

Memorandum

To: CHAIR AND COMMISSIONERS

CTC Meeting: May 7, 2013

Reference No.: 2.2c. (20)
Action

From: ANDRE BOUTROS
Executive Director

Subject: **APPROVAL OF PROJECT FOR FUTURE CONSIDERATION OF FUNDING
FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE REVISED
PLATINUM TRIANGLE EXPANSION PROJECT INCLUDING THE KATELLA AVENUE
WIDENING PROJECT (RESOLUTION E-13-39)**

ISSUE:

Should the Commission, as a Responsible Agency, accept the Final Subsequent Environmental Impact Report (FSEIR), Findings of Fact and Statement of Overriding Considerations for the Revised Platinum Triangle Expansion Project including the Katella Avenue Widening Project (project) in Orange County and approve the project for future consideration of funding?

RECOMMENDATION:

Staff recommends that the Commission accept the FSEIR, Findings of Fact and Statement of Overriding Considerations and approve the project for future consideration of funding.

BACKGROUND:

The City of Anaheim (City) is the CEQA lead agency for the project. The project is located on Katella Avenue between Lewis Street and State College Boulevard in the southern portion of the City of Anaheim. The project will widen Katella Avenue to provide four westbound and four eastbound lanes consisting of 13-foot wide curb lanes and 11-foot wide inside lanes. The project will also construct a 26-inch wide raised landscaped median, a new 13-foot parkway consisting of seven-foot sidewalks and six-feet of landscaping, and install four bus pads. The project is one component of the Revised Platinum Triangle Expansion Project that addresses development intensification and improvements to the 820-acre area known as the Platinum Triangle located near the confluence of Interstate-5 and State Route-57 and encompassing the Angel Stadium of Anaheim, the Honda Center and the Grove of Anaheim. On October 26, 2010 the City Council approved and certified a FSEIR for the Revised Platinum Triangle Expansion Project including the Katella Avenue Widening Project.

The FSEIR for the Revised Platinum Triangle Expansion Project determined that impacts related to air quality, land use & planning, noise, traffic & transportation, and greenhouse gas emissions would be significant and unavoidable as follows:

- Short term construction emissions associated with build-out of the project would exceed the South Coast Air Quality Management District's (SCAQMD) regional and localized construction emissions thresholds; and long term operational emissions associated with build-out of the project would exceed SCAQMD's regional significance thresholds for certain criteria pollutants. Additionally, build out of the proposed project would place sensitive uses near major pollutant sources.
- High-rise residential towers associated with project build out will conflict with the operation of the Southern California Gas Company's existing microwave tower located in the project vicinity.
- Project build out will result in substantial, permanent increase in ambient traffic noise that may exceed City standards prior to roadway improvements and noise attenuation; exterior noise levels from roadway, railroad and stadium operations that may exceed compatibility goals established by the City; and substantial temporary increase in noise levels and vibration during construction.
- Project-related trip generation would impact levels of service for the area roadway system and increase traffic volumes on State Highway facilities resulting in decreased levels of service unless planned roadway improvements are implemented by the responsible agencies including the City of Orange and Caltrans.
- The proposed project would generate substantial greenhouse gas emissions and cumulatively contribute to climate change; however, the proposed project is a mixed-use infill project that is consistent with the Attorney General's recommended measures for land use as well as statewide and regional greenhouse gas reduction goals.

Findings of Fact were developed which provide that changes or alternations have been required in, or incorporated into, the Revised Platinum Triangle Expansion Project that avoid or substantially lessen the significant environmental effect and that impacts have been reduced to the extent feasible; however, after implementation of the mitigation measures contained in the SEIR, these impacts remain significant and unavoidable. The City adopted the FSEIR, Findings of Fact and a Statement of Overriding Considerations for the plan on October 26, 2010. The City found that the significant, unavoidable adverse impacts are acceptable and are outweighed by social, economic and other benefits of the Revised Platinum Triangle Expansion Project. These benefits include, but are not limited to: contribution toward a beneficial mix of residential, commercial, industrial institutional recreation, and open space uses in the Platinum Triangle, providing significant housing, recreational and public services benefits of local and regional significant as well as providing various public infrastructure improvements. The City established a Mitigation Monitoring Program to ensure that the mitigation measures specified for the plan are implemented.

Upon further analysis by the City it was determined that the Katella Avenue Widening Project has no environmental effects beyond those analyzed in the approved FSEIR for the Revised Platinum Triangle Expansion Project. Therefore, no further project level CEQA compliance is required. On March 13, 2013 the City provided written confirmation that the preferred alternative set forth in the final environmental document is consistent with the project programmed by the Commission.

The project is fully funded through construction and is estimated to cost \$7,300,000. The project is funded with SLPP (\$1,000,000) and Local (\$6,300,000) funds. Construction is estimated to begin in fiscal year 2013/14.

