ATTACHMENT A

VOLUME 1 OF 3

FINAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

ORANGE COUNTY TRANSPORTATION AUTHORITY
TRANSIT SECURITY AND OPERATIONS CENTER PROJECT

ANAHEIM, CALIFORNIA

SCH NO. 2018101071

LSA

October 2018

FINAL IS/MND CONTENTS

The Final IS/MND proposed for adoption by the Orange County Transportation Authority (OCTA) Board of Directors includes three volumes. Volume 1 consists of the IS/MND as published for public review on October 30, 2018. Volume 2 consists of the Responses to Comments document, which includes all comments received during the public review period, responses to those comments, as well as other information included as part of the Final IS/MND under consideration. Volume 3 consists of the Appendices to the IS/MND as published for public review on October 30, 2018.

Volume 1: IS/MND (as published on October 30, 2018)

Volume 2: Responses to Comments

Volume 3: IS/MND Appendices (as published on October 30, 2018)

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VOLUME 1 OF 3

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ORANGE COUNTY TRANSPORTATION AUTHORITY TRANSIT SECURITY AND OPERATIONS CENTER PROJECT

ANAHEIM, CALIFORNIA

SCH No. 2018101071

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October 2018

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LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
AST	aboveground storage tank
Basin	South Coast Air Basin
bgs	below ground surface
BMPs	best management practices
CalGreen	California Green Building Standards Code
CalEEMod	California Emissions Estimator Model
California Register	California Register of Historical Resources
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDR	Conceptual Development Review
CEQA	California Environmental Quality Act
CH_4	methane
CNDDB	California Natural Diversity Database
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalents
County	County of Orange
CVC	California Vehicle Code
cy	cubic yard(s)
dBA	A-weighted decibel
EDR	Environmental Data Resources Report
EOC	Emergency Operations Center
ESBSSA	Essential Services Buildings Seismic Safety Act of 1986
FAA	Federal Aviation Administration
FCC	Federal Communications Commission
ft	foot/feet
FTE	full time employee(s)
GFA	gross floor area
GWP	global warming potential
HFCs	hydrofluorocarbons
HHWE	Household Hazardous Waste Element
HVAC	heating, ventilation, and air conditioning

IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
lbs/day	pounds per day
L_{max}	maximum instantaneous noise level
LOS	level(s) of service
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MM	mitigation measure
MS4	Municipal Separate Storm Sewer System
MT	metric ton
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
National Register	National Register of Historic Places
NEPA	National Environmental Policy Act
NO	nitric oxide
NO_2	nitrogen dioxide
NOI	Notice of Intent
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OCSD	Orange County Sanitation District
OCTA	Orange County Transportation Authority
Pb	lead
PFCs	perfluorocarbons
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PRC	(California) Public Resources Code
PRD	Permit Registration Documents
PRIMP	Paleontological Resource Impact Mitigation Program
Proposed project	OCTA's proposed Transit Security and Operations Center
PS&E	Plans, Specifications, and Estimates
ROC	reactive organic compounds
SARWQCB	Santa Ana Regional Water Quality Control Board
SC	standard condition
SCAQMD	South Coast Air Quality Management District

SCCIC	South Central Coastal Information Center
sf	square foot/feet
SF_6	sulfur hexafluoride
SNA	John Wayne Airport
SO_2	sulfur dioxide
SO_X	sulfur oxides
SR-22	State Route 22
SR-241	State Route 241
SRA	Source Receptor Area
SRRE	Source Reduction and Recycling Element
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TMP	traffic management plan
TSOC	Transit Security and Operations Center
UPRR	Union Pacific Railroad
USACE	United States Army Corps of Engineers
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VOC	volatile organic compounds
WQMP	Water Quality Management Plan

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1.0 PROJECT DESCRIPTION

1.1 INTRODUCTION

The Orange County Transportation Authority (OCTA) is proposing to construct a new operations center for its transit and emergency security functions. The proposed Transit Security and Operations Center (TSOC) (proposed project) is planned to include a two-story facility that is approximately 30,000 square feet (sf), a roof-mounted microwave tower (not to exceed 60 feet (ft) in from ground elevation), a fueling station, electric vehicle charging stations, and dedicated parking for employees, patrol vehicles and visitors. The project site is approximately 3 acres and is located at the intersection of Lincoln Avenue and Manchester Avenue in the City of Anaheim, adjacent to the Interstate 5 (I-5)/Lincoln Avenue interchange. Refer to Figure 1 for the project location and site boundaries. OCTA owns the project site.

1.2 BACKGROUND

Currently, OCTA's core operational and security functions are centralized at the OCTA Garden Grove bus base/Annex facility (Annex) located at 11790 Cardinal Circle in the City of Garden Grove, southwest of Harbor Boulevard and the State Route 22 (SR-22 Freeway). In addition to the transit bus base operations, the following OCTA departments and functions are housed in the buildings at the Garden Grove Annex facility:

- Operations Training (Bus)
- Central Communications (Bus)
- Field Operations (Bus)
- Transit Police Services (Bus, Paratransit, and Rail)
- Emergency Operations Center (Agency-wide)
- File Storage

There is currently not enough space at the Garden Grove Annex facility for the above functions to operate efficiently, and there is no room for expansion on the site. In addition, any structural upgrades to the existing building require meeting standards set forth by the Essential Services Buildings Seismic Safety Act (ESBSSA) of 1986, as codified in California Health and Safety Code, Chapter 2, Sections 16000 through 16022. Implementation of the ESBSSA is further defined in Title 24 of the California Building Standards (Title 24). The ESBSSA requires that buildings providing essential services be capable of providing those services to the public after a disaster. It was determined that structural upgrades of existing buildings to comply with the ESBSSA and Title 24 were not feasible due to structural limitations of the buildings and the disruption of operations while upgrades are undertaken. This high-level construction standard is required because the facility houses both first responders and public evacuation response teams in the case of large-scale disasters in the County and in coordination with surrounding counties.

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Project Site Boundaries

FIGURE 1

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SOURCE: Bing (2017)

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OCTA Transit Security and Operations Center Project

Project Location and Site Boundaries

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1.3 NEEDS EVALUATION

In 2013, OCTA, completed a feasibility and planning study for a new TSOC facility that would be designed to current Essential Services Facility Standards per the latest edition of the California Building Code as well as meeting the requirements of all public agency users from OCTA and the Orange County Sheriff's Department. The proposed TSOC would generally house some of the existing facility functions at the Garden Grove Annex (described above), provide adequate space for these functions, improve efficiency of room layouts, and provide space for future functions and/or expansion. This study looked at staffing, space, and infrastructure needs at a preliminary level.

In 2015, OCTA completed a preliminary evaluation of programming and space needs in anticipation of identifying a new location and facility to house the transit and security functions currently located at the Garden Grove Annex. In that report, it was anticipated that staff would increase in the future from 47 full time employees (FTEs) to 65 FTEs and that space requirements would more than double from 12,777 sf at the Garden Grove Annex to approximately 27,000 sf.

Once those needs were identified, a site-selection screening process was completed using specific criteria. Those criteria included identifying lot sizes that were at least 1.85 acres or larger to accommodate a 27,000 sf building and house 123 parking spaces on site, at a minimum. In addition, a central location was a highly weighted criterion to ensure easy access and proximity to OCTA functions. Through this screening process, 55 sites in central Orange County were initially identified. Of those 55 sites, 20 sites were advanced for further review based on availability, cost, and development potential. Those 20 sites were comparatively evaluated based on land use impacts, site location, ownership, site layout, and security. Four final sites in Anaheim, Costa Mesa, Irvine, and Santa Ana were advanced for final evaluation. A Title VI Equity Analysis for these four final sites was conducted, in addition to more advanced screenings to select a preferred project site. The Anaheim site was deemed to be optimal based on procurement and development costs, and location.

In early 2018, OCTA updated the programming and space needs assessment to verify that the design and function of the new TSOC facility would meet OCTA's needs as well as other users. The site design was further refined to reflect all the updated programming needs for all the operations and functions that will occupy the site. These details are described further in Section 1.6.3, below.

1.4 PROJECT LOCATION

As shown in Figure 1, the regional location of the project site is in central Orange County in Anaheim. The specific project site, also shown in Figure 1, is located in the southwestern corner of the Lincoln Avenue/Manchester Avenue intersection, adjacent to the I-5/Lincoln Avenue interchange.

1.5 ENVIRONMENTAL SETTING AND EXISTING LAND USES

The project site is a partially vacant lot with three active automotive repair businesses and a tire business on site. OCTA owns the project site and will cease the leases with the existing tenants prior to project construction. OCTA is actively working to relocate these businesses off site pursuant to OCTA relocation policies per the Uniform Relocation Assistance Act (42 USC Section 4601 et seq.) These policies include: assistance with a search for a new property to re-establish the business and

assistance with moving costs and re-establishment expenses. Information about available properties, zoning requirements and typical real estate purchase and rental costs may also be provided.[1] Figure 2 shows the existing project area and surrounding land uses.

Existing land uses in the vicinity of the project site consist primarily of industrial, automotive-related businesses and transportation facilities. The eastern side of the project site surrounds an existing pest control business on three sides. There is an existing storage facility that abuts the project site to the south and an automotive salvage business that abuts the project site to the southeast. The project site is bordered by the Union Pacific Railroad (UPRR) railroad tracks to the west and Lincoln Avenue to the north.

The project site is designated General Commercial in the Anaheim General Plan and zoned General Commercial on the central part of the project site and Industrial on the eastern and western sides of the project site. Figures 3 and 4, respectively, show the General Plan and zoning for the project site.

1.6 PROJECT DESCRIPTION

1.6.1 Introduction

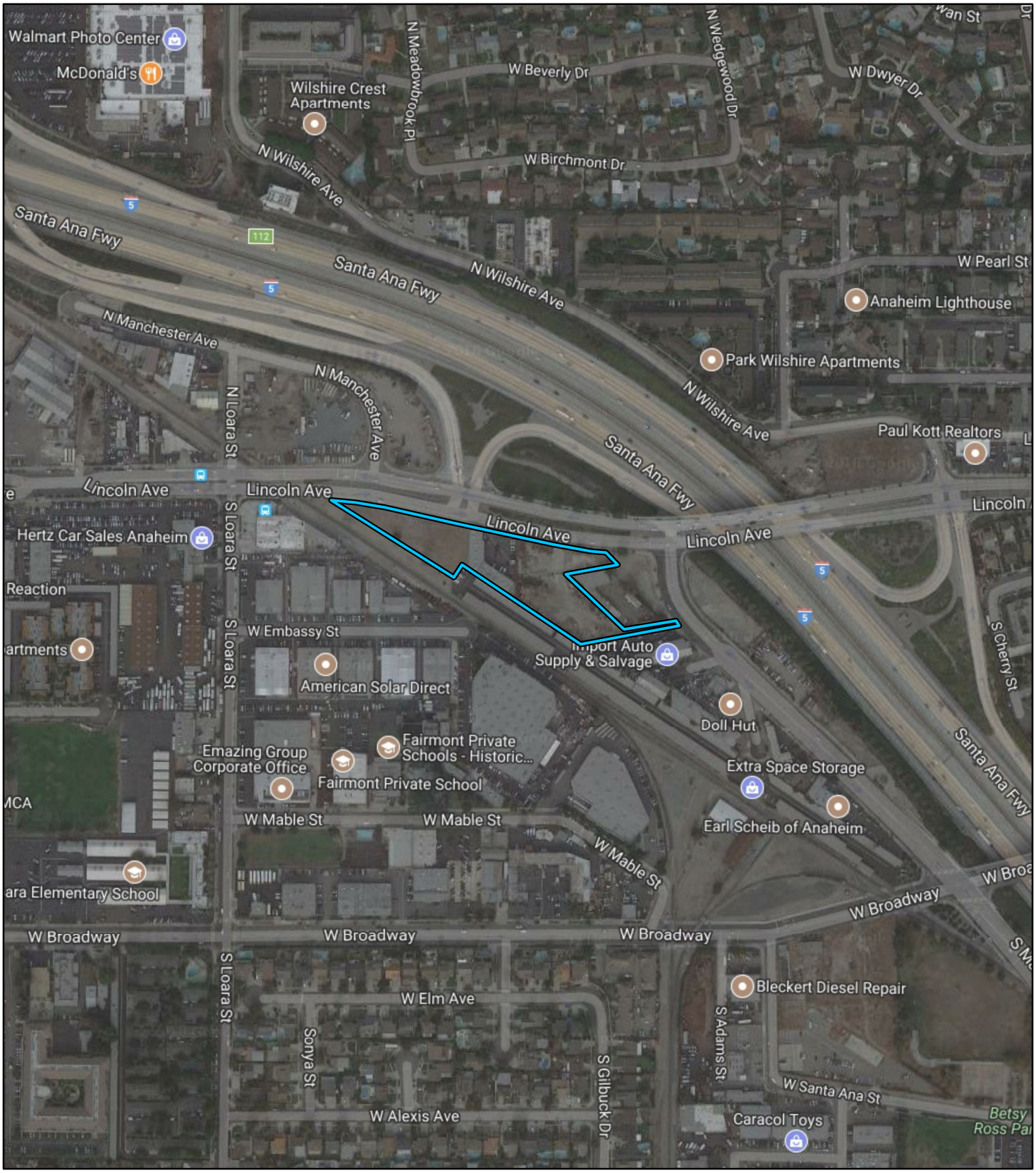
The proposed project would include the construction of new structures and new operations at the project site. In addition, the construction phase, with an estimated duration of approximately two years, would introduce construction activities on the project site. In addition, the proposed project was designed to meet the City's development standards for building design. All construction, structural, and operational components are described in detail in this section.

1.6.2 Structural Elements

As shown on Figures 5 and 6, the proposed project includes the following structural elements:

- A 30,000 sf two-story building (Figure 6 shows elevations)
- A fueling island and aboveground storage tank
- Up to 10 electrical vehicle charging stations
- Approximately 190 parking spaces, with a mixture of secured and unsecured
- A roof-mounted microwave communications tower that would not exceed 60 ft in height measured from ground elevation
- Drainage and water quality improvements (refer to the discussions in Sections 1.6.11 and 1.6.12, below).

[1] Orange County Transportation Authority (OCTA). Orange County Bridges. Summary of Relocation Benefits. Website: http://www.octa.net/uploadedFiles/OC_Bridges/Relocation% 20Businesses.pdf (accessed August 13, 2018).



