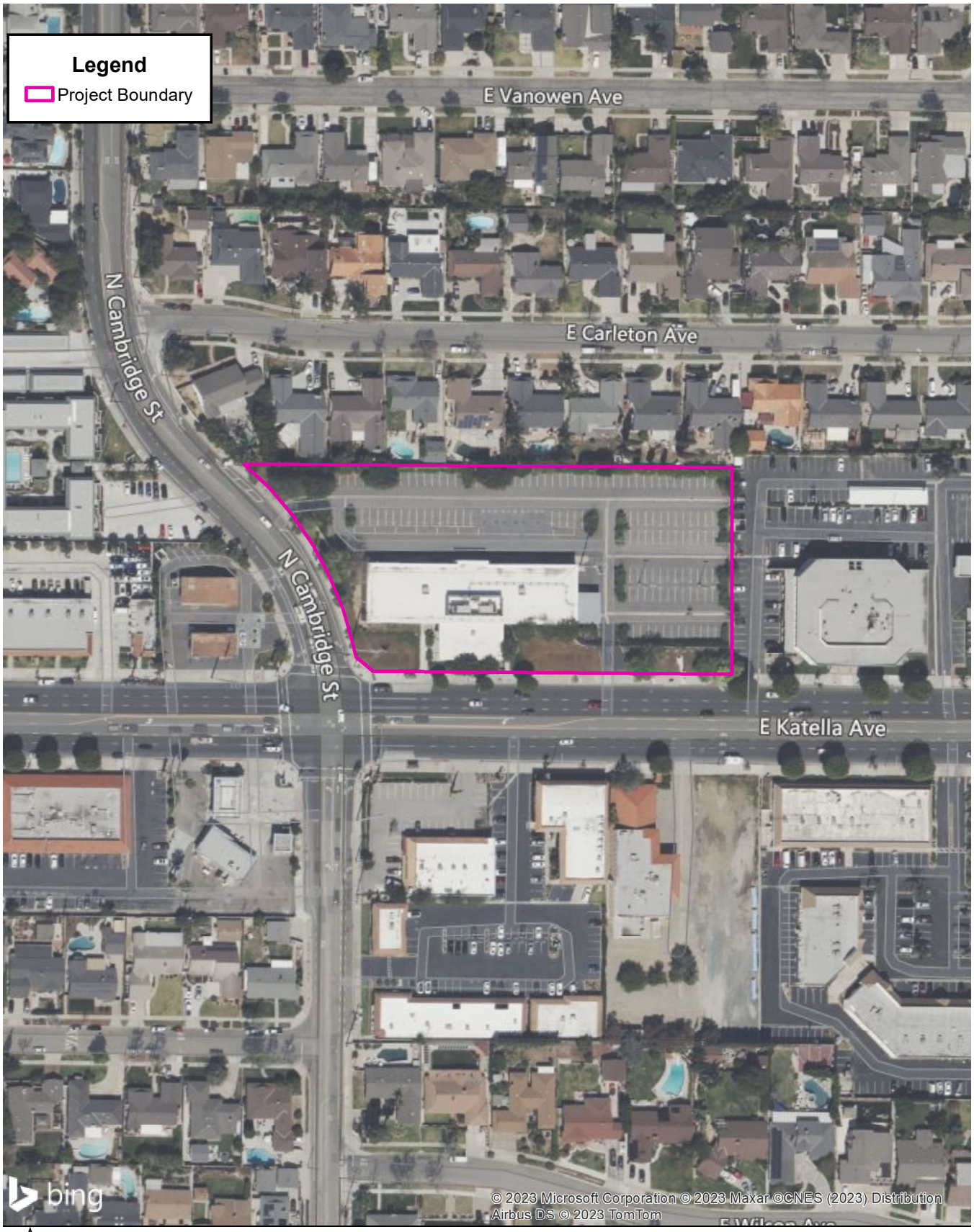
N.T.S.

Source: Bing Maps.

FIGURE 1
Regional Location Map



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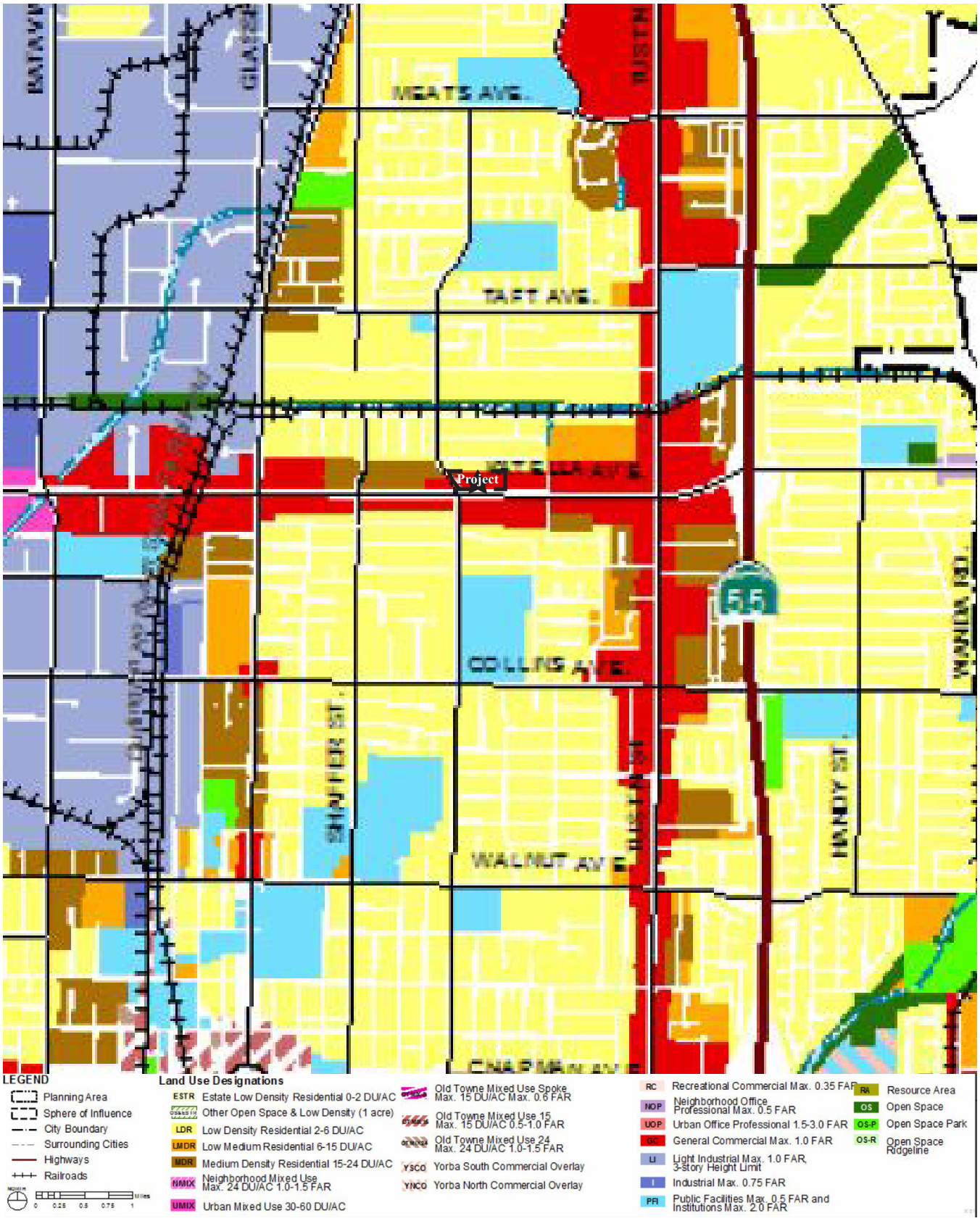
N.T.S.

Source: Bing Maps.

FIGURE 2
Project Vicinity Map



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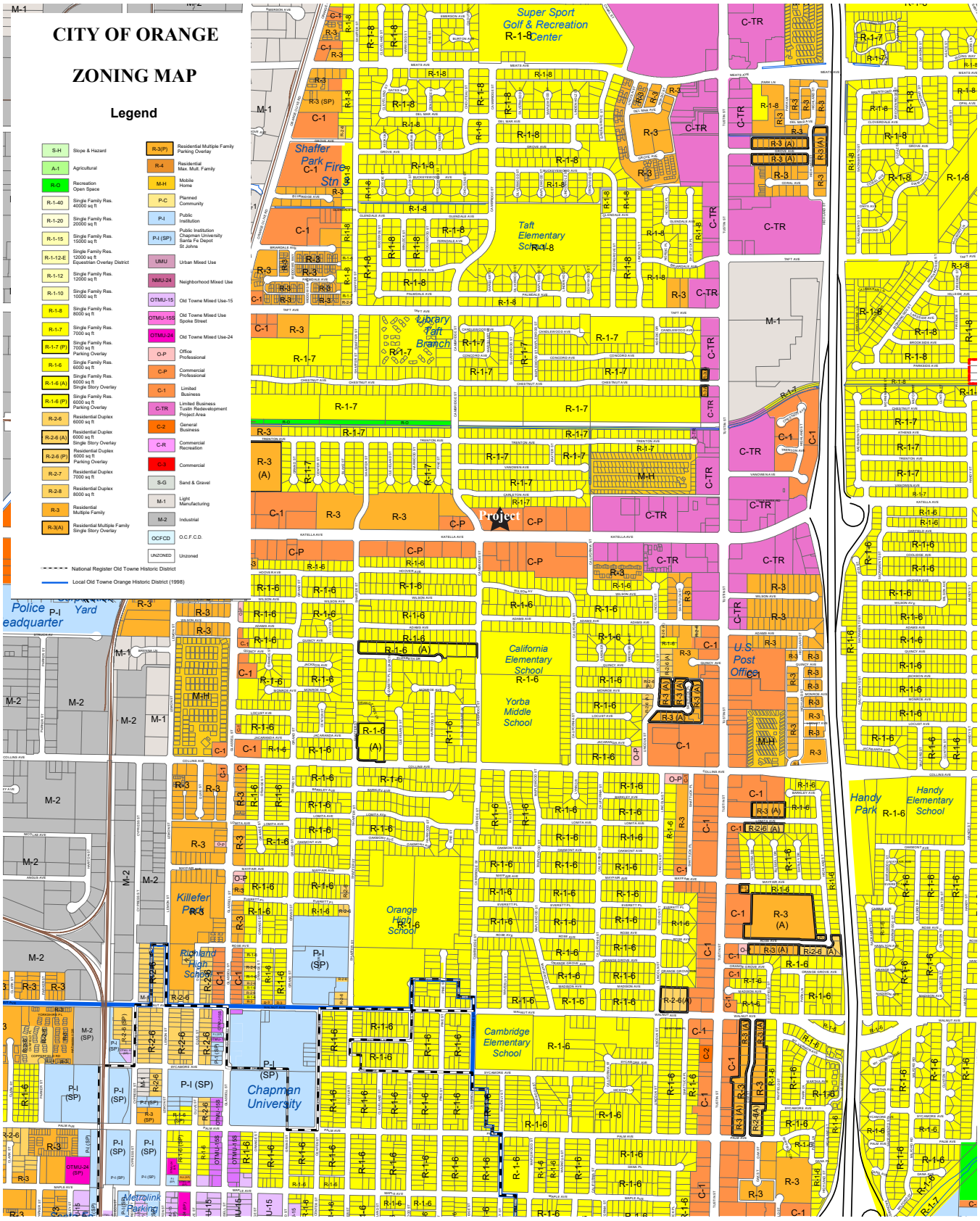
N.T.S.

Source: City of Orange (2010).

FIGURE 3
General Plan Land Use Designation



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N.T.S.

Source: City of Orange (2010).

FIGURE 4
Zoning Classification

2.3 Surrounding Land Uses

To the north of the site are nine detached homes built in the 1960s. To the east is a two-story commercial building with retail and professional offices. To the south, on the south side of East Katella Avenue are two-story multi-tenant commercial buildings. To the west, on the west side of North Cambridge Street is a Speedway Express gas station and convenient store as well as the Cambridge Court apartments.

SECTION 3.0 PROJECT DESCRIPTION

The Project proposes to demolish all on site improvements and construct 49 new paired and detached small lot homes (17 paired and 15 detached) on the 2.71-acre Project site, including four open space and recreation areas and guest parking (**Figures 5 and 6**). To accommodate this proposal, a General Plan Amendment and Zone Change are requested. The General Plan Amendment would change the land use designation from General Commercial (GC) to Medium Density Residential (MDR). The Zone Change would change the zoning classification from Commercial Professional (C-P) to Multiple-Family Residential (R-3) with application of Small Lot Subdivision Development Standards (OMC 17.14.270). The proposed community would have a density of 18.1 dwelling units per acre (du/ac), approximately the midpoint of the Medium Density Residential Zone, which provides for densities of 15.1 to 24.0 dwelling unit per acre.

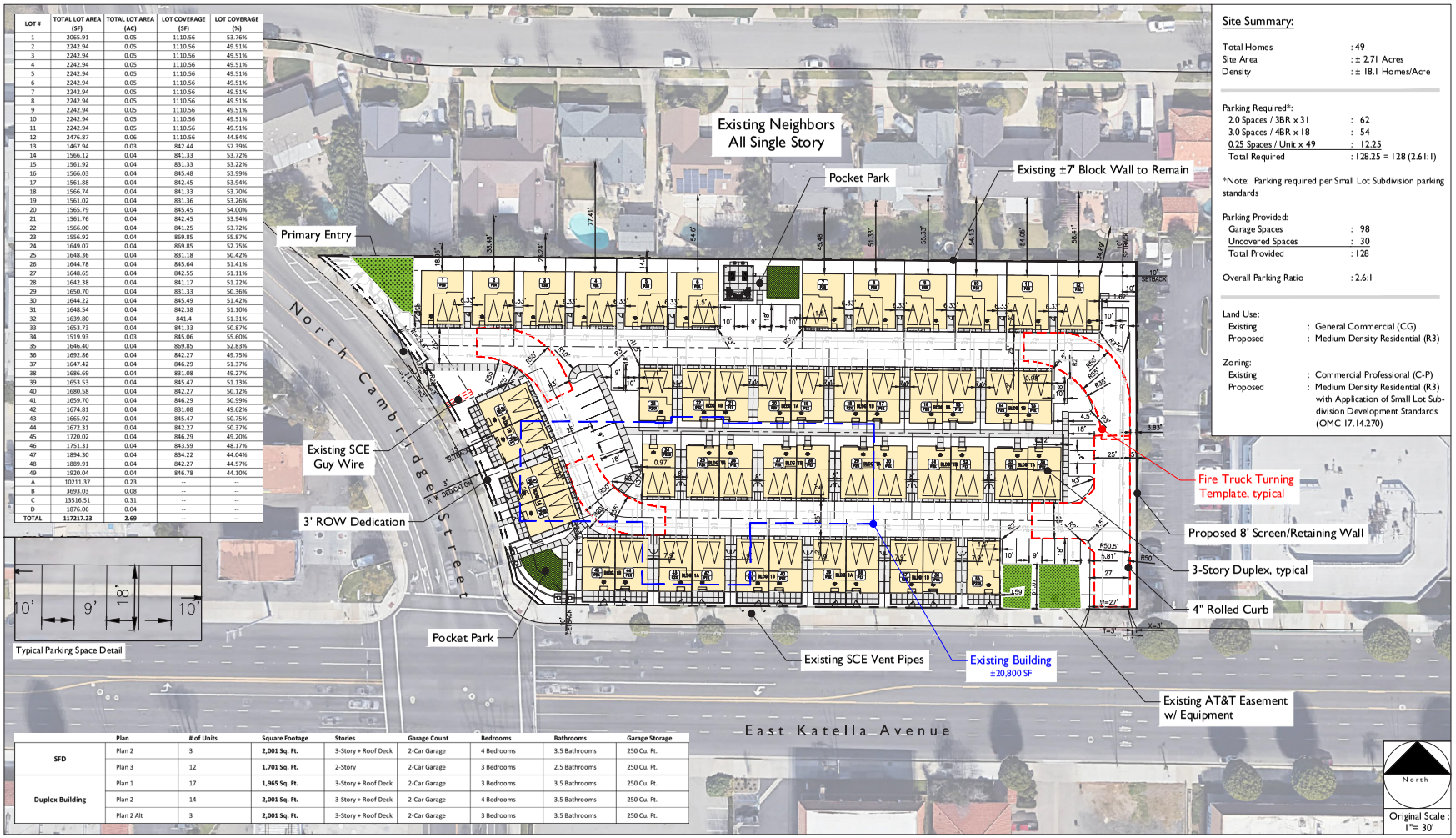
The preliminary unit mix incorporates multiple different floor plans concentrated in three- and four-bedroom configurations ranging from approximately 1,701 to 2,004 square feet. Homes are planned to be 2 and 3-stories, with several floor plans also offering a roof deck, and a maximum height of 35 feet. Along the northern property boundary, adjacent to existing single-family homes, the Project proposes twelve (12) single family detached homes, all of which are two-story homes (**Figures 7 through 13**). Table 1 summarizes the proposed floor plans.

Table 1. Floor Plan Summary

	Plan	# of Units	Square Footage	Stories	Garage Count	Bedrooms	Bathrooms	Garage Storage
SFD	Plan 2	1	2,004 SF	3-story	2-car	4 bdrm	3.5 bath	250 cu.ft.
	Plan 2X (Roof Deck)	2	2,001 SF	3-story + roof deck	2-car	4 bdrm	3.5 bath	250 cu.ft.
	Plan 3	12	1,701 SF	2-story	2-car	3 bdrm	2.5 bath	250 cu.ft.
Duplex Building 1	Plan 1	7	1,984 SF	3-story	2-car	3 bdrm	3.5 bath	250 cu.ft.
	Plan 2	4	2,004 SF	3-story	2-car	4 bdrm	3.5 bath	250 cu.ft.
	Plan 2 Alt	3	2,004 SF	3-story	2-car	3 bdrm	3.5 bath	250 cu.ft.
Duplex Building 2 (Roof Deck)	Plan 1X (Roof Deck)	10	1,965 SF	3-story + roof deck	2-car	3 bdrm	3.5 bath	250 cu.ft.
	Plan 2X (Roof Deck)	10	2,001 SF	3-story + roof deck	2-car	4 bdrm	3.5 bath	250 cu.ft.

N.T.S.