Attachment

- Resolution E-13-39
- Findings of Fact & Statement of Overriding Considerations
- Project Location

CALIFORNIA TRANSPORTATION COMMISSION

Resolution for Future Consideration of Funding 12 – Orange County Resolution E-13-39

- 1.1 **WHEREAS**, the City of Anaheim (City) has completed a Final Environmental Impact Report pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines for the following project:
- Revised Platinum Triangle Expansion including the Katella Avenue Widening Project
- 1.2 **WHEREAS**, the City has certified that the Final Environmental Impact Report has been completed pursuant to CEQA and the State CEQA Guidelines for its implementation; and
- 1.3 **WHEREAS**, the project will widen Katella Avenue to provide four westbound and four eastbound lanes consisting of 13-foot wide curb lanes and 11-foot wide inside lanes. The project will also construct a 26-inch wide raised landscaped median, a new 13-foot parkway consisting of seven-foot sidewalks and six-feet of landscaping, and install four bus pads. The project is one component of the Revised Platinum Triangle Expansion Project that addresses development intensification and improvements to the 820-acre area known as the Platinum Triangle located near the confluence of Interstate-5 and State Route-57 and encompassing the Angel Stadium of Anaheim, the Honda Center and the Grove of Anaheim; and
- 1.4 **WHEREAS**, the California Transportation Commission, as a Responsible Agency, has considered the information contained in the Final Environmental Impact Report; and
- 1.5 **WHEREAS**, Findings of Fact made pursuant to CEQA guidelines indicate that specific unavoidable significant impacts related to air quality, noise, public services & utilities, and traffic make it infeasible to avoid or fully mitigate to a less than significant level the effects associated with the project; and
- 1.6 **WHEREAS**, the City adopted a Statement of Overriding Considerations for the project; and
- 1.7 **WHEREAS**, the City adopted a Mitigation Monitoring Program for the project; and
- 1.8 **WHEREAS**, the above significant effects are acceptable when balanced against the facts as set forth in the Statement of Overriding Considerations.
- 2.1 **NOW, THEREFORE, BE IT RESOLVED** that the California Transportation Commission does hereby accept the Final Environmental Impact Report, Findings of Fact and Statement of Overriding Considerations and approve the above referenced project to allow for future consideration of funding.

3. Findings on Potentially Significant Impacts

This section identifies the findings on impact categories analyzed in the Draft and Final EIR, including potentially significant impacts of the project.

3.1 AESTHETICS

Impact 5.1-1: The proposed project would alter the visual appearance of the project area.

As discussed in the DSEIR, development in accordance with the increased development intensities would inevitably result in changes to the visual appearance of the project area as the height, size, and scale of structures increase. The proposed project would also modify widths of streets and street intersections within the Platinum Triangle to ensure that increased development intensities are accommodated.

However, all new mixed use development would be required to adhere to the adopted design standards set forth in the Chapter 18.20, Platinum Triangle Mixed Use (PTMU) Overlay Zone, and other applicable zoning regulations of the City of Anaheim Municipal Code. Development within the Platinum Triangle would be designed in accordance with the adopted Platinum Triangle design principles. Development projects within the project area would be constructed in sizes and scales that are consistent with planned development in the area and provide a rich mix of block, building, and unit configurations to enhance the visual attractiveness. As implementation of the proposed project occurs over an extended period of time, various urban design attributes incorporated in the Master Land Use Plan (MLUP) and PTMU Overlay Zone would ensure that individual projects are architecturally consistent and well landscaped, as envisioned by the MLUP.



State College Boulevard Railroad Undercrossing

The AT&SF railroad crosses State College Boulevard approximately 250 feet north of Wright Circle within the Platinum Triangle. In order to improve traffic flow and safety, the City of Anaheim is working with the Orange County Transportation Authority (OCTA) on an underpass concept at this location. Figure 3-12 shows the proposed undercrossing location and conceptual illustration. Because it is an underpass concept, any visual impact would be minimal, as it would not be visible from surrounding areas. It is anticipated that this undercrossing would improve the visual quality of the area as landscaping would be incorporated into the project design.

Shade/Shadow Impact

The issue of shade and shadow pertains to the blockage of direct sunlight by on-site buildings, which affects adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational, outdoor restaurants, and pedestrian areas have expectations for direct sunlight and warmth from the sun. Factors that influence the extent and range of shading include season; time of day; weather; building height, bulk, and scale; spacing between buildings; and tree cover. The longest shadows are cast during the winter months, when the sun is lowest on the horizon, and the shortest shadows are cast during the summer months. Shadows are longer in the early morning and late afternoon. The City does not provide any specific provisions in

3. Findings on Potentially Significant Impacts

regulating shade or shadow impacts. Therefore, this analysis assumes that the extent of shadow impacts is considered substantial if 50 percent of sun-sensitive area is in shade/shadow for at least 50 percent of the duration for the season (i.e., three hours between 9 AM and 3 PM during winter daylight hours).