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Project Location

FIGURE 2

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SOURCE: Google (2017)

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OCTA Transit Security and Operations Center Project

Surrounding Land Uses

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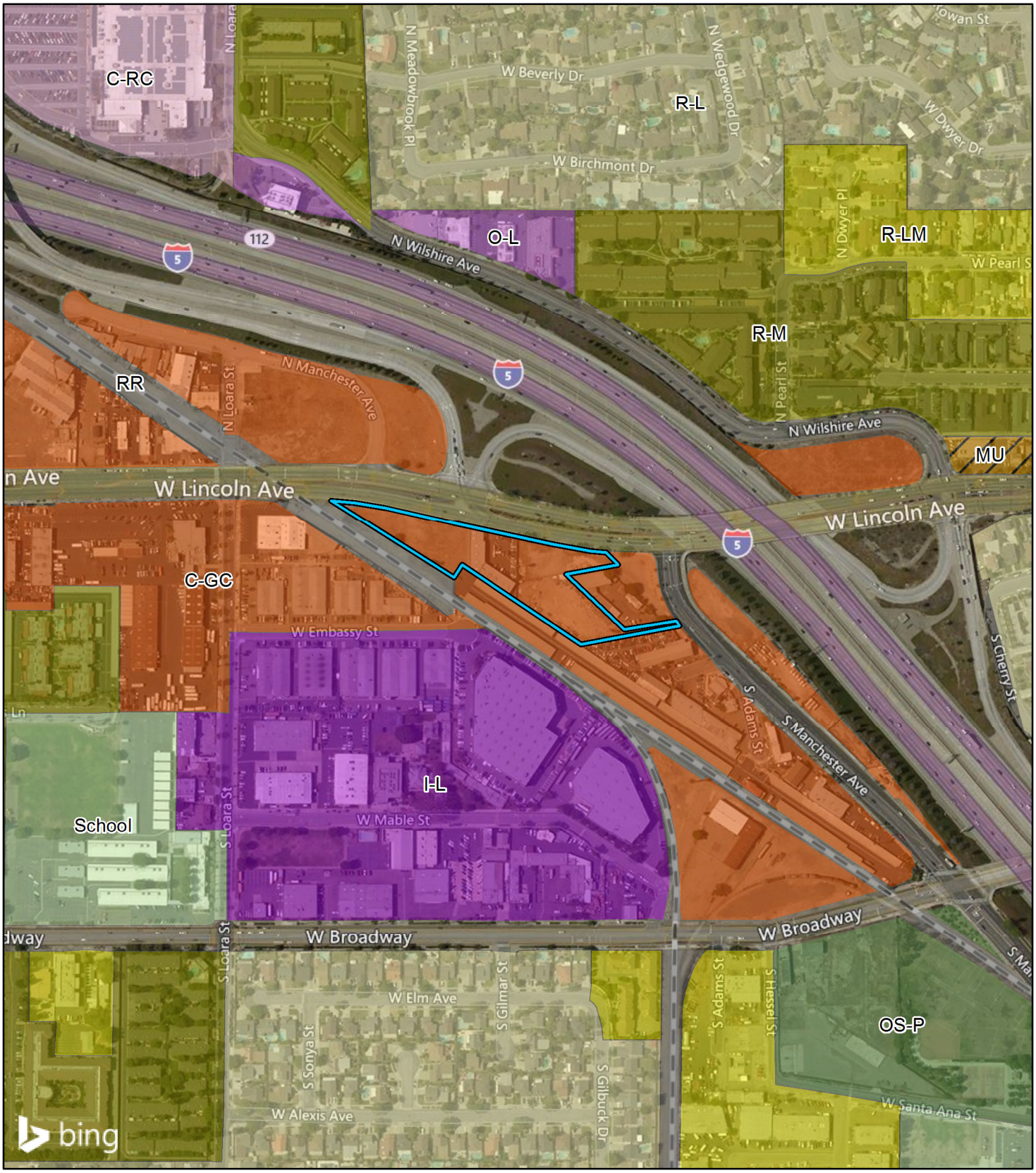

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Project Location

General Plan Land Use

Residential

- Low Density (R-L)
- Low-Medium Density (R-LM)
- Medium Density (R-M)

Commercial

- General Commercial (C-GC)
- Commercial Recreation (C-RC)

Other Land Uses

- Industrial (I-L)
- Mixed Use (MU)
- Office-Low (O-L)
- Parks (OS-P)
- Railroad (RR)
- Schools

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SOURCE: Bing (7/2014); City of Anaheim (9/2011)

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FIGURE 3

OCTA Transit Security and Operations Center Project

Anaheim

General Plan Designations

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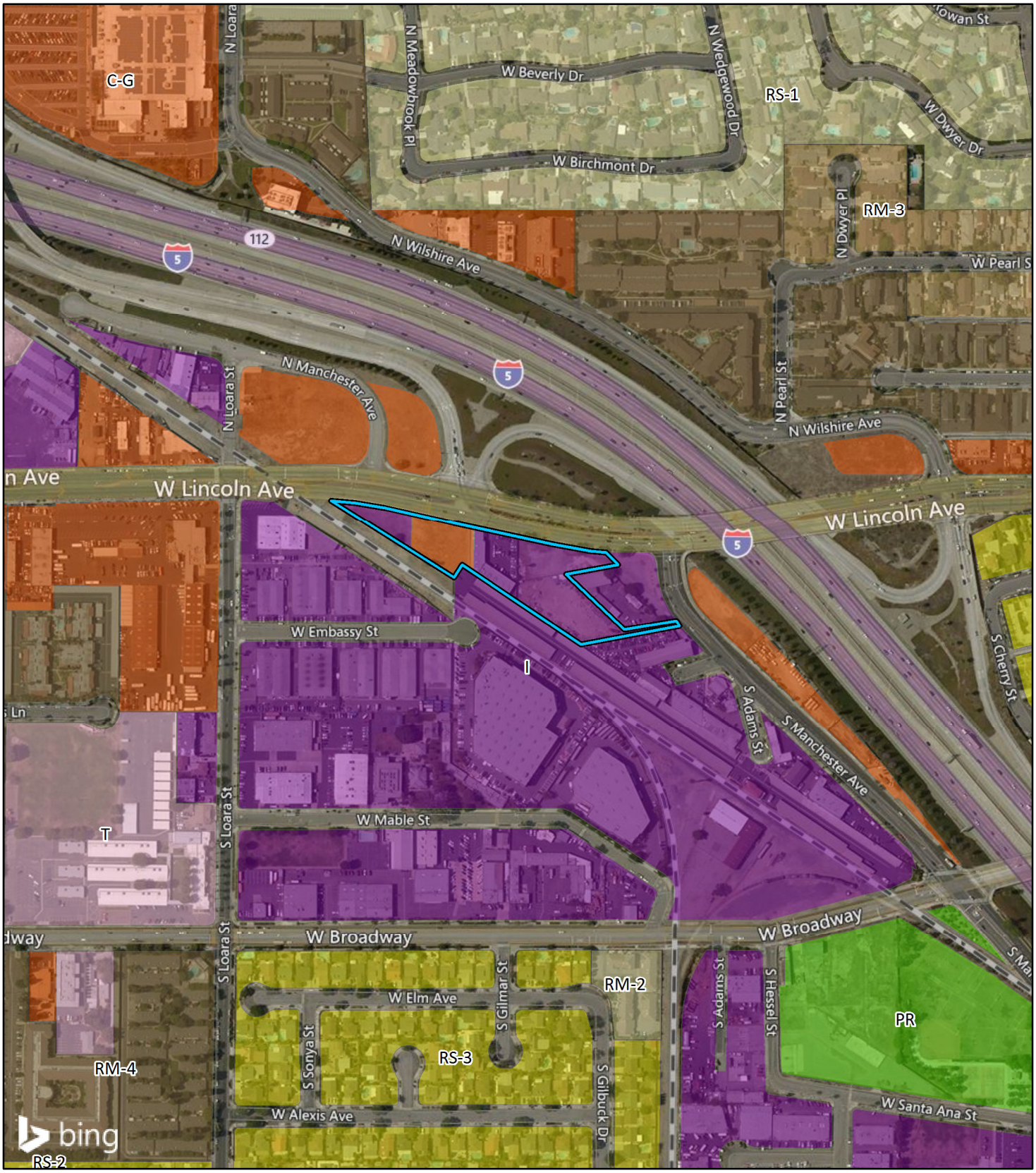

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Project Location

Zoning

Multiple-Family Residential

RM-2

RM-3

RM-4

Single-Family Residential

RS-1

RS-2

RS-3

Other Zoning

General Commercial

Industrial

Public Recreation

Transitional

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SOURCE: Bing (7/2014); City of Anaheim (4/2015)

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FIGURE 4

OCTA Transit Security and Operations Center Project

Anaheim

Zoning Designations

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FIGURE 5

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OCTA Transit Security and Operations Center Project

Conceptual Site Plan

SOURCE: STV

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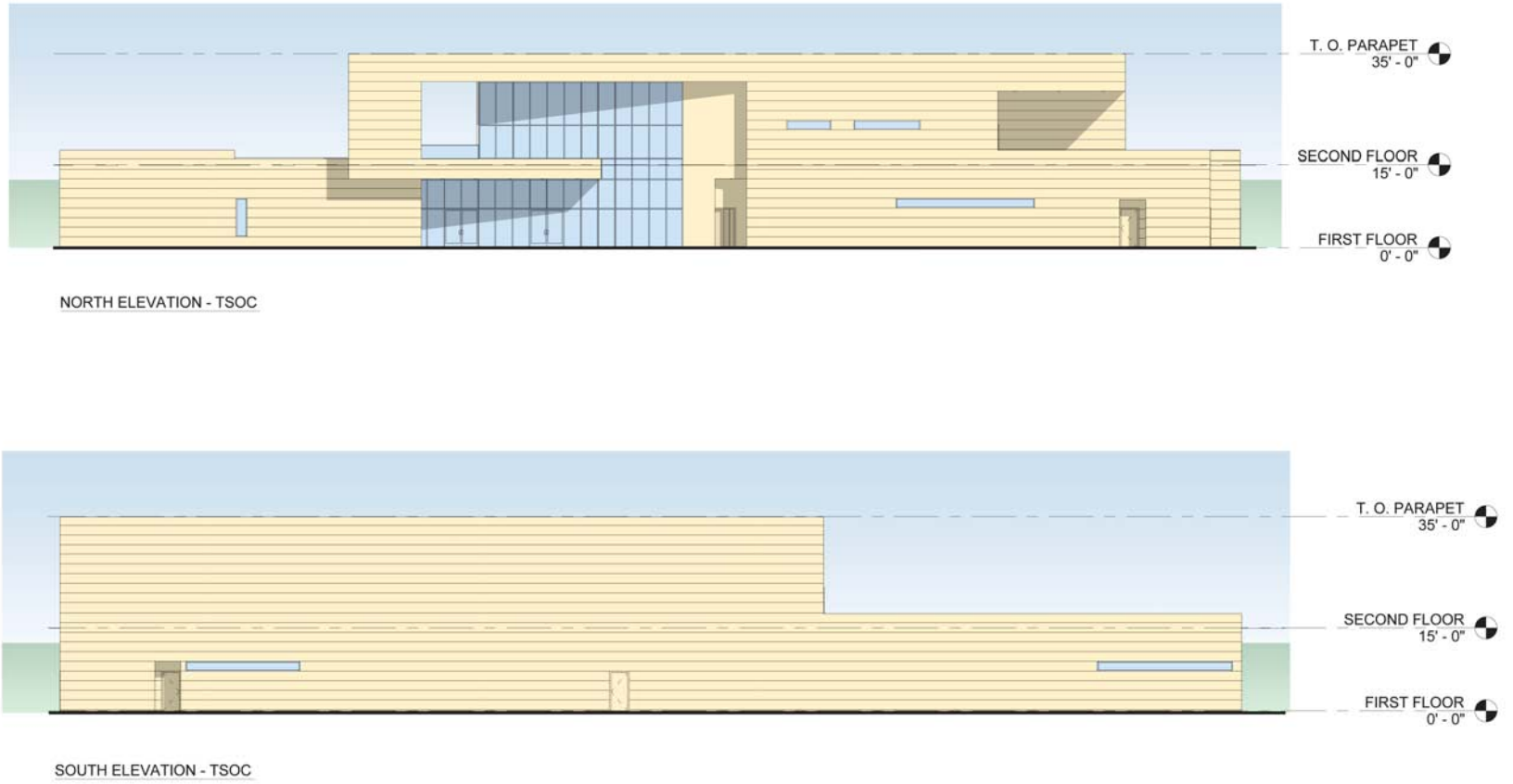

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FIGURE 6
Sheet 1 of 2

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SOURCE: STV

OCTA Transit Security and Operations Center Project
Site Elevations

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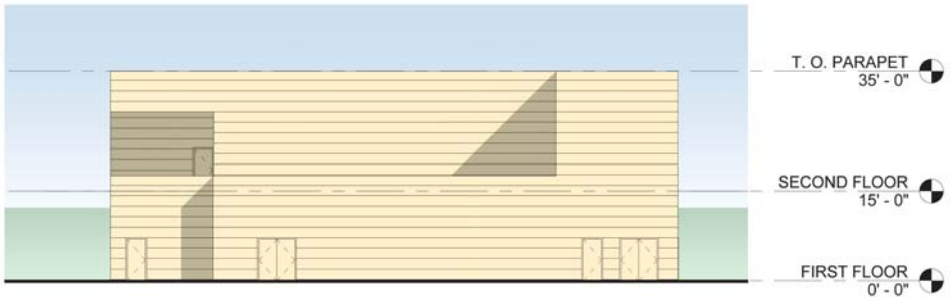

WEST ELEVATION - TSOC

EAST ELEVATION - TSOC

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FIGURE 6
Sheet 2 of 2

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SOURCE: STV

OCTA Transit Security and Operations Center Project
Site Elevations

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1.6.3 Demolition

The project site currently includes automotive repair businesses and a tire business. As described above, OCTA will terminate the leases with the existing business tenants prior to project construction. At or prior to the commencement of construction of the proposed TSOC facility on the project site, these structures would be demolished along with a block wall and other associated pavement. The demolition is expected to yield approximately 2,000 cubic yards (cy) of construction material that would need to be removed from the project site.

1.6.4 Grading

The entire project site will require grading. An estimated 2 ft of soil removal would be required over the total project site. An additional 7.5 ft of soil removal would be required at the building pad. This grading would result in a total of approximately 6,550 cy of excess soil material (4,600 cy for the site and 1,950 cy for the building pad) which would be transported off the project site. In addition, in order to export, an estimated 1,950 cy of soil would need to be imported for foundations and other uses. Commercial hauling trucks have a typical load capacity of 15 cy. Thus, the total hauling trip generation for the proposed grading would be approximately 1,134 trips ([8,500/ 15 = 567] x 2) over the duration of grading operations estimated to be approximately 3–4 months, and hauling would occur only during permitted construction hours for the City of Anaheim, 7:00 a.m. and 7:00 p.m. The conceptual grading is shown on Figure 7.

1.6.5 Operations

Some of the operations on site include 24-hour security functions, while other operations take place during regular work hours.

The following Department and/or Functions will operate out of the proposed TSOC Facility. These operations include functions that occur during regular business hours as well as 24-hour security activities:

- Central Communications (route, dispatcher, rail, supervisors)
- Emergency Operations Center and Back-up Generator
- Transit Police Services and K-9 Units (no kennels will be required)
- Field Operations and Operations Training
- Information Systems and Technology
- File Storage

For a departmental/functional comparison, Table A shows the allocation area at the existing Garden Grove Annex compared to the proposed programmed square footage at the proposed TSOC site.