Source: Bassenian|Lagoni



LOT #	TOTAL LOT AREA (SF)	TOTAL LOT AREA (AC)	LOT COVERAGE (SF)	LOT COVERAGE (%)
1	2065.91	0.05	1110.56	53.76%
2	2242.94	0.05	1110.56	49.51%
3	2242.94	0.05	1110.56	49.51%
4	2242.94	0.05	1110.56	49.51%
5	2242.94	0.05	1110.56	49.51%
6	2242.94	0.05	1110.56	49.51%
7	2242.94	0.05	1110.56	49.51%
8	2242.94	0.05	1110.56	49.51%
9	2242.94	0.05	1110.56	49.51%
10	2242.94	0.05	1110.56	49.51%
11	2242.94	0.05	1110.56	49.51%
12	2476.87	0.06	1110.56	44.84%
13	1467.94	0.03	842.44	57.39%
14	1566.12	0.04	841.33	53.72%
15	1561.92	0.04	831.33	53.22%
16	1566.03	0.04	845.48	53.99%
17	1561.88	0.04	842.45	53.94%
18	1566.74	0.04	841.33	53.70%
19	1561.02	0.04	831.36	53.26%
20	1565.79	0.04	845.45	54.00%
21	1561.76	0.04	842.45	53.94%
22	1566.00	0.04	841.25	53.72%
23	1556.92	0.04	869.85	55.87%
24	1649.07	0.04	869.85	52.75%
25	1648.36	0.04	831.18	50.42%
26	1644.78	0.04	845.64	51.41%
27	1648.65	0.04	842.55	51.11%
28	1642.38	0.04	841.17	51.22%
29	1650.70	0.04	831.33	50.36%
30	1644.22	0.04	845.49	51.42%
31	1648.54	0.04	842.38	51.10%
32	1639.80	0.04	841.4	51.31%
33	1653.73	0.04	841.33	50.87%
34	1519.93	0.03	845.06	55.60%
35	1646.40	0.04	869.85	52.83%
36	1692.86	0.04	842.27	49.75%
37	1647.42	0.04	846.29	51.37%
38	1686.69	0.04	831.08	49.27%
39	1653.53	0.04	845.47	51.13%
40	1680.58	0.04	842.27	50.12%
41	1659.70	0.04	846.29	50.99%
42	1674.81	0.04	831.08	49.62%
43	1665.92	0.04	845.47	50.75%
44	1672.31	0.04	842.27	50.37%
45	1720.02	0.04	846.29	49.20%
46	1751.31	0.04	843.59	48.17%
47	1894.30	0.04	834.22	44.04%
48	1889.91	0.04	842.27	44.57%
49	1920.04	0.04	846.78	44.10%
A	10211.37	0.23	--	--
B	3693.03	0.08	--	--
C	13516.51	0.31	--	--
D	1876.06	0.04	--	--
TOTAL	117217.23	2.69	--	--

Site Summary:

Total Homes	: 49
Site Area	: ± 2.71 Acres
Density	: ± 18.1 Homes/Acre

Parking Required*:

2.0 Spaces / 3BR x 31	: 62
3.0 Spaces / 4BR x 18	: 54
0.25 Spaces / Unit x 49	: 12.25
Total Required	: 128.25 = 128 (2.61:1)

*Note: Parking required per Small Lot Subdivision parking standards

Parking Provided:

Garage Spaces	: 98
Uncovered Spaces	: 30
Total Provided	: 128
Overall Parking Ratio	: 2.6:1

Land Use:

Existing	: General Commercial (CG)
Proposed	: Medium Density Residential (R3)

Zoning:

Existing	: Commercial Professional (C-P)
Proposed	: Medium Density Residential (R3) with Application of Small Lot Subdivision Development Standards (OMC 17.14.270)

	Plan	# of Units	Square Footage	Stories	Garage Count	Bedrooms	Bathrooms	Garage Storage
SFD	Plan 2	3	2,001 Sq. Ft.	3-Story + Roof Deck	2-Car Garage	4 Bedrooms	3.5 Bathrooms	250 Cu. Ft.
	Plan 3	12	1,701 Sq. Ft.	2-Story	2-Car Garage	3 Bedrooms	2.5 Bathrooms	250 Cu. Ft.
Duplex Building	Plan 1	17	1,965 Sq. Ft.	3-Story + Roof Deck	2-Car Garage	3 Bedrooms	3.5 Bathrooms	250 Cu. Ft.
	Plan 2	14	2,001 Sq. Ft.	3-Story + Roof Deck	2-Car Garage	4 Bedrooms	3.5 Bathrooms	250 Cu. Ft.
	Plan 2 Alt	3	2,001 Sq. Ft.	3-Story + Roof Deck	2-Car Garage	3 Bedrooms	3.5 Bathrooms	250 Cu. Ft.

FIGURE 5

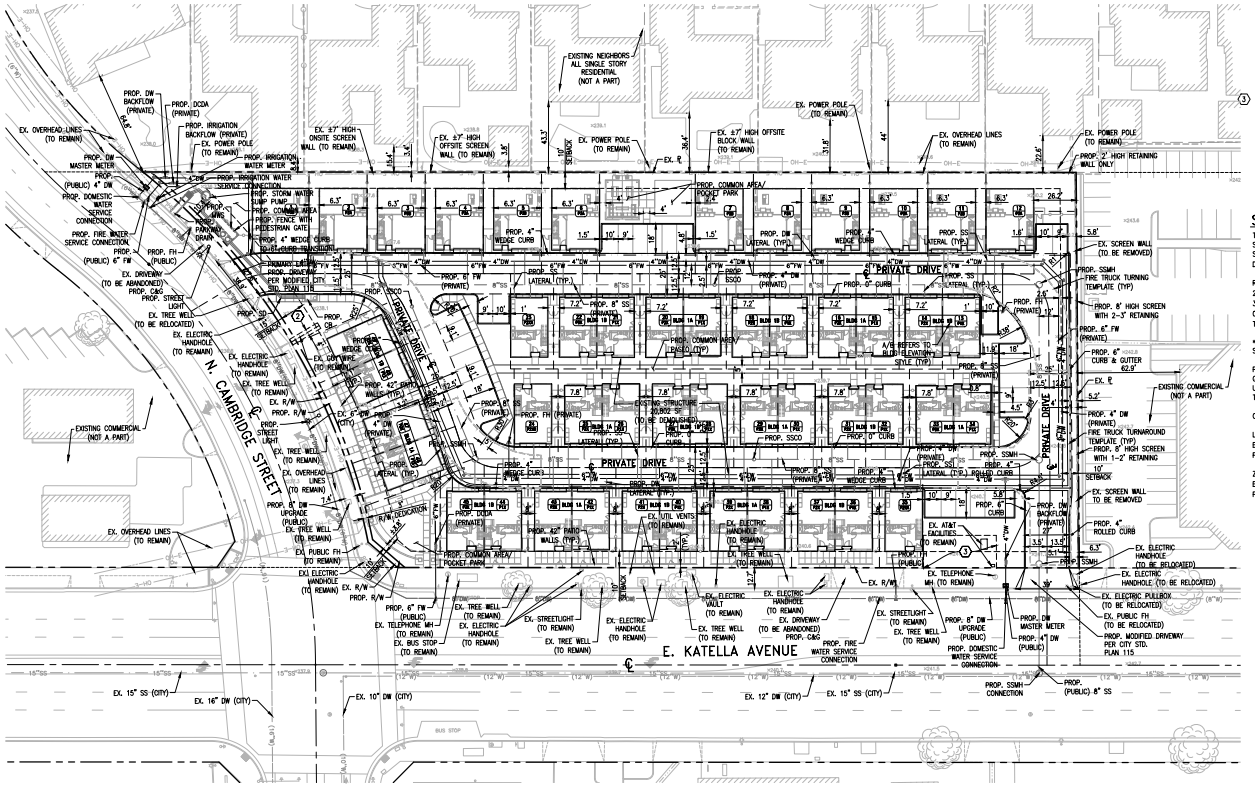
Conceptual Site Plan

N.T.S.

Source: C&V Consulting

TENTATIVE TRACT NO. 19253

PLANNING LAND USE APPLICATION NO. 0051-22, SMALL LOT ORDINANCE
901 EAST KATELLA AVENUE
CITY OF ORANGE, COUNTY OF ORANGE
STATE OF CALIFORNIA



LEGEND:

- CENTERLINE
- EXISTING BOUNDARY
- PROPOSED BOUNDARY
- PROPOSED LOT LINE
- SETBACK
- EXISTING LOT LINE
- EXISTING WALL
- PROPOSED WALL

ABBREVIATIONS:

BNDY	BOUNDARY
CB	CATCH BASIN
CF	CURB FACE
CLF	CHAIN LINK FENCE
CO	CLEANOUT
DCDA	DOUBLE CHECK DETECTOR ASSEMBLY
DI	DROP INLET
DW	DOMESTIC WATER
DWY	DRIVEWAY
ELEC	ELECTRIC
ESMT	EASEMENT
EVCS	ELECTRIC VEHICLE CHARGING STATION
EX.	EXISTING
FG	FINISHED GRADE
FL	FLOW LINE
FF	FINISHED FLOOR
FH	FIRE HYDRANT
FS	FINISHED SURFACE
FW	FIRE WATER
GM	GAS METER
INV	INVERT
LP	LOW POINT
MH	MANHOLE
MWS	MODULAR WETLANDS SYSTEM
NTS	NOT TO SCALE
OH	OVERHEAD WIRES
PB	PULL BOX
PED	PEDESTAL
PKWY	PARKWAY
PL	PROPERTY LINE
POC	POINT OF CONNECTION
PP	POWER POLE
PROP.	PROPOSED
R	RADIUS
RPM	RESIDENTIAL FIRE METER
R/W	RIGHT OF WAY
SD	STORM DRAIN
SF	SQUARE FEET
SS	SANITARY SEWER
STD	STANDARD
STLT	STREETLIGHT
TC	TOP OF CURB
TE	TRASH ENCLOSURE
TG	TOP OF GRATED INLET
TYP.	TYPICAL
WM	WATER METER
WV	WATER VALVE

TITLE INFORMATION:

THE FOLLOWING TITLE INFORMATION WAS DERIVED FROM A PRELIMINARY REPORT ISSUED BY FIDELITY NATIONAL TITLE COMPANY, ORDER NO.: 010-30084576-TC1 DATED APRIL 6, 2022 AT 7:30 A.M.

(#) DENOTES PLOTTED ITEM.

(2) AN EASEMENT FOR THE PURPOSE SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT GRANTED TO: SOUTHERN CALIFORNIA EDISON COMPANY, A CORPORATION
PURPOSE: PUBLIC UTILITIES AND INCIDENTAL PURPOSES
RECORDED: MAY 23, 1993 AS INSTRUMENT NO. 83-216107 OF OFFICIAL RECORDS

MATTERS CONTAINED IN THAT CERTAIN DOCUMENT ENTITLED: CONSENT TO GRANT OF EASEMENT
EXECUTED BY: THE PACIFIC TELEPHONE AND TELEGRAPH COMPANY, A CALIFORNIA CORPORATION RECORDING DATE: OCTOBER 3, 1983
RECORDING NO: AS INSTRUMENT NO. 83-434484 OF OFFICIAL RECORDS
(TO REMAIN)

(3) AN EASEMENT FOR THE PURPOSE SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT
GRANTED TO: PACIFIC BELL TELEPHONE COMPANY, A CALIFORNIA CORPORATION
PURPOSE: PUBLIC UTILITIES
RECORDED: JULY 28, 2000 AS INSTRUMENT NO. 20000396907 OF OFFICIAL RECORDS
(TO REMAIN)

SITE SUMMARY:

TOTAL HOMES:	49 UNITS
SITE GROSS AREA:	2.711 ACRES
SITE NET AREA:	2.691 ACRES
DENSITY:	18.21 UNITS/ ACRE

REQUIRED PARKING*:

2.0 SPACES/ 3BR X 32:	64
3.0 SPACES/ 4BR X 17:	51
0.25 SPACES/ UNIT X 49:	12.25
TOTAL REQUIRED:	127.25 = 128 (2.61:1)

*NOTE: PARKING REQUIRED PER SMALL LOT SUBDIVISION PARKING STANDARDS.

PARKING PROVIDED:

GARAGE SPACES:	98
UNCOVERED SPACES:	30
TOTAL PROVIDED:	128

OVERALL PARKING RATIO: 2.6:1

LAND USE:

EXISTING:	GENERAL COMMERCIAL (GC)
PROPOSED:	MEDIUM DENSITY RESIDENTIAL (R3)

ZONING:

EXISTING:	COMMERCIAL PROFESSIONAL (C-P)
PROPOSED:	MEDIUM DENSITY RESIDENTIAL (R3) WITH APPLICATION OF SMALL LOT SUBDIVISION DEVELOPMENT STANDARDS (OMC 17.14.270)

REVISIONS

NO	DATE	INITIAL	DESCRIPTION	APP	DATE

DEVELOPER:
INTRACORP SW, LLC
895 DOVE STREET, SUITE 400
NEWPORT BEACH, CA 92660
PHONE (949) 955-2370

SOILS ENGINEER:
GEOTEK, INC.
1548 N. MAPLE STREET
CORONA, CA 92880
PHONE (951) 710-1160

PREPARED BY :
C&V CONSULTING, INC.
CIVIL ENGINEERING
LAND PLANNING & SURVEYING
2000 RYE CENTER DRIVE
IRVINE, CALIFORNIA 92606
949.553.0666
INFO@CVIRVINE.NET
WWW.CVIRVINE.NET

REGISTERED PROFESSIONAL ENGINEER
RENEW: 9-30-25
No. 69147
CIVIL
STATE OF CALIFORNIA

TENTATIVE TRACT MAP
19253
PRELIMINARY SITE PLAN

SHEET 2 OF 4

SCALE: AS SHOWN | DRAWN BY: TC | CHECKED BY: JH

CITY OF ORANGE

PLAN SET: PSR
DATE: 11/1/23

FIGURE 6

Tentative Tract Map

N.T.S.
Source: Land Concern

FIGURE 7
Proposed Elevations -Katella and Cambridge

Plan 2

CONTEMPORARY - A

CONTEMPORARY - B

N.T.S.
Source: Bassenian|Lagoni

FIGURE 8
Proposed Elevations -Street Scene and Plan 2

Plan 2A

Plan 2B

N.T.S.
Source: Bassenian|Lagoni

FIGURE 9
Proposed Elevations - Plan 2A and 2B

Building I

CONTEMPORARY - A

CONTEMPORARY - B

Building IA

N.T.S.
Source: Bassenian|Lagoni

FIGURE 10
Proposed Elevations - Building I and IA

Building IB

N.T.S.
Source: Bassenian|Lagoni

FIGURE 11
Proposed Elevations - Building IB

Plan 3 SFD

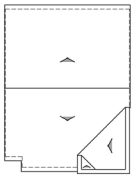
CONTEMPORARY - A

CONTEMPORARY - B

Plan 3A

LEFT

FRONT A



ROOF PLAN A

PITCH: 2:12
RAKE: TIGHT
EAVE: 12"
ROOF MATERIAL: COMPOSITION SHINGLE

RIGHT

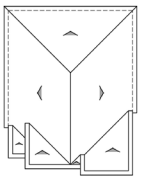
REAR

N.T.S.
Source: Bassenian|Lagoni

FIGURE 12
Proposed Elevations - Plan 3 SFD and 3A

Plan 3B

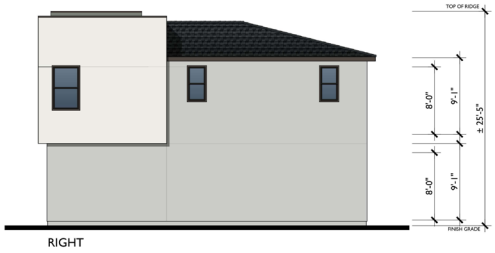
LEFT



ROOF PLAN B

PITCH: 3:12
RAKE: TIGHT
EAVE: 12"
ROOF MATERIAL: COMPOSITION SHINGLE

FRONT B



RIGHT

REAR

N.T.S.
Source: Bassenian|Lagoni

FIGURE 13
Proposed Elevations - Plan 3 B

All homes along the north property line have a 10-foot rear yard setback consistent with the Small Lot Subdivision Development Standards.

Eleven homes (5 paired and one detached) will face out onto East Katella Avenue creating "eyes on the street" and providing an interesting building articulation along the street frontage. The Project includes a 10-foot setback along East Katella Avenue consistent with the Small Lot Subdivision Development Standards.

Vehicle access would occur at an entry along North Cambridge Street, generally in the same location as the existing access, and along East Katella Avenue, at the southeast portion of the site. The Project is not proposed to be gated. The two access points will be widened from the current 27-foot commercial driveway apron to a 39-foot-wide drive apron consistent with Standard Plan 115.

Each dwelling unit is planned with a side-by-side two car garage. No individual driveways in front of garages are proposed. The garage spaces total 98 covered spaces. The site plan provides for 30 uncovered guest parking spaces. The site plan provides a total of 128 parking spaces, which represents a parking ratio of 2.6 spaces per residential unit. The interior loop drive aisle measures 25-feet in width.

Sewer, domestic water, and storm drainage for the Project would be served from existing public services located in East Katella Avenue and Cambridge Street. The domestic water main along the Project frontage of East Katella Avenue and Cambridge Street will be upgraded from a 6-inch line to an 8-inch line. All work would occur within the existing streets. Dry utility service would be accessed from available existing electrical, gas, CATV and telephone providers currently serving the site and area. The existing above-ground electrical lines on Cambridge Street would remain and not be modified. The existing sidewalks, street trees, and bus stop along the Project site frontage would also remain and not be modified, except to accommodate the modified ingress/egress access to the Project site.

The existing block wall fencing will remain along the northern property boundary. A new block wall, partially retaining, is proposed along the eastern Project boundaries. The wall measures 8 feet in height.

Open space areas total approximately 18,357 square feet. A pocket park area is proposed along the northern property boundary, consisting of a seating area, BBQ, shaded picnic tables, multipurpose lawn area, landscaping, and enhanced paving. An open space feature with landscaping and walkways is proposed at the corner of Cambridge Street and East Katella Avenue. This area includes bench seating, entry portals, signage wall, landscaping, and lawn area. A central east-west extending paseo is proposed in the center of the Project site. Lastly, landscape areas are proposed in the northwest corner of the Project site, north of the entry off Cambridge Street and near the eastern entry drive to East Katella Avenue (**Figure 14**). The common open space areas would be owned and maintained by a newly formed homeowner's association.

Construction of the Project would begin with demolition of the existing building, walls, and parking areas. All material would be hauled off site and to the extent possible taken to a recycling facility. The Project site would be graded, which includes the removal and recompaction of the upper three to fifteen feet depending on the underlying soil conditions. Grading will occur in a single phase and require import of approximately 1,000 cubic yards of fill dirt.

Runoff will be conveyed by concrete v-gutters and an onsite area drain system, collected by two (2) onsite catch basins and routed to the proposed Biofiltration vault treatment device. The flows in excess

of the 25 -year storm event will enter the stormwater sump pump which outlets onto Cambridge Street through a parkway drain.

Trash storage will occur as individual carts stored within the enclosed garage of each dwelling unit.

3.1 Intended Use of the IS/MND

The Project proposes the following entitlements:

- General Plan Amendment No. 0004-22 - General Commercial (GC) to Medium Density Residential (MDR)
- Zone Change No. 1307-22 - Commercial Professional (C-P) to Multiple-Family Residential (R-3)
- Tentative Tract Map No. 0051-22
- Major Site Plan Review No. 1111-22
- Design Review No. 5092-22
- Application of Small Lot Subdivision Development Standards (OMC 17.14.270)

3.2 Other Public Agencies Whose Approval is Required (Responsible or Trustee Agencies):

- South Coast Air Quality Management District (SCAQMD)

3.3 Scheduled Public Meetings or Hearings:

- DRC Meeting December 6, 2023

N.T.S.

Source: Bassenian|Lagoni

FIGURE 14

Proposed Landscaping

Landscape Key

1. COMMUNITY ENTRY
2. 42"HT. COURTYARD WALLS: STUCCO FINISH TO MATCH ARCHITECTURE.
   - PRIVATE PATIOS WITH CONCRETE PAVING
3. POCKET PARK
   - SEATING AREA
   - SHADED PICNIC TABLES
   - BBQ
   - ENHANCED PAVING
   - LAWN
4. PASEO
5. PRIVATE PATIOS W/ CONCRETE PAVING
6. CORNER POCKET PARK
   - BENCH SEATING
   - ENTRY PORTALS
   - LAWN
7. PRIVATE YARD
8. EXISTING TREES TO REMAIN
9. SIGNAGE WALL
10. ROLLED CURB AND LOW VEGETATION
11. SCREENING HEDGE AT PARKING

Tree Palette

SYMBOL	NAME	SIZE	QUANTITY	WUCOLS

-- REFER TO CONCEPTUAL PLANTING PLANS, SHEET L-24 OF THIS SET --

Notes

- All landscape areas shall be irrigated by an automatic irrigation system all the trees be irrigated via separate, dedicated bubbler circuits all other landscape areas shall be irrigated via a drip irrigation system. The entire irrigation system shall be on an automatically controlled system with a separate programs capable of irrigating each hydrozone independently. The intent of the landscape and water delivery systems is to meet all aspects of the City of Orange water efficiency landscape ordinance.
- All planting areas are to be covered with 3" of mulch.

SECTION 4.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

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

M Schw
Signature

11-6-23
Date

SECTION 5.0 ENVIRONMENTAL CHECKLIST

5.1 Aesthetics

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS. 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 nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact Analysis

The Project site constitutes an infill site currently developed with an abandoned commercial building and wireless community facility. The Project site has had a history of vandalism, homelessness, and small fires.

The Project site is not located on a ridgeline or an area of visual prominence. There are no rock outcroppings or other unique geologic features. The few trees on the Project site are common to the area.

The City's General Plan EIR (Section 5.1.1) defines scenic vista as "a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public." (OGP EIR, p. 5.1-1) While there are a number of scenic vistas within Orange, the Project site does not have the elements to meet the definition of scenic vista.