Nonetheless, the increased allowable density and height of the Proposed Project would result in increased shadow lengths and widths being cast by the existing conditions. Therefore, despite the existing design guidelines, there is a potential that over 50 percent of on- and off-site shadow-sensitive areas would experience shade/shadow effects for more than 50 percent of the sunlight hours. Future development projects adjacent to uses that are deemed shadow sensitive would be required to demonstrate that they would not interfere with those uses' exposure to natural sunlight and to incorporate design features that allow direct sunlight for at least 50 percent of the sun-sensitive areas for at least 50 percent of duration for the season. Therefore, with mitigation, implementation of the Proposed Project would result in less than significant impacts associated with the project area's visual appearance.

Mitigation Measures:

Applicable Measure from MMP No. 106A

The following mitigation measure was included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332, and is applicable to the proposed project. Additions are shown in bold and deletions are indicated in ~~strikethrough~~ format. The mitigation reference number is shown in *(italics)*.

- 1-1 ~~Prior to approval of a~~ **Prior to approval of a** ~~part of the Final Site Plan application, where adjacent uses are deemed to be shadow sensitive (e.e.g., residential, recreational, outdoor-restaurants, and pedestrian areas), the property owner/developer for future development projects shall demonstrate that the Proposed Project would not preclude shadow sensitive receptors' exposure to natural sunlight for at least 50 percent of duration for the season, for at least 50 percent of the shade-sensitive area, to the satisfaction of the Planning Director. (5.1-7)~~

Finding: The mitigation measure is feasible and avoids or substantially lessens potentially significant aesthetic impacts to a less than significant level for the reasons set forth in the Draft SEIR.

Reference: FSEIR Section 5.1, Pages 5.1-9 through 5.1-12.

3.2 AIR QUALITY

Impact 5.2-1: Construction activities associated with the Proposed Project would generate substantially more short-term air pollutants compared to the Adopted Master Land Use Plan and would continue to exceed South Coast Air Quality Management District's regional significance thresholds.

Construction activities occurring within the Platinum Triangle would potentially exceed the SCAQMD emissions thresholds for NO_x, CO, VOC, PM₁₀ and PM_{2.5} and significantly contribute to the O₃, PM₁₀, and PM_{2.5} nonattainment designation of the SoCAB. The emissions shown in Table 5.2-7 represent an estimate of construction emissions from development of multiple projects occurring within the Platinum Triangle MLUP. However, actual maximum daily emissions would depend on the number of simultaneously occurring projects. Regional construction impacts associated with the Adopted MLUP in

3. Findings on Potentially Significant Impacts

the 2SEIR No. 332 were considered a significant impact of the project. The Proposed Project would generate substantially more construction emissions over the same 20-year time frame as compared to the adopted MLUP. Impacts would remain significant and unavoidable.

Mitigation Measures:

Applicable Measures from MMP No. 106A

The following mitigation measures were included in Updated and Modified Mitigation Monitoring Program No. 106 prepared for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 (FSEIR No. 332), and are applicable to the Proposed Project. (For mitigation measures to reduce energy consumption, see also Chapter 5.10, *Utilities and Service Systems*). Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The reference number for each measure from MMP No.106A is shown in *(italics)*.

Construction

2-1 Ongoing during grading and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to reduce construction-related emissions; however, the resultant value is expected to remain significant. (5.2-1)

- a) The contractor shall ensure that all construction equipment is being properly serviced and maintained in accordance with the manufacturer's recommendations to reduce operational emissions.
- b) ~~Where feasible, the~~ The contractor shall use Tier 3 or higher, as identified by the United States Environmental Protection Agency, off-road construction equipment with higher air pollutant emissions standards for equipment greater than 50 horsepower, based on manufacturer's availability. ~~low-emission-mobile construction.~~
- c) The contractor shall utilize existing power sources (e.g., power poles) or clean-fuel generators rather than temporary diesel-power generators, where feasible.



2-2 Ongoing during grading and construction, the property owner/developer shall implement the following measures in addition to the existing requirements for fugitive dust control under South Coast Air Quality Management District Rule 403 to further reduce ~~in order to reduce~~ PM₁₀ and PM_{2.5} emissions. To assure compliance, the City shall verify compliance that these measures have been implemented during normal construction site inspections. The measures to be implemented are listed below: (5.2-2)

- a) ~~The property owner/developer shall implement standard mitigation measures in accordance with South Coast Air Quality Management District's Rules 402 and 403, to control fugitive dust emissions and ensure that nuisance dust conditions do not occur during construction.~~
- b) ~~In addition to the standard measures, the property owner/developer shall implement supplemental measures as feasible to reduce fugitive dust emissions to the extent feasible during construction operations. To assure compliance, the City shall verify~~

3. Findings on Potentially Significant Impacts

~~compliance that these measures have been implemented during normal construction site inspections. The measures to be implemented are listed below:~~

- a) ~~e~~—During all grading activities, the property owner/developer's construction contractor shall ~~re~~establish ground cover on the construction site through seeding and watering as quickly as possible to achieve a minimum control efficiency for PM_{10} of 5 percent.
- b) ~~e~~—During all grading activities, the property owner/developer's construction contractor shall apply chemical soil stabilizers ~~have~~ to on-site haul roads to achieve a control efficiency for PM_{10} of 85 percent compared to travel on unpaved, untreated roads.
- c) ~~e~~—The property owner/developer's construction contractor shall ~~p~~Phase grading to prevent the susceptibility of large areas to erosion over extended periods of time.
- d) ~~e~~—The property owner/developer's construction contractor shall ~~s~~chedule activities to minimize the amount of exposed excavated soil during and after the end of work periods.