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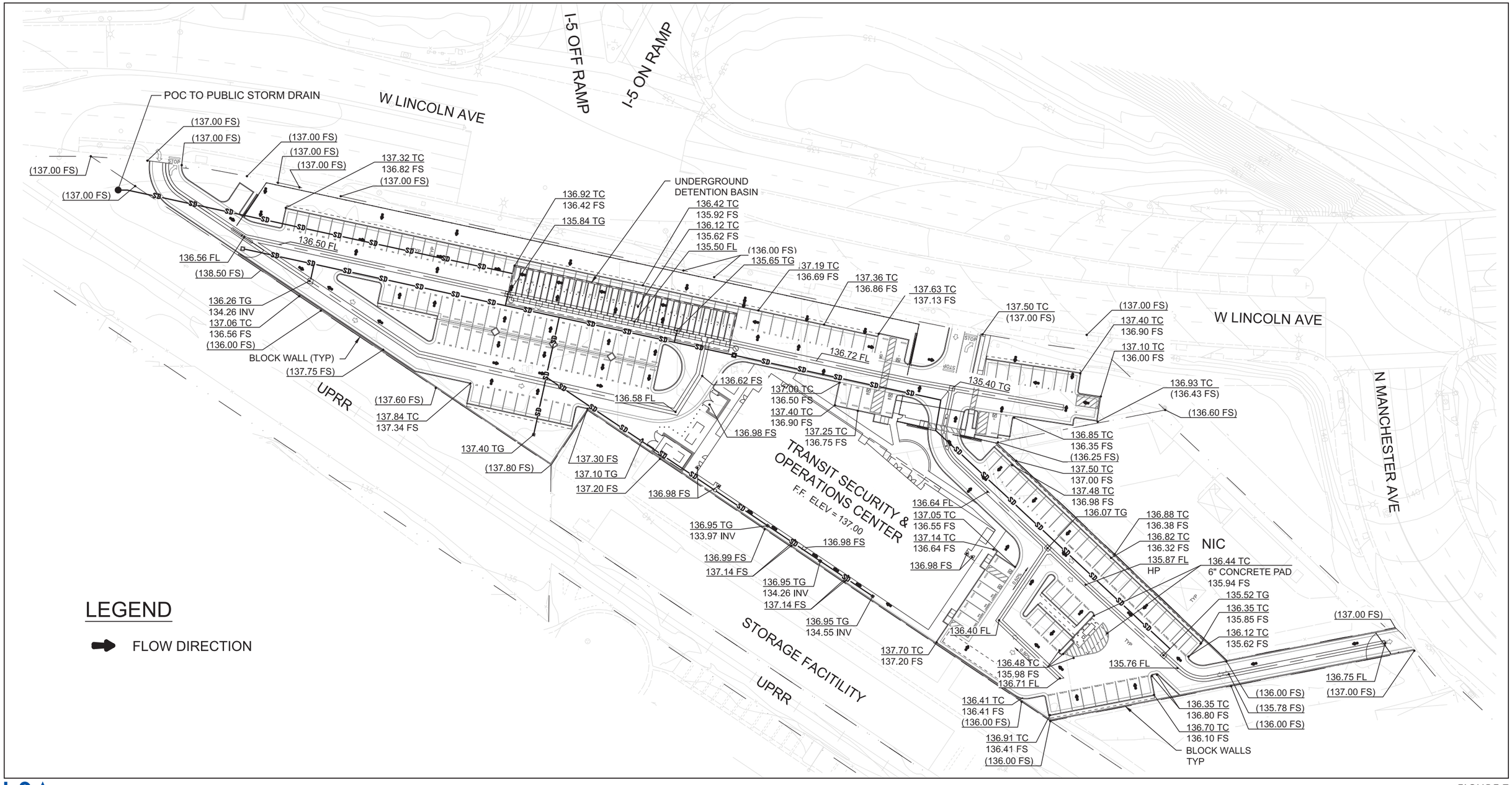

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FIGURE 7

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SOURCE: STV

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OCTA Transit Security and Operations Center Project
Conseptual Grading and Drainage Plan

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Table A: Existing Site and Proposed Site Operations Comparison

Department / Function	Existing Annex SF	Proposed TSOC SF
Central Communications	1,429	5,149
Emergency Operations Center	353	2,485
Transit Police Services	2,097	3,456
Field Operations	1,585	1,835
Records Storage	1,708	426
Information Systems	1,290	1,111
Operations Training	5,098	0
Breakrooms	525	500
Facility Maintenance	261	0
Utility / Service	1,312	2,215
Security	0	869
Total*	**15,658**	**18,046**

* Program anomalies and circulation/gross square footage factors account for the difference in total building square footage, approximately 30,000 sf and programmed square footage.
SF = square footage
TSOC = Transit Security and Operations Center

1.6.6 Microwave Tower

One element of the proposed project includes a roof-mounted microwave communications tower extending 60 ft in height (from ground elevation). This tower will provide a crucial link to the County's Loma Ridge Emergency Operations Center (EOC) located at the intersection of Santiago Canyon Road and SR-241. The tower must have a clear line-of-sight to the EOC. This system supports critical systems of the bus network such as Computer Aided Dispatch, Automatic Vehicle Location and radio communications.

1.6.7 Fueling and Charging Stations

The proposed project would include a gasoline fueling island with a 2,000-gallon aboveground storage tank (AST) for fueling security operations patrol cars. There would also be up to 10 electrical vehicle charging stations in a specially designated area. In addition, an aboveground storage tank for diesel fuel for the back-up generators would be housed in a separate structure with the back-up generators adjacent to the proposed main building.

1.6.8 Access and Parking

Parking has been developed to support the specific requirements of the proposed project, incorporating the needs of both day-to-day and emergency operations, which indicate 142 spaces would be required; however, 190 parking spaces are proposed to be provided on site. Parking would consist of zoned parking areas, including visitor, dedicated patrol and operations vehicles, employee parking, and overflow parking. Secured parking areas would be provided for law enforcement. Overflow parking would be intended for emergency event parking which would not be part of the routine activities of the proposed facility. Delivery/loading zone would be provided at-grade adjacent to the exterior of the building (not recessed or elevated).

1.6.9 Sustainable Design

The proposed project has been designed to meet minimum requirements of California Green Building Standards Code (CalGreen) and the California Energy Code.

1.6.10 Signage

On-site signage would be included to indicate secure parking areas, public parking areas, main entrances and whether an area is accessible to the public or staff only. All safety and caution signage would be in compliance with applicable codes.

1.6.11 Drainage

Drainage features would be incorporated as a part of the proposed project to collect on-site and then be transported to local storm drains in Lincoln Avenue and ultimately the West Anaheim Storm Drain operated by the County. Due to the increase in impervious surfaces with the implementation of the proposed project, on-site retention of storm water would be included as part of the proposed project. The proposed location of the retention area is on the north side of the project site and is shown on Figure 7. Retention basin capacity would be metered so that no more than a 5 percent net increase of runoff volume would occur to local storm drains, as required by Orange County's Model Water Quality Management Plan (WQMP).

1.6.12 Water Quality

The project construction activities would comply with the applicable requirements of the City's current municipal separate stormwater sewer (MS4) Permit Program. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared for the proposed project and to ensure water quality is protected during the construction process. The proposed project would comply with all federal, State, and local requirements related to water quality and waste discharge.

1.6.13 Utilities

A 2018 utility investigation report, (STV, Inc. July 2018, provided in Appendix A) was prepared to identify any potential conflicts or service issues associated with construction and operation of the proposed project. In total, 16 utilities companies were contacted. None indicated the potential for service issues. Five indicated that they had facilities on or near the project site so that they could be avoided during project construction. Electricity, sewer, and wastewater connections are available at the project site. There are no uses proposed that would have an unusually high utilization level of these utilities. All building code requirements would be met regarding water and wastewater usage.

1.6.14 Right-of-Way Requirements

No right-of-way acquisitions are anticipated to be required for the proposed project. Encroachment permits may be required within public right-of-way in Lincoln Avenue and Manchester Avenue to connect to utilities within the street.

1.6.15 Lighting

Standard exterior lighting would be used on all proposed structures and parking area meeting code requirements. Federal Aviation Administration (FAA) night-lighting requirements would be implemented for the communications tower as part of the Federal Communications Commission (FCC) tower permitting.

1.7 CONSTRUCTION AND PHASING

Contracts and construction are anticipated to take approximately 24 months to complete, and the proposed project would be constructed in one continual phase.

1.8 CITY OF ANAHEIM COORDINATION

Because the project site is located within the City of Anaheim, OCTA initiated coordination with the City's Planning and Building Department. On February 20, 2018, OCTA submitted an application to initiate a Conceptual Development Review (CDR) with the City. As part of this review, the City provided comments on the proposed project site plan relating to compliance with City development standards, including comments from the Planning and Public Works Department and the Anaheim Fire Department. The City also reviewed the traffic evaluation prepared for the proposed project. The City determined that the proposed project did not generate enough traffic to warrant more detailed analysis. Very minor comments were received and were responded to with changes incorporated into the proposed project site plan.

1.9 AGREEMENTS, PERMITS, AND APPROVALS

The following agreements, permits, and approvals are applicable to the proposed project:

- Orange County Transportation Authority
    - Approval of the Initial Study/Mitigated Negative Declaration (IS/MND)
    - Approval of Final Design Plans (Plans, Specifications, and Estimates [PS&E])
    - Advertisement of construction bid documents
- City of Anaheim
    - Conceptual Development Review (completed)
- Utilities Agreements if Alteration is Required (including sanitary sewer, fire department, domestic water, electrical power, data telecommunications, storm drain, and gas)
- Federal Permits
    - FCC communications microwave tower license
    - Federal Transit Administration (FTA) funding application approvals
    - National Environmental Policy Act (NEPA) compliance for federal permits

1.10 INTENDED USES OF THIS INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

This IS/MND for the proposed project is intended to be used as the environmental analysis for the OCTA TSOC Project. This document is meant to provide identification of any project impacts on the environment and any mitigation measures to address those impacts in order to provide the necessary California Environmental Quality Act (CEQA) clearance for the required project approvals. The impacts evaluated include the potential for temporary impacts associated with project construction as well as the potential for permanent impacts associated with project operation.

2.0 ENVIRONMENTAL ANALYSIS

This section includes analyses of environmental parameters found on the State's CEQA Analysis Checklist (Appendix B of this IS/MND) based on Appendix G of the *State CEQA Guidelines*. The discussion includes not only the areas for which there is potential for environmental impacts, but also provides justification for the conclusions that either no impacts, less than significant impacts, or less than significant impacts with mitigation could occur. The CEQA Analysis Checklist questions and the environmental significance conclusion appear under each environmental parameter, followed by a discussion supporting each conclusion. In some cases, the discussion may apply to more than one question. In these cases, the questions have been grouped together and the response indicates that it applies to multiple questions and designated by the corresponding lettered question (i.e. "a, b and c – Less than Significant.")

Two types of measures are included in this IS/MND to address the impacts of the proposed project. Mitigation measures are project-specific measures imposed to avoid, reduce, or offset impacts to a less than significant level and are designated by the abbreviation MM. Standard conditions are measures applicable to the proposed project based on existing regulations and laws other than CEQA and are designated by the abbreviation SC. The mitigation measures and standard conditions included in the proposed project, as described in the following sections in this IS/MND, are also listed in the Mitigation Monitoring and Reporting Program (MMRP) provided in Appendix C.

2.1 AESTHETICS

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

No Impact. The project site is located in a relatively flat urbanized area adjacent to I-5. The proposed TSOC building would be built along the south side of Manchester Avenue at the intersection of Lincoln Avenue. The existing visual character of the project site along Manchester Avenue and Lincoln Avenue consists of both industrial and commercial developments. No scenic highways or vistas are located in the project area, as noted in the Orange County Scenic Highway Plan and the Anaheim Scenic Highways Map (Figure C-3 of the Circulation Element of the City General Plan). Additionally, no designated scenic highways, vistas, or historic resources that are located in this area of the City are noted in the City of Anaheim's General Plan. Given the urbanized nature of the project area and the lack of designated scenic resources adjacent to the project site, the proposed project would not affect a scenic vista nor would the proposed project degrade the existing visual character of the site and its surroundings.

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

No Impact. The project site is not located on a State-designated scenic highway and would not affect scenic resources.

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

Less than Significant Impact. The proposed project includes a building and parking area. The building will not look substantially different from other industrial and warehouse buildings in the area. In addition, the City reviewed the proposed project site plan and had no comments on the appearance of the building were provided.

The proposed roof-mounted tower is the highest structure on the site and would be visible from off-site areas. The total height of the tower would not exceed 60 ft measured from the ground elevation. While, the tower would be a new visible element, the project site is located in an area that does not have sensitive views or vistas and, therefore, the proposed tower would not significantly impact views from off-site locations. In addition, the proposed project would replace areas on the site that are currently used for outdoor storage or that are vacant and fenced off. The proposed project would create a uniform development on the site and generally improve its appearance. No mitigation is required.

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

Less than Significant Impact. The proposed project would involve the installation of new outdoor lighting for building and parking lots. All new lighting would be designed and placed consistent with the City's Lighting Ordinance and new fixtures would be shielded and designed to illuminate only the project site, reducing the potential for off-site light. Therefore, the new lighting introduced by the proposed project would be reduced to a less than significant level due to project design. In addition, the exterior treatment of the building would have standard construction materials that would not produce inordinate or significant glare. No mitigation is required.

2.2 AGRICULTURE AND FORESTRY RESOURCES

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. There are no Prime, Unique, or Farmlands of Statewide Importance designated on the project site, based on a review of the United States Department of Agriculture (USDA) Natural Resources Conservation Service database and the State of California Department of Conservation (DOC) Orange County Important Farmland Map (2014) This mapping classifies the project site as "Urban and Built-up." The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site uses are designated Industrial, commercial or highway uses in the City of Anaheim Zoning Code and are not zoned for agricultural use nor is the project site currently under a Williamson Act contract, according to the State DOC Land and Conservation Map for Orange County (2016).

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?

No Impact. As stated above, the project site's zoning and land use designations are commercial and industrial and not designated for forest land, timberland, or timberland zoned timberland production. The proposed project does not conflict with any zoning for forest land, timberland, or timberland zoned timberland production.

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

No Impact. The project site and the surrounding parcels are not designated forest land. The proposed project would not result in the loss or conversion of forest land to non-forest use.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion forest land to non-forest use?

No Impact. Refer to Responses 2.2.a and 2.2.b. The proposed project would not affect any agricultural uses, soils, or forest land.

2.3 AIR QUALITY

The Air Quality Memorandum in Appendix D (LSA, 2018) provides a detailed analysis of the potential for short- and long-term air quality impacts associated with the construction and operation of the proposed project. The findings of the air quality analyses are summarized in the following sections and in the responses to the CEQA checklist questions.

2.3.1 Existing Conditions, Regulatory Setting, and Thresholds

The project site is located in the City of Anaheim, which is part of the South Coast Air Basin (Basin). The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality in the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD has established an Air Quality Management Plan that contains policies and measures to meet air quality standards.

Both the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established health-based ambient air quality standards for common air pollutants: carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), and suspended particulate matter (PM). These standards are designed to protect the health and welfare of the populace with a regional margin of safety. These ambient air quality standards are levels of contaminants which represent safe levels that avoid specific adverse health effects associated with each criteria pollutant. The Basin is in nonattainment for the federal and State standards for O_3 and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). In addition, the Basin is in nonattainment for the State particulate matter less than 10 microns in diameter (PM_{10}) standard and in attainment/maintenance for the federal PM_{10}, CO, and NO_2 standards.

The proposed project would generate air emissions during project construction and operations. Specific criteria for determining whether the potential air quality impacts of a project are potentially significant are set forth in SCAQMD's *CEQA Air Quality Handbook* (1993, currently being revised).

The daily thresholds for construction and operational emissions have been established by SCAQMD and are used in the analysis of air quality impacts for the proposed project; they are shown in Table B.

Table B: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOC	NO_x	CO	PM_{10}	$PM_{2.5}$	SO_x
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: SCAQMD. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf (accessed July 2018).

CO = carbon monoxide
lbs/day = pounds per day
NOx = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Projects in the Basin with emissions that exceed any of the emission thresholds above would be considered potentially significant by SCAQMD.

In addition, SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors (SCAQMD 2008a).This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance to the proposed project. SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather as sensitive receptors (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields).

LSTs are based on the ambient concentrations of that pollutant in the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the nearby North Orange County area (SRA 16). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances.

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

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

a and b - Less than Significant Impact. One measure of determining whether the proposed project is consistent with the air quality plans is if the proposed project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards of the interim emission reductions specified in the air quality plans.

Short Term Construction. During project construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by excavation, grading, hauling, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, reactive organic gas (ROG), directly-emitted particulate matter ($PM_{2.5}$ and PM_{10}), and toxic air contaminants (TACs) (e.g., diesel exhaust particulate matter).