The City's General Plan EIR (Section 5.1.1) defines scenic resources as "those landscape patterns and features that are visually or aesthetically pleasing and that, therefore, contribute affirmatively to the definition of a distinct community or region including, but not limited to, trees, rock outcroppings, and historic buildings." (OGP EIR, p. 5.1-1) The Project site does not contain visual or aesthetically pleasing resources and the existing abandoned building on the Project site is not historic nor does it contribute architectural value.

Several City roadways have scenic qualities and are designated as viewscape corridors by the County of Orange. Viewscape corridors are defined as routes that traverse a corridor within which

unique or unusual scenic resources and aesthetic values are found. Viewscape corridors include portions of Jamboree Road, Santiago Canyon Road, and Newport Boulevard. The planning area does not contain any County-designated landscape corridors. SR-91, just north of and outside of the planning area, is an officially designated state scenic highway.

a) Have a substantial adverse effect on a scenic vista? Less than Significant. The Project site does not represent a scenic vista. The Project site is developed with an abandoned commercial use. The Project site is not located near any designated scenic highways, significant ridgelines, or other identified scenic resources, and would not result in any impacts related to having an adverse impact on a scenic vista. The closest scenic highway to the Project site is the SR-91 located north and outside of the City.

Since the proposed Project site does not contain a scenic vista or scenic resources, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? Less than Significant. The Project site does not contain scenic resources. The Project site is developed with an abandoned commercial use. The Project site is not located near any designated scenic highways, significant ridgelines, or other identified scenic resources, and would not result in any impacts related to having an adverse impact on a scenic vista. The closest scenic highway to the Project site is the SR-91 located north and outside of the City.

Since the proposed Project site does not contain scenic resources, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? Less than Significant. The Project site is located in an urban area of Orange. The Project site is located along a major arterial roadway and surrounded by residential and commercial uses. Therefore, the applicable threshold of significance is whether the proposed Project would conflict with applicable zoning and other regulations governing scenic quality.

The proposed Project requests approval of a General Plan Amendment to change the land use designation from General Commercial (GC) to Medium Density Residential (MDR). A Zone

Change is also requested to change the zoning classification from Commercial Professional (C-P) to Multiple-Family Residential (R-3).

The City's General Plan Natural Resources Element includes a number of policies that pertain to visual and aesthetic resources (OGP, page NR-8). Below are the policies and a discussion on the proposed Project's consistency.

> *Goal 7.0: Protect significant view corridors, open space, and ridgelines within the urban environment.*

The Project site is not located along a view corridor, does not contain existing open space, and the site is flat without ridgelines or significant views of ridgelines. The proposed Project is consistent with this goal.

> *Policy 7.1: Preserve the scenic nature of significant ridgelines visible throughout the community.*

The Project site is flat and does not contain a significant ridgeline. Furthermore, re-development of the Project site would not impact views of significant ridgelines. The proposed Project is consistent with this policy.

> *Policy 7.2: Designate Santiago Canyon Road east of Jamboree Road as a City Scenic Highway to preserve the scenic nature of the open space adjacent to the road.*

The Project site is not located along Santiago Canyon Road, and re-development of the Project site would not impede the designation of Santiago Canyon Road as a scenic highway. The proposed Project is consistent with this policy.

> *Policy 7.3: Encourage the development of landscaped medians and parkway landscaping along arterial streets in public and private projects, and encourage the state to provide freeway landscaping.*

The Project site is located along East Katella Avenue, an arterial roadway within the City. The proposed Project includes landscaping and architectural design along the frontage of East Katella Avenue. The design of the proposed Project is consistent with this policy.

> *Policy 7.4: Coordinate with Southern California Edison and other utilities to place utility lines underground wherever possible.*

Existing above-ground transmission (22.5 kv) electric lines extend along the Cambridge Street frontage to the corner of Cambridge Street and East Katella Avenue. The electric lines turn west along East Katella Avenue away from the Project site. Because the transmission lines occur along a short distance of the Project frontage and turn away from the Project site along East Katella, undergrounding along the short Project frontage is not feasible. Therefore, the above-ground transmission lines will remain. The proposed Project is consistent with this policy.

Policy 7.5 Encourage the retention and enhancement of scenic corridors and visual focal points within the community.

The Project site is neither along a scenic corridor nor a visual focal point within the community. The re-development of the Project site from an abandoned commercial use to residential uses with extensive landscaping and strong architectural features will be a visual improvement to the Project site. The proposed Project is consistent with this policy.

Since the proposed Project is consistent with the visual resource policies included in the General Plan and will result in a visual improvement to the Project site, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? Less than Significant. The Project site is located in an urban area with numerous nearby light sources. The existing development of the Project site includes wall-mounted lighting, security lighting, and parking lot lighting. Existing light sources surrounding the Project site include streetlights, existing residential neighborhoods, and existing commercial uses. The Project would include light sources typical of residential developments, which are less intensive than the surrounding commercial property lighting. Internal roadways would have streetlights and each residence would have typical wall lighting associated with residential uses. The light sources included in the proposed Project have the same character and intensity as existing surrounding light sources, therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *City of Orange General Plan EIR, Section 5.1; City of Orange General Plan Natural Resources Element, page NR-8; Google Earth and site visits; and Engineering plans.*

5.2 Agriculture and Forestry Resources

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

Impact Analysis

The Project site is developed with an existing approximately 20,621 square foot abandoned commercial building used for communications, a parking area of approximately 152 parking stalls, and an approximately 53-foot-tall wireless communication pole and associated utility boxes and equipment. The Project site is not being actively farmed or used for forest use and there is no recent history of such uses on the Project site.

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? No Impact. The Project site is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance based on mapping by the Department of Conservation. The Project site is mapped as "Urban and Built-Up Land."

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? No Impact. The Project site is not subject to a Williamson Act contract.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

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))? No Impact. The Project site is zoned for commercial development. While the proposed Project includes a request for a General Plan Amendment and Zone Change, the request does not include rezoning of agricultural or forest land. No impact would occur.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

d) Result in the loss of forest land or conversion of forest land to non-forest use? No Impact. The Project site does not have forest land or land that was used for the harvesting of timber.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

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? No Impact. Existing properties surrounding the Project site consist of residential and commercial uses. There are no properties designed as prime farmland or forest uses within proximity to the Project site. Therefore, the proposed Project would not encroach into designated Prime Farmland or forest land and the proposed Project would not influence existing designated Prime Farmland or forest land to convert into non-agricultural or non-forest uses. No impact would occur.

Significance Determination: No Impact

Mitigation Measures: None
Significance Determination After Mitigation: No Impact

Sources: *Department of Conservation Important Farmland Finder, DLRP Important Farmland Finder (ca.gov); Title Report; City of Orange General Plan Land Use Map; City of Orange Zoning Map; and Google Earth.*

5.3 Air Quality

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. 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?	☐	☐	☒	☐

Impact Analysis

The proposed Project site is located within the South Coast Air Basin, for which the South Coast Air Quality Management District (SCAQMD) is responsible for controlling emissions primarily from stationary sources and to a lesser extent, mobile sources. Additionally, AQMD, in coordination with the Southern California Association of Governments (SCAG) is responsible for creating, updating, and implementing the Air Quality Management Plan (AQMP), which is a regional air quality strategy program. While air quality has improved dramatically over the past years, the South Coast Air Basin continues to exceed federal public health standards for ozone and particulate matter (PM).

The City of Orange relies on the SCAQMD for establishing significance thresholds for criteria air pollutants. By complying with the thresholds of significance, the Project would also be in compliance with the SCAQMD Air Quality Management Plan (AQMP) and the federal and state air quality standards.

Table 2. SCAQMD Air Quality Significance Thresholds

Pollutant	Construction (Lbs /Day)	Operation (Lbs/Day)
NO_X	100	55
VOC	75	55
PM_{10}	150	150
PM2.5	55	55
SO_X	150	150
CO	550	550

Source:http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significancethresholds.pdf

Furthermore, Localized Significance Thresholds (LST) are used to determine whether a project may generate significant adverse localized air quality impacts. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. LSTs are developed based on the ambient concentrations of four applicable air pollutants for source receptor area (SRA) 17 – Central Orange County. Table 3, below, provides the LST threshold of significance developed by AQMD.

Table 3. SCAQMD Localized Significance Thresholds (LST)

Pollutant	Construction (Lbs /Day)	Operation (Lbs/Day)
NO_X	107.3	107.3
CO	672.7	672.7
PM_{10}	5.9	1.6
PM2.5	3.9	1.1

Source: SCAQMD Mass Rate Localized Significance Thresholds for a 1.9-acre site in SRA-17 at 25 meters

The report, *901 E. Katella Avenue In-Fill Residential Development Air Quality and Greenhouse Gas Impact Study, City of Orange, California*, dated September 5, 2023, and prepared by RK Engineering Group, Inc. (**Appendix A**), analyzes potential air quality impacts from construction and operations of the proposed Project. The report analyzes grading the Project site, including the import of approximately 962 cubic yards of fill material and the demolition of the existing structure and parking lot. The report also analyzes operational impacts from construction of 49 dwelling units.

The analysis of air quality impacts included in the *Air Quality and Greenhouse Gas Impact Study* assumes implementation of standard air quality rules and requirements and design features designed to reduce emissions. These commitments are defined as Project Design Features (PDFs), which will be included in the Mitigation Monitoring and Reporting Program as PDFs to ensure implementation. The following PDFs were included in the air quality analysis and are hereby incorporated into the Project.

Construction Design Features:

PDF AQ-1 The project must follow the standard SCAQMD rules and requirements with regards to fugitive dust control, which include, but are not limited to the following:

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

9. Cover all trucks hauling dirt, sand, soil, or other loose materials, and maintain at least 2 feet of freeboard space in accordance with the requirements of California Vehicle Code (CVC) section 23114.
10. Use gravel aprons and track out grates at all truck exits.
11. Replace the ground cover of disturbed areas as quickly as possible.

PDF AQ-2 All diesel construction equipment should have Tier 4 low emission "clean diesel" engines (OEM or retrofit) that include diesel oxidation catalysts and diesel particulate filters that meet the latest CARB best available control technology.

PDF AQ-3 Construction equipment should be maintained in proper tune.

PDF AQ-4 All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.

PDF AQ-5 Minimize the simultaneous operation of multiple construction equipment units, to the maximum extent feasible.

PDF AQ-6 The use of heavy construction equipment and earthmoving activity should be suspended during Air Alerts when the Air Quality Index reaches the "Unhealthy" level.

PDF AQ-7 Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.

PDF AQ-8 Establish staging areas for the construction equipment that are as far from adjacent residential homes, as feasible.

PDF AQ-9 Use haul trucks with on-road engines instead of off-road engines for on-site hauling.

Operational Design Features:

PDF AQ-10 The project must comply with the mandatory requirements of the California Building Standards Code, Title 24, Part 6 (Energy Code) and Part 11 (CALGreen), including, but not limited to:

- Install low-flow fixtures and toilets, water-efficient irrigation systems, drought tolerant/native landscaping, and reduce the amount of turf.
- Provide the necessary infrastructure to support electric vehicle charging.
- Provide solar installations (or other sources of on-site renewable energy) per the prescribed Energy Design Ratings.

PDF AQ-11 Participate in the local waste management recycling and composting programs.

a) Conflict with or obstruct implementation of the applicable air quality plan? Less than Significant. The Project site is located within the South Coast Air Basin, which includes all of

Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is under the jurisdiction of the SCAQMD. The SCAQMD adopted the *2016 Air Quality Management Plan* (2016 AQMP) in March 2017.

Consistency with the 2016 AQMP for the Basin would be achieved if a Project is consistent with the goals, objectives, and assumptions in the respective plan to achieve the federal and state air quality standards. One such plan is the General Plan, which determines land use and land use intensity. The City of Orange General Plan designates the land use on the Project site as commercial. The Project proposes a General Plan Amendment to residential. While the proposed Project is not consistent with the land use designation assumed in the AQMP, the AQMP assumed development of the Project site as commercial, with associated emissions. Therefore, consistency with the AQMP is determined by whether the proposed Project exceeds SCAQMD daily emissions thresholds. As detailed in Sections b), c), and d) below, emissions generated by the proposed Project would be below emissions thresholds established by SCAQMD. Therefore, the proposed Project would be consistent with, and would not conflict with or obstruct, implementation of the AQMP. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

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? Less than Significant. Criteria pollutant emissions from the proposed Project would be generated by both construction emissions and operational emissions. As shown in **Table 4** below, the daily construction emissions would be less than the SCAQMD air quality standards and thresholds of significance.

Table 4. Daily Construction Emissions

Maximum Daily Emissions (lbs/day)[1]						
Activity	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**PM2.5**
Demolition	1.54	16.31	14.50	0.03	2.03	0.90
Site Preparation	1.33	14.30	10.03	0.03	1.24	0.59
Grading	1.39	16.45	9.66	0.03	3.71	1.98
Building Construction	1.88	14.13	15.91	0.03	1.25	0.76
Paving	1.07	8.13	12.14	0.02	0.56	0.41
Architectural Coating	33.61	1.24	2.10	0.00	0.17	0.09
Maximum[1]	**33.61**	**16.45**	**15.91**	**0.03**	**3.71**	**1.98**
SCAQMD Threshold	75	100	550	150	150	55
Exceeds Threshold (?)	**No**	**No**	**No**	**No**	**No**	**No**

[1] Maximum daily emission during summer or winter; includes both on-site and off-site Proposed Project emissions.

Table 5 below summarizes the analysis of operational emissions. As shown in **Table 5,** operational emissions would also be below the SCAQMD thresholds.

Table 5. Daily Operational Emissions

Maximum Daily Emissions (lbs/day)[1]						
Activity	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**PM2.5**
Mobile Sources	1.24	1.20	12.57	0.03	3.29	0.89
Energy Sources	0.03	0.22	0.09	0.00	0.02	0.02
Area Sources	1.36	0.91	4.66	0.01	0.09	0.09
Stationary Source	0.00	0.00	0.00	0.00	0.00	0.00
Total	**2.63**	**2.33**	**17.32**	**0.04**	**3.40**	**1.00**
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold (?)	**No**	**No**	**No**	**No**	**No**	**No**

[1] Maximum daily emission during summer or winter; includes both on-site and off-site Proposed Project emissions.

With implementation of the Project Design Features (PDFs), the proposed Project would not contribute to a cumulatively considerable net increase of any criteria pollutant for which the region is in non- attainment under an applicable Federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors). Therefore, impacts from criteria pollutant emissions would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

c) Expose sensitive receptors to substantial pollutant concentrations? Less than Significant. Sensitive receptors surrounding the Project site include neighboring residential uses. Exposure of pollutant concentrations on sensitive receptors can occur from construction and operation of the proposed Project. While project construction would generate less than significant criteria pollutant emissions, construction operations could cause fugitive dust impacts and impacts from diesel particulate matter. Operation of the proposed Project could also result in localized concentration of emissions.

Localized Significance Thresholds (LST) are used to determine whether a project may generate significant adverse localized air quality impacts. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. LSTs are developed based on the ambient concentrations of four applicable air pollutants for source receptor area (SRA) 17 – Central Orange County.

With implementation of the PDFs, localized construction and operational emissions are summarized in the following tables.

Table 6. Construction Localized Emissions

	Pollutant Emissions (lbs/day)[1]			
Emissions Sources	**NOx**	**CO**	**PM_{10}**	**PM2.5**
On-Site Emissions	14.47	14.21	3.31	1.87

Emissions Sources	Pollutant Emissions (lbs/day)[1]			
	NOx	**CO**	**PM_{10}**	**PM2.5**
SCAQMD Threshold[2]	107.3	672.7	5.9	3.9
Exceed Threshold?	**No**	**No**	**No**	**No**

[1]Maximum daily emission during summer or winter; includes on-site project emissions only.
[2]Reference 2006-2008 SCAQMD Mass Rate Localized Significant Thresholds for construction and operation. SRA-17, Central Orange County, 2-acre site, receptor distance 25 meters.

Table 7. Operational Localized Emissions

Emissions Sources	Pollutant Emissions (lbs/day)[1]			
	NOx	**CO**	**PM_{10}**	**PM2.5**
On-Site Emissions[2]	1.19	5.38	0.3	0.2
SCAQMD Threshold[3]	107.3	672.7	1.6	1.1
Exceed Threshold?	**No**	**No**	**No**	**No**

[1] Maximum daily emission in summer or winter.
[2] Mobile source emissions include on-site vehicle emissions only. It is estimated that approximately 5% of mobile emissions will occur on the project site.
[3] Reference: 2006-2008 SCAQMD Mass Rate Localized Significant Thresholds for construction and operation Table C-1 through C-6; SRA 17, Central Orange County disturbance area of 2 acre and receptor distance of 25 meters.

As shown in the prior tables, emissions from the proposed Project would not exceed localized significance thresholds (LSTs) for the nearest sensitive receptors for construction and operational emissions. Therefore, impacts are less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? Less than Significant. Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills, or heavy manufacturing uses. The proposed Project does not include any of these uses that result in significant odor impacts. Some objectionable odors may occur during construction from diesel engines, paving, and architectural coatings/paint. However, these odors are temporary, limited only to specific construction activities, and dissipate quickly. Since residential uses do not typically generate objectionable odors and the Project site is surrounded by existing residential uses on all sides, no new objectionable odors would be created. Impacts would be less than significant**.**

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *901 E. Katella Avenue In-Fill Residential Development Air Quality and Greenhouse Gas Impact Study, City of Orange, California, dated September 5, 2023, and prepared by RK Engineering Group, Inc. (Appendix A).*

5.4 Biological Resources

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES. 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?	☐	☐	☐	☒

Impact Analysis

Biological resources on the Project site were evaluated and presented in *Biological Resources Assessment for 901 E. Katella Project in the City of Orange*, dated November 14, 2022, by Carlson Strategic Land Solutions, and included in **Appendix B**. The Project site is classified as entirely developed. Non-native vegetation consists of variegated agave (*Agave americana 'Variegata'*), glossy privet (*Ligustrum lucidum*), creeping juniper (*Juniperus horizontalis*). Trees located on site include jacaranda (*Jacaranda mimosifolia*), Chinese elm (*Ulmus parvifolia*), and Silk Floss trees (*Ceiba speciosa*). No blue line drainages or drainages that qualify as jurisdictional Waters of the U.S. or Waters of the State were identified on the Project site.

The Project site is not located within the Orange County NCCP/HCP.

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? Less than Significant with Mitigation Incorporated. No special status plant or wildlife species were identified on the Project site, nor were any observed offsite within the buffer area. The proposed Project includes the removal of all buildings, ornamental trees and shrubs, and the parking lot area. Since the project site does not contain special status plant or wildlife species, impacts would be less than significant, and no mitigation is required.

The Project site consists of developed habitat and lacks suitable habitat for sensitive wildlife species. The Project site provides limited suitable habitat for some common avian species in the form of ornamental species and existing building eaves. While none of the common species carry a Federal or State listing as threatened or endangered, they are all protected under the Migratory Bird Treaty Act (MBTA). Therefore, a pre-construction survey is required in compliance with the MBTA. Implementation of **Mitigation Measure MM BIO-1** would reduce potential impacts to the avian species to a less than significant level, if nesting individuals are present.

With implementation of **Mitigation Measure MM BIO-1** impacts to sensitive wildlife species would be mitigated to less than significant.

Significance Determination: Potentially Significant Impact
Mitigation Measures:

Mitigation Measure MM BIO-1: Prior to ground disturbances that would impact potentially suitable nesting habitat for avian species, the project applicant shall adhere to the following:

1. Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to the extent feasible to avoid potential impacts to nesting birds and/or ground nesters.
2. Any construction activities that occur during typical nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat, on-site and within 300-feet surrounding the site (as feasible), be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement ground disturbances. If active nests are identified, the biologist would establish buffers around the vegetation (500 feet for raptors and sensitive species, 200 feet for non-raptors/non-sensitive species). All work within these buffers would be halted until the nesting effort is finished (i.e. the juveniles are surviving independent from the nest). The onsite biologist would review and verify compliance with these nesting boundaries and would verify the nesting effort has finished. Work can resume within these areas when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated.