~~Dispose of surplus excavated material in accordance with local ordinances and use sound engineering practices:~~

~~Restore landscaping and irrigation that are removed during construction in coordination with local public agencies:~~

- e) ~~e~~—During all construction activities, the property owner/developer's construction contractor shall ~~s~~weep streets with Rule 1186-compliant PM_{10} -efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.
- f) ~~e~~—During active demolition and debris removal and grading, the property owner/developer's construction contractor shall ~~s~~suspend demolition and grading operations when ~~during~~ high winds speeds exceed 25 miles per hour to achieve an emissions control efficiency for PM_{10} under worst-case wind conditions of 98 percent ~~in accordance with Rule 403 requirements.~~

~~Wash off trucks leaving site:~~

- g) ~~e~~—During all construction activities, the property owner/developer's construction contractor shall ~~m~~aintain a minimum 12-inch freeboard ~~ratio~~ on haul trucks hauling dirt, sand, soil, or other loose materials and tarp materials with a fabric cover or other suitable means to achieve a control efficiency for PM_{10} of 91 percent. ~~e~~ ~~Cover payloads on trucks hauling soil using tarps or other suitable means.~~
- h) During all construction activities, the property owner/developer's construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site to achieve an emissions reduction control efficiency for PM_{10} of 61 percent.

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- i) During active demolition and debris removal, the property owner/developer's construction contractor shall apply water to disturbed soils at the end of each day to achieve an emission control efficiency for PM_{10} of 10 percent.
 - j) During scraper unloading and loading, the property owner/developer's construction contractor shall ensure that actively disturbed areas maintain a minimum soil moisture content of 12 percent by use of a moveable sprinkler system or water truck to achieve a control efficiency for PM_{10} of 60 percent.
 - k) During all construction activities, the property owner/developer's construction contractor shall limit on-site vehicle speeds on unpaved roads to no more than 15 miles per hour to achieve a control efficiency for PM_{10} of 57 percent.
- 2-3 Prior to approval of each grading plan (for Import/Export Plan) and prior to issuance of demolition permits (for Demolition Plans), the property owner/developer shall submit Demolition and Import/Export Plans detailing construction and demolition (C&D) recycling and waste reduction measures to be implemented to recover C&D materials. These plans shall include identification of off-site locations for materials export from the project and options for disposal of excess material. These options may include recycling of materials on-site or to an adjacent site, sale to a soil broker or contractor, sale to a project in the vicinity or transport to an environmentally cleared landfill, with attempts made to move it within Orange County. The property owner/developer shall offer recyclable building materials, such as asphalt or concrete for sale or removal by private firms or public agencies for use in construction of other projects if not all can be reused at the project site. (5.2-3)
- 2-4 Prior to issuance approval of each building permit, the property owner/developer shall submit evidence that high-solids or water-based low emissions paints and coatings are utilized in the design and construction of buildings, in compliance with South Coast Air Quality Management District's regulations. ~~To ensure that volatile organic compounds (VOC) emissions from architectural coatings do not exceed AQMD's significance thresholds for architectural coatings, the number of gallons of coatings shall be restricted, to the maximum extent feasible, to the maximum daily coating usage identified in Table 5.2-D of the SEIR. This information shall be denoted on the project plans and specifications. Additionally, the property owner/developer shall specify the use of high-volume, low-pressure spray equipment or hand application. Air-atomized spray techniques shall not be permitted. Where feasible, the paint contractor shall use hand applications as well. This information shall be denoted on the project plans and specifications. Additionally, the property owner/developer's shall specify the use of high-volume, low-pressure spray equipment or hand application. Air-atomized spray techniques shall not be permitted. Plans shall also show that property owner/developers shall construct/build with materials that do not require painting, or use pre-painted construction materials, to the extent feasible. (5.2-4)~~



Finding: The mitigation measures are feasible and would reduce emissions from architectural coatings, construction vehicle exhaust, and fugitive dust during construction activities. However, as individual development projects could overlap and considering the magnitude of construction activities proposed within the Platinum Triangle, emissions of CO, NO_x, ROG, PM_{10} , and $PM_{2.5}$ would continue to exceed the SCAQMD's regional thresholds for construction. As a result, Impact 5.2-1 would remain Significant and Unavoidable and a Statement of Overriding Considerations is required.