Site preparation and project construction would involve grading, paving, and building activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. Sources of fugitive dust would include disturbed soils at the construction site. If not properly controlled, these activities would temporarily generate particulate emissions. Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The project would be required to comply with SCAQMD Rule 403: Fugitive Dust, which would require the project proponent to implement measures that would reduce the amount of particulate matter generated during the construction period, included below as Standard Conditions (SC) AQ-1 and AQ-2. Additionally, if construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site.

As supported in the analysis in the Air Quality Memorandum (Appendix D, LSA 2018), the proposed project would result in short-term air quality impacts that are less than significant. Construction emissions for the proposed project were estimated using the California Emissions Estimator Model, Version 2016.3.1 (CalEEMod), consistent with SCAQMD recommendations. Default assumptions (e.g., construction fleet activities) from CalEEMod were used for the proposed project. The construction schedule for all improvements was assumed to be approximately 12 months;[2] however, impacts are measured by daily construction emissions. Construction-related emissions for the proposed project are presented in Table C. The results indicate that construction emissions would not exceed SCAQMD's suggested thresholds for maximum daily construction emissions for the proposed project and, therefore, would not result in a substantial increase in regional air emissions. However, the proposed project would be required to comply with the standard condition SCAQMD Rule 403 for fugitive dust, which would reduce particulate matter from grading to a less than significant level.

Given that the proposed project's construction emissions are below the suggested SCAQMD thresholds, potential impacts regarding the proposed project's consistency with the Air Quality Management Plan or other regional air quality plans are considered less than significant, and no mitigation measures are required.

[2] Although the construction period for the project is 24 months, 12 months was assumed for construction for modeling purposes because the majority of the construction and site preparation= would

Table C: Short-Term Regional Construction Emissions

Construction Phase	Total Regional Pollutant Emissions (lbs/day)							
	VOC	NO_X	CO	SO_X	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$
Demolition	4	37	23	<1	<1	2	<1	2
Site Preparation	4	46	23	<1	8	3	5	2
Grading	4	69	27	<1	6	2	2	1
Building Construction	3	23	19	<1	1	1	<1	1
Architectural Coatings	14	2	2	<1	<1	<1	<1	<1
Paving	2	13	13	<1	<1	1	<1	1
Peak Daily	**14**	**69**	**27**	**<1**	**11**		**7**	
SCAQMD Suggested Thresholds	**75**	**100**	**550**	**150**	**150**		**55**	
Significant Emissions?	**No**	**No**	**No**	**No**	**No**		**No**	

Source: Compiled by LSA (July 2018).
Assumes the Building Construction and Architectural Coating phases overlap. PM_{10} and $PM_{2.5}$ fugitive emissions are from the Mitigated results - the only "mitigation" applied in this modeling is required dust control measures per SCAQMD Rule 403. Numbers may not appear to add correctly due to rounding. These values were computed assuming a one-year construction phase.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Operational Emissions. Long-term operational air pollutant emission impacts are those associated with stationary sources and mobile sources involving any project-related activities. The proposed project would result in net increases in both stationary and mobile-source emissions. The area wide source emission categories include both stationary and off-road mobile sources. Stationary sources in CalEEMod include gasoline-dispensing pumps, aboveground storage tanks, and consumer products, whereas off-road mobile sources include off-road equipment such as landscaping equipment.[3]

Based on trip generation factors provided in the *Trip Generation for Proposed Transit Security and Operations Center* (LIN Consulting, Inc. [LIN] 2018), the proposed project would generate up to 920 daily trips. These trips were entered in the CalEEMod model. In addition, estimated VOC emissions from the gasoline dispensing pumps are included in the operational emission analysis under stationary sources. The long-term operational emissions associated with the proposed project are shown in Table D.

[3] California Air Resources Board. Information on Areawide Source Categories. Website: https://www.arb.ca.gov/ei/areasrc/moreareainfo.htm (accessed July 2018; page last reviewed February 11, 2013).

Table D: Project Regional Operational Emissions

Source	Pollutant Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	<1	<1	<1	0	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	2	6	20	<1	6	2
Stationary	10	0	0	0	0	0
Total Project Emissions	**12**	**6**	**20**	**0**	**6**	**2**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (July 2018).
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides
VOC = volatile organic compounds

As shown in Table D, proposed project-related increases of all criteria pollutants would not exceed the corresponding SCAQMD daily emission thresholds for any criteria pollutants.

Table E shows the calculated emissions for the proposed operational activities compared with the appropriate LSTs. By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in Table E include all on-site project-related area sources and 5 percent of the project-related mobile sources, which are an estimate of the amount of project-related vehicle traffic that would occur on site. In total, 5 percent would be considered conservative because the average trip lengths assumed are 16.6 miles for home to work, 8.4 miles for home to shopping, and 6.9 miles for other types of trips. The average on-site distance driven is unlikely to be even 1,000 ft, which is approximately 2 percent of the total miles traveled. Considering the total trip length included in the CalEEMod, the 5 percent assumption is conservative.

Table E: Long-Term Operational Localized Impacts Analysis

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	<1	1	<1	<1
LST Thresholds	**167**	**3,229**	**19**	**7**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (July 2018).
Note: Source Receptor Area – Central Orange County, 3 acres, receptors at 675 feet, on-site traffic 5 percent of total.
CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance thresholds
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

As shown in Tables C through E, proposed project emissions remain below the regional and localized significance criteria. Given that the proposed project's construction operational emissions are below the suggested SCAQMD thresholds, the proposed project would have less than significant impacts to air quality and regional air quality.

c) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

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

c and d - Less than Significant Impact. Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day-care centers, nursing homes, hospitals, and residential dwelling units. The closest sensitive receptor to the project site is Fairmont Private School, located 370 ft south of the project site.

Construction Localize Significance Thresholds. Table F shows the portion of the construction emissions that would be emitted on the project site compared to the Localized Significance Thresholds (LST). Table F shows that the localized construction emissions would not result in a locally significant air quality impact.

Table F: Construction Localized Impacts Analysis

Emissions Sources	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions	46	22	11	7
LST Thresholds	**176**	**3,453**	**80**	**30**
Significant Emissions?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (July 2018).
Note: Source Receptor Area – Central Orange County, 3.5 acres, receptors at 675 feet
CO = carbon monoxide
lbs/day = pounds per day
LST = local significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

Standard Condition

The following standard conditions are regulatory requirements that would be implemented to reduce impacts related to air quality emissions for the proposed project to a less than significant level. Compliance with these conditions would reduce impacts on nearby sensitive receptors to a less than significant level.

SC AQ-1 The following measures from the South Coast Air Quality Management District (SCAQMD) Rule 403 are required for fugitive dust suppression:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least twice daily (locations where grading is to occur will be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (ft) (0.6 meter [m]) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Pave construction access roads at least 100 ft (30 m) onto the site from the main road.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.

Given that the proposed project's construction and operational pollutant emissions are below the suggested SCAQMD LST thresholds, the proposed project would have less than significant impacts to sensitive receptors and would not result in a cumulatively considerable net increase in air pollutant emissions.

e) Would the project create objectionable odors affecting a substantial number of people?

Less than Significant Impact. Heavy-duty equipment in the project area during construction could emit odors, primarily from equipment exhaust. No other sources of objectionable odors have been identified for the proposed project. Given that odors associated with construction would be of a short duration and the distance to sensitive receptors, potential objectionable odor impacts are considered less than significant.

2.4 BIOLOGICAL RESOURCES

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Services?

Less than Significant Impact with Mitigation. A search the California Natural Diversity Database (CNDDB) for the Anaheim Quadrangle and aerial photo survey of the project site limits was conducted on August 8, 2018, to determine the potential occurrence of special-status plant and animal species on or in the immediate vicinity of the project site. Appendix E provides the biological database search results.

The project site has little to no vegetation and contains sparse ornamental landscaping (palm trees and California pepper trees along the sidewalk. The areas surrounding the project site are entirely developed. The results of the CNDDB review indicated the potential occurrence of three federally and/or State-listed wildlife species, one federally and/or State-listed plant species, three other special-interest wildlife species, and five special-interest plant species (not federally and/or State-listed) in the vicinity of the project site. The list of special-status plant and wildlife species was evaluated, and it was determined that the potential for special-status plant and wildlife species to occur in the vicinity or on the project site is unlikely due to lack of suitable habitat. The project site supports no habitat for the special-interest animal species that may occur in the project area. Additionally, given the extent of historical disturbance in the impact area for the project site, the probability of any of the special-interest plant and wildlife species occurring in the project area is very low. Therefore, the proposed project is not expected to impact special-status biological resources. However, there are some trees on the project site that could provide nesting habitat for birds. The Migratory Bird Treaty Act (MBTA) (16 United States Code [USC] 703–712) protects birds during their nesting season. After compliance with Mitigation Measure (MM) BIO-1, potential impacts to migratory birds protected under the MBTA are reduced to less than significant.

MM BIO-1 Any vegetation removal should take place outside of the active nesting bird season (i.e., February 15–August 15), when feasible, to ensure compliance with the California Fish and Game Code and the Migratory Bird Treaty Act.

Prior to construction activities, the OCTA Construction Contractor shall hire a qualified biologist to conduct a nesting bird survey to ensure that birds are not engaged in active nesting within 100 feet (ft) of the project site. If nesting birds are discovered during preconstruction surveys, the biologist should identify an appropriate buffer (i.e., up to 500 ft, depending on the circumstances and specific bird species) where no construction activities or other disturbances are allowed to occur until after the birds have fledged from the nest or the nest is no longer active.

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

No Impact. Habitats in the project area consist mainly of highly disturbed area and ornamental landscaping. The project site is in an urban area and does not impact any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations (including habitat conservation plans) or by the California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS).

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

No Impact. No wetlands occur on the project site. Therefore, the proposed project would not impact any wetlands or jurisdictional waters.

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

No Impact. The proposed project does not impede the movement of any native resident or migratory fish or wildlife species, or inhibit their use of native wildlife nursery sites because the project site is located within a built-up urban environment. According to the database searches, no listed endangered and/or threatened species, designated critical habitat or wildlife movement corridors or nursery sites are anticipated to be affected by the proposed project.

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

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

e and f - No Impact. There are no Habitat Conservation Plans, Natural Community Conservation Plan or other approved habitat conservation plans that include the project site, and the proposed project would have no effect on these plans.[4].

2.5 CULTURAL/SCIENTIFIC RESOURCES

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

No Impact. On January 23, 2018, a records search for the project site and a 0.5-mile radius around the area was completed at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System located at California State University, Fullerton (Appendix F, Cultural Resources Report, LSA, 2018).

The records search indicated that are 10 resources within 0.5 mile of the project site. Nine of these resources have been determined ineligible for the National Register of Historic Places (National Register) by consensus through the Section 106 process, but they have not been evaluated for the California Register of Historical Resources (California Register) or for Local Listings. One resource within 0.5 mile of the project site is of note, the Mother Colony Pioneer House, which is located at 414 North West Street and is approximately 0.4 mile from the project site. It is listed as State Historical Landmark 201. The Mother Colony Pioneer House is listed in the State Historical Landmarks 1-769 and Points of Historical Interest and is eligible for the National Register as an individual property. However, given the distance between the project site and this resource and the fact that I-5 is located between the project site and this resource, no impacts to this resource or any of the Mother Colony area are anticipated.

[4] County of Orange Environmental Management Agency. May 1996. Website: https://occonservation.org/wp-content/uploads/2015/04/NCCP-EIR-Map-Section.pdf (accessed August 10, 2018).

None of these resources would be impacted by the proposed project and, therefore, the proposed project would not adversely change the significance of any historic resource. No mitigation is required.

b) Would the project cause a substantial adverse changed in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant Impact with Mitigation. As noted above, the record search initiated on January 23, 2018, indicates there are no cultural resources identified in the boundaries of the project site. In addition, in field surveys on May 10, 2018 and May 29, 2018, no cultural resources were observed. However, the SCCIC database indicates that no previous cultural resources studies have covered the project site, although eight studies have been conducted within 0.5 mile of the project site. Because there have been no previous cultural resource studies conducted within the project site and few previous cultural resource studies conducted within 0.5 mile of the APE, the archaeological sensitivity of the project site is unknown. Based on the results of the SCCIC records search, as well as review of historic aerial photographs and United States Geological Survey (USGS) quadrangle maps, there is a moderate potential that project work on the property may encounter unknown subsurface archaeological resources. With implementation of MM CR-1, potential impacts associated with encountering unknown archaeological resources would be reduced to less than significant.

Mitigation Measure

MM CR-1 Prior to starting grading activities (excluding demolition), the OCTA Construction Contractor shall retain a project archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards and is eligible for or listed in the Register of Professional Archaeologists and is registered or certified by the County of Orange. The archaeologist shall monitor grading activities.

If potential archaeological resources are identified during monitoring of grading, the archaeologist shall order the temporary diversion of work outside a 100-foot radius around the discovery until the archaeologist has evaluated whether they are eligible for the listing in the California Register of Historical Resources or the National Register of Historic Places. After the archaeologist determines that the resources are not significant, or if significant, have been successfully recovered, work may resume in the area where the archaeological resources were encountered.

If archaeological resources are found to be eligible and thus are significant historical resources under California Environmental Quality Act (CEQA), a data recovery plan shall be prepared and approved by the OCTA Construction Contractor. Implementation of the plan shall be overseen by the OCTA Construction Contractor and archaeologist. This data recovery plan shall include methods for hand-excavation, analysis, and report writing and shall also provide procedures for the curation of any collected material and associated project material at a facility meeting federal standards. A final report on any find and their historical significance shall be prepared and submitted to the Construction Contractor and OCTA for the

project file. The final report should be submitted to the South Central Coastal Information Center (SCCIC). The historical resource shall be recorded in accordance with requirements of the Office of Historic Preservation (i.e., using Department of Parks and Recreation 523 Series forms).

For the discussion on Native American cultural resources, refer to Section 2.17, Tribal Consultation, later in this document.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact with Mitigation. The project site is located near the central portion of the Orange County coastal plain. Regional geologic maps indicate the project site is underlain by Recent to Holocene-age younger alluvial deposits, refer to Figure 8. These deposits typically consist of moderately to well-consolidated sand, silty sand, and sandy silt. The younger alluvial deposits underlie modern stream channels and form flood plains on the valley floor in broader valleys. Younger alluvium is relatively thin, generally less than 30 feet thick (Kunkel and Upson 1960). The younger alluvial fan and fluvial deposits have a low paleontological sensitivity because they are not known to have produced fossils in the past and consist of sediments too young to produce fossils. Fill soils of varying thickness and material types related to roadways, utilities, and existing structures are also present over portions of the project site. Due to the fact that overexcavation of soils on the project site, previously undisturbed native soil may be encountered during grading, which has the low-to-medium potential to contain paleontological resources. Consequently, grading should be monitored to recover any paleontological resources. With implementation of MM CR-2, potential impacts to paleontological resources during excavation of the site would be reduced to less than significant.

Mitigation Measure

The following mitigation measure should be implemented to reduce impacts related to paleontological resources for the proposed project to a less than significant level.

MM CR-2 Prior to the start of construction, the Paleontological Resources Impact Mitigation Program (PRIMP) enumerated below shall be required.

Paleontological Resources Impact Mitigation Program (PRIMP). A qualified paleontologist shall be retained by the OCTA Construction Contractor to develop a PRIMP for this project. The PRIMP shall include the methods that will be used to protect paleontological resources that may exist within the project area, as well as procedures and activities for monitoring, fossil preparation and identification, curation into a reputable repository, and preparation of a report at the conclusion of grading as follows:

- Excavation and grading activities shall be monitored by a paleontological monitor. No monitoring is required for excavations in rocks or areas with no or low paleontological sensitivity (i.e., Artificial Fill).