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? No Impact. No riparian habitat or jurisdictional features occur on the Project site that meet the definition and are considered jurisdictional Waters of the United States or Waters of the State, pursuant to Section 1600-1603 of the California Fish and Game Code and Section 401 and 404 of the Clean Water Act, respectively. Therefore, no impacts would occur, and no mitigation is required.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

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? No Impact. No jurisdictional non-wetland or wetland waters regulated under Section 404 of the Clean Water Act occur on the Project site. Therefore, no impacts would occur, and no mitigation is required.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

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? Less than Significant with Mitigation Incorporated. The Project site is surrounded by existing residential and commercial development and is located at the corner of a busy intersection. The Project site does not function as a wildlife corridor.

The Project site provides limited suitable habitat for some common avian species in the form of ornamental species and existing building eaves. While not considered a wildlife corridor, the potential exists for avian species to nest on the Project site. Nesting activity typically occurs from January 15 through August 31 for raptors and February 15 through August 31 for all other avian species. Disturbing or destroying active nests is a violation of the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Wildlife Code Section 3503. As such, direct impacts to breeding birds (e.g. through nest removal) or indirect impacts (e.g. by noise causing abandonment of the nest) is considered a potentially significant impact. Compliance with the MBTA through **Mitigation Measure MM BIO-1**would reduce impacts to a less than significant level.

Significance Determination: Potentially Significant Impact
Mitigation Measures: Implement MM BIO-1.

Mitigation Measure MM BIO-1: Prior to ground disturbances that would impact potentially suitable nesting habitat for avian species, the project applicant shall adhere to the following:

1. Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to the extent feasible to avoid potential impacts to nesting birds and/or ground nesters.

2. Any construction activities that occur during typical nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat, on-site and within 300-feet surrounding the site (as feasible), be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement ground disturbances. If active nests are identified, the biologist would establish buffers around the vegetation (500 feet for raptors and sensitive species, 200 feet for non-raptors/non-sensitive species). All work within these buffers would be halted until the nesting effort is finished (i.e. the juveniles are surviving independent from the nest). The onsite biologist would review and verify compliance with these nesting boundaries and would verify the nesting effort has finished. Work can resume within these areas when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Less than Significant. The City of Orange has a tree preservation ordinance, which regulates the removal of trees from undeveloped and public interest properties. The Project site is neither undeveloped nor considered a public interest property. Therefore, the City's tree preservation ordinance does not apply to the Project site. The Project site currently contains minimal ornamental trees along the frontages. New landscaping, including street trees and on-site trees is proposed with the Project. Impacts are considered less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

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? No Impact. The Project site is not mapped within the boundary of the Orange County Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP). Therefore, no impact would occur.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

Sources: *Biological Resources Assessment for 901 E. Katella Project in the City of Orange, dated November 14, 2022, by Carlson Strategic Land Solutions, and included in Appendix B.*

5.5 Cultural Resources

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 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?	☐	☐	☒	☐

Impact Analysis

The potential for cultural resources to occur on the Project site was assessed in the Cultural Resources Study for the *901 East Katella Avenue Project, City of Orange, Orange County California*, prepared by BFSA Environmental Services, dated September 7, 2023, and included in **Appendix C**. The analysis included a review of archaeological records at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. A Sacred Lands File (SLF) search was also requested from the Native American Heritage Commission (NAHC). Additionally, a field survey was also conducted of the Project site.

The Project site was previously developed with a commercial building that is older than 50 years. Given its age, the structure was assessed by an architectural historian. The building was constructed between 1970 and 1972 and first used by Pacific Telephone Company of San Ana and later AT&T. The style of the building was influenced by International-style architecture.

a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5? Less than Significant. The Project site was developed in the early 1970's with a commercial/office building, which was first used by Pacific Telephone Company of San Ana and later AT&T. The style of the building was influenced by International-style architecture. International style architecture was a major world-wide architectural trend of the 1920s and 30s and reflects the formative decades of Modernism prior to World War II. (BFSA, p. 3.0-7) Consistent with CEQA Guidelines Section 15064.5, the building was assessed to determine the historical significance of the structure. The California Register of Historic Resources (CRHR) eligibility criteria were used to determine if the building is eligible for listing and thus, the building's historical significance.

To be eligible for listing on the CRHR, the resource must be found significant under one or more of the following criteria:

- CRHR Criterion 1: *It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage*.

- CRHR Criterion 2: *It is associated with the lives of persons important in our past*.

- CRHR Criterion 3: *It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values*.

- CRHR Criterion 4: *It has yielded, or may be likely to yield, information important in prehistory or history*.

The evaluation of the four CRHR criteria are presented in the Cultural Resources Study for the *901 East Katella Avenue Project, City of Orange, Orange County California*, prepared by BFSA Environmental Services, dated September 7, 2023, and included in **Appendix C.** The analysis determined the existing building is a common example of early 1970's office/commercial buildings possessing limited integrity. While influenced by the International Style architecture, the building is not a very good example and not considered architecturally important. The building is not associated with any significant events or individuals and is not likely to provide any information important to the history of the region. Therefore, the existing structure is not considered a historical resource and impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? Less than Significant. The records search from SCCIC indicated that three resources, all historic in age, are located within a one-mile radius of the Project site. Additionally, a field survey was conducted of the Project site. However, no records indicate pre-historic resources on the Project site and the field survey did not identify any evidence of resources on the Project site. An SLF search was also requested from NAHC to identify any sacred sites or locations of religious or ceremonial importance on or near the Project site. The search did not identify any tribal resources on or near the Project site.

Given the disturbed nature of the Project site resulting from previous agricultural use and development of the property, and that no prehistoric resources have ever been recorded within the vicinity of the Project site, the likelihood that archaeological deposits are present within the Project site is very low and impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

c) Disturb any human remains, including those interred outside of formal cemeteries? Less than Significant. No conditions exist that suggest human remains are likely to be found on the Project site. However, if human remains are found, those remains would be required to conduct proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code Sections 7050.5 to 7055 describe the general provisions for human remains. Specifically, Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the

requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County Coroner, notification of the NAHC and consultation with the individual identified by the NAHC to be the "most likely descendant (MLD)." The MLD would have 48 hours to make recommendations to landowners for the disposition of any Native American human remains and grave goods found. If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains until the County coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains. Since the treatment of human remains is governed by state law, no mitigation measures are necessary, and impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *901 East Katella Avenue Project, City of Orange, Orange County California, prepared by BFSA Environmental Services, dated September 7, 2023, and included in Appendix C.*

5.6 Energy

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ENERGY. Would the project:				
a) Result in 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?	☐	☐	☒	☐

Impact Analysis

An analysis of energy consumption is provided in the report, *901 E. Katella Avenue In-Fill Residential Development Air Quality and Greenhouse Gas Impact Study, City of Orange, California*, dated September 5, 2023, and prepared by RK Engineering Group, Inc. (**Appendix A**).

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? Less than Significant. The proposed Project has been designed and would comply with California's Building Energy Efficiency Standards (Title 24, Part 6) and Green Building Standards (CALGreen, Title 24, Part 11) to reduce energy consumption. One requirement placed on the Project is the incorporation of solar installations (or other sources of on-site renewable energy) to satisfy the required Energy Design Ratings from the Energy Code. By virtue of compliance with these codes, the proposed Project would not cause wasteful, inefficient, or unnecessary consumption of energy resources and impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? Less than Significant. The Project will purchase electricity through Southern California Edison which is subject to the requirements of California Senate Bill 100 (SB 100). SB 100 is the most stringent and current energy legislation in California; requiring that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers and 100% of electricity procured to serve all state agencies by December 31, 2045.[1] Furthermore, the Project would comply with California's Building Energy Efficiency Standards (Title 24, Part 6) and Green Building Standards (CALGreen, Title 24, Part 11) to reduce energy consumption.

Therefore, the proposed Project would not conflict with or obstruct a state or local plan, and by virtue of compliance with state and local plans, the proposed Project would not cause wasteful,

[1] SB-100 California Renewables Portfolio Standard Program

inefficient, or unnecessary consumption of energy resources. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *901 E. Katella Avenue In-Fill Residential Development Air Quality and Greenhouse Gas Impact Study, City of Orange, California, dated September 5, 2023, and prepared by RK Engineering Group, Inc. (Appendix A).*

5.7 Geology and Soils

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GEOLOGY AND SOILS. 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?	☐	☒	☐	☐

Impact Analysis

Geotechnical evaluation of the Project site was initially conducted by Salem Geotechnical Engineering Group in 2019. The Salem investigation included eight (8) exploratory borings to a depth of 50 feet below ground surface (bgs). Salem also conducted percolation testing. In June 2022, GeoTek, Inc. conducted an updated investigation for the proposed Project. The GeoTek investigation included three additional exploratory borings to a depth of 22.5 feet bgs and two percolation test borings. The results of both investigations are provided in the report, *Updated Geotechnical and Infiltration Evaluation for Proposed 49-Unit Residential Development, 901 E. Katella Avenue, City of Orange, Orange County, California*, dated June 3, 2022 and prepared by GeoTek, Inc. (**Appendix D**).

The Project site is generally flat with site elevations ranging from approximately 223 – 229 feet above mean sea level (MSL) generally descending to the west - southwest. The Project site is mostly underlain by medium dense/stiff to very dense/hard alluvial deposits. There are areas of localized undocumented fill up to 15 feet in thickness. No groundwater was encountered to the boring depth of 50 feet.

Percolation testing was performed to determine infiltration rates. After applying a factor of safety, the infiltration rates range from poor to favorable (0 to 2 inches per hour), depending on location and underlying soil density.

The Project site is not located within a State mapped Earthquake Fault Hazard Zone (Alquist-Priolo Earthquake Zoning Act) or a mapped liquefaction hazard area.

a.i) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. Less than Significant. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone and no faults were identified on the site during the geotechnical evaluation conducted by GeoTek, Inc. The closest active fault to the Project site is the Elsinore fault – Whittier Section, which is mapped approximately 7.6 miles north. The possibility of damage due to ground rupture is considered low since no active faults are known to cross the site. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

a.ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving Strong seismic ground shaking? Less than Significant. The Project site, like many areas in Southern California, is subject to strong seismic ground shaking. While the Project site does not have any faults on the property, the closest known active earthquake fault is the Elsinore fault located approximately 7.6 miles north of the Project site, which has the potential to generate strong ground shaking. The Elsinore Fault is capable of producing a magnitude 7 or larger event.

The construction of two and three-story single family residential homes is common in earthquake prone areas like Southern California, including the Project site. The geotechnical analysis included in **Appendix D** included an evaluation of site seismic characteristics in accordance with the California Building Code (CBC). Based on the site seismic characteristics, the CBC provides building code guidelines to minimize the effects of seismic ground shaking. With adherence to the building code standards, impacts associated with seismic ground shaking would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None

Significance Determination After Mitigation: Less than Significant

a.iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving Seismic-related ground failure, including liquefaction? Less than Significant. The Project site does not have earthquake faults on the property, therefore, the potential for seismic rupture is very low. The closest active fault to the Project site is the Elsinore Fault, approximately 7.6 miles north of the Project site. The distance of the Project site to the Elsinore Fault minimizes the risk of fault rupture to less than significant.

The Project site is not located within a liquefaction hazard zone as mapped by the State of California Seismic Hazard Zone mapping. Given the presence of dense/stiff alluvium and the lack of shallow groundwater, the potential for liquefaction or significant dynamic settlement is negligible, and therefore less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

a.iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving Landslides? Less than Significant. The Project site and the immediate area consists of generally flat topography, which is not prone to landsliding. Therefore, the potential for landsliding is negligible and impacts would be less than significant.

Secondary types of ground failure that might occur from a large seismic event include ground subsidence, ground lurching, and lateral spreading. Based on the proposed grading and the flat topography across the site, landsliding, ground subsidence and lateral spreading are considered unlikely at the Project site. Ground lurching could occur during a major seismic event, however, the remedial grading described in Section (c) and compliance with the seismic building standards in the California Building Code, would reduce the potential impact to less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Result in substantial soil erosion or the loss of topsoil? Less than Significant. The Project site and surrounding properties are essentially flat, without large steep slopes on or adjacent to the property that would be conducive to soil erosion or loss of topsoil. The Project site was previously graded and developed with commercial use. Furthermore, the Project site is surrounded by existing residential and commercial development and arterial roadways. Given current site conditions, the potential for soil erosion or loss of topsoil is low. Furthermore, during grading when the highest risk of loss of topsoil and/or erosion would occur, silt fencing, sandbags, waddles, and other BMPs would be installed as part of the Stormwater Pollution Prevention Plans (SWPPP). Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None

Significance Determination After Mitigation: Less than Significant

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? Less than Significant with Mitigation Incorporated. The Project site is not located on a geologic unit that is unstable or could become unstable. The Project site consists of mostly medium dense/stiff to very dense/hard alluvial deposits. There are areas of localized undocumented fill up to 15 feet in thickness. There are no mapped earthquake faults or landslides. The potential for liquefaction is very low given the underlying dense alluvial deposits and lack of shallow groundwater, and the Project site has very low to low expansive soil potential. The existing undocumented fills are not suitable in its current state to support the construction of new structures and infrastructure. Therefore, removal and recompaction of the undocumented fill is necessary prior to construction.

The Project site was evaluated for geotechnical feasibility pursuant to CEQA and determined to be feasible, without causing significant impacts, with implementation of design standards presented in the geotechnical report included in **Appendix D**. An example of a design standard included in the geotechnical report is the removal and recompaction of soil to depths of 3 to 15 feet bgs or two (2) feet below footing base, whichever is deeper, in order to provide a homogeneous, dense fill mat for structural support. Furthermore, prior to grading, a final geotechnical report must be prepared to accompany the construction level documents and the final geotechnical report will ensure all design recommendations have been incorporated. While standard practice, the requirement for a final geotechnical report has been included as a mitigation measure for further disclosure and tracking. Therefore, implementation of Mitigation Measures **MM GEO-1** and **MM GEO-2** would reduce impacts to less than significant.

Significance Determination: Potentially Significant Impact
Mitigation Measures: Implement MM GEO-1 and MM GEO-2.

Mitigation Measure MM GEO-1: The Project Applicant shall implement the recommendations contained in the report *Updated Geotechnical and Infiltration Evaluation for Proposed 49-Unit Residential Development, 901 E. Katella Avenue, City of Orange, Orange County, California,* dated June 3, 2022, and prepared by GeoTek, Inc. (Appendix D) to reduce geologic hazards during implementation of the proposed Project. Included in the reports are site-specific recommendations involving such topics as, grading and earthwork, slope stability, retaining walls, seismic design, construction materials, geotechnical observation, and testing and plan reviews.

Mitigation Measure MM GEO-2: Prior to the issuance of a grading permit, the Applicant shall prepare a final geotechnical report based on the final rough grading plans and the final geotechnical report shall incorporate all of the recommendations included in the preliminary geotechnical reports included in Appendix D. The geotechnical reports included in Appendix D have established that the site is geotechnically suitable for development and a final geotechnical report is required to ensure all construction-level geotechnical recommendations and design parameters are included on the final rough grading plans.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated

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? Less than Significant. Based on test results from GeoTek, the soils encountered on the Project site have a very low to low expansion potential. The Salem investigation encountered soils with a medium expansion potential. Implementation of Mitigation Measure MM GEO-1 includes removals to ensure a homogeneous, dense fill mat for structural support to ensure the expansion potential remains low. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

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? Less than Significant. The Project site is currently developed with commercial development that relies on sewer system connections. Construction of the proposed Project would also rely on sewer connections and no septic systems are proposed. Since no new septic is proposed, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? Less than Significant with Mitigation Incorporated. Based on site survey and data base results presented in *Paleontological Assessment for the 901 East Katella Avenue Project*, dated October 25, 2022, by BFSA Environmental Services (**Appendix E**), there is a potential for paleontological resources to occur on the Project site.

The existence of Pleistocene old alluvial fan deposits near the surface of the Project site, the high paleontological resource sensitivity assigned to these sediments, and the presence of previously recorded fossil specimens from the similar deposits less than five miles of the Project site, result in the potential for significant impacts. Implementation of **Mitigation Measure MM PALEO-1**, which requires full-time paleontological monitoring starting at a depth of five feet below the surface during grading, excavation, or utility trenching activities, would reduce impacts to less than significant.

Significance Determination: Potentially Significant
Mitigation Measures: Implement MM PALEO-1.

Mitigation Measure MM PALEO-1. Prior to the issuance of a grading permit, the Applicant shall prepare for City review and approval a Paleontological Mitigation Monitoring Plan, as follows:

1. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting will be held and attended by the paleontologist of record, representatives of the grading contractor and subcontractors, the project owner or developer, and a representative of the lead agency. The nature of potential paleontological resources shall be discussed, as well as the protocol that is to be implemented following discovery of any fossiliferous materials.
2. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Monitoring will be conducted full-time in areas of grading or excavation in undisturbed sediments of Pleistocene old alluvial fan deposits starting at a depth of five feet. The project paleontologist should have the discretion of adjusting the monitoring schedule based on any changing geological conditions observed during monitoring.
3. Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface or, if present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.
4. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils are collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes are taken on the map location and stratigraphy of the site, and the site is photographed before it is vacated and the fossils are removed to a safe place. On mass grading projects, any discovered fossil site is protected by red flagging to prevent it from being overrun by earthmovers (scrapers) before salvage begins. Fossils are collected in a similar manner, with notes and photographs being taken before removing the fossils. Precise location of the site is determined with the use of handheld Global Positioning System units. If the site involves a large terrestrial vertebrate, such as large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, a fossil recovery crew will excavate around the find, encase the find within a plaster and burlap jacket, and remove it after the plaster is set. For large fossils, use of the contractor's construction equipment is solicited to help remove the jacket to a safe location before it is returned to the laboratory facility for preparation.
5. Isolated fossils are collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes are taken on the map location and stratigraphy of the site, and the site is photographed before it is vacated and the fossils are removed to a safe place.
6. Particularly small invertebrate fossils typically represent multiple specimens of a limited number of organisms, and a scientifically suitable sample can be obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry-screen the sediment in the field, a concentrated sample may consist of one or two buckets of material. For vertebrate fossils, the test is usually the observed presence of small pieces of bones within the sediments. If present, multiple five-

gallon buckets of sediment can be collected and returned to a separate facility to wet-screen the sediment.

7. In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology guidelines (2010:7), bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil "microvertebrates" in order to test the feasibility of the deposit to yield fossil bones and teeth.
8. In the laboratory, individual fossils are cleaned of extraneous matrix, any breaks are repaired, and the specimen, if needed, is stabilized by soaking in an archivally approved acrylic hardener (*e.g.*, a solution of acetone and Paraloid B-72).
9. Preparation of recovered specimens to a point of identification and permanent preservation (not display), including screen-washing sediments to recover small invertebrates and vertebrates. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.
10. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (*e.g.,* OC Parks in Santa Ana, California). The paleontological program should include a written repository agreement prior to the initiation of mitigation activities. The lead agency may select another repository if it so desires.
11. Preparation of a final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). The report, when submitted to and accepted by the appropriate lead agency, will signify satisfactory completion of the project program to mitigate impacts to any potential nonrenewable paleontological resources (*i.e.,* fossils) that might have been lost or otherwise adversely affected without such a program in place.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated

Sources: *Updated Geotechnical and Infiltration Evaluation for Proposed 49-Unit Residential Development, 901 E. Katella Avenue, City of Orange, Orange County, California, dated June 3, 2022 and prepared by GeoTek, Inc. (Appendix D); and Paleontological Assessment for the 901 East Katella Avenue Project, dated October 25, 2022, by BFSA Environmental Services (Appendix E).*

5.8 Greenhouse Gas Emissions

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS. 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 emission of greenhouse gases?	☐	☐	☒	☐

Impact Analysis

GHGs comprise less than 0.1 percent of the total atmospheric composition, yet they play an essential role in influencing climate. Greenhouse gases include naturally occurring compounds such as carbon dioxide (CO_2), methane (CH_4), water vapor (H2O), and nitrous oxide (N_2O), while others are synthetic. Man-made GHGs include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs), as well as sulfur hexafluoride (SF_6).

The State of California has adopted extensive legislation to reduce greenhouse gas emissions across all sectors of the economy. Some of the key climate change legislation includes Assembly Bill (AB) 32 – the California Global Warming Solutions Act of 2006, Senate Bill (SB) 375 – the Sustainable Communities & Climate Protection Act of 2008, and SB 100 – the California Renewables Portfolio Standard Program.