3. Findings on Potentially Significant Impacts

Reference: FSEIR Section 5.2, Pages 5.2-17 through 5.2-37.

Impact 5.2-2: Implementation of the Proposed Project would generate substantially more long-term air pollutants compared to the Adopted Master Land Use Plan and would continue to exceed South Coast Air Quality Management District's regional significance thresholds.

The Adopted MLUP and the Proposed Project would exceed the SCAQMD thresholds for CO, NO_x, VOC, PM₁₀, and PM_{2.5}. The Proposed Project would generate substantially more air pollutant emissions when compared to the Adopted MLUP because the project would result in additional residential, commercial, and office development. The primary source of project-related long-term air pollutant emissions are from mobile sources (i.e., vehicles traveling to and from the project site). Emissions of VOC, PM₁₀, PM_{2.5}, and NO_x that exceed the SCAQMD emission thresholds would contribute to the O₃ nonattainment designation. Emissions of PM₁₀ and PM_{2.5} that exceed the SCAQMD emission thresholds would contribute to the particulate matter (PM₁₀ and PM_{2.5}) nonattainment designations of the SoCAB, and impacts would remain significant and unavoidable for both the Adopted MLUP and the Proposed Project.

Mitigation Measures:

Applicable Measures from MMP No. 106A

The following mitigation measures were included in Updated and Modified Mitigation Monitoring Program No. 106 prepared for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332, and are applicable to the Proposed Project. (For mitigation measures to reduce energy consumption, see also Chapter 5.10, *Utilities and Service Systems*). Additions are shown in bold and deletions are indicated in strikethrough format. The reference number for each measure from MMP No. 106A is shown in *italics*.

Operation

- 2-5 In accordance with the timing required by the Traffic and Transportation Manager, but no later than prior to the first final Building and Zoning inspection, the property owner/developer shall implement the following measures to reduce long-term operational CO, NO_x, ROG, and PM₁₀ emissions: (5.2-5)
- Traffic lane improvements and signalization as outlined in the Revised Platinum Triangle Expansion Project Draft Traffic Study Report by Parsons Brinckerhoff, August 2010, ~~traffic study~~ and Master Plan of Arterial Highways (MPAH) shall be implemented as required by the Traffic and Transportation Manager.
 - The property owner/contractor shall place bus benches and/or shelters as required by the Traffic and Transportation Manager at locations along any site frontage routes as needed.
- 2-6 Prior to issuance of building permits, the property owner/architect shall submit energy calculations used to demonstrate compliance with the performance approach to the California Energy Efficiency Standards to the Building Division that shows each new structure exceeds the applicable Building and Energy Efficiency Standards by a minimum of 10 percent at the time of the building permit. Prior to issuance of a building permit, plans shall show the following:

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- a) Energy-efficient roofing systems, such as vegetated or "cool" roofs, that reduce roof temperatures significantly during the summer and therefore reduce the energy requirement for air conditioning. Examples of energy efficient building materials and suppliers can be found at <http://eetd.tnl.gov/CoolRoofs> or similar websites.
- b) Cool pavement materials such as lighter-colored pavement materials, porous materials, or permeable or porous pavement, for all roadways and walkways not within the public right-of-way, to minimize the absorption of solar heat and subsequent transfer of heat to its surrounding environment. Examples of cool pavement materials are available at http://www.epa.gov/heatshield/images/extra/level3_pavingproducts.html or similar websites.
- c) Energy saving devices that achieve the existing 2008 Appliance Energy Efficiency Standards, such as use of energy efficient appliances (e.g., EnergyStar® appliances) and use of sunlight-filtering window coatings or double-paned windows.
- d) Electrical vehicle charging stations for all commercial structures encompassing over 50,000 square feet.
- e) Shady trees strategically located within close proximity to the building structure to reduce heat load and resulting energy usage at residential, commercial, and office buildings.

~~Implementation of energy conservation techniques (i.e., installation of energy saving devices, construction of electrical vehicle charging stations, use of sunlight-filtering window coatings or double-paned windows, utilization of light colored roofing materials as opposed to dark colored roofing materials, and placement of shady trees next to habitable structures) shall be indicated on plans. (5.2-6)~~

The following Mitigation Measure from Mitigation Monitoring Plan No. 106A is no longer applicable because SCAQMD adopted Rule 445, Wood-Burning Devices. SCAQMD Rule 445 prohibits installation of wood-burning fireplaces. Consequently, all fireplaces installed within the Platinum Triangle would be required to be gas-burning and former Mitigation Measure 5.2-7 is no longer required.

~~5.2-7 Prior to issuance of a building permit, the property owner/developer shall be responsible for the placement of a note on the plans stating that to reduce the health impacts of air quality hazards within The Platinum Triangle, placement of wood-burning fireplaces in residential units shall be prohibited. As an alternative to wood-burning fireplaces, gas fireplaces may be used.~~

Finding: The mitigation measures are feasible and avoid or substantially lessen the significant air quality impacts of the project to the extent feasible. However, due to the magnitude of the development forecast under the Platinum Triangle, Impact 5.2-2 would remain Significant and Unavoidable and a Statement of Overriding Considerations is required.