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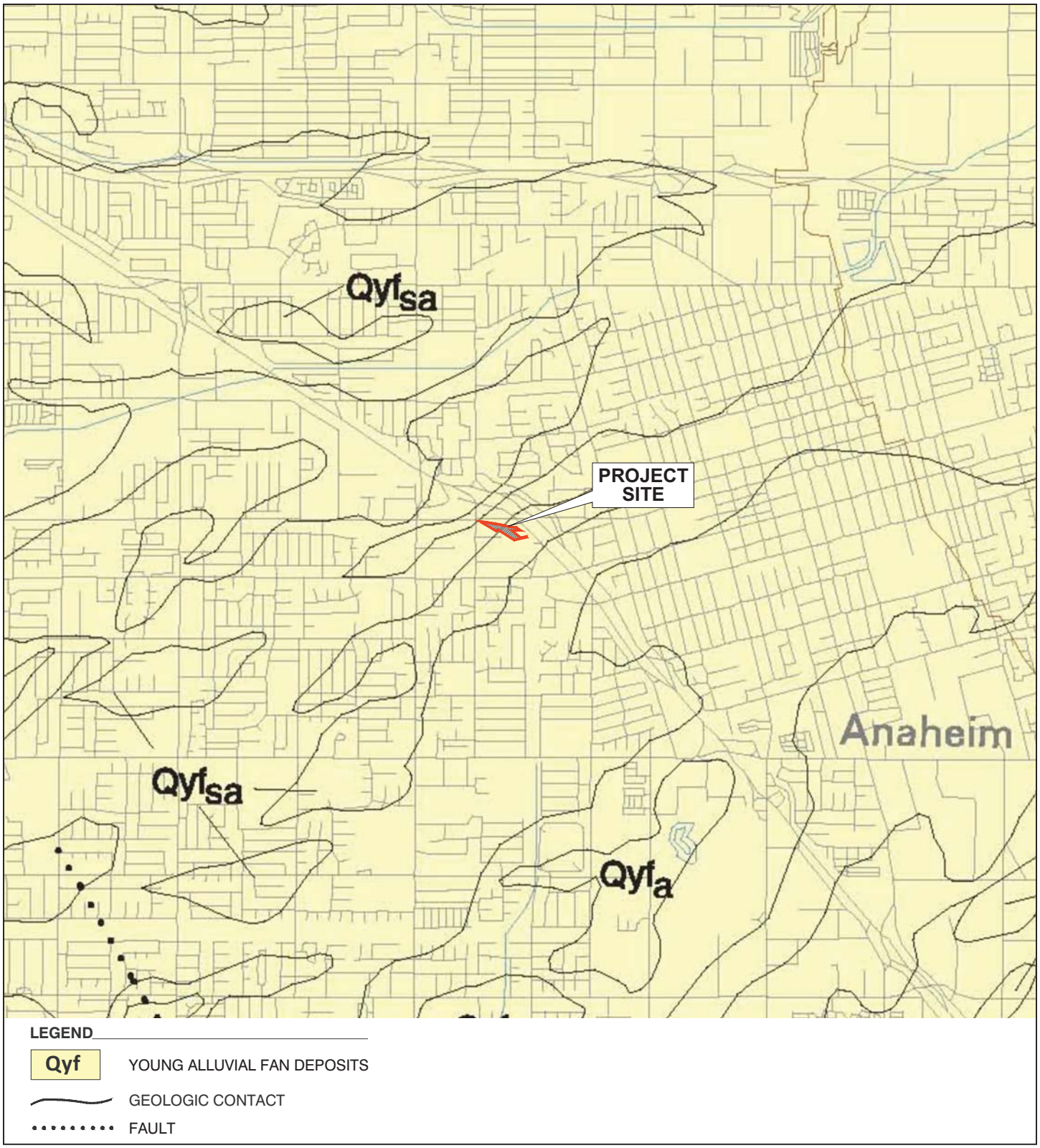

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FIGURE 8

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SOURCE: Ninyo & Moore

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- If paleontological resources are encountered during the excavation and grading activities, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance.

- In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected and a paleontologist should be contacted to assess the find for significance. If determined to be significant, the fossil shall be collected from the field.

- Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a scientific institution.

- At the conclusion of the monitoring program, a report of findings shall be prepared to document the results of the monitoring program and submitted to the OCTA Construction Contractor and OCTA for the project file.

d) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. As indicated in Response 2.5.b, the SCCIC record search revealed that no cultural resources have been documented in the project area. The proposed project does not anticipate disturbance of any human remains on the project site. However, if human remains are encountered, the proposed project would be required to comply with the applicable provisions of State Health and Safety Code Section 7050.5, which requires that no further disturbance occur in the event of a discovery or recognition of any human remains on site and that the County Coroner be notified immediately. If the remains are determined to be of Native American descent, the County Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD) and potentially inspect the site of the discovery. Upon completion of the assessment, consulting archaeologists would prepare a report documenting the methods and results regarding the treatment of the remains. Therefore, with compliance with Section 7050.5 of the Health and Safety Code as outlined in SC CR-3 below, potential impacts related to unknown human remains would be less than significant, and no mitigation would be required.

Standard Condition

The following standard condition is a regulatory requirement that would be implemented to reduce impacts related to the disturbance of any human remains within project site to a less than significant level.

SC CR-3 **Human Remains.** If human remains are unearthed, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find

immediately. If the remains are determined to be Native American, the County Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC. The MLD will have the opportunity to offer recommendations for the disposition of the remains.

2.6 GEOLOGY AND SOILS

The discussion in this section is based on the Preliminary Geotechnical Evaluation prepared for the project site (Ninyo & Moore, September 2017, provided in Appendix G to this document).

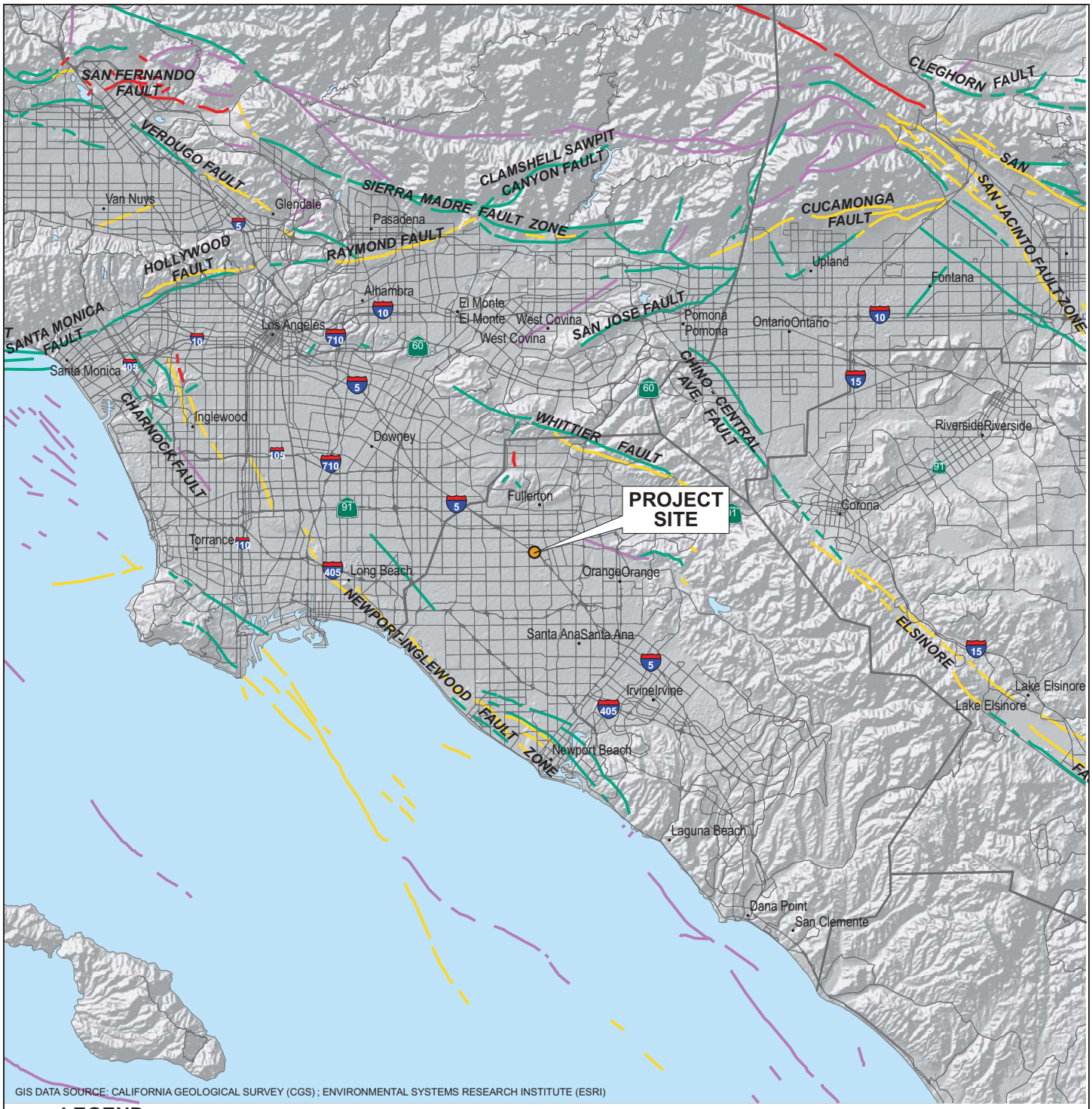
a) *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

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.*

Less than Significant Impact. The project area is not located on any known earthquake fault based on the California Geological Service Mapping Program (EQZAPP). The project site is not transected by known active or potentially active faults. Table G below shows the distance of active faults in the area from the project site. Figure 9 shows the local faults in the Southern California region. The closest active fault is the Puente Hill Blind Thrust Fault located approximately 2.8 miles north of the project site. The project site is not located within a State of California Earthquake Fault Zone (Hart and Bryant, 2007). Therefore, the potential for surface rupture is considered low.

ii. *Strong seismic ground shaking?*

Less than Significant Impact with Mitigation. As noted in Response 2.6.a.i, the closest fault to the project site is the Puente Hill Blind Thrust Fault which is located approximately 2.8 miles north of the project site. In order to protect building occupants from any strong seismic ground shaking and to meet the requirements of the Essential Services Buildings Seismic Safety Act (ESBSSA), compliance with standards set forth in Title 24 of the California Building Code would be incorporated in the final project design. In addition, a full Geotechnical Report including soil borings will be prepared as part of the final design for the building. All recommendations made in the Geotechnical Report prepared as part of the final design will be adhered to and incorporated in the project plans. Therefore, with implementation of SC GEO-1, impacts related to loss, injury, or death during seismic events would be reduced to a less than significant level.



LSA

FIGURE 9

N

0 5 10

MILES

SOURCE: Ninyo & Moore

OCTA Transit Security and Operations Center Project

Regional Fault Locations

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Table G: Principal Regional Active Faults

Fault	Approximate Fault-to-Site Distance miles (kilometers)[1]	Maximum Moment Magnitude (Mmax)[1]
Puente Hills (Blind Thrust)	2.8 (4.5)	7.1
Elsinore	7.9 (12.8)	6.8
San Joaquin Hills (Blind Thrust)	8.4 (13.5)	7.1
Newport Inglewood	10.5 (16.9)	7.1
San Jose	14.6 (23.6)	6.4
Chino-Central Avenue	15.9 (25.9)	6.7
Upper Elysian Park (Blind Thrust)	18.9 (30.4)	6.4
Raymond	22.2 (35.7)	6.5
Cucamonga	23.4 (37.9)	6.9
Clamshell – Sawpit Canyon	24.1 (39.0)	6.5
Verdugo	24.2 (39.2)	6.9
Hollywood	26.1 (40.0)	6.4
Santa Monica	31.9 (51.7)	6.9
Malibu Coast	36.6 (58.9)	6.4
Sierra Madre (San Fernando)	37.1 (59.7)	7.2
San Jacinto	38.0 (61.2)	6.7
Coronado Bank	38.0 (61.2)	7.1
San Gabriel	38.9 (62.7)	7.1
San Andreas	41.0 (66.4)	7.4

[1] United States Geological Survey (USGS) (2008).

Mitigation Measure

SC GEO-1 As part of final design, OCTA's Design Consultant shall have prepared a Geotechnical Report and conduct borings as part of a geotechnical investigation for review by OCTA, and acceptance by OCTA's Design Consultant. The Geotechnical Report will identify appropriate measures for building design to ensure compliance with Title 24 of the California Building Code, in particular compliance with the Essential Services Buildings Seismic Safety Act (ESBSSA). Recommendations in the geotechnical report will be reviewed and incorporated into the project's final design.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact with Mitigation. Liquefaction is the phenomenon in which loosely deposited granular soils located below the water table undergo rapid loss of shear strength due to excess pore pressure generation when subjected to strong earthquake-induced ground shaking. Ground shaking of sufficient duration results in the loss of grain-to-grain contact due to rapid rise in pore water pressure causing the soil to behave as a fluid for a short period of time. Liquefaction is known generally to occur in saturated or near-saturated cohesionless soils at depths shallower than 50 ft.

According to the Seismic Hazard Zones Map published by the State of California (CGS, 1998), the project site is not located within an area considered susceptible to liquefaction. Recent data indicate that groundwater depths in the project area are on the order of 60 to 100 ft below the

ground surface; and the historic high groundwater depths in the site vicinity are greater than 50 ft.

Although not mapped as being in a known area subject to liquefaction, a detailed assessment of the potential for liquefaction and seismically induced dynamic settlement and its effect on the proposed project improvements would be performed prior to design and construction of project improvements, and incorporated into the final building design, as appropriate. Site-specific geotechnical evaluations to assess the liquefaction and dynamic settlement characteristics of the on-site soils would include drilling of exploratory borings, cone penetration tests, evaluation of groundwater depths, and laboratory testing of soils.

Additionally, all construction will follow California Building Code standards as required by Titles 15 and 24 of the Public Resources Code (PRC), and will comply with all recommendations made in the Geotechnical Report. Therefore, with implementation of SC GEO-1, the proposed project would not expose people or structures to adverse effects due to liquefaction or ground failure.

iv. Landslides?

Less than Significant Impact. According to the Preliminary Geotechnical Report, the project site is not located in a potential Earthquake-Induced Landslide zone. Due to the general flatness of the project area, the potential for landslides is considered low. Adverse effects due to landslides are considered less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Erosion is a process by which soil or earth material is loosened or dissolved and removed from its original location. Future construction at the project site would result in ground surface disruption during demolition, excavation, grading, and trenching that would create the potential for erosion to occur. Erosion can occur by varying processes and may occur at the project site where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses.

Based on review of geologic references and site reconnaissance, the materials exposed at the surface of the project site include sands, silty sands, and sandy silt soils. Granular soils typically have low cohesion, and have a relatively higher potential for erosion from surface runoff when exposed in cut slopes or utilized near the face of fill embankments. Surface soils with higher amounts of clay tend to be less erodible as the clay acts as a binder to hold the soil particles together.

Future construction at the project site may create the potential for soil erosion during excavation, grading, and trenching activities. As discussed in Response 2.9.a and specified in SC WQ-1, the Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) to identify construction Best Management Practices (BMPs) to be implemented as part of the proposed project to reduce impacts to water quality during construction, including those impacts associated with soil erosion and siltation. Therefore, with implementation of SC WQ-1, impacts related to substantial soil erosion or the loss of topsoil would be less than significant.