The South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group (Working Group). At its last meeting in September 2010, the Working Group established for non-exempt projects, such as the proposed Project, a screening level threshold of 3,000 metric tons of CO_2e ($MTCO_2e$) and land use specific thresholds, which for residential projects, was established at 3,500 $MTCO_2e$. Greenhouse gas emissions occur from the following four sources for residential projects: construction; gas, electricity, and water uses; solid waste disposal; and motor vehicle use. Since construction operations are temporary, short-term emissions, the total construction emissions are amortized over 30 years per Working Group guidance. The City of Orange relies on the SCAQMD thresholds as its thresholds of significance for GHG emissions.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Less Than Significant. The proposed Project would generate greenhouse gas emissions through the construction and operation of the proposed residences.

As documented in the report, *901 E. Katella Avenue In-Fill Residential Development Air Quality and Greenhouse Gas Impact Study, City of Orange, California,* dated September 5, 2023, and prepared by RK Engineering Group, Inc. (**Appendix A**), total GHG emissions for the proposed

Project would be less than the screening level threshold of 3,000 $MTCO_2e$ and the land use specific threshold of 3,500 $MTCO_2e$, as shown in the following tables.

Table 8. Construction Greenhouse Gas Emissions

Emission Source	On-site ($MTCO_2e$)[1]	Off-site ($MTCO_2e$)[1]	Total ($MTCO_2e$)[1]
Demolition	21.22	10.77	31.99
Site Preparation	3.26	0.10	3.36
Grading	5.48	3.15	8.63
Building Construction	229.55	68.24	297.79
Paving	7.82	0.62	8.44
Architectural Coating	1.28	0.42	1.70
Total	268.61	83.30	351.91
Amortized over 30 years[2]	8.95	2.78	11.73

Source: *Air Quality and Greenhouse Gas Impact Study (Appendix A)*
[1] $MTCO_2e$ is metric tons of carbon dioxide equivalent (includes carbon dioxide, methane, nitrous oxide, and/or hydrofluorocarbon)
[2] The emissions are amortized over 30 years and added to the operational emissions, pursuant to SCAQMD recommendations.

Table 9. Operational and Total Greenhouse Gas Emissions

Emission Source	GHG Emissions ($MTCO_2e$)[1]
Mobile Source	415.04
Energy Source	92.80
Area Source	13.46
Water	16.71
Waste	12.03
Construction 30-yr Amortization	11.73
Total	561.77
SCAQMD Tier 3 Screening Threshold[2]	3000
Exceed Tier 3 Threshold?	No

Source: *Air Quality and Greenhouse Gas Impact Study (Appendix A)*
[1] $MTCO_2e$ is metric tons of carbon dioxide equivalent (includes carbon dioxide, methane, nitrous oxide, and/or hydrofluorocarbon)
[2] Per South Coast Air Quality Management District (SCAQMD) Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

Since the proposed Project would generate less than 3,000 $MTCO^2e$, which is the emission threshold established by the City of Orange and SCAQMD, the Project would have a less than significant impact.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases? Less than Significant. The proposed Project will be required to comply with the mandatory requirements of the latest 2019 California Building Standards Code,

including Title 24, Part 11, CALGreen, and Title 24, Part 6, Energy Code. The purpose of the building standards is to reduce negative impacts on the environment through improved planning and design, energy efficiency, water efficiency and conservation, and material and resource conservation. The California Building Standards were developed to help meet the requirements of the Global Warming Solutions Act (AB 32).

By complying with the California Building Standards Code requirements the project would not conflict with an applicable plan, policy, or regulation for the purpose of reducing the emissions of greenhouse gases, and the impact is considered less than significant.

Furthermore, the Project will implement Project Design Features, as described in the Air Quality section, that will further ensure the Project is consistent with applicable GHG reduction standards. Therefore, the proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the proposed Project's impact would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *901 E. Katella Avenue In-Fill Residential Development Air Quality and Greenhouse Gas Impact Study, City of Orange, California, dated September 5 2023, and prepared by RK Engineering Group, Inc. (**Appendix A**).*

5.9 Hazards and Hazardous Materials

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS. 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 § 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 two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Impact Analysis

A Phase I Environmental Site Assessment was prepared to analyze the history of the site and the potential for encountering hazardous materials. The report, *Phase I Environmental Site Assessment Report*, dated May13, 2022 by Partner Engineering and Science, Inc. is included in **Appendix F**.

The Project site was previously used as agricultural land between 1938 and 1963, graded circa 1968 and developed with the current commercial use in 1970. According to a previous analysis by BA Environmental in 2014, records indicate the Project site had a 4,000-gallon diesel underground storage tank (UST) near the northeast corner of the building. According to the Orange Fire Department (OFD) records, the UST was removed in 2013. During removal there was no evidence of leaking. Soil samples were collected and reported no detectable concentrations of petroleum hydrocarbons. The Orange County Environmental Health Care Agency (OCHCA) and OFD determined no leak occurred and no further action was required.

a) 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. Residential projects are not operators or generators of hazardous materials. Thus, operation of the proposed Project would not involve the use, transport, or disposal of hazardous materials, nor would it generate hazardous emissions, materials, or wastes. Grading and construction activities may involve limited transport, use, and disposal of hazardous materials such as fuel for construction equipment. However, construction activities are short-term and hazardous materials used during construction would be transported, used, and disposed of according to federal, State, and local health and safety requirements.

Given the age of the structure on the Project site there is a potential for asbestos containing materials (ACM), lead based paint (LBP) and polychlorinated biphenyl (PCBs). Access into the structures was not available during on-site surveys. Since there is potential for these toxic materials to exist on the Project site and the transport and disposal of these materials has the potential for release of hazards, a significant impact would occur. To mitigate impacts to less than significant, a survey for asbestos, lead based paint and polychlorinated biphenyl shall be conducted as outlined within **Mitigation Measure MM HAZ-1** shall be implemented.

Implementation of **Mitigation Measure MM HAZ-1** would reduce impacts to less than significant.

Significance Determination: Potentially Significant Impact
Mitigation Measures: Implement MM HAZ-1.

> **Mitigation Measure MM HAZ-1:** Prior to the demolition of existing structures, a survey for asbestos containing materials (ACM), lead based paint (LBP), and polychlorinated biphenyl (PCBs) shall be conducted, and any such materials shall be removed and disposed of properly by qualified certified technicians in accordance with State regulations.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated

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? Less than Significant with Mitigation Incorporated. The *Phase I Environmental Site Assessment Report* (**Appendix F**) includes results from database searches to determine the potential for release of hazardous materials from the Proposed Project site. No Recognized Environmental Conditions (REC), Controlled Recognized Environmental Conditions (CREC), or Historical Recognized Environmental Conditions (HREC) occur on the Project site. There is a Business Environmental Risk (BER) associated with the potential for ACM and LBP, which has been addressed in **Mitigation Measure MM HAZ-1**. Furthermore, residential projects are not operators or generators of hazardous materials. The proposed Project would not involve the use, transport, or disposal of hazardous materials, nor would it generate hazardous emissions, materials, or wastes during operations. Hazardous materials used during construction would be used in accordance with federal, State, and local regulations. Previous Asbestos, Lead and Miscellaneous Toxic Materials (universal wastes), if present, would be handled and disposed of in accordance

with **Mitigation Measure MM HAZ-1.** Implementation of Mitigation Measure MM HAZ-1 would reduce impacts to less than significant.

Neither the Project site conditions, nor Project activities, would result in a reasonably foreseeable accident condition, given the minimal use of hazardous materials during the limited construction phase of the Project. Therefore, no potential for release of hazardous materials was identified and impacts would be less than significant with mitigation.

Significance Determination: Potentially Significant Impact
Mitigation Measures: Implement MM HAZ-1.

> **Mitigation Measure MM HAZ-1:** Prior to the demolition of existing structures, a survey for asbestos containing materials (ACM), lead based paint (LBP), and polychlorinated biphenyl (PCBs) shall be conducted, and any such materials shall be removed and disposed of properly by qualified certified technicians in accordance with State regulations.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? Less than Significant with Mitigation Incorporated. The Project site is located approximately one-quarter mile north of the California Inspire Academy / California Elementary school located at 1081 N. California Street, Orange, which creates a potentially significant impact.

Residential projects are not operators or generators of hazardous materials. Thus, operation of the proposed Project would not involve the use, transport, or disposal of hazardous materials, nor would it generate hazardous emissions, materials, or wastes. Grading and construction activities may involve limited transport, use, and disposal of hazardous materials such as fuel for construction equipment. However, construction activities are short-term and hazardous materials used during construction would be transported, used, and disposed of according to federal, State, and local health and safety requirements. Therefore, impacts would be less than significant.

Given the age of the structures on the Project site, there is a potential for asbestos containing materials (ACM), lead based paint (LBP) and polychlorinated biphenyl (PCBs). Access into the structures was not available during on-site surveys. Since there is potential for these toxic materials to exist on the Project site and the transport and disposal of these materials has the potential for release of hazards, a significant impact would occur. To mitigate impacts to less than significant, the Applicant shall implement **Mitigation Measure MM HAZ-1**, which would reduce impacts to less than significant.

Significance Determination: Potentially Significant Impact
Mitigation Measures: Implement MM HAZ-1.

> **Mitigation Measure MM HAZ-1:** Prior to the demolition of existing structures, a survey for asbestos containing materials (ACM), lead based paint (LBP), and polychlorinated biphenyl (PCBs) shall be conducted, and any such materials shall be removed and disposed of properly by qualified certified technicians in accordance with State regulations.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? Less than Significant. The *Phase I Environmental Site Assessment Report* (**Appendix F**) includes results from database searches to determine if the Project site is on a list of hazardous materials sites. The Phase I searched the California Environmental Protection Agency (CalEPA), Orange County Health Care Agency (OCHCA), Orange Fire Department (OFD), South Coast Air Quality Management District (SCAQMD), Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), City of Orange building and planning departments, and California Geologic Energy Management Division (CalGEM). The Project site is not listed on any of the regulatory databases and no other sites listed on the databases pose a significant threat to the Project site. No oil wells are located on the Project site. Therefore, no Recognized Environmental Conditions (REC) were identified on or near the Project site. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? Less than Significant. The Project site is not located within an airport land use plan, nor within two miles of a private airstrip or public airport. The closest airport is John Wayne Airport, located in Santa Ana, approximately 9 miles from the Project site. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Less than Significant. The Project site is bordered by Cambridge Street and E. Katella Avenue and surrounding residential and commercial development. According to the City's General Plan Public Safety Element, Figure PS-4, Generalized Evacuation Corridors, the closest emergency evacuation routes to the Project site include E. Katella Avenue, adjacent to the Project site, and Glassell Street, west of the Project site. These emergency access routes would remain unchanged by the proposed Project and the proposed Project would not interfere with an emergency response plan. Furthermore, during site plan review the Orange Fire Department determined the proposed Project provides sufficient on-site emergency access. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? Less than Significant. According to Cal Fire – Fire and Resource Assessment Program, the Project site is not located within a Very High Fire Hazard Severity Zone.

The Project site is surrounded by existing developed and urban conditions and is not located near wildlands. Therefore, the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Furthermore, the proposed Project would provide new streets and fire hydrants, landscaping compatible for wildland fire restrictions, and all new structures would comply with current building standards, including fire sprinklers. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *Phase I Environmental Site Assessment Report, dated May13, 2022 by Partner Engineering and Science, Inc. (Appendix F); City of Orange General Plan Public Safety Element, Figures PS-1 and PS-4; and Cal Fire – Fire and Resource Assessment Program, Fire Hazard Severity Zones (ca.gov).*

5.10 Hydrology and Water Quality

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY. 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?	☐	☐	☒	☐

Impact Analysis

The hydraulic and water quality analysis is based on the technical reports, *Preliminary Hydrology Study, TTM 19253, 901 E. Katella Avenue, Orange, California, 92867*, dated August 2022, by C&V Consulting, Inc. included in **Appendix G** and the *Preliminary Water Quality Management Plan (WQMP), 901 E. Katella Avenue, Orange, CA 92867*, dated August 2022, by C&V Consulting, Inc. (**Appendix H**).

Currently, the Project site primarily flows in the north and westerly direction toward N. Cambridge Street. Stormwater flow is concentrated within v-gutters at the centers of the parking lot drive aisles. The area west and south of the existing building appear to slope away from the building to

the west and south toward the public right-of-way, respectively. No offsite run-on drainage or cross lot drainage is entering the site.

Once the runoff reaches N. Cambridge Street, it flows north and is then conveyed in the catch basin directly north of the intersection with Trenton Avenue. The Project site is located within the Santa Ana River Watershed per the Orange County Flood Control District (OCFCD) Drainage System Map No. 21. Per the OCFCD Drainage Maps, stormwater then enters the existing underground storm drain system and continues to the OCFCD Marlboro Storm Channel, converging with the Collins Storm Channel, Santa Ana River, and ultimately discharging to the Pacific Ocean.

Runoff in the proposed condition will be conveyed through concrete v-gutters then collected by two (2) onsite catch basins and an onsite area drain system that will be routed to the proposed Biofiltration Vault treatment device prior to discharge to the public right-of-way via a stormwater sump pump system. Treated runoff and overflow will be conveyed through a proposed parkway drain to the public right-of-way of Cambridge Street. Upon entering Cambridge Street, site runoff will follow the existing historical drainage pattern.

a) Less than Significant. Water quality treatment is further discussed in the Water Quality Management Plan, included in **Appendix H** . Water quality treatment will be provided by a Modular Wetlands System (MWS) biofiltration vault. The MWS has been sized to collect and treat runoff from a 24-hour, 85th percentile storm event prior to release into the storm drain system. The MWS system has been reviewed and determined consistent with Orange County Technical Guidance Document (OC TGD) requirements for water quality. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? Less than Significant. The geology and geotechnical analysis (see Section 5.7) determined the Project site is underlain by dense alluvium. Drilling to 50 feet below ground surface (bgs) did not encounter groundwater. Furthermore, the percolation testing determined a low feasibility for infiltration with low percolation rates. Without feasible infiltration, the Project site does not provide groundwater recharge. Furthermore, the Project is not relying on groundwater supplies and no groundwater was encountered to the maximum drilling depth of 50 feet. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

C.i) 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 result in substantial erosion or siltation on- or off-site?

Less than Significant. Development of the Project site would increase the amount of impervious surface, increase stormwater runoff that could lead to erosion, and increase stormwater runoff that could exceed existing conditions, leading to downstream flooding. However, the proposed Project is in an area with an existing fully stabilized drainage system(s) receiving runoff from the Project site and the proposed Project is designed with a biofiltration vault system that would reduce potential impacts from onsite erosion to offsite collection systems to less than significant.

Table 10 below compares the existing runoff in the 25 (Q_{25}) and 100-year (Q_{100}) storm events to the proposed Project conditions. As shown in this table, the proposed Project would reduce storm runoff from the Project site.

Table 10. Peak Discharge Rates Q_{25} and Q_{100} for Existing and Proposed Conditions

	Q_{25} (CFS)	**Q_{100} (cfs)**
Existing Condition	8.58	11.17
Proposed Condition	7.95	10.31
% Decrease	-7.3%	-7.7%

Reducing the peak discharge rates to below existing conditions would also reduce the risk of downstream erosion and/or flooding, resulting in less than significant impacts.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

C.ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? Less than Significant. Development of the Project site would increase the amount of impervious surface, increase stormwater runoff that could lead to erosion, and increase stormwater runoff that could exceed existing conditions, leading to downstream flooding. However, the proposed Project is in an area with an existing fully stabilized drainage system(s) receiving runoff from the Project site and the proposed Project is designed with a biofiltration vault system that would reduce potential impacts from onsite erosion to offsite collection systems to less than significant.

Table 10 above compares the existing runoff in the 25 (Q_{25}) and 100-year (Q_{100}) storm events to the proposed Project conditions. As shown in this table, the proposed Project would reduce storm runoff from the Project site.

Reducing the peak discharge rates to below existing conditions would also reduce the risk of downstream erosion and/or flooding, resulting in less than significant impacts.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

C.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. Development of the Project site would increase the amount of

impervious surface, increase stormwater runoff that could lead to erosion, and increase stormwater runoff that could exceed existing conditions, leading to downstream flooding. However, the proposed Project is in an area with an existing fully stabilized drainage system(s) receiving runoff from the Project site and the proposed Project is designed with a biofiltration vault system that would reduce potential impacts from onsite erosion to offsite collection systems to less than significant.

Table 10 above compares the existing runoff in the 25 (Q_{25}) and 100-year (Q_{100}) storm events to the proposed Project conditions. As shown in this table, the proposed Project would reduce storm runoff from the Project site.

Reducing the peak discharge rates to below existing conditions would also reduce the risk of downstream erosion and/or flooding, resulting in less than significant impacts.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

C.iv) Impede or redirect flood flows? Less than Significant. Development of the Project site would increase the amount of impervious surface, increase stormwater runoff that could lead to erosion, and increase stormwater runoff that could exceed existing conditions, leading to downstream flooding. However, the proposed Project is in an area with an existing fully stabilized drainage system(s) receiving runoff from the Project site and the proposed Project is designed with a biofiltration vault system that would reduce potential impacts from onsite erosion to offsite collection systems to less than significant.

Table 10 above compares the existing runoff in the 25 (Q_{25}) and 100-year (Q_{100}) storm events to the proposed Project conditions. As shown in this table, the proposed Project would reduce storm runoff from the Project site.

Reducing the peak discharge rates to below existing conditions would also reduce the risk of downstream erosion and/or flooding, resulting in less than significant impacts.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? No Impact. The Project site is not located in flood hazard area. Furthermore, the Project site is approximately 14 miles from the Pacific Ocean and no other large waterbodies are located nearby; therefore, no impacts from tsunami or seiche would occur. No impacts would occur.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? Less than Significant. The Project has been designed to be consistent with the City of Orange Local Implementation Plan (LIP) and OC TGD, which includes water quality and hydromodification requirements. The infiltration testing on the Project site did not identify favorable infiltration conditions. Furthermore, no groundwater was encountered to exploratory depth of 50 feet. The proposed Project includes a Modular Wetland System for treatment, which is consistent with the OC TGD requirements. Therefore, impacts to water quality are less than significant and the proposed Project is consistent with water quality regulations.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *Preliminary Hydrology Study, TTM 19253, 901 E. Katella Avenue, Orange, California, 92867, dated August 2022, by C&V Consulting, Inc. (Appendix G); and Preliminary Water Quality Management Plan (WQMP), 901 E. Katella Avenue, Orange, CA 92867, dated August 2022, by C&V Consulting, Inc. (Appendix H).*

5.11 Land Use and Planning

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
LAND USE AND PLANNING. 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?	☐	☐	☒	☐

Impact Analysis

The Project proposes to change the General Plan and Zoning designations for the Project site as follows:

	General Plan	Zoning
Existing:	General Commercial (GC)	Commercial Professional (C-P)
Proposed:	Medium Density Residential (MDR)	Multiple Family Residential (R-3)

The Project also proposes development standards under the City's Small Lot Subdivision Development Standards (OMC 17.14.270).

a) Physically divide an established community? Less than Significant. The proposed Project plans to demolish an existing commercial structure and associated accessory uses, such as a parking lot, communication tower, etc. The Project site is surrounded by existing roads and development on all four sides. The proposed Project is not gated and includes pedestrian walkways through the Project site that would be available to existing surrounding residents.

The proposed Project would require a General Plan Amendment and Zone Change. However, these changes would not divide an existing community. The Project site is currently developed, and the proposal would only change the land use and not create a barrier that would divide the community. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

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? Less than Significant. The proposed Project is currently not consistent with the adopted land use plan and both a General Plan Amendment and Zone Change would be required. However, there is no indication the current land use designation for the Project site was adopted for the purpose of

avoiding or mitigating an environmental effect. The Project site was previously developed with all areas of the Project site previously disturbed. Therefore, the current land use designation was not adopted to avoid physical impact to the Project site. The prior development of the Project site also previously generated traffic, noise, and air quality emissions. Therefore, there is no indication the current land use designation was adopted to avoid environmental effects from the operation of uses on the Project site.

This Initial Study analyzes the direct, indirect, and cumulative effects of the proposed Project. As such, this Initial Study also analyzes the direct, indirect, and cumulative effects of the proposed change in land use designation. All impacts have been determined to be either less than significant or mitigated to less than significant.