Reference: FSEIR Section 5.2, Pages 5.2-19 through 5.2-37.



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Impact 5.2-3: Construction activities would potentially expose sensitive receptors to substantial pollutant concentrations of NO_x, CO, PM₁₀, and PM_{2.5}.

Construction associated with implementation of the Proposed Project would cause temporary, short-term emissions of CO, NO_x, VOC, SO_x, PM₁₀, and PM_{2.5}. The SCAGMD developed LSTs for emissions of NO_x, CO, PM₁₀, and PM_{2.5} generated at the project site (off-site mobile source emissions are not included the LST analysis). LSTs represent the maximum emissions at a project site that are not expected to cause or contribute to an exceedance of the most stringent national AAQS or California AAQS. LSTs are based on the ambient concentrations of that pollutant within the project SRA area and the distance to the nearest sensitive receptor.

Information regarding specific development projects, soil types, and the locations of receptors would be needed to quantify the level of impact associated with construction activity. Air quality emissions related to construction must be addressed on a project-by-project basis. For this broad-based master land use plan it is not possible to determine the emissions that would be generated by the development of individual projects that would occur through the implementation of the Proposed Project, due to the speculative nature of scheduling construction projects. However, it is expected that due to the proximity of the existing and proposed residences within the Platinum Triangle in addition to the magnitude of construction activities, construction activities associated within build-out of the Proposed Project could result in exposure of sensitive receptors to substantial pollutant concentrations during construction activities. Consequently, this impact would be significant for both the Adopted MLUP and the Proposed Project.

Mitigation Measures:

Applicable Measures from MMP No. 106A

Mitigation Measures 2-1 through 2-4 would also reduce localized concentration of air pollutants during construction.

Findings: The mitigation measures as described above are feasible and would reduce localized construction emissions. However, due to the magnitude of the construction grading activities, the probability that multiple construction activities would occur at the same time, and the proximity of existing and future sensitive receptors within the Platinum Triangle, Impact 5.2-3 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

Reference: FSEIR Section 5.2, Pages 5.2-20 through 5.2-37.

Impact 5.2-4: Mobile sources of emissions related to the Proposed Project would not expose sensitive receptors in the vicinity of the project to substantial pollutant concentrations.

Impact 5.2-4 was not found to be significant and no findings are required for this impact.

Impact 5.2-5: Sensitive land uses within 500 feet of State Route 57 and Interstate 5 or within the recommended buffer distances to facilities emitting TACs may be exposed to substantial pollutant concentrations.

Under the Proposed Project, development of residential uses and associated private recreational areas would be limited to the mixed-use districts. As shown in Figure 5.2-3 of the DSEIR, *CARB 500-Foot*

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Recommended Buffer Distance from Freeways, portions of the mixed-use districts and associated private facilities would fall within the 500-foot buffer distance to Interstate 5 (I-5) and State Route 57 (SR-57). Proposed parks within the Platinum Triangle would not be within the 500-foot buffer distance of the freeway. In addition, future residents and recreational uses may be within the recommended buffer distance of existing distribution centers, chrome platers, dry cleaners, gas stations, or other facilities that may be currently operating within the Platinum Triangle that emit TACs. Consequently, applicants for new development within the Platinum Triangle would need to evaluate air quality land use compatibility. However, the mixed-use districts would be buffered from the existing industrial areas in the Platinum Triangle by the office districts. Placement of sensitive uses (residential and recreational) near major pollutant sources would result in significant air quality impacts from the exposure of persons to substantial concentrations of toxic air pollutant contaminants.

Mitigation Measures

Applicable Measures from MMP No. 106A

No mitigation measures are applicable.

Additional Mitigation

2-7 Applicants for new residential developments in the Platinum Triangle Master Land Use Plan within 500 feet of Interstate 5 (I-5) or State Route 57 (SR-57) shall be required to install high efficiency Minimum Efficiency Reporting Value (MERV) filters of MERV 14 or better in the intake of residential ventilation systems. Installation of MERV filters shall be shown on plans submitted for building permits. MERV 14 filters have a Particle Size Efficiency rating of 90 percent for particulates 1.0 micron to 3.0 microns in size and a Particle Size Efficiency rating of 75 to 85 percent for particles 0.3 to 1.0 micron in size. A MERV 14 filter creates more resistance to airflow because the filter media becomes denser as efficiency increases. Heating, air conditioning, and ventilation systems shall be installed with a fan unit designed to force air through the MERV 14 filter.