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

Less than Significant Impact with Mitigation. Due to the variety of soils on the project site (aluminum, gravel, and undocumented fill), testing for the presence of dynamic soils, such as lateral spreading, subsidence, liquefaction, and collapse, and landslide, a geotechnical investigation as described in SC GEO-1, above, would be conducted to characterize site-specific conditions related to these types of geotechnical/soil issues. Any recommended measures identified in the Soils Report would be included in the project construction and final design plans. To address liquefaction and all other soil stability issues, the proposed project would be required as part of final design to comply with the California Building Code and with the County's Grading Code, as well as the Geotechnical Report required in SC GEO-1. With adherence to these standards and SC GEO-1, impacts related to lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

d) Would the project be located on expansive soils, as defined in Table 18-1-B of the California Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact with Mitigation. As shown on Figure 10, Alluvial Fan Deposits lie in the disturbance area for the project site, which are noted for having granular characteristics, variable soils are anticipated on the project site, which could include expansive clay soils. Prior to the start of construction, and as part of the final design, a geotechnical investigation that includes borings shall be completed as per SC GEO-1. In the event that the borings reveal there are expansive soils, the proposed project will replace the expansive soil with compacted fills or other remediation measures as recommended in the Geotechnical Report. All construction will follow California Building Code standards and will comply with all recommendations made in the Geotechnical Report. Therefore, with implantation of SC GEO-1, substantial risks to life or property due to expansive soils would be mitigated to less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of wastewater?

No Impact. The project area is served by the City of Anaheim and the Orange County Sanitation District for sewage and wastewater disposal. The proposed project would not be using alternative wastewater disposal or any septic system because it has sewer and wastewater service. Therefore, soil suitability for percolation for a septic system is not relevant.

2.7 GREENHOUSE GAS EMISSIONS

The Air Quality Memorandum in Appendix D provides a detailed analysis of the potential for the proposed project to result in greenhouse gas (GHG) emissions. The findings of that analysis are summarized in the following sections.

2.7.1 Background

Greenhouse gases are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF_6)

Certain gases (e.g., water vapor) are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes (e.g., oceanic evaporation).

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. Greenhouse gas emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

In October 2008, SCAQMD released a *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* (*Draft Guidance Document*) (SCAQMD 2008b) that suggested a tiered approach to analyzing GHG emissions in a project-level analysis. In the *Draft Guidance Document*, SCAQMD provided bright line numerical thresholds that can be applied to smaller projects (e.g., the proposed project). The interim GHG significance thresholds are 10,000 metric tons (MT) of annual CO_2e for industrial projects where SCAQMD is the Lead Agency and 3,000 MT of CO_2e per year for all residential and commercial land uses under CEQA. If the project emissions are at or less than the applicable numerical threshold, then the project's effects related to GHG emissions would be less than significant and the analysis is complete.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

a and b - Less than Significant Impact. Emission estimates for the proposed project are discussed below. GHG emission estimates are provided herein for informational purposes only, as there is no established quantified GHG emission threshold. Bearing in mind that CEQA does not require

"perfection," but instead "adequacy, completeness, and a good faith effort at full disclosure," the analysis below is based on methodologies and information available to OCTA at the time this analysis was prepared. Estimation of GHG emissions in the future does not account for all changes in technology that may reduce such emissions; therefore, the estimates are based on past performance and represent a scenario that is worse than what is likely to be encountered (after energy-efficient technologies have been implemented).

Although information is presented below to assist the public and decision-makers in understanding the proposed project's potential contribution to global climate change impacts, the information available to the OCTA is not sufficiently detailed to allow a direct comparison between particular project characteristics and particular climate change impacts, nor between any particular proposed mitigation measure and any reduction in climate change impacts.

Proposed project construction and operation would generate GHG emissions, with the majority of energy consumption (and associated generation of GHG emissions) occurring during the proposed project's operation (as opposed to during its construction). Typically, more than 80 percent of the total energy consumption takes place during the use of buildings and less than 20 percent of energy is consumed during construction (United Nations Environment Programme 2007).

Table H lists the annual CO_2e emissions for each of the planned construction phases based on the results from CalEEMod. Per SCAQMD guidance (SCAQMD 2008b), due to the long-term nature of the GHGs in the atmosphere, instead of determining significance of construction emissions alone, the total construction emissions are amortized over 30 years (an estimate of the life of the proposed project), added to the operational emissions, and compared to the applicable GHG significance threshold.

Table H: Construction Greenhouse Gas Emissions

Construction Phase		Total Regional Pollutant Emissions (MT/yr)			
		CO_2	CH_4	N_2O	CO_2e
2019	Demolition	38	<1	0	38
	Site Preparation	5	<1	0	5
	Grading and Excavation	40	<1	0	40
	Building Construction	343	<1	0	344
	Paving	9	<1	0	9
	Architectural Coating	<1	<1	0	<1
2020	Architectural Coating	1	<1	0	1
Total Construction Emissions		**438**	**<1**	**0**	**440**
Amortized over 30 years		**15**	**<1**	**0**	**15**

Source: CalEEMOD as compiled by LSA (July 2018).
CalEEMod = California Emission Estimator Model
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide

Long-term operation of the proposed project would generate GHG emissions from area and mobile sources and indirect emissions from stationary sources associated with energy consumption. Mobile-source emissions of GHGs would include project-generated vehicle trips. Area-source emissions would be associated with activities including landscaping and maintenance of the proposed project, natural gas for heating, and other sources. Increases in stationary-source

emissions would also occur at off-site utility providers as a result of demand for electricity, natural gas, and water by the proposed project.

The GHG emission estimates presented in Table I shows the emissions associated with the level of development envisioned by the proposed project at opening. Appendix D includes the worksheets for the GHG emissions. As shown in Table I, the proposed project would result in GHG emissions of 1,300 MT of CO_2e per year. This emission level is less than the applicable SCAQMD GHG threshold of 3,500 MT of CO_2e per year. Therefore, GHG emissions associated with the proposed project would be less than significant.

Table I: Operational Greenhouse Gas Emissions

Source	Pollutant Emissions (MT/yr)					
	Bio- CO_2	**NBio- CO_2**	**Total CO_2**	**CH_4**	**N_2O**	**CO_2e**
Construction emissions amortized over 30 years	0	15	15	<1	0	15
Operational Emissions						
Area Sources	0	<1	<1	<1	0	<1
Energy Sources	0	295	295	<1	<1	295
Mobile Sources	0	903	903	<1	0	904
Waste Sources	5	0	5	<1	0	13
Water Usage	2	67	68	<1	<1	73
Total Project Emissions	**7**	**1,279**	**1,285**	**0**	**0**	**1,300**
					SCAQMD Threshold	**3,500**
					Would Emissions Exceed Threshold?	**No**

Source: Compiled by LSA (July 2018).
Note: Numbers in table may not appear to add up correctly due to rounding of all numbers.
Bio-CO_2 = biologically generated CO_2
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide
NBio-CO_2 = Non-biologically generated CO_2
SCAQMD = South Coast Air Quality Management District

2.8 HAZARDOUS MATERIALS

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

Less than Significant Impact. The proposed project includes two 5,000-gallon aboveground storage tanks (ASTs) for fuel dispensing and storage of gasoline and diesel. Therefore, a fueling truck would service these storage tanks on a regular basis to ensure an adequate fuel supply is on hand. All fuel transport would be provided by licensed vendors under contract to OCTA. These licensed vendors would transport fuel onto the site in compliance with State and federal laws regarding such transport. However, the storage and use of these fuels on site would require a spill contingency plan pursuant to water quality and hazardous materials areas to ensure that any fuel spills on site are adequately contained and neutralized in an effective and efficient manner. SC HAZ-1, which is a required standard condition, outlines the spill contingency plan. With the application of the required SC HAZ-1, impacts regarding transport and storage of fuels on site will be less than significant.

Standard Condition

SC HAZ-1 Prior to any fuel deliveries to the site, a spill prevention plan for potentially hazardous materials including fuels would be prepared and implemented by OCTA. The plan would include proper procedures for handling and storing potentially hazardous materials, as well as for cleaning up and reporting any spills. The plan would be located on site with responsibility, and oversight specifically identified, and on-site training will be required on a regular basis (no less than every 6 months) to ensure the effective implementation of the plan.

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

Less than Significant Impact. As discussed above in Response 2.8.a, the proposed project would provide on-site fuel storage and dispensing. Compliance with SC HAZ-1 would address spills of fuel at the site. Therefore, the potential for a hazard would be less than significant with the application of SC HAZ-1.

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

Less than Significant Impact. There are two schools within 0.25 mile of the project site: Fairmont Private School, located 370 ft south of the project site, and Loara Elementary School, located 900 ft southwest of the project site. Both schools have intervening buildings in direct line of the project site. The proposed project does not include elements that would create hazardous emissions or that would require the handling of acutely hazardous substances. Therefore, the proposed project would not pose a significant exposure risk to these schools.

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

Less than Significant Impact with Mitigation. As indicated in the Phase 1 and Phase 2 Environmental Site Assessments[5] (Rincon Consultants, Inc., 2017, provided in Appendix H), the project site is not listed on any government lists per Government Code Section 65962.5. Certain parcels within 0.5 mile of the project site have been identified in the database (also included in Appendix H), as having environmental records indicating previous cases of hazardous material sites. Six adjacent properties were listed on the Environmental Data Resources, Inc. (EDR) report. Three of those properties were reported to have experienced a hazardous material release. However, due to the lack of information regarding one of the releases, it is unknown if this property, located adjacent to the north at 1541 W. Lincoln Avenue, has the potential to impact the project site. The other two releases would not impact the project site based on the closed case statuses, the soils-only nature of the releases-

[5] Environmental Site Assessments are investigatory reports for pre-existing hazardous materials that may exist on or near a given property.

and/or the downgradient location of these properties. None of these properties is listed on the specified government list per Government Code Section 659962.5. No mitigation is required.

As described in both the Phase 1 and Phase 2 assessment reports, both the existing automotive business structures and the soils around the hydraulic lifts and south part of the site have been identified as affected by hazardous materials. The Phase 2 assessment focused on the soils and concluded that no further testing would be required, but that a soil management plan should be prepared for removal of contaminated soils encountered during grading. In addition, a Hazardous Building Material Survey (Ninyo & Moore, 2017 also in Appendix H) was performed to evaluate the asbestos and lead-based paint on the site due to the age of the buildings on the project site. Both lead-based paint and asbestos-containing materials have been identified in the structures, the following two measures from the Phase 2 and Building Materials reports are included to ensure the proper disposal of potentially hazardous materials on the project site.

Mitigation Measures

MM HAZ-2 Prior to demolition of the on-site structures, hazardous materials would need to be removed by a certified hazardous materials remediation company and legally disposed of at a landfill that accepts hazardous waste. Completion of this mitigation measure must precede all other construction activities and would need to be verified by the OCTA Construction Contractor as having been completed.

Based on the previous assessments that were conducted at the project site in 1993 through 2004, hydrocarbon and lead-impacted soil were previously identified at numerous locations at the project site. The majority of the impacted soil was identified in the southern portion of the project site at 1514 and 1516 W. Lincoln Avenue to 10 ft below ground surface.

MM HAZ-3 Prior to grading operations, OCTA shall have a soil management plan prepared that addresses issues associated with the impacted soils that will be encountered during future site excavation/grading activities. Impacted soils would require special handling and should be removed in accordance with local environmental health regulations and requirements.

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

f) For a project within the vicinity of private airstrip, would the project result in a safety hazard for people residing or working in the project area?

e and f - No Impact. The nearest airports are the Fullerton Municipal Airport at 4011 West Commonwealth Avenue, approximately 1.75 miles northwest of the project site, and John Wayne Airport (SNA), at 3160 Airway Avenue, approximately 10.5 miles southeast of the project site. Therefore, no impacts are anticipated related to airport hazards, and no mitigation would be required.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. One of the stated purposes of the proposed project is to enhance emergency response in Orange County, particularly related to OCTA operations and coordination with other agencies conducting emergency response functions. In particular, the proposed microwave tower would improve the level of communication with the Loma Ridge Emergency Center. Therefore, the proposed project would not interfere or impact any emergency response plan.

h) Would the project expose people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project area is in an urban area and could not be affected by wildland fires because they tend to occur on an urban/rural fringe.

2.9 HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less than Significant Impact. The proposed project involves construction of a secured office building and parking area. Pollutants of concern during project construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. According to North Orange County Integrated Regional Watershed Management Plan, the project site is located in the Lower San Gabriel River/Coyote Creek Watershed. According to the State's Water Quality Planning Tool, both the lower San Gabriel River and Coyote Creek are on the State's 303(d) (listed as impaired) and have total maximum daily loads (TMDLs) for heavy metals including copper and lead. The proposed project would not contribute to these runoff constituents.

During project construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via stormwater runoff into receiving waters (i.e., local storm drains, intermediate water bodies like the San Gabriel River, and ultimately the Pacific Ocean).

During project construction, the total disturbed soil area would be approximately 3 acres. Projects that disturb more than 1 acre of soil are subject to the requirements of the State Water Resources Control Board's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002, as amended by Orders No. 2010-0014-DWQ and 2012-0006-DWQ; Construction General Permit). Therefore, the proposed project would be required to obtain coverage under the Construction General Permit, as specified in SC WQ-1. The Construction General Permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of construction BMPs detailed in the SWPPP during construction activities.

Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

Pollutants of concern from operation of the proposed project include sediments, trash and debris, and pathogens. The proposed project would result in a permanent increase in impervious surfaces. The increase in impervious surface area would result in a permanent increase in the volume of runoff and pollutant loading to surface waters during a storm. An increase in impervious area would increase the volume of runoff during a storm, which would more effectively transport pollutants to receiving waters. As specified in SC WQ-2, the proposed project would implement operational BMPs to reduce pollutants of concern in stormwater runoff. The project will be required to comply with the requirements of the Anaheim Municipal Separate Storm Sewer System (MS4) Permit and to prepare a Water Quality Management Plan (WQMP) that specifies the operational BMPs that will be incorporated into the project design. The proposed BMPs may include, but not be limited to, biofiltration strips, biofiltration swales, pervious pavement, and biofiltration devices with underdrains. In addition, the spill contingency plan in SC HAZ-1 would also be required to ensure that any fuel spills would be contained and neutralized on site, and not enter the storm drain system.

The construction and operational BMPs would target and remove pollutants of concern in stormwater runoff and would reduce impacts to water quality. Therefore, SC WQ-1 and SC WQ-2, which require incorporation of construction and operational BMPs to target pollutants of concern, and SC HAZ-1, would reduce impacts related to violation of water quality standards or waste discharge requirements to a less than significant level.

Standard Conditions

The following mitigation measures will reduce impacts related to hydrology and water quality for the proposed project to a less than significant level.