Therefore, while the Project is inconsistent with the existing land use designation, the existing land use designation was not adopted to avoid environmental effects. Therefore, the impact is less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *Orange General Plan Land Use Plan.*

5.12 Mineral Resources

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MINERAL RESOURCES. 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?	☐	☐	☐	☒

Impact Analysis

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? No Impact. The City of Orange prepared an Environmental Impact Report (EIR) for its General Plan update. Section 7.5 of the General Plan EIR determined adoption of the current General Plan would have no significant effect on Mineral Resources. This conclusion was reached because the areas within the City of Orange with significant aggregate resources as identified by the State Mining and Geology Board are designated as Resource Areas or Open Space in the General Plan. Since the adoption of the updated General Plan continued to implement these land use designations, the EIR found that no significant impact would occur.

Since the Project site is currently designated General Commercial (G-C) and not Resource Areas or Open Space, the proposed Project would not impact a site that has been historically used for the extraction of mineral resources, nor would the proposed Project conflict with areas designated by the General Plan as mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

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? No Impact. The City of Orange prepared an Environmental Impact Report (EIR) for its General Plan update. Section 7.5 of the General Plan EIR determined adoption of the current General Plan would have no significant effect on Mineral Resources. This conclusion was reached because the areas within the City of Orange with significant aggregate resources as identified by the State Mining and Geology Board are designated as Resource Areas or Open Space in the General Plan. Since the adoption of the updated General Plan continued to implement these land use designations, the EIR found that no significant impact would occur.

Since the Project site is currently designated General Commercial (G-C) and not Resource Areas or Open Space, the proposed Project would not impact a site that has been historically used for the

extraction of mineral resources, nor would the proposed Project conflict with areas designated by the General Plan as mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

Sources: *City of Orange General Plan Land Use Plan; and City of Orange General Plan EIR, Section 7.5, P. 7-17.*

5.13 Noise

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE. 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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Impact Analysis

Noise impacts can occur from construction operations and long-term operations of a project, which for residential consists of vehicle traffic noise, and stationary sources, such as air conditioning noise. Potential noise impacts from these sources were analyzed in the report, *901 E. Katella Avenue In-Fill Residential Development Noise Impact Study, City of Orange, California*, prepared by RK Engineering Group, Inc., dated September 5, 2023 and included in **Appendix I**.

Noise is regulated by the City of Orange General Plan and Chapter 8.24 of the Orange Municipal Code. For construction noise, Chapter 8.24.050 of the Orange Municipal Code states that construction activity is exempt from exterior noise standards provided construction activities take plan between the hours of 7 a.m. and 8 p.m. on any day except for Sunday or a Federal holiday, or between the hours of 9 a.m. and 8 p.m. on Sunday or a Federal holiday. Noise generated outside of those hours is subject to the standards in Table 8.24.040.

The standards for stationary noise sources are defined in Table N-4 of the Orange General Plan Noise Element. During the daytime (7am – 10 pm), hourly noise levels shall not exceed 55 dBA, with a maximum of 70 dBA. During the nighttime (10 pm – 7 am), hourly noise levels shall not exceed 45 dBA, with a maximum of 65 dBA.

The Orange General Plan Noise Element also provides land use compatibility standards in Table N-3. For medium density residential neighborhoods, the land use compatibility noise standard is 45 dBA CNEL for interior and 65 dBA CNEL for exterior. The CNEL noise metric is the Community Noise Equivalent Level (CNEL), which is a 24-hour weighted average noise measurement.

In addition to the noise standards outlined in Tables N-3 and N-4, the City has established the following increases in ambient noise levels as the thresholds for determining significance under CEQA.

- Where the existing ambient noise level is less than 65 dBA, a project related permanent increase in ambient noise levels of 5 dBA CNEL or greater.

- Where the existing ambient noise level is greater than 65 dBA, a project related permanent increase in ambient noise levels of 3 dBA CNEL or greater.

The analysis of noise impacts included in the *Noise Study* assumes implementation of design features designed to reduce noise emissions. These commitments are defined as Project Design Features (PDFs), which will be included in the Mitigation Monitoring and Reporting Program as PDFs to ensure implementation. The following PDFs were included in the noise analysis and are hereby incorporated into the Project.

PDF NOI-1 The project will need to comply with California Title 24 building insulation requirements for exterior walls, roofs, and common separating assemblies (e.g. floor/ceiling assemblies and demising walls), which shall be reviewed by the City prior to issuance of a building permit.

- Interior noise levels due to exterior sources must not exceed a community noise equivalent level (CNEL) or a day-night level (LDN) of 45 dBA, in any habitable room.

- Party wall assembly designs must provide a minimum STC of 50, based on lab tests. Field tested assemblies must provide a minimum noise isolation class (NIC) of 45.

PDF NOI-2 A "windows closed" condition is expected to be required for all residential units within the project site to meet the interior noise standard. To accommodate windows closed conditions, all units shall be equipped with adequate fresh air ventilation, per the requirements of the California Building Standards.

PDF NOI-3 Upgraded windows and sliding glass doors with a minimum STC rating of 32 or greater are expected to be required for all units facing Cambridge Street and Katella Avenue.

PDF NOI-4 Deliveries, loading and unloading activities, and trash pick-up hours should be limited to daytime hours only (7 a.m. – 10 p.m.).

PDF NOI-5 Engine idling time for all delivery vehicles and moving trucks to 5 minutes or less.

PDF NOI-6 Construction-related noise shall take place only between the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, and 9:00 a.m. to 8:00 p.m. on Sundays and Federal holidays.

PDF NOI-7 Provide public notifications and signage in readily visible locations along the perimeter of construction sites that indicate the dates and duration of construction activities, as well as provide a telephone number where neighbors can enquire about the construction process and register complaints to a designated construction noise disturbance coordinator.

PDF NOI-8 All construction equipment shall be equipped with muffles and other suitable noise attenuation devices (e.g., engine shields).

PDF NOI-9 Establish an electric connection to the site to avoid the use of diesel- and gas-powered generators, if feasible.

PDF NOI-10 Locate staging area, generators, and stationary construction equipment as far from the adjacent residential homes as feasible.

PDF NOI-11 Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? Less than Significant. Noise impacts can occur from construction operations and long-term operations of a project, which for residential consists of vehicle traffic noise, and stationary sources, such as air conditioning noise. Potential noise impacts from these sources were analyzed in the report, *901 E. Katella Avenue In-Fill Residential Development Noise Impact Study, City of Orange, California*, prepared by RK Engineering Group, Inc., dated September 5, 2023, and included in **Appendix I**.

While construction noise levels are exempt from the City's noise standards, construction noise levels were calculated for the different phases of construction, including demolition, site preparation, grading, building construction, paving, and architectural coating. The construction levels were measured against the Federal Transportation Administration General Assessment Construction Noise Criteria.

Noise levels for each stage of construction are shown in **Table 11** below.

Table 11. Construction Noise Levels at Neighboring Properties

Stage	Equipment	Combined Noise Level (dBA)
Demolition	Concrete saw, rubber tired dozers, tractors, loaders, backhoes	85.2
Site Preparation	Graders, scrapers, tractors, loaders, backhoes	83.0
Grading	tractors, loaders, backhoes, graders, rubber tired dozers	83.8
Bldg Const.	Cranes, forklifts, gen sets, tractors, welders	81.9
Paving	tractors, loaders, backhoes, concrete mixers, pavers, rollers	82.0
Arch Coating	Air compressors	71.7
Worst case Construction Phase Noise Level – Leq (dBA)		85.2
FDA Daytime General Assessment Construction Noise Criteria – Leq (dBA)		90.0

Source: *Transit Noise and Vibration Impact Assessment Manual, Section 7 Noise and Vibration during Construction,* by the Federal Transit Administration

As shown in **Table 11**, all of the construction operations remain below the 90 dBA threshold of significance. This construction analysis assumes implementation of the Project Design Features and compliance with the City's noise ordinance. No significant impacts have been identified.

Operational noise impacts were analyzed by combining equipment noise from HVAC equipment, road noise from additional vehicle trips and ambient conditions to determine cumulative noise impacts from the operation of the proposed Project. **Tables 12 and 13** below summarize the results for daytime and nighttime, respectively.

Table 12. Daytime Cumulative Noise Impacts

Receiver Number	Receiver Location	Ambient (dBA)	Project Noise (dBA)	Cumulative (dBA)	Increase over Ambient (dBA)
R1	Northwest	60.2	35.1	60.2	0.1
R2	North	56.0	44.5	56.3	0.3
R3	Northeast	56.0	36.3	56.0	0.4

Source: *Noise Study Report*, RK Engineering, Table 12

The City of Orange daytime noise level standard (Leq) is 55 dBA. The noise generated by the Project would not exceed 55 dBA. Furthermore, a significant impact would occur where there is an existing ambient noise level of less than 65 dBA and a project related permanent increase in ambient noise levels of 5 dBA CNEL or greater. The largest increase is 0.4 dBA, which is less than the 5dBA threshold and impacts would be less than significant.

Table 13. Nighttime Cumulative Noise Impacts

Receiver Number	Receiver Location	Ambient (dBA)	Project Noise (dBA)	Cumulative (dBA)	Increase over Ambient (dBA)
R1	Northwest	50.2	34.8	50.3	0.1
R2	North	46.0	44.5	48.3	2.3
R3	Northeast	46.0	36.2	46.4	0.4

Source: *Noise Study Report*, RK Engineering, Table 13

The City of Orange nighttime noise level standard (Leq) is 45 dBA. The noise generated by the Project would not exceed 45 dBA. Furthermore, a significant impact would occur where there is an existing ambient noise level of less than 65 dBA and a project related permanent increase in ambient noise levels of 5 dBA CNEL or greater. The largest increase is 2.3 dBA, which is less than the 5dBA threshold and impacts would be less than significant.

Noise increases of 3 dBA are generally the limits of detection by the human ear. Less than 3 dBA increases in noise levels are not perceptible by humans. Therefore, 3 dBA is often used to determine if changes in noise are audible. The largest increase in noise over ambient conditions during both the daytime and nighttime is 2.3 dBA, well below the audible limit. Therefore, cumulative noise level increases from the proposed Project would not be audible and therefore, less than significant.

Lastly, the proposed Project is consistent with the noise policies and land use compatibility standards contained in the City of Orange General Plan. The common pocket park located along the northern property line would remain below the 65 dBA CNEL land use compatibility

designation and ambient noise conditions would not impact interior noise levels of the proposed Project or surrounding sensitive receptors. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Generation of excessive groundborne vibration or groundborne noise levels? Less than Significant. The proposed grading phase of construction is expected to generate the highest vibration levels of the three construction stages referenced in Table 13, as it includes the use of excavation and grading equipment. The evaluation of an impact's significance can be determined by reviewing both the likelihood of annoyance to individuals as well as the potential for damage to existing structures. The construction vibration assessment utilizes the referenced vibration levels and methodology set forth within the Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, September 2018.

According to the Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, September 2018, the appropriate threshold for damage to modern residential structures is a PPV of 0.5 inches/second. Annoyance is assessed based on levels of perception, with a PPV of 0.01 being considered "barely perceptible," 0.04 inches/second as "distinctly perceptible," 0.1 inches/second as "strongly perceptible," and 0.4 inches/second as "severe."

The nearest location of grading equipment to occupied residences is approximately 60 feet. At this distance, the PPV from a large bulldozer would be approximately 0.034 inches/second; from a vibratory roller would be approximately 0.080 inches/second; and from loaded trucks would be approximately 0.029 inches/second. This level of vibration falls below the building damage PPV criteria of 0.5 inches/second. In terms of annoyance, the impact would be "barely perceptible" to "distinctly perceptible." Since construction vibration would not cause damage to off-site buildings and the majority of the grading would be barely perceptible to off-site receivers, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? No Impact. The Project site is not located within an airport land use plan, nor within two miles of a private airstrip or public airport. The closest airport is John Wayne Airport, located in Santa Ana, approximately 9 miles from the Project site. No impact would occur.

Significance Determination: No Impact
Mitigation Measures: None
Significance Determination After Mitigation: No Impact

Sources: *901 E. Katella Avenue In-Fill Residential Development Noise Impact Study, City of Orange, California, prepared by RK Engineering Group, Inc., dated September 5, 2023, and included in Appendix I; City of Orange General Plan; City of Orange Municipal Code; and Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, September 2018.*

5.14 Population and Housing

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
POPULATION AND HOUSING. 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?	☐	☐	☒	☐

Impact Analysis

The American Community Survey, prepared by the U.S. Census Bureau, provides demographic data for cities, such as Orange. The Census defines a "household" as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing living quarters. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households.

The American Community Survey estimated that in 2022 the City of Orange had 43,421 households, an average household size of 3.03 persons per household, and a total population of 136,178 persons[2].

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)? Less than Significant. The proposed Project would generate growth beyond that planned in the City's General Plan due to the conversion of commercial use to residential use. However, the proposed Project would not indirectly encourage population growth in other areas of the City.

The proposed Project does not include any infrastructure that could indirectly cause growth in other portions of the City. The proposed Project is located on an already developed site and bordered on two sides by existing roadways and by existing residential and commercial development on the other two sides of the Project site. The proposed Project would connect to existing water and sewer service within surrounding streets. The domestic water main along the Project frontage of E. Katella and Cambridge Street will be upgraded from a 6-inch line to an 8-inch line. This upgrade is necessary to serve the existing plus project condition and does not constitute a growth-inducing upgrade. Therefore, the proposed Project does not include any infrastructure, such as roadways, water, sewer or other facilities, sized beyond what is necessary to serve only the proposed Project, therefore, no growth-inducing impacts would occur.

[2] The *City of Orange 2021-2029 Housing Element Update* included data from the 2019 American Community Survey, which shows the City with 43,075 households and an average household size of 3.18. The analysis in this section relies on the 2022 American Community Survey data, which is slightly different than the data from 2019. The difference in data does not change the analysis or conclusions presented in this section.

At 3.03 persons per household, the additional 49 residential units would generate approximately 148 additional residents for the City that would exceed General Plan projections. The current population of Orange is approximately 136,178 residents. The addition of 148 residents above the General Plan projections represents approximately 0.0011% of the current population. A 1/10 of 1% increase is not considered a substantial unplanned population increase and the very small population increase would not cause impacts to public services.

Furthermore, this IS/MND has analyzed the additional 49 dwelling units in its analysis of the operational topics that are sensitive to density and the number of dwelling units, such as air quality, greenhouse gas, noise, energy, population and housing, public services, traffic, and utilities. This IS/MND has found for each of those environmental topics all impacts would be either less than significant or can be mitigated to less than significant. Therefore, potential impacts associated with growth beyond General Plan projections would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? Less than Significant. The Project site currently contains an abandoned commercial development that would be impacted by the Project. No existing residences would be displaced. Therefore, impacts associated with the loss of existing residential units and displacement of people would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *City of Orange General Plan 2021-2029 Housing Element Update; and American Community Survey prepared by the U.S. Census Bureau American Community Survey (ACS) | Department of Finance.*

5.15 Public Service

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES.				
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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Impact Analysis

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: Less than Significant.

Fire Protection. The proposed Project site is served by the City of Orange Fire Department. Orange's Fire Department provides fire, paramedic, and ambulance services. Paramedic teams are located at eight stations, of which three also provide ambulance service with an average response time of 4 minutes, 47 seconds; and average transport unit response times of 5 minutes, 29 seconds. The Fire Department employs fire fighters who are also trained in paramedic techniques.

The closest fire station to the proposed Project site is Station #3 located at 1910 N. Shaffer Street, approximately 0.9 miles from the Project site. The next closest station is Station #2 located at 2900 E. Collins Avenue, approximately 1.75 miles from the Project site.

Orange Fire previously served the approximately 20,000 square foot commercial use and wireless communication facility and continues to respond to service calls to the abandoned building. Redevelopment of the property would not change the City's ability to continue to provide service. The additional 49 residential units and approximately 148 residents would change the demands on the Fire Department from commercial (and now abandoned commercial) to residential. Through

the development review process, Orange Fire has reviewed the proposed Project for site access, turn-arounds, fire hose pull lengths, fire hydrant placement, etc. and determined the Project meets Fire Department requirements. Orange Fire also determined that the change from commercial to residential service of 49 residential units would cause an incremental increase in demand on Fire Department resources, however that incremental demand represents such a small fraction of the overall service area that Orange Fire can serve the proposed Project without any significant reduction in level or service, response times, or the need for additional equipment or personnel.

Therefore, impacts would be less than significant.

Police Protection. The City of Orange Police Department currently serves the Proposed Project site. The City's Police Station Headquarters are located at 1107 N. Batavia Street, approximately 1.2 miles west of the Project site. However, police officers are routinely on patrol throughout the City, therefore, response times can vary.

The Project site is currently being served by the Orange Police Department and the redevelopment of the property would not change the City's ability to continue to provide service. The additional 49 residential units and 148 residents above General Plan projections would place additional demands on the Police Department not previously planned. Using design strategies and added security measures from various stakeholders could help reduce the number of times the police department responds to the proposed project. To ensure adequate services are provided and to minimize the demands on police services, security and design strategies which employ defensible space concepts shall be utilized throughout the formation of development and construction plans. These measures incorporate the concepts of Crime Prevention through Environmental Design (CPTED), which involves the placement, and orientation of structures, access and visibility of common areas, placement of doors, windows, addressing, lighting and landscaping. CPTED promotes public safety, physical security and allows citizens the ability to monitor activity. In addition, the project shall comply with the requirements established in Chapter 15.52 of the Orange Municipal Code (Building Security Ordinance #6-18). Conditions of approval related to CPTED and the Orange Building Security Standards will be included on the Project. Therefore, impacts would be less than significant.

Schools. The Project site falls within the boundaries of the Orange Unified School District (OUSD). OUSD provides three (3) preschools, 29 elementary schools, 7 middle schools, and 6 high schools. Students from the proposed Project would likely attend California Elementary School for grades TK-5, Yorba Middle School for grades 6-8, and Villa Park High School for grades 9-12.

The additional 49 residential units and 148 residents above General Plan projections would place additional demands on the public school system not previously planned. However, the additional number of students generated by the proposed Project would be a small fraction of the overall student population of the school district.

In accordance with standard conditions of approval, the Project Applicant would be required to pay development impact fees to both OUSD residential development per Senate Bill (SB) 50. The

fees would be collected by the school districts at the time building permits are issued. As stated in Government Code Section 65995(h):

> *The payment or satisfaction of a fee, charge, or other requirement levied or imposed … are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization …on the provision of adequate school facilities.*

Payment of these fees would offset impacts from the increased demand for school services associated with the proposed Project by providing an adequate financial base to construct and equip new and existing schools as needed. Therefore, OUSD would be able to provide adequate school facilities for the projected student residents of the proposed Project, and payment of development impact fees would ensure that impacts would be less than significant.

Parks. The proposed Project would add new residents to the City who would increase the demand for park facilities. The new proposed residential units would exceed the City's General Plan projections, resulting in an additional 49 dwelling units and approximately 148 new residents. This unplanned growth in population represents approximately 0.0011% of the City's overall population. The unplanned growth that would exceed General Plan projections represents a very small fraction of the overall City population and therefore, demand on park facilities.

According to the City of Orange General Plan Natural Resources Element the City's park objective is to reach 3 acres per 1,000 residents. As stated on Page NR-45,

> *To support these objectives, the City will require dedication of parkland at a rate of 3 acres per 1,000 anticipated residents or payment of in-lieu fees for new residential projects. Payment of in-lieu fees constitutes sufficient mitigation for parks impacts under California law, and new development projects cannot be required to directly mitigate existing parkland deficiencies. However, the City will utilize fees collected to the fullest extent possible to improve current park facilities and to acquire additional lands for the construction of new parks.*

Therefore, payment of the park fees offsets impacts from additional demand placed on park facilities; therefore, impacts would be less than significant.

Other Public Facilities. The proposed Project would place additional demands on other public facilities. These facilities range from the City's library to streets, storm drains, and other public facilities such as City Hall, etc. When a residential development project is newly constructed in an established city, often that project would rely on, and impact, established infrastructure. In those situations, the impacts would be often offset by payment of development impact fees. The City of Orange collects as development impact fees the Transportation System Improvement Program Fee, Park Infill Fee, Fire Protection Facility Fee, Police Facility Development Fee and Library Facilities Development Fee.