To ensure long-term maintenance and replacement of the MERV 14 filters in the individual units, the following shall occur:

- a) Developer, sale, and/or rental representative shall provide notification to all affected tenants/residents of the potential health risk from I-5/SR-57 for all affected units.
- b) For rental units within 500 feet of the I-5/SR-57, the owner/property manager shall maintain and replace MERV 14 filters in accordance with the manufacturer's recommendations. The property owner shall inform renters of increased risk of exposure to diesel particulates from I-5 or SR-57 when windows are open.
- c) For residential owned units within 500 feet of I-5/SR-57, the homeowner's association (HOA) shall incorporate requirements for long-term maintenance in the Covenant, Conditions, and Restrictions and inform homeowners of their responsibility to maintain the MERV 14 filter in accordance with the manufacturer's recommendations. The HOA shall inform homeowners of increased risk of exposure to diesel particulates from I-5/SR-57 when windows are open.

2-8 Based on the recommended buffer distances of the California Air Resources Board, applicants for new developments in the Platinum Triangle shall place residential structures

3. Findings on Potentially Significant Impacts

and active outdoor recreational areas outside of the recommended buffer distances to the following stationary air pollutant sources:

- 1,000 feet from the truck bays with an existing distribution center that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units, or where transport refrigeration unit operations exceed 300 hours per week.
- 1,000 feet from an existing chrome plating facility.
- 300 feet from a dry-cleaning facility using perchloroethylene using one machine and 500 feet from dry-cleaning facility using perchloroethylene using two machines.
- 50 feet from gas pumps within a gas-dispensing facility and 300 feet from gas pumps within a gasoline-dispensing facility with a throughput of 3.6 million gallons per year or greater.

2-9 All outdoor active-use public recreational areas associated with development projects shall be located more than 500 feet from the nearest lane of traffic on Interstate 5 and State Route 57.

Findings: Mitigation measures are feasible and avoid or substantially reduce the potential health risk for future residences within the Platinum Triangle from proximity to the freeway. However, because long-term maintenance associated with replacement of the MERV filters is not in the control of the developer, and because the filters do not affect air quality outdoors, Impact 5.2-5 would remain Significant and Unavoidable and a Statement of Overriding Considerations is required. However, it should be noted that as set forth in the response to comments, recent data has called into question the validity of the CARB and SCAQMD studies that have been used to generate estimated background levels of DPM. It is likely that the FSEIR overestimates impacts to residents living within 500 feet of the freeway.

Reference: FSEIR Section 5.2, Pages 5.2-22 through 5.2-37.

Impact 5.2-6: The Proposed Project is consistent with the 2007 AQMP.

Impact 5.2-6 was not found to be significant and no findings are required for this impact.

Impact 5.2-7: The Proposed Project would not create objectionable odors; however, implementation of the Proposed Project could result in new residential land uses located near existing odor generators.

SCAQMD Rule 402, *Nuisance*, regulates the generation of offensive odors. Project construction would involve the operation of heavy equipment and haul trucks, resulting in exhaust emissions and attendant nuisance odors. Any such odors would be confined to the immediate vicinity of the equipment itself. By the time odors generated by diesel exhaust reached the sensitive residential receptors, they would be diluted to well below any level of air quality concern. An occasional "whiff" of diesel exhaust from passing equipment and trucks accessing the site from public roadways may result. Such brief exhaust odors are not significant air quality impact. Additionally, some odor would be produced from the

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application of asphalt, paints, and coatings. Again, any exposure of the general public to these common odors would be of short duration and less than significant.

Off-Site Impacts

Odors generated by land uses within the Platinum Triangle must comply with SCAQMD Rule 402, which prohibits the generation of odors that cause injury, detriment, nuisance, or annoyance to a considerable number of persons or which endanger the comfort, repose, health, or safety of people. Because proposed office, commercial, hotel, and residential land uses typically do not generate substantial odors, no significant impacts would occur. Impacts would be less than significant.

On-Site Impacts

SCAQMD cites the following land uses as having the potential to generate noxious odors: agricultural (farming and livestock), chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants (SCAQMD 2005). Industrial uses within the Platinum Triangle area may generate odors that are objectionable to some. At buildout, residential areas would be buffered by office uses from industrial areas that have the potential to generate odors. Therefore, at buildout, residential land uses would not be exposed to objectionable odors. While many of the industrial land uses within The Platinum Triangle are generally non-odorous, during conversion of The Platinum Triangle residential land uses may be temporarily located adjacent to industrial businesses that generate odors. Consequently, impacts would be potentially significant without mitigation measures to ensure that new land uses are not located in proximity to existing land uses that generate substantial odors within the Platinum Triangle.



Mitigation Measures

Applicable Measures from MMP No. 106A

No mitigation measures are applicable.

Additional Mitigation

5-10 For projects located within 1,000 feet of an industrial facility that emits substantial odors, which includes but is not limited to:

- wastewater treatment plants
- composting, greenwaste, or recycling facilities
- fiberglass manufacturing facilities
- painting/coating operations
- coffee roasters
- food processing facilities

Project Applicant shall submit an odor assessment to the Planning Director prior to approval of any future discretionary action that verifies that the South Coast Air Quality Management District (SCAQMD) has not received three or more verified odor complaints. If the Odor Assessment identifies that the facility has received three such complaints, the applicant will be required to identify and demonstrate that Best Available Control Technologies for Toxics (T-BACTs) are capable of reducing potential odors to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to,

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scrubbers at the industrial facility, or installation of Minimum Efficiency Reporting Value (MERV) filters rated at 14 or better at all residential units.

Findings: The mitigation measure is feasible and avoids or substantially lessens potentially significant aesthetic impacts to a less than significant level for the reasons set forth in the Draft SEIR.

Reference: FSEIR Section 5.2, Pages 5.2-27 through 5.2-37.

3.3 HYDROLOGY AND WATER QUALITY

Impact 5.3-1: The proposed project would place additional demands on groundwater supplies due to the construction of a new water well.

The City owns and operates a network of groundwater wells to supply groundwater to their users. Groundwater supplies approximately 66 percent of the City's current total water production. There are two groundwater wells located on the project area: a monitoring well on the eastern border of the project area and a production well located north of Angel Stadium of Anaheim. To meet the project water demands the City proposes to upgrade the initial production rate of a previously proposed new water well in the Platinum Triangle (located adjacent to planned Fire Station No. 12, between Anaheim Way and Santa Cruz Street and designated as Well No. 57) and drill an additional new water well at a location to be determined.

The Orange County Groundwater Basin holds millions of acre feet (af) of water, of which about 1.25 to 1.5 million af are available for use. The OCWD drills one new well every one or two years to replace existing shallow and deteriorated wells and provide additional production capacity. Construction of an additional water well to serve the Platinum Triangle would provide the necessary production capacity. The proposed water well is one of the water facility improvements identified in Rule 15D – Water Facility Fee for the Platinum Triangle and would not result in substantial depletion of groundwater supplies. Additionally, a Water Supply Assessment (WSA) for the Platinum Triangle prepared in July 2009 determined that adequate water supply is available to serve the proposed project.

Note: Water quality was adequately discussed in FSEIR No. 334. Since the Revised Platinum Triangle project would not result in any additional water quality impacts, no additional discussion relating to water quality was necessary in FSEIR No. 339.

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measures were included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 and are applicable to the proposed project. Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 3-1 Prior to issuance of a grading permit, the property owner/developer shall submit plans documenting that the design of all aboveground structures (with the exception of parking structures) shall be at least three feet higher than the 100-year flood zone, where applicable,

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unless otherwise required by the City Engineer. All structures below this level shall be floodproofed to prevent damage to property or harm to people. (5.5-1)

3-2

Prior to the initiation of grading activities, for projects greater than one acre, coverage for the project must be obtained by electronically submitting permit registration documents to the State or obtaining coverage via current general construction permit prescribed method by the property owner/developer pursuant to State and Federal National Pollution Discharge Elimination System (NPDES) requirements. As part of the NOI, a Surface Water Pollution Prevention Plan (SWPPP) shall be prepared. The Property owner/developer shall also prepare and submit to the Development Services Division of the Public Works Department, a Water Quality Management Plan (WQMP) in accordance with the City's municipal NPDES requirements and Chapter 7 of the Orange County Drainage Area Management Plan. The WQMP must be approved prior to issuance of grading permit. The SWPPP, in conjunction with the WQMP, will describe the structural and nonstructural BMPs that will be implemented during construction (short-term) within the Project Area as well as BMPs for long-term operation of the Project Area that address potential impacts to surface waters. (5.5-2)

~~At least 60 days prior to the initiation of grading activities, for projects greater than one acre, an NOI shall be filed with the Regional Water Quality Control Board (RWQCB) by the property owner/developer pursuant to State and Federal National Pollution Discharge Elimination System (NPDES) requirements. As part of the NOI, a Surface Water Pollution Prevention Plan (SWPPP) shall be prepared. The property owner/developer shall also prepare and submit to RWQCB, a Water Quality Management Plan (WQMP) in accordance with the City's municipal NPDES requirements and the Orange County Drainage Area Management Plan. The SWPPP, in conjunction with the WQMP, will describe the structural and nonstructural BMPs that will be implemented during construction (short-term) within the Project Area as well as BMPs for long-term operation of the Project Area. Long-term measures could include, but may not be limited to, street sweeping, trash collection, proper materials storage, designated wash areas connected to sanitary sewers, filter and grease traps, and clarifiers for surface parking areas. The BMPs selected shall be consistent with the Water Quality Technical Report set forth in for the Proposed Project (Appendix G) of SEIR No. 339. (5.5-2)~~



Additional Mitigation Measures

No additional mitigation measures are required.

Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant hydrology and water quality impacts to a less than significant level for the reasons set forth in the Draft SEIR.

Reference: FSEIR Section 5.3, Pages 5.3-6 through 5.3-9; DSEIR Appendix G.

3.4 LAND USE AND PLANNING

Impact 5.4-1: Project Implementation would conflict with applicable plans, policies, and/or regulation.

Impact 5.4-1 was not found to be significant and no findings are