SC WQ-1 **Construction General Permit.** Prior to the start of construction, OCTA shall obtain coverage for the project under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent (NOI) for coverage under the permit to the State Water Resources Control Board (SWRCB). A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

SC WQ-2 **Operational Best Management Practices.** Prior to the start of construction, OCTA shall ensure that operational BMPs are incorporated into the final project design. The proposed BMPs may include, but not be limited to, biofiltration strips, biofiltration swales, pervious pavement, and/or biofiltration devices with underdrains. The BMPs shall be designed to reduce stormwater runoff to at or below existing conditions. If the project is determined to be a Priority Project, a Final Water Quality Management Plan (WQMP) shall be prepared consistent with the Anaheim Municipal Separate Storm Sewer System (MS4) Permit, Drainage Area Management Plan, Model WQMP, and Technical Guidance Document. The Final WQMP shall specify BMPs to be incorporated into the design of the project.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level (e.g., the production rate of the pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less than Significant Impact. According to the Preliminary Geotechnical Evaluation (Appendix G) and the Phase 1 Report (Appendix H), depth to groundwater at the site is expected to be 60–100 ft below ground surface (bgs). During project construction, the maximum depth of excavation would not exceed 20 ft bgs. Based on the maximum depth of excavation (20 ft) and the anticipated depth of groundwater (60+ ft bgs), groundwater dewatering during construction is not anticipated. The proposed project would increase impervious surface areas, which would incrementally decrease infiltration. However, this decrease in infiltration would be minimal due to the small size of the project site. In addition, project operation would not require groundwater extraction. Therefore, impacts related to depletion of groundwater supplies or interference with groundwater recharge would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area including the alteration of the course of a stream or river, in manner which would result in substantial erosion or siltation on or off-site?

Less than Significant Impact. According to the preliminary drainage studies, the existing drainage pattern will remain unchanged and will continue to discharge to the existing drainage system on Lincoln Avenue. However, the proposed project is anticipated to significantly increase the impervious area from 18 percent to approximately 90 percent at the project site. On-site retention of runoff is included as part of the project. This on-site retention will reduce the rate and volume of runoff from the project site and avoid on- or off-site erosional issues when the project is completed. Therefore, the project would have less than significant impacts to existing drainage patterns in the area.

d) Would the project substantially alter drainage patterns of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less than Significant Impact. During project construction activities, soil would be disturbed and compacted and drainage patterns would be temporarily altered, which can increase the volume and velocity of stormwater runoff and increase the potential for localized flooding compared to existing conditions. However, grading would be conducted in a manner to control and direct runoff to receiving waters. In addition, the construction BMPs in the required SWPPP described in SC WQ-1 would also provide control of surface runoff on site. Any increase in runoff would be temporary during construction and treated and released or retained on site. Because on-site runoff would be controlled, construction activities would not result in on- or off-site flooding. Therefore, construction impacts related to altering the existing drainage pattern of the project site or area or increasing the rate or amount of surface runoff in a manner that would result in flooding on- or off-site would be less than significant with the incorporation of SC WQ-1.

The existing drainage pattern would remain unchanged and would continue to discharge to the existing drainage system on Lincoln Avenue. However, the proposed project would significantly increase the impervious area from 18 percent to approximately 90 percent. The proposed project run-off volume would be 16 percent higher than the existing conditions. Therefore, the proposed project would include the use of an on-site retention facility such that the ultimate stormwater discharge volume would not exceed 5 percent over the existing site discharge per the hydromodification requirements defined in the Orange County's Model WQMP. With the retention basin, the proposed project would not exceed the capacity of the downstream storm drain lines or result in off-site flooding. In addition, the proposed BMPs and on-site storm drain facilities would be sized to accommodate stormwater runoff from the project site so that on-site flooding would not occur. Finally, the proposed project would not alter the course of a stream or river. As such, with implementation of SC WQ-2, operational impacts related to on-site or off-site flooding would be reduced to less than significant. Therefore, impacts related to alteration of the existing drainage patterns in a manner that would substantially increase the rate or amount of surface runoff or result in flooding on- or off-site would be reduced to less than significant with implementation of SC WQ-1 and SC WQ-2.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. According to the Conceptual Drainage Study (STV, 2017, provided in Appendix I), the proposed development is anticipated to significantly increase the impervious area from 18 percent to approximately 90 percent. According to the Small Area Unit Hydrograph analysis attached in the Conceptual Drainage Study, the project run-off volume would be 16 percent higher than the existing conditions. Therefore, the use of an on-site retention facility is proposed and will be sized such that the ultimate stormwater discharge volume would not exceed a 5 percent net increase of discharge over existing conditions per the hydromodification requirements defined in the Orange County's Model WQMP. The retention basin is proposed to be located on the northeast corner of the project site. With the addition of the retention basin to the project design and the application of SC WQ-2, the proposed project would have a less than significant impact to drainage/runoff volume.

The construction of the proposed project has the potential to introduce pollutants to the storm drainage system from erosion, siltation, and accidental spills. However, as specified in SC WQ-1, the Construction General Permit requires preparation of an SWPPP to identify construction BMPs to be implemented during project construction to reduce impacts to water quality, including those impacts associated with soil erosion, siltation, and spills. As also discussed previously, pollutants of concern during project operations include sediments, trash and debris, and pathogens. As specified in SC WQ-2, the proposed project would implement operational BMPs to reduce pollutants of concern in stormwater runoff. With implementation of SC WQ-1 and SC WQ-2, which require implementation of construction and operational BMPs, the proposed project would not provide substantial additional sources of polluted runoff. Therefore, impacts related to the creation or contribution of runoff water that would exceed the capacity of existing or planned storm water drainage systems or the provision of substantial additional sources of polluted runoff would be less than significant with implementation of SC WQ-1 and SC WQ-2.

f) Would the project otherwise substantially degrade water quality?

Less than Significant Impact. Refer to Response 2.9.a.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The proposed project involves the construction of a secured office building. The proposed project does not include a housing component and would, therefore, not place housing within a 100-year flood hazard area. No impact relating to placement of housing within a 100-year flood hazard area would occur, and no mitigation is required.

h) Would the project place structures within a 100-year flood hazard area, which would impede or redirect flood flows?

No Impact. The proposed project would not place any structures within a 100-year flood hazard area. According to the City's Flood Hazard Area Map, the entire City west of the Santa Ana River is in the 500-year flood hazard area or an area where the 100-year flood hazard is below 1 ft. Therefore, the proposed project would not place structures within a 100-year flood hazard area that would impede or redirect flood flows, and no impacts would occur in a 100-year flood hazard area.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. According the City's Dam Inundation Map in the Safety Element of the General Plan, the project site is located outside of the three areas subject to inundation due to dam failure. In addition, the proposed project would not result in population growth; therefore, the proposed project would not result in additional people living in the dam inundation zone, which covers portions of the City. Therefore, proposed project impacts from exposure of people or structures to loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, would not be significant. No mitigation is required.

j) Would the project be subject to inundation by seiche, tsunami, or mudflow?

No Impact. Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. No unenclosed water retention facilities are located in close proximity to the project site. The risk associated with possible seiche waves is, therefore, not considered an impact.

Tsunamis are generated ocean wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. According to the California Tsunami Inundation Map for Emergency Planning, the proposed project is located approximately 11 miles from the ocean shoreline and is not in a tsunami inundation area. The risk associated with tsunamis is, therefore, not considered an impact.

Mudslides and slumps are described as a shallower type of slope failure usually affecting the upper soil mantle or weathered bedrock underlying natural slopes and triggered by surface or shallow subsurface saturation. The project site is relatively flat, and no existing landslides are present on the property. The risk associated with possible mudflows and mudslides is, therefore, not considered an impact.

2.10 LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. As described in Section 1.5, Environmental Setting and Existing Land Uses, the project area land uses consist of commercial and industrial businesses. There are no community resources on or near the project site. The closest residential area is located north of the project site across I-5. Therefore, the proposed project would not physically divide an established community, and would have no impact on parcels abutting the project site. No mitigation is required.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The City General Plan Land Use and Zoning Maps designate the project site as General Commercial and General Commercial/Industrial, respectively. The proposed project does not conflict with the City's General Plan or Zoning Code. As discussed in Section 1.8, City of Anaheim Coordination, OCTA, through the Conceptual Development Review process, and the City have determined that the proposed project is consistent with these local planning programs.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. There are no Habitat Conservation Plans, Natural Community Conservation Plan, or other approved habitat conservation plans that include the project site, and the proposed project would have no effect on these plans.[6]

2.11 MINERAL RESOURCES

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

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

a and b - No Impact. No known mineral resources are currently available at the project site. There are no known mineral resources or active mines identified in the vicinity of the project site in the Anaheim General Plan. The proposed project would not have any effect on such resources.

2.12 NOISE

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?

b) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

a and b - Less than Significant Impact.

Construction Noise. Typical noise levels range up to 92 A-weighted decibels (dBA) maximum instantaneous noise level (L_{max}) at 50 ft during the noisiest construction phases based on the type of construction equipment in use. Construction noise is exempt from City noise standards, but is regulated by the Anaheim Construction Noise Ordinance in the Municipal Code. Section 6.70.010 of the City Municipal Code states that the sound created by construction or building repair of any premises within the City shall be exempt from the applications of the ordinance between the hours of 7:00 a.m. and 7:00 p.m. The Noise Ordinance does not establish any upper limits for construction noise because such noise is temporary and will cease to occur after the completion of project construction. The Noise Ordinance regulates the timing of construction activities and includes special provisions for sensitive land uses. Construction activities will occur generally during the permitted hours of 7:00 a.m. and 7:00 p.m. in compliance with the City's Noise Ordinance, unless a waiver is granted by the City of Anaheim.

Construction associated with the proposed project would comply with the permitted construction hours. Therefore, construction-related noise impacts from the proposed project would be less than significant.

[6] County of Orange, Environmental Management Agency. May 1996. Website: https://occonservation.org/wp-content/uploads/2015/04/NCCP-EIR-Map-Section.pdf (accessed August 10, 2018).

Operational Noise. Operations of the proposed project are typical of office uses, and these activities do not generate any significant amount of stationary source noise. In addition, the project site is not located near any sensitive uses such as residential or institutions. The proposed project would have vehicles coming in and out of the project site for an entire 24-hour period, but the majority of these vehicles would access the project site during the day. Vehicular movement on the project site would not produce much noise because vehicles would not be able to produce enough speed due to the size of the project site and the layout of the proposed parking area. In addition, noise would be generated by the fans associated with the heating, ventilation, and cooling (HVAC) system for the building, and the fuel delivery truck. The HVAC system will be housed on the roof of the building and enclosed, thereby reducing noise emissions. The fueling truck would deliver fuel 1–2 times per week, and therefore, would not be a significant source of noise due to its infrequency on the site. Lastly, the closest sensitive receptor is the school located 370 feet south of the site; however, sound transmission to the school is inhibited by intervening structures. Therefore, on-site noise would be less than significant.

c) Would the project result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

Less than Significant Impact. Construction of the proposed project would involve standard demolition, site preparation, and construction activities that would not involve the use of construction equipment that would result in substantial ground-borne vibration or ground-borne noise on properties adjacent to the project site. No pile driving or blasting is proposed.

Furthermore, proposed project operations associated with the secured office facility are similar to general office uses and would not generate substantial ground-borne noise and vibration. Therefore, the proposed project would not result in the exposure of persons to or generation of excessive ground-borne noise and vibration during construction activities or operation of the proposed project, and potential impacts are considered less than significant.

d) Would the project cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact. As discussed above, the Anaheim Noise Ordinance has not established any upper limits for construction noise because construction noise is temporary and would cease to occur after the completion of construction. The proposed project would be constructed in compliance with the City's Noise Ordinance which regulates the timing of construction. Because the proposed project would comply with the permitted construction hours for the City, construction-related noise impacts from the proposed project would be less than significant.

As discussed in Response 2.12.b above, operational noise would be typical of an office and parking lot and would not exceed any noise control levels in the city's ordinance or general plan. Therefore, the proposed project would have less than significant impact related to operational noise.

e) For a project located within an airport land use plan area, 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?

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

e and f - No Impact. The nearest airports are the Fullerton Municipal Airport at 4011 West Commonwealth Avenue, approximately 1.75 miles northwest of the project site, and John Wayne Airport (SNA), at 3160 Airway Avenue, approximately 10.5 miles southeast of the project site. No private airstrips are located in the vicinity of the project site. Therefore, noise-related impacts due to airport activities are not anticipated.

2.13 POPULATION AND HOUSING

a) Would the project induce substantial 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)?

No Impact. The area surrounding the project site is already developed and urbanized and infrastructure is already in place. The proposed project would not induce substantial growth because the facility would house already existing operations and functions within OCTA. Therefore, no direct or indirect growth would occur in and around the project site due to construction and operation of the proposed project.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project would not displace any existing housing because no housing exists on the project site.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project would not displace a substantial number of people because no homes are affected; therefore, no replacement housing would be needed.

2.14 PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

No Impact. The Anaheim Fire and Rescue Department provides fire protection services for the City. Station No. at 2141 W. Crescent Avenue in Anaheim, located approximately 1 mile east of the project site, provides for the immediate fire protection needs in the project area. No additional fire protection would be warranted because the proposed project will be required to meet the Anaheim Fire Code, at a minimum, and has been and will continue to be reviewed by Anaheim Fire and Rescue Department as part of the plan review process.

ii. Police protection?

No Impact. Police services for the City are provided by the Anaheim Police Department. The proposed project has a security component that includes the OCTA Transit Police and the Orange County Sheriff's Department and would not generally require local police assistance, unless under a mutual aid agreement. In addition, the proposed project would not induce population growth and therefore would not increase police service demand. Therefore, no additional police protection is anticipated.

iii. Schools?

No Impact. The proposed project has no residential component and, thus, would not induce substantial population growth requiring additional schools.

iv. Parks?

No Impact. No added demand on off-site park infrastructure in the City of Anaheim is anticipated because the proposed project does not include new residential uses or population growth.

v. Other Public Facilities?

No Impact. No additional demand on City of Anaheim or the County of Orange public facilities in the project area is anticipated as a result of the proposed project. All of the public facilities and services that could be affected by the proposed project have been analyzed in other sections. As such, the proposed project would not necessitate the expansion of other public facilities. No mitigation is required.

2.15 RECREATION

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) Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

a and b - No Impact. The proposed project would have no effect on any recreational facilities because there are no recreational facilities at or near the project site. In addition, the proposed project would have no residential component that could increase park use. The proposed

operations would have no secondary effects on any recreational facilities in the local area or region. No mitigation is necessary.

2.16 TRANSPORTATION AND TRAFFIC

A Traffic Memorandum (provided in Appendix J) was prepared by LIN (2018) for the TSOC. The memorandum provides an analysis of proposed project operation and vehicular trip generation. Due to the unusual type of use included in the proposed project, standard trip generations (e.g., Institute of Transportation Engineers [ITE]) were not used. A customized trip generation was developed to more accurately reflect the uses and operations at the proposed project.

Trip generation for the proposed project was calculated using counts from the existing OCTA Garden Grove Annex, as a proxy, which contains most of the same functions that would move to the project site under the proposed project, using methods detailed in Chapter 9 of the ITE's *Trip Generation Handbook*, 3rd Edition (Table J). Three, 24-hour driveway counts conducted on February 28, 2018, provided existing access and egress trips for the existing OCTA Garden Grove Annex and bus operations. Trips associated with the OCTA Garden Grove Annex were not differentiated from trips associated with the bus operations building due to similarity in agencies and the shared parking lot. The calculated trip generation for the proposed project is an overestimation representing a conservative analysis. For purposes of trip estimation, gross floor area (GFA) was considered to be equivalent to total floor area.

Trip Distribution

Trip distribution represents the directional orientation of traffic to and from the project site. Trip distribution is heavily influenced by the geographical location of the project site, the location of residential, commercial, and recreational opportunities and the proximity to the regional freeway system.

The proposed project would house the following agencies from the OCTA Garden Grove Annex: Central Communications, Emergency Operations Center, Transit Police Services (provided by the Orange County Sheriff), and Field Operations and Information Systems, resulting in approximately 11,000 sf GFA. All agencies in the bus operations building will remain in the Garden Grove facility.