Payment of the fees, which are a condition of approval, would reduce impacts on public services to less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *City of Orange General Plan Public Safety Element and Natural Resources Element; and Annual Financial Reports for development impact fees for Fiscal Year 2021-2022.*

5.16 Recreation

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION. Would the project:				
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?	☐	☐	☒	☐

Impact Analysis

Existing public park facilities in the vicinity of the proposed Project include Schaffer Park, approximately 0.95 miles northwest of the Project site. The City also has a joint-use agreement with the Orange Unified School District for park use of school facilities outside of school hours. The California Elementary School and Yorba Middle School campuses are approximately 0.3 miles south of the Project site.

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. The proposed Project would add new residents to the City who would increase the demand for park facilities. The new proposed residential units would exceed the City's General Plan projections, resulting in an additional 49 dwelling units and approximately 148 new residents. This unplanned growth in population represents approximately 0.0011% of the City's overall population. The unplanned growth that would exceed General Plan projections represents a very small fraction of the overall City population and therefore, demand on park facilities.

According to the City of Orange General Plan Natural Resources Element the City's park objective is to reach 3 acres per 1,000 residents. As stated on Page NR-45,

> *To support these objectives, the City will require dedication of parkland at a rate of 3 acres per 1,000 anticipated residents or payment of in-lieu fees for new residential projects. Payment of in-lieu fees constitutes sufficient mitigation for parks impacts under California law, and new development projects cannot be required to directly mitigate existing parkland deficiencies. However, the City will utilize fees collected to the fullest extent possible to improve current park facilities and to acquire additional lands for the construction of new parks.*

Therefore, payment of the park fees offsets impacts from additional demand placed on park facilities; therefore, impacts would be less than significant.

Significance Determination: Less than Significant

Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? Less than Significant. The proposed Project is not of sufficient size to require, and does not propose to construct new park facilities, or expand existing park facilities, located outside of the Project site. As described in a) above, the proposed Project would pay park fees in accordance with the City of Orange Municipal Code and payment of those fees would reduce impacts to less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *City of Orange Municipal Code; and City of Orange General Plan Natural Resources Element.*

5.17 Transportation/Traffic

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
TRANSPORTATION/TRAFFIC. 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?	☐	☐	☒	☐

Impact Analysis

On September 27, 2013, Senate Bill (SB) 743 was signed into law. The legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled and thereby contribute to the reduction of greenhouse gas emissions, as required by the California Global Warming Solutions Act of 2006 (Assembly Bill 32).

SB 743 started a process that fundamentally changes transportation impact analysis as part of CEQA compliance. Changes include the elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts. As part of the new CEQA Guidelines, the new criteria were designed to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. The Office of Planning and Research (OPR) developed alternative metrics and thresholds based on Vehicle Miles Traveled (VMT). The guidelines were certified by the Secretary of the Natural Resources Agency in December 2018, and automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, could not be considered a significant impact on the environment.

The City of Orange *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (TIAG)* were adopted in July 2020. This document sets out the methodology for conducting a Transportation Study and a CEQA VMT (Vehicle Miles Traveled) analysis.

The Orange General Plan includes LOS policy standards for intersections within the City. Because General Plan consistency is often analyzed pursuant to CEQA, and consistency with LOS standards is not a determination of a significant impact, projects should be analyzed to determine if consistency with General Plan LOS standards would lead to the construction of traffic

improvements, the construction of which would result in an impact to the environment. This is consistent with the following guidance from the Office of Planning and Research.

> *"Even if a general plan contains an LOS standard and a project is found to exceed that standard, that conflict should not be analyzed under CEQA. CEQA is focused on planning conflicts that lead to environmental impacts. (The Highway 68 Coalition v. County of Monterey (2017) 14 Cal.App.5th 883; see, e.g., Appendix G, IX(b) [asking whether the project will "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?"].) Auto delay, on its own, is no longer an environmental impact under CEQA. (See Pub. Resources Code, § 21099(b)(2).)"*

While VMT is the preferred quantitative metric for assessing potentially significant transportation impacts under CEQA, it should be noted that SB 743 does not prevent a city or county from using metrics such as LOS as part of the application of local general plan policies, municipal and zoning codes, conditions of approval, or any other planning requirements through a city's planning approval process; cities can still ensure adequate operation of the transportation system in terms of transportation congestion measures related to vehicular delay and roadway capacity. As such, the City continues to require congestion-related transportation analysis and project changes to LOS at an intersection(s) that result in a potential safety impact or hazardous condition should also be analyzed pursuant to CEQA.

The TIAG includes screening criteria for both LOS and VMT analyses. For LOS, a project that meets any of the criteria shall prepare a Transportation Impact Analysis (TIA).

- When either the AM or PM peak hour trip generation is expected to exceed 100 vehicle trips from the proposed development.

- Projects on the Arterial Highway System which generate 1,600 Average Daily Trips (ADT).

- Projects that will add 51 or more trips during either the AM or PM peak hours to any intersection.

- Any project where variations from the standards and guidelines provided in this manual are being proposed.

- When determined by the City Traffic Engineer that existing or proposed traffic conditions in the project vicinity have unique characteristics that warrant evaluation.

For VMT, a VMT assessment is required for projects that do not satisfy one of the identified project screening criteria:

- Transit Priority Areas Screening
- Low VMT-generating Areas Screening
- Project Type Screening

- Certain Land uses
- Projects generating less than 110 daily trips

Transportation impacts, both VMT and LOS, have been analyzed in the reports *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Vehicle Miles Traveled (VMT) Analysis, City of Orange, CA*, prepared by Linscott, Law, & Greenspan, dated October 14, 2022 and included in **Appendix J,** *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Trip Generation Analysis, City of Orange, CA*, prepared by Linscott, Law, & Greenspan, dated October 14, 2022 and included in **Appendix K**, and *Site Distance Analysis for the 901 E. Katella Avenue Residential Project, Orange, CA*, prepared by Linscott, Law, & Greenspan, dated July 22, 2022 and included in **Appendix L.**

As described in detail in Table 2 of the *Trip Generation Analysis*, the proposed Project would have a net trip generation of 353 average daily trips (ADT), with 24 trips in the AM Peak Hour and 28 trips in the PM Peak Hour. Since the proposed Project would generate less than 51 peak hour trips, the Project is screened from further LOS analysis.

Furthermore, the Project is also screened from further VMT analysis because the Project occurs in a low VMT generating area.

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? Less than Significant. The City's General Plan Circulation and Mobility Element includes "Goal 1.0", and numerous related policies, to "Provide a safe, efficient, and comprehensive circulation system that serves local needs, meets forecasted demands, and sustains quality of life in neighborhoods." The proposed Project is consistent with that goal by providing a residential neighborhood in a location adjacent to existing roadways that facilitate both automobile and pedestrian movement. The proposed Project would replace an abandoned commercial use and provide residential housing within close proximity to commercial uses, facilitating pedestrian mobility between commercial and residential uses. The proposed Project also generates less peak hour traffic (AM = 24 trips and PM = 28 trips) than the City's screening threshold (51+ peak hour trips) and is therefore exempt from further analysis of automobile delay at intersections thereby avoiding improvements that could cause environmental impacts, as described in (c) below. Therefore, the proposed Project is consistent with the adopted plans and policies pertaining to the entire circulation system. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? Less than Significant. The City's TIAG requires a VMT analysis unless the Project meets one of three screening criteria, which include transit priority area screening, low VMT area screening, and project type screening. Furthermore, the City of Orange VMT Guidelines states that a project would result in a significant project-generated VMT impact if either of the following conditions are satisfied.

1. The baseline project-generated VMT per service population exceeds the City of Orange General Plan Buildout VMT per service population, or

2. The cumulative project-generated VMT per service population exceeds the City of Orange General Plan Buildout VMT per service population.

As document in the report *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Vehicle Miles Traveled (VMT) Analysis, City of Orange, CA*, prepared by Linscott, Law, & Greenspan, dated October 14, 2022, and included in **Appendix J**, the VMT per Service Population within the Traffic Analysis Zone (TAZ) for the Project site would be 15.4 VMT. For the same TAZ, the VMT per Service Population for the City of Orange General Plan Build Out is 31.3 VMT. Since the VMT per Service Population for the proposed Project is less than the VMT per Service Population for the City of Orange General Plan Build Out, the proposed Project is screened from further VMT analysis and the Project's impact on VMT would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? Less than Significant with Mitigation Incorporated. Driveways into the Project site currently exist from Cambridge Street and E. Katella Avenue. Those existing driveways would be used for the proposed residential Project, except the driveway along E. Katella would move farther east, away from the Cambridge/Katella intersection. No other roadway improvements would be made, or are required, by the Project.

Although existing, the Project driveway on Cambridge Street is close to the Cambridge/Katella intersection. A potential hazard could occur with cars exiting the Project site and making a left turn on to Cambridge Street. Given the potential impact, a sight distance analysis was prepared for that intersection (*Site Distance Analysis for the 901 E. Katella Avenue Residential Project, Orange, CA*, prepared by Linscott, Law, & Greenspan, dated July 22, 2022 and included in **Appendix L**). The sight distance analysis used the criteria and procedures included in the California Department of Transportation (Caltrans) State Highway Design Manual (HDM) for "Private Road Intersections." Stopping sight distance is defined in the Caltrans HDM to be the distance required by the driver of a vehicle, traveling at a given speed, to bring the vehicle to a stop after an object ½ foot high on the road becomes visible. Stopping sight distance is measured from the driver's eyes, which is assumed to be 3 ½ feet above the pavement surface, to an object ½ foot high on the road. The speed used in determining stopping sight distance is defined as the "critical speed" or 85th percentile speed which is the speed at which 85% of the vehicles are traveling at or less. The critical speed is the single most important factor in determining stopping sight distance.

Based on this methodology, both outbound left and right turns were evaluated. Only inbound left turns from Cambridge were analyzed since inbound right turns would have no potential impact. The analysis determined that sufficient sight distance exists for both outbound movements.

However, for the inbound left turn movement, the analysis determined that the sight lines could be obstructed by vehicles queued in the southbound left-turn lane and/or southbound through lane at the intersection of Cambridge Street and Katella Avenue. Therefore, a significant impact could occur as a result of creating a dangerous turning movement. **Mitigation Measure MM TRANS-1** has been included to mitigate this impact by restricting left turn movements from southbound Cambridge into the Project site.

The driveway inbound and outbound from E. Katella does not pose the same turning movement hazard. While E. Katella is an arterial roadway with substantial traffic volume, a striped center median currently exists that provides an area of refuge for vehicles making left turns into and out of properties along both sides of E. Katella. The proposed Project would rely on this center painted median to facilitate left turns into and left turns out of the Project site. Therefore, similar to the other existing properties and businesses along E. Katella Avenue, access from E. Katella to and from the Project site is not considered a hazardous condition. No access restrictions or mitigation measures would be required.

No other roadway improvements are required by the proposed Project. The proposed Project generates less peak hour traffic (AM = 24 trips and PM = 28 trips) than the City's screening threshold (51+ peak hour trips) and is therefore exempt from further analysis of automobile delay at intersections thereby avoiding improvements that could cause environmental impacts. Therefore, the proposed Project does not cause any substantial changes to the operation of surrounding intersections such that the intersections would not perform properly, or improvements would be necessary, and no new hazardous conditions would be created.

With implementation of Mitigation Measure MM TRANS-1 impacts would be reduced to less than significant.

Significance Determination: Potentially Significant
Mitigation Measures: Implement MM TRANS-1.

> **Mitigation Measure MM TRANS-1:** The Project Applicant shall install striping modifications or signage to prohibit the southbound left turn movement from Cambridge Street into the Project.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated

d) Result in inadequate emergency access? Less than Significant. The Project site is bordered by Cambridge Street and E. Katella Avenue and surrounding residential and commercial development. According to the City's General Plan Public Safety Element, Figure PS-4, Generalized Evacuation Corridors, the closest emergency evacuation routes to the Project site include E. Katella Avenue, adjacent to the Project site, and Glassell Street, west of the Project site. These emergency access routes would remain unchanged by the proposed Project and the proposed Project would not interfere with an emergency response plan. Furthermore, during site plan review, the Orange Fire Department determined the proposed Project provides sufficient on-site emergency access. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Vehicle Miles Traveled (VMT) Analysis, City of Orange, CA, prepared by Linscott, Law, & Greenspan, dated October 14, 2022 and included in* ***Appendix J*** *; 901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Trip Generation Analysis, City of Orange, CA, prepared by Linscott, Law, & Greenspan, dated October 14, 2022 and included in* ***Appendix K;*** *City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (TIAG) dated July; and City of Orange General Plan Public Safety Element, Figure PS-4.*

5.18 Tribal Cultural Resources

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) 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	☐	☐	☒	☐
b) 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Impact Analysis

Cultural and paleontological resource assessments were prepared for the Project site. The Cultural Resources Study, *901 East Katella Avenue Project, City of Orange, Orange County California*, prepared by BFSA Environmental Services, dated September 7, 2023, is included in **Appendix C**. The Paleontological Resources Study, *Paleontological Assessment for the 901 East Katella Avenue Project*, dated September 7, 2023, by BFSA Environmental Services is included in **Appendix E**.

Pursuant to AB 52, the City provided notification of the proposed Project to the Native American Historical Commission (NAHC) and notification letters were sent to the following tribes on August 7, 2023: Gabrieleno Band of Mission Indians – Kizh Nation, Torres Martinez Desert Cahuilla Indians, San Gabriel Band of Mission Indians, and Gabrielino/Tongva Nation. The Gabrieleno Band of Mission Indians – Kizh Nation requested consultation and telephone consultation occurred with the City on August 17, 2023, which concluded consultation. The Gabrielino/Tongva Nation also requested consultation and telephone consultation occurred with the City on September 28, 2023, which concluded consultation. No other tribes requested consultation and the consultation period ended on September 28, 2023.

a) 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. The Project site was developed in the early 1970's with a commercial/office building, which was first used by Pacific Telephone Company of San Ana and later AT&T. The style of the building was influenced by International-style architecture. International style

architecture was a major world-wide architectural trend of the 1920s and 30s and reflects the formative decades of Modernism prior to World War II. (BFSA, p. 3.0-7) Consistent with CEQA Guidelines Section 15064.5, the building was assessed to determine the historical significance of the structure. The California Register of Historic Resources (CRHR) eligibility criteria were used to determine if the building is eligible for listing and thus, the building's historical significance.

To be eligible for listing on the CRHR, the resource must be found significant under one or more of the following criteria:

- CRHR Criterion 1: *It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage*.

- CRHR Criterion 2: *It is associated with the lives of persons important in our past*.

- CRHR Criterion 3: *It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values*.

- CRHR Criterion 4: *It has yielded, or may be likely to yield, information important in prehistory or history*.

The evaluation of the four CRHR criteria are presented in the Cultural Resources Study for the *901 East Katella Avenue Project, City of Orange, Orange County California*, prepared by BFSA Environmental Services, dated October 26, 2022, and included in **Appendix C.** The analysis determined the existing building is a common example of early 1970's office/commercial buildings possessing limited integrity. While influenced by the International Style architecture, the building is not a very good example and not considered architecturally important. The building is not associated with any significant events or individuals and is not likely to provide any information important to the history of the region. Therefore, the existing structure is not considered a historical resource and impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. Less than Significant with Mitigation Incorporated. Tribal consultation with the Gabrieleno Band of Mission Indians – Kizh Nation concluded on August 17, 2023, following a telephone conference call. Furthermore, consultation with the Gabrielino/Tongva Nation concluded on September 28, 2023, following a telephone conference call. The tribal consultation concluded with a request for the City to impose its standard tribal cultural resource mitigation measures on the proposed Project given the potential to discover tribal cultural resources. No other

tribes requested consultation and the consultation period ended on September 28, 2023. Mitigation Measures MM TRC-1 through MM TRC-3 shall be implemented.

Implementation of **Mitigation Measures MM TRC-1 through MM TRC-3** would reduce impacts to tribal cultural resources to less than significant.

Significance Determination: Potentially Significant Impact
Mitigation Measures: Implement MM TRC-1 through MM TRC - 3.

Mitigation Measure MM TRC-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation and the Gabrielino/Tongva Nation. The monitors 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 agreements with Gabrieleño Band of Mission Indians – Kizh Nation and Gabrielino/Tongva Nation 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 monitors 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 Tribes.
D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh and Gabrielino/Tongva Nation 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 project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh and Gabrielino/Tongva Nation to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh and Gabrielino/Tongva Nation TCRs.

Mitigation Measure MM TRC-2: **Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)**

A. 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.

Mitigation Measure MM TRC-3: **Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects**

A. Native American human remains are defined in PRC 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 are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 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. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Significance Determination After Mitigation: Less than Significant with Mitigation Incorporated

Sources: *901 East Katella Avenue Project, City of Orange, Orange County California*, prepared by BFSA Environmental Services, dated September 7, 2023, (Appendix C); and *Paleontological Assessment for the 901 East Katella Avenue Project*, dated October 25, 2022, by BFSA Environmental Services (Appendix E).

5.19 Utilities and Service Systems

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Impact Analysis

The proposed Project would be served by the City of Orange water and sewer. A Will Serve letter for domestic water service is included in **Appendix M**. A Sewer Capacity Study prepared by C&V Consulting, Inc. dated August 18, 2022, is included in **Appendix N**.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? Less than Significant. The proposed Project would connect to existing water and sewer facilities located within the adjacent streets. The domestic water main along the Project frontage of East Katella Avenue and Cambridge Street will be upgraded from a 6-inch line to an 8-inch line. Both the water and wastewater treatment systems have sufficient capacity to accommodate the proposed Project. The City issued a Will Serve letter for domestic water service on June 22, 2022, committing to serve the proposed Project.

A Sewer Capacity Study was prepared (Appendix N) to determine the potential impact of the Project on the existing sewer system. An existing 15-inch public sewer main is located with E. Katella Avenue adjacent to the Project site. Average daily flows were calculated for the existing and proposed condition, which determined the depth of the flows within the sewer main would increase by approximately 0.0013 feet (0.0156 inches) with a calculated d/D of 0.4382. Therefore,

in the proposed condition, the depth of flows within the sewer main would remain less than 50% of capacity.

Dry utilities, including electric, natural gas, and telecommunications, are also available within adjacent streets and available to serve the proposed Project. Will Serve letters for dry utilities are also included in Appendix M. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? Less than Significant. The City of Orange provides potable water to its residents and would serve the proposed Project. The City is a member agency of The Municipal Water District of Orange County (MWDOC) with five other jurisdictions, which led to annexation to the Metropolitan Water District of Southern California. The City has a number of service connection agreements with MWDOC, which allows the City to receive water from MWDOC as MWDOC receives water from Metropolitan.

The City issued a Will Serve letter for domestic water service on June 22, 2022, committing to provide water service to the proposed Project and the City's commitment to serve the proposed Project is consistent with the City's Urban Water Management Plan (UWMP), including normal, dry, and multiple dry years. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

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? Less than Significant. The Project site is served by regional trunk lines owned by the Orange County Sanitation District (OCSD). OCSD is responsible for the treatment of residential, commercial and industrial sewage in Orange. Collected effluent is treated at Reclamation Plant No. 1 in Fountain Valley or Treatment Plant No. 2 in Huntington Beach.

To respond to the increased need for sewage treatment in Orange County, OCSD needs to replace aging regional collection and treatment infrastructure and build additional secondary treatment facilities. A portion of the sewage fee charged to developers in the City of Orange will be paid to the OCSD for improvements of regional facilities, which are currently strained by the County's rapidly growing population. A Capital Facilities Capacity Charge, designed to fund improvements in the efficiency and effectiveness of OCSD operations, is applied to cities and developers for new residential, commercial, or industrial development and/or expansion of existing facilities.

The City of Orange completed a Sewer Master Plan Update in 2003. In order to improve the reliability and efficiency of the sewer system, the City plans to replace older sewer lines. The new

lines will maintain, and in some cases increase, the City's sewer line capacity, and provide adequate sewer collection for the future.

Therefore, while the proposed Project would increase wastewater demand, sufficient capacity exists and fee programs are in place to add future treatment capacity. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

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? Less than Significant. The City of Orange contracts with CR&R for waste and recycling services. CR&R and the City have an extensive program designed to recycle trash consistent with state regulations. The California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The City of Orange achieves waste reduction through resident curbside recycling, which includes separate carts for refuse, recyclables, and green waste.