Table J: Calculated Average Rate of Garden Grove Facility

Vehicle Trip Ends vs:	On a	Total Trips	Total Floor Area (1,000 sf)[1]	Average Rate
1,000 sf total floor area	Weekday	1,138	32.8	34.70
1,000 sf total floor area	AM Peak Hour (7:00 AM–9:00 AM)	26	32.8	0.79
1,000 sf total floor area	PM Peak Hour (4:00 PM–6:00 PM)	31	32.8	0.96
1,000 sf total floor area	AM Peak Hour of Generator (11:30 AM)	83	32.8	2.53
1,000 sf total floor area	PM Peak Hour of Generator (2:30 PM)	82	32.8	2.50

Source: LIN Consulting, Inc. (2018).
[1] Total floor area captures all functions at the Annex including functions that would not be related to the proposed TSOC.
sf = square foot/feet
TSOC = Transit Security and Operations Center

The proposed project accounts for future programmed growth of the agencies that are moving, which results in a larger GFA (25,400 sf). Similarly, the Garden Grove Annex would have additional space for future expansion in the existing facility.

Primary access to the project site would be via the entrance/exit driveways at Lincoln Avenue with secondary access on Manchester Avenue being primarily limited to Sheriff's Department vehicles. Since the Sheriff dispatch operation is expected to serve both local as well as County-wide transit locations, most trips were distributed to the freeways; however, some traffic remain on local streets due to the proximity of large transit-oriented hubs in the vicinity such as Disneyland.

Utilizing the trip generation for the Garden Grove Annex provided in Table J, the trip distribution pattern was calculated and presented in Table K. As shown in Table K, the proposed project would generate approximately 882 trips per day (access + egress).

Table K: TSOC Project Trip Generation

Vehicle Trip Ends vs: (GFA)	On a:	Quantity (sf GFA) GFA	Access/Egress %/%	AM Peak Hour		PM Peak Hour		Weekday Daily	
				Access	Egress	Access	Egress	Access	Egress
1,000	Weekday	25,400	50/50					441	441
1,000	AM Peak	25,400	75/25	16	5				
1,000	PM Peak	25,400	24/75			6	19		
1,000	AM Peak Generator (11:30 AM)	25,400	55/45	36	29				
1,000	PM Peak Generator (2:30 PM)	25,400	43/57			28	36		

Source: LIN Consulting, Inc. (2018).
GFA = gross floor area
sf = square foot/feet

Thresholds and Criteria

The assignment of traffic from the project site to the adjoining roadway system has been based upon the proposed project's trip generation, trip distribution, and circulation to and from arterial highway and the local street systems.

Most trips entering the project site would have, at some point, utilized Euclid Street, Lincoln Avenue, Manchester Avenue, or I-5 in order to gain access to the two parking lot driveways on Lincoln Avenue or to the exclusive Orange County Sheriff's Department driveway on Manchester Avenue. Trips from Manchester Avenue and westbound Lincoln Avenue would access one of the driveways on Lincoln Avenue via a U-turn on Euclid Street and eastbound Lincoln Avenue. Trips to northbound and southbound Euclid Avenue, westbound Lincoln Avenue, and I-5 South would egress

from one of the driveways on Lincoln Avenue via a U-turn on Manchester Avenue and Lincoln Avenue. The parking lot driveway on Manchester Avenue would be dedicated to the Sheriff's Department's patrol and operations vehicles only. These vehicles would access the driveway from the I-5 freeway ramps on Lincoln Avenue and would egress from the driveway to the I-5 southbound ramps via a U-turn on Manchester Avenue and Lincoln Avenue and to the I-5 northbound ramps via eastbound Lincoln Avenue.

As shown in Table K, the trip generation during peak hour would be 25 trips at its highest rate, and peak generation times would occur at 11:30 AM and 2:30 PM, both outside of peak-hour traffic times for morning and evening. With such low trip generation, a full traffic impact analysis was not warranted. The Traffic Memorandum, analyzed turn-movement volumes in and out of the project site for the AM and PM peak hours at the seven intersections listed below:

- Euclid Street and I-5 northbound Ramps
- Euclid Street and Lincoln Avenue
- Lincoln Avenue and Loara Street
- Lincoln Avenue and I-5 southbound Ramps
- Lincoln Avenue and Manchester Avenue
- Broadway and Manchester Avenue
- I-5 northbound Ramps/Wilshire Avenue and Lincoln Avenue

The highest turn-movement volume was seven at Lincoln Avenue and the I-5 southbound ramps, and at Lincoln Avenue and Manchester Avenue during the PM peak hour.

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less than Significant Impact. As discussed in the Traffic Memorandum (LIN 2018), the effects of the proposed project on vehicular mobility would be minimal because the trip generation would be so low for the proposed project, especially during the morning and evening peak hours. In addition, bicycle and transit movements along Manchester Avenue and Lincoln Avenue would be maintained and the design of the access points would not affect pedestrian, bicycle, and transit used in the area. Therefore, there would be no adverse impacts to the local circulation system, which includes, but is not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less than Significant Impact. As discussed above, the proposed project would generate minimal trips and most would fall outside of peak hours. The proposed project effects on vehicular mobility would be minimal. The proposed project would not conflict with the OCTA Congestion Management

Program, level-of-service standards, travel demand measures, or other standards designated for roads and highways in proximity to the project area. Therefore, effects are considered less than significant, and no mitigation is required.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

No Impact. The proposed project would not result in a change in air traffic patterns because it proposes an office building with security operations enclosed. The proposed tower would be equipped with FAA-required night-lighting for safety. Furthermore, the nearest airports are the Fullerton Municipal Airport at 4011 West Commonwealth Avenue, approximately 1.75 miles northwest of the project site, and John Wayne Airport (SNA), at 3160 Airway Avenue, approximately 10.5 miles southeast of the project site. Therefore, no impacts are anticipated to air traffic patterns, and no mitigation would be required.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact with Mitigation. The project site was selected due to its central location and access to local freeways. There are no proposed project components that would introduce equipment, design, or operations that could create a new hazard to local mobility. Furthermore, no project-related sight obstructions are located along any of the surrounding access points or roads, and the design of the facility would not increase hazards or create incompatible uses with the surrounding area. Therefore, no mitigation is required.

However, during project construction, materials will be hauled off and onto the project site onto local streets. This impact would only occur during the construction phase. MM TR-1 has been added to ensure that adequate construction traffic management is implemented during construction.

Mitigation Measure

MM TR-1: Prior to the commencement of construction activities, the OCTA Construction Contractor shall prepare a construction traffic management plan (TMP) for approval by the City of Anaheim including protocols for construction trucks leaving and entering the project site, appropriate training, markers and signage, and coordination with the City of Anaheim should any lane closures be required. The TMP must be included with the construction plans and be available for inspection on site.

e) Would the project result in inadequate emergency access?

Less than Significant Impact. The existing street configuration at Lincoln Avenue and Manchester Avenue would remain unchanged by the proposed project. Emergency access to the surrounding project area would not be restricted by the proposed project, and would remain as currently provided. Therefore, adequate emergency access would be provided and would be unimpeded for all vehicles (i.e., emergency and maintenance vehicles). In addition, the proposed project would

enhance the emergency operations for OCTA by providing a newer and more effective emergency operations center, a core feature of the proposed project and would meet all Anaheim Fire Code requirements for emergency access.

f) Would the project conflict with adopted policies, plan, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. OCTA provides public transit service throughout the City and the County in proximity to the project site (i.e., I-5). Construction and operation of the proposed project would not affect existing transit service facilities (i.e., bus stops or routes [42A]) in the project area because the proposed project would enhance security of OCTA's transit operations. The proposed project would not decrease the performance or safety of any public transit, bicycle (planned bikeway [94]), or pedestrian facilities (none existing or planned), and is in fact intended to enhance them. As a result, no mitigation is required.

2.17 TRIBAL CONSULTATION

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

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

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

Less than Significant Impact. Effective July 1, 2015, Assembly Bill (AB) 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in Section 21074. A tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed projects in its traditionally and culturally affiliated area. The lead agency must provide written formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification, if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

OCTA has received requests from two California Native American Tribes to be notified of projects in which the County is the Lead Agency under CEQA. The Gabrieleño Band of Mission Indians – Kizh Nation, and the Gabrieleno Tongva – San Gabriel Band of Mission Indians were both notified of the proposed project on July 28, 2018 (Appendix F). No response was received from either of these two tribes. However, a response was received from the Viejas Band of Kumeyaay Indians in Alpine, California. They stated in their letter that the Tribe has "determined that the project site has little cultural significance or ties" to them. They further requested notification on any finds and that OCTA work with more local tribes. This letter can be reviewed in Appendix K.

As previously discussed in Section 2.5, Cultural/Scientific Resources, above, the project area is highly urbanized and most of the project area is on Artificial Fill. Based on the Cultural Resources Report (Appendix F), the project site is not expected to yield any Native American artifacts, human remains, or cultural resources, because excavation depths are limited, and because the project site is within a modern, built environment, including concrete and asphalt roadways and other development. However, if human remains are encountered, as described in the Cultural Resources Report (Appendix F), SC CR-3, as noted in Section 2.5.d, would be implemented. Thus, no impacts to tribal cultural resources are anticipated to occur as a result of the proposed project, and no mitigation is required.

2.18 UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact. The City of Anaheim's local sanitary sewer system serves the project vicinity and is tributary to the Orange County Sanitation District (OCSD). The OCSD service area comprises 480 square miles of northern and central Orange County. OCSD operates 579 miles of sewer lines, 15 off-site pumping station, two regional wastewater treatment plants, and an ocean disposal system. The project site falls within the Santa Ana Regional Water Quality Control Board (SARWQCB) area. The SARWQCB regulates the treatment of wastewater at treatment plants and the discharge of treated wastewater into receiving waters. However, the proposed project would connect with local trunk sewers and implement standard wastewater connections for the proposed project. There are no operations or uses included as part of the proposed project (a two-story security building) that would result in any exceedance of wastewater treatment standards. Thus, no potential exists for the proposed project to impact the OCSD wastewater treatment facilities or exceed SARWQCB requirements. No mitigation is required.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?

Less than Significant Impact. The overall water use and wastewater generation area-wide would not substantially increase. The proposed project would increase water and wastewater production over the existing uses. However, the project site is already served by the City's water and sewer services. The City has reviewed the plans as part of the Conceptual Development Review process and did not

require any expansion, extension, or new water or wastewater facilities to serve the project. No mitigation is required.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?

Less than Significant Impact. As discussed in Response 2.9.a, the proposed project would result in a permanent increase in impervious surface. The increase in impervious surface area would result in a permanent increase in the volume of runoff and pollutant loading to surface waters during a storm. However, a retention basin has been included in the project design to ensure that the increase in impervious area on the project site would not result in a substantial increase in stormwater runoff. In addition and as specified in SC WQ-2, the proposed project would implement operational BMPs to reduce stormwater runoff to existing levels. With implementation of the retention basin and BMPs, stormwater runoff would not be greater than existing levels, no new or expanded stormwater facilities would be required, and impacts would be less than significant.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact. No new or expanded entitlements or resources are required for water supply availability to the project site. The proposed project includes uses that are similar to an office building and would not require substantial demand for potable water from the Anaheim Water Department through its existing facilities. There are no uses proposed that would require water expansion of water supply availability or connections.

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

Less than Significant Impact. As stated above, the City and the OCSD are responsible for the collection, treatment, and disposal of domestic, commercial, and industrial wastewater. The proposed project includes uses that are similar to an office building and would not require substantial demand for wastewater. None of the wastewater utilities serving the project site have indicated inadequate capacity or ability to serve the site based on previous communications with the City during the Conceptual Development Review. Therefore, there are less than significant impacts related to wastewater generation, and no mitigation is required.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. The project area is located within the City of Anaheim and will be serviced through the City's solid waste provider. Based on the City's General Plan EIR No. 330, the City of Anaheim complies with all federal, State and local statutes and regulations related to solid waste. State law requires that after 2000, the City of Anaheim divert at least 50 percent of solid waste from landfills through conservation, recycling, and composting. In 2000, the City diverted 50

percent of its solid waste. This was achieved through City participation in over 20 programs, such as residential curbside recycling, to facilitate the diversion of waste from landfills. The City has also adopted a Source Reduction and Recycling Element (SRRE) and a Household Hazardous Waste Element (HHWE) to develop programs to address household hazardous waste State Law. Therefore, no significant impacts are anticipated.

Non-hazardous construction waste would be hauled to the Olinda Alpha Landfill. Based on Orange County Waste & Recycling's management of the three Orange County landfills, capacity is available for residents and businesses through the year 2053.[7] Hazardous soils would be disposed of at an authorized landfill or contaminated soil treatment facility in Southern California. Operation of the proposed project would not generate substantial amounts of solid waste given the level of activity anticipated. Based on Table L, approximately 135 pounds of solid waste would be generated daily. The rate is based on commercial waste generation, which is slightly higher than for an office use. Thus, this estimate is likely an overestimation of waste generation. Solid waste generation would increase on the site over the existing solid waste generation of the existing businesses. This slight increase in solid waste will not necessitate any alterations to existing landfills or waste hauling operations.

Table L: Estimated Generation of Solid Waste at Project Buildout (2018)

	Land Use	Proposed Development	Estimated Solid Waste Generation Rate	Estimated Solid Waste Generation (lbs/day)
Proposed Project	Commercial Space	26,800 sf	5 lbs/1,000 sf/day[1]	135

Source: LSA Associates, Inc. (June 2018).
[1] Orange County Waste & Recycling. Website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates (accessed August 8, 2018).
lbs/day = pounds per day
sf = square feet

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. The proposed project is expected to comply with existing or future statutes and regulations, including waste diversion programs mandated by city, State, or federal law. In addition, as discussed above, the proposed project would not result in an excessive production of solid waste that would exceed the capacity of the existing landfill serving the project area. Therefore, the proposed project would not result in an impact related to federal, State, and local statutes and regulations related to solid wastes.

h) Have significant effects on energy resources as described in Appendix F of the State CEQA Guidelines?

[7] OC Waste & Recycling. Website: http://www.oclandfills.com/landfill/active/bowerman (accessed August 13, 2018).

Less than Significant Impact. No new utility infrastructure would be needed to serve the proposed project. The proposed project would connect to existing electrical and natural gas infrastructure adjacent to the project site. The proposed uses on the project site are typical of office uses; however, the proposed project would operate 24 hours per day. The proposed project would be required to meet energy conservation policies in the California Building Standards Code (California Code of Regulations [CCR], Title 24) and would be more energy-efficient than the existing Garden Grove Annex facility.

2.19 MANDATORY FINDINGS

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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 Impact with Mitigation. No native plant or wildlife would be impacted with implementation of the proposed project and MM BIO-1 regarding compliance with the MBTA. Potential impacts to cultural resources could occur, but would be reduced to a less than significant level with implementation of MM CR-1 and MM CR-2 as noted above.

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 Impact with Mitigation. The project site is located in an urban area on a previously developed site. Mitigation measures have been added to ensure that impacts regarding biological resources (MM BIO-1), cultural and paleontological resources (MM CR-1 and MM CR-2), soils (SC GEO-1), hazardous materials (MM HAZ-2 and MM HAZ-3), and traffic (MM TR-1) would be less than significant. There is no indication that the proposed project would have environmental impacts that could cause other facilities or projects to be adversely affected. The area is highly urbanized and, therefore, subject to mostly infill development and redevelopment projects. Therefore, the proposed project, when taken into consideration with other local development, has little demonstrable impact, and the impacts are considered less than cumulatively considerable.

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

Less than Significant Impact with Mitigation. With implementation of standard conditions and mitigation measures, potential impacts related to air quality, hazards, and water quality and traffic were determined to be less than significant. With implementation of standard conditions, impacts related to air quality were determined to be less than significant. Therefore, implementation of the proposed project would not cause substantial adverse effects on human beings.

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