The State of California has set an ambitious goal of 75% recycling, composting or source reduction of solid waste by 2020. The City of Orange and CR&R have launched an expanded Organics Recycling Program for residents with cart service, such as the proposed Project. This requires changes in how residents and businesses sort their organics waste. Organic waste is mainly comprised of food scraps and yard waste such as green waste, landscape, and pruning waste. It will be transported to CR&R's Regional Organics Anaerobic Recovery (ROAR) facility where technology will convert food scraps and yard waste into renewable natural gas and compost.

Each residential dwelling would be supplied with three trash carts (refuse, recyclables, and green waste). The Project's Conditions, Covenants, and Restrictions (CC&Rs) would require that each resident store trash carts in the garage or in a fenced yard area, out of sight of other residences and Association Property, until scheduled collection times. Residents are therefore responsible for separating waste into the three bins, including yard waste from the private outdoor space of each dwelling. Waste generated from the common area, which is maintained by the Association, would generally include trash and green waste. The Association's contractors, generally landscape contractors, would collect the green waste and refuse from common area (Association) property and dispose of the green waste at a ROAR or equivalent green waste recycling facility and the refuse at a landfill.

Waste that cannot be disposed of would likely be taken to one of the three landfills in Orange County: Olinda Alpha in Brea, the Frank R. Bowerman Landfill in Irvine, and the Prima Deshecha Landfill in San Juan Capistrano. The Orange County Integrated Waste Management Department (IWMD) owns and operates the landfills. The Olinda Alpha landfill has capacity until approximately 2030 and averages 7,000 tons per day (TPD). The Frank R. Bowerman Landfill has capacity until approximately 2053 and averages 8,500 TPD. The Prima Deshecha landfill has

capacity until approximately 2102. Therefore, sufficient capacity is available to serve the proposed Project. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? Less than Significant. The California Integrated Waste Management Act of 1989, also known as Assembly Bill 939 (AB 939), mandates jurisdictions to meet a diversion goal of 50 percent by the year 2000, and thereafter. Senate Bill (SB) 1383 is a bill that sets goals to reduce disposal of organic waste in landfills, including edible food. The bill's purpose is to reduce greenhouse gas emissions, such as methane, and address food insecurity in California.

The City implements programs applicable to the proposed Project that comply with these statutes. One strategy required of residents of residential communities, such as the proposed Project, is curbside separation of trash into recyclable, green waste, and solid waste. The City recently began a pilot program call Recycle From Home, which allows residents to be paid for recycling cans and bottles from their home instead of taking the bottles and cans to a redemption center. Collection bags and QR code tracking labels are provided to residents to sort aluminum cans, plastic, and glass bottles. The City also implements free disposal days, Christmas tree collection, household hazardous waste centers, used oil collection centers. Furthermore, the City's Green Building Program's requires recycling and diversion from landfills, which would apply during construction of the proposed Project.

Therefore, the proposed Project would not conflict with federal, state, and local ordinances in place designed to reduce solid waste generation. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *City of Orange Public Works, Residential Trash, Recycling, and Organics | City of Orange, CA; City of Orange General Plan EIR; City of Orange General Plan Infrastructure Element; Orange County Integrated Waste Management, About OC Waste & Recycling | OC Waste & Recycling (oclandfills.com); and CalRecycle, New Statewide Mandatory Organic Waste Collection - CalRecycle Home Page.*

5.20 Wildfire

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
WILDFIRE. 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?	☐	☐	☒	☐

Impact Analysis

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? Less than Significant. The Proposed Project site is not located in or adjacent to land classified as very high fire hazard severity zones. Neither the City of Orange General Plan Public Safety Element, Figure PS-1 nor the Cal Fire – Fire and Resource Assessment Program list the Project site within a Very High Fire Hazard Severity Zone. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

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? Less than Significant. The proposed Project would not exacerbate fire risks. The proposed Project is located within an urban area surrounded by residential and commercial development, and arterial roadways. All new structures would comply with current building standards, including fire sprinklers. Therefore, the proposed Project would not exacerbate fire risk to surrounding properties or to the new residents of the Project site. Fires in the general Orange and County of Orange areas could expose occupants to smoke during a wildfire. This risk is temporary and would not be exacerbated by the proposed Project. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

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? Less than Significant. The Project site is not located in or adjacent to land classified as very high fire hazard severity zones. Neither the City of Orange General Plan Public Safety Element, PS-1 nor the Cal Fire – Fire and Resource Assessment Program list the Project site within a Very High Fire Hazard Severity Zone. No fuel modification, fire breaks, etc. are required of the proposed Project. Therefore, impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? Less than Significant. The Project site currently consists of a nearly flat area. Furthermore, the Project site is surrounded by existing streets and residential and commercial development approximately the same elevation as the Project site. The Project site is not located adjacent to any large hillsides that could cause flooding, mudflows, landslides, or significant erosion after a fire. Impacts would be less than significant.

Significance Determination: Less than Significant
Mitigation Measures: None
Significance Determination After Mitigation: Less than Significant

Sources: *City of Orange General Plan Public Safety Element, Figure PS-1; and Cal Fire – Fire and Resource Assessment Program, Fire Hazard Severity Zones (ca.gov).*

5.21 Mandatory Findings of Significance

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☐	☒	☐	☐

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. As discussed in the Biological Resources Section, the proposed Project has no potential to impact special status species or habitat supporting special status species. The Project would however potentially result in significant impacts to biological resources from impacts to nesting birds. As such, the proposed Project would incorporate **Mitigation Measure MM BIO-1**, to reduce the potential impact to nesting birds to a less than significant level. Additionally, as discussed in the Cultural Resources Section, no newly or previously recorded historic sites were identified within the Project site as a result of the records search, archival research, or the intensive-level pedestrian survey. Therefore, the proposed Project would not alter, destroy or adversely affect a historic site. However, due to the moderate sensitivity of a paleontological resource occurring onsite, the proposed Project would incorporate **Mitigation Measure PALEO-1.** Through consultation with the Native American tribes, a potential for tribal cultural resources exists on the Project site. Implementation of **Mitigation Measures MM TRC-1 through TRC-3** would reduce all cultural resource impacts to a less than significant level. Therefore, with implementation of mitigation, the proposed Project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations 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, or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant with mitigation incorporated.

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. As concluded throughout this IS/MND, the proposed Project would result in either no impact, less-than-significant impact, or a less-than-significant impact with mitigation incorporated with respect to all environmental impact areas outlined in the CEQA Guidelines Appendix G Environmental Checklist. Reasonably foreseeable projects have been incorporated into the traffic, air quality, noise, and greenhouse gas studies, all of which have shown that impacts can be reduced to less than significant. Furthermore, no significant resources, such as cultural, geotechnical, or biotic, exist on the Project site and therefore no cumulative impact would occur. The proposed Project would detain and treat storm runoff from the proposed Project on-site, therefore no cumulative impacts would occur. For all resource areas analyzed, the proposed Project's individual-level impacts would be at less-than-significant levels, which, in turn, would reduce the potential for these impacts to be considered part of any cumulative impact. Therefore, the proposed Project would not result in individually limited but cumulatively considerable impacts. Impacts would be less than significant with mitigation incorporated.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? Less than Significant with Mitigation Incorporated. As evaluated throughout this document, the proposed Project would have no impact, less-than-significant impact, or a less-than-significant with mitigation incorporated with respect to all environmental impact areas. Therefore, the proposed Project would not directly or indirectly cause substantial adverse effects on human beings. Impacts would be less than significant with mitigation incorporated.

SECTION 6.0 MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION NUMBER (1882-22)

PROJECT NAME: 901 East Katella Avenue Residential Development Project

PROJECT LOCATION: 901 East Katella Avenue, City of Orange, County of Orange, California 92867
PROJECT DESCRIPTION: The Project proposes to demolish all on site improvements and construct 49 new paired and small lot detached homes (17 paired and 15 detached) on the 2.71-acre Project site, including four open space and recreation areas and guest parking. To accommodate this proposal, a General Plan Amendment and Zone Change are requested. The General Plan Amendment would change the land use designation from General Commercial (GC) to Medium Density Residential (MDR). The Zone Change would change the zoning classification from Commercial Professional (C-P) to Multiple-Family Residential (R-3) with application of Small Lot Subdivision Development Standards (OMC 17.14.270). The proposed community would have a density of 18.1 dwelling units per acre (du/ac), approximately the midpoint of the Medium Density Residential Zone, which provides for densities of 15.1 to 24.0 dwelling unit per acre.

LEAD AGENCY: City of Orange
CONTACT PERSON/ TELEPHONE NO.: Monique Schwartz, Senior Planner/ (714) 744-7224

APPLICANT: Intracorp, SoCal-1, LLC
CONTACT PERSON/ TELEPHONE NO.: Emilie Simard / (949) 724-5923

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
Air Quality						
PDF AQ-1	The project must follow the standard SCAQMD rules and requirements with regards to fugitive dust control, which include, but are not limited to the following: 1. All active construction areas shall be watered two (2) times daily. 2. Speed on unpaved roads shall be reduced to less than 15 mph.					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	3. Any visible dirt deposition on any public roadway shall be swept or washed at the site access points within 30 minutes. 4. Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered twice daily. 5. All operations on any unpaved surface shall be suspended if winds exceed 15 mph. 6. Access points shall be washed or swept daily. 7. Construction sites shall be sandbagged for erosion control. 8. Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more). 9. Cover all trucks hauling dirt, sand, soil, or other loose materials, and maintain at least 2 feet of freeboard space in accordance with the requirements of California Vehicle Code (CVC) section 23114. 10. Use gravel aprons and track out grates at all truck exits. 11. Replace the ground cover of disturbed areas as quickly as possible.					
PDF AQ-2	All diesel construction equipment should have Tier 4 low emission "clean diesel" engines (OEM or retrofit) that include diesel oxidation					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	catalysts and diesel particulate filters that meet the latest CARB best available control technology.					
PDF AQ-3	Construction equipment should be maintained in proper tune.					
PDF AQ-4	All construction vehicles should be prohibited from excessive idling. Excessive idling is defined as five (5) minutes or longer.					
PDF AQ-5	Minimize the simultaneous operation of multiple construction equipment units, to the maximum extent feasible.					
PDF AQ-6	The use of heavy construction equipment and earthmoving activity should be suspended during Air Alerts when the Air Quality Index reaches the “Unhealthy” level.					
PDF AQ-7	Establish an electricity supply to the construction site and use electric powered equipment instead of diesel-powered equipment or generators, where feasible.					
PDF AQ-8	Establish staging areas for the construction equipment that are as far from adjacent residential homes, as feasible.					
PDF AQ-9	Use haul trucks with on-road engines instead of off-road engines for on-site hauling.					
PDF AQ-10	The project must comply with the mandatory requirements of the California Building Standards Code, Title 24, Part 6 (Energy Code)					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	and Part 11 (CALGreen), including, but not limited to: • Install low-flow fixtures and toilets, water-efficient irrigation systems, drought tolerant/native landscaping, and reduce the amount of turf. • Provide the necessary infrastructure to support electric vehicle charging. • Provide solar installations (or other sources of on-site renewable energy) per the prescribed Energy Design Ratings.					
PDF AQ-11	Participate in the local waste management recycling and composting programs.					
Biological Resources						
MM BIO-1	Prior to ground disturbances that would impact potentially suitable nesting habitat for avian species, the project applicant shall adhere to the following: 1. Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to the extent feasible to avoid potential impacts to nesting birds and/or ground nesters.	Prior to Ground Disturbances – Applicant/ Construction Contractor	Prior to Ground Disturbances – City			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	2. Any construction activities that occur during typical nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat, on-site and within 300-feet surrounding the site (as feasible), be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement ground disturbances. If active nests are identified, the biologist would establish buffers around the vegetation (500 feet for raptors and sensitive species, 200 feet for non-raptors/non-sensitive species). All work within these buffers would be halted until the nesting effort is finished (i.e. the juveniles are surviving independent from the nest). The onsite biologist would review and verify compliance with these nesting boundaries and would verify the nesting effort has finished. Work can resume within these areas when no other active nests are found. Alternatively, a qualified biologist may determine that					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping					
Geology and Soils						
MM GEO-1	The Project Applicant shall implement the recommendations contained in the report Updated Geotechnical and Infiltration Evaluation for Proposed 49-Unit Residential Development, 901 E. Katella Avenue, City of Orange, Orange County, California, dated June 3, 2022, and prepared by GeoTek, Inc. (Appendix D) to reduce geologic hazards during implementation of the proposed Project. Included in the reports are site-specific recommendations involving such topics as, grading and earthwork, slope stability, retaining walls, seismic design, construction materials, geotechnical observation, and testing and plan reviews.	Pre ground disturbances – Applicant/ Geotechnical Engineer	Plan Check – Applicant/ City Geotechnical Engineer			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
MM GEO-2	Prior to the issuance of a grading permit, the Applicant shall prepare a final geotechnical report based on the final rough grading plans and the final geotechnical report shall incorporate all of the recommendations included in the preliminary geotechnical reports included in Appendix D. The geotechnical reports included in Appendix D have established that the site is geotechnically suitable for development and a final geotechnical report is required to ensure all construction-level geotechnical recommendations and design parameters are included on the final rough grading plans.	Prior to grading permit – Applicant/ Geotechnical Engineer	Prior to grading permit – Applicant/ City Geotechnical Engineer			
MM PALEO-1	Prior to the issuance of a grading permit, the Applicant shall prepare for City review and approval a Paleontological Mitigation Monitoring Plan, as follows: 1. Prior to initiation of any grading, drilling, and/or excavation activities, a preconstruction meeting will be held and attended by the paleontologist of record, representatives of the grading contractor and subcontractors, the project owner or developer, and a representative of the lead agency. The nature of potential	Prior to grading permit – Applicant/ Cultural Consultant	Prior to grading permit – City			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	paleontological resources shall be discussed, as well as the protocol that is to be implemented following discovery of any fossiliferous materials. 2. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Monitoring will be conducted full-time in areas of grading or excavation in undisturbed sediments of Pleistocene old alluvial fan deposits starting at a depth of five feet. The project paleontologist should have the discretion of adjusting the monitoring schedule based on any changing geological conditions observed during monitoring. 3. Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	present in the subsurface or, if present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. 4. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils are collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes are taken on the map location and stratigraphy of the site, and the site is photographed before it is vacated and the fossils are removed to a safe place. On mass grading projects, any discovered fossil site is protected by red flagging to prevent it from being overrun by earthmovers (scrapers) before salvage begins. Fossils are collected in a similar manner, with notes and photographs being taken before removing the fossils. Precise location of the site is determined with the					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	use of handheld Global Positioning System units. If the site involves a large terrestrial vertebrate, such as large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, a fossil recovery crew will excavate around the find, encase the find within a plaster and burlap jacket, and remove it after the plaster is set. For large fossils, use of the contractor's construction equipment is solicited to help remove the jacket to a safe location before it is returned to the laboratory facility for preparation. 5. Isolated fossils are collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes are taken on the map location and stratigraphy of the site, and the site is photographed before it is vacated and the fossils are removed to a safe place. 6. Particularly small invertebrate fossils typically represent multiple specimens of a limited number of organisms, and a scientifically suitable sample can be					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry-screen the sediment in the field, a concentrated sample may consist of one or two buckets of material. For vertebrate fossils, the test is usually the observed presence of small pieces of bones within the sediments. If present, multiple five-gallon buckets of sediment can be collected and returned to a separate facility to wet-screen the sediment. 7. In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology guidelines (2010:7), bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil "microvertebrates" in order to test the feasibility of the deposit to yield fossil bones and teeth. 8. In the laboratory, individual fossils are cleaned of extraneous matrix, any breaks					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	are repaired, and the specimen, if needed, is stabilized by soaking in an archivally approved acrylic hardener (e.g., a solution of acetone and Paraloid B-72). 9. Preparation of recovered specimens to a point of identification and permanent preservation (not display), including screen-washing sediments to recover small invertebrates and vertebrates. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils. 10. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (e.g., OC Parks in Santa Ana, California). The paleontological program should include a written repository agreement prior to the initiation of mitigation activities. The lead agency may select another repository if it so desires.					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	11. Preparation of a final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). The report, when submitted to and accepted by the appropriate lead agency, will signify satisfactory completion of the project program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place					
Hazards and Hazardous Materials						
MM HAZ-1	Prior to the demolition of existing structures, a survey for asbestos containing materials (ACM), lead based paint (LBP), and polychlorinated biphenyl (PCBs) shall be conducted, and any such materials shall be removed and disposed of properly by qualified certified technicians in accordance with State regulations.	Prior to and during demolition – Applicant/ Professional	Prior to and during demolition – City			
Noise						
PDF NOI-1	The project will need to comply with California Title 24 building insulation requirements for					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	exterior walls, roofs, and common separating assemblies (e.g. floor/ceiling assemblies and demising walls), which shall be reviewed by the City prior to issuance of a building permit. • Interior noise levels due to exterior sources must not exceed a community noise equivalent level (CNEL) or a day-night level (LDN) of 45 dBA, in any habitable room. • Party wall assembly designs must provide a minimum STC of 50, based on lab tests. Field tested assemblies must provide a minimum noise isolation class (NIC) of 45.					
PDF NOI-2	A "windows closed" condition is expected to be required for all residential units within the project site to meet the interior noise standard. To accommodate windows closed conditions, all units shall be equipped with adequate fresh air ventilation, per the requirements of the California Building Standards.					
PDF NOI-3	Upgraded windows and sliding glass doors with a minimum STC rating of 32 or greater are expected to be required for all units facing Cambridge Street and Katella Avenue.					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
PDF NOI-4	Deliveries, loading and unloading activities, and trash pick-up hours should be limited to daytime hours only (7 a.m. – 10 p.m.).					
PDF NOI-5	Engine idling time for all delivery vehicles and moving trucks to 5 minutes or less.					
PDF NOI-6	Construction-related noise shall take place only between the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, and 9:00 a.m. to 8:00 p.m. on Sundays and Federal holidays.					
PDF NOI-7	Provide public notifications and signage in readily visible locations along the perimeter of construction sites that indicate the dates and duration of construction activities, as well as provide a telephone number where neighbors can enquire about the construction process and register complaints to a designated construction noise disturbance coordinator.					
PDF NOI-8	All construction equipment shall be equipped with muffles and other suitable noise attenuation devices (e.g., engine shields).					
PDF NOI-9	Establish an electric connection to the site to avoid the use of diesel- and gas-powered generators, if feasible.					
PDF NOI-10	Locate staging area, generators, and stationary construction equipment as far from the adjacent residential homes as feasible.					
PDF NOI-11	Construction-related equipment, including heavy-duty equipment, motor vehicles, and					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	portable equipment, shall be turned off when not in use for more than 5 minutes.					
Transportation and Traffic						
MM TRANS-1	The Project Applicant shall install striping modifications or signage to prohibit the southbound left turn movement from Cambridge Street into the Project.	Before final approved grading/ construction plans – Applicant/City	Before final approved grading/ construction plans – City			
Tribal Cultural Resource						
MM TRC-1	A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation and the Gabrielino/Tongva Nation. The monitors 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.	Prior to Ground Disturbances – Applicant and Native American Monitor	Prior to Ground Disturbances – City and Native American Monitor			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	B. A copy of the executed monitoring agreements with Gabrieleño Band of Mission Indians – Kizh Nation and Gabrielino/Tongva Nation 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 monitors 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					

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	provided to the project applicant/lead agency upon written request to the Tribes. D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh and Gabrielino/Tongva Nation 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 project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh and Gabrielino/Tongva Nation to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh and Gabrielino/Tongva Nation TCRs.					
MM TRC-2	A. 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	During Grading – Applicant/ Cultural Monitor	During Grading – City			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	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 TRC-3	A. Native American human remains are defined in PRC 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 are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 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. Preservation in place (i.e., avoidance) is the preferred manner of treatment for	During Grading – Applicant/ Cultural Monitor	During Grading – City			

No.	Mitigation Measure	Time Frame and Responsible Party for Implementation	Time Frame and Responsible Party for Monitoring	Verification of Compliance		
				Initials	Date	Remarks
	discovered human remains and/or burial goods. E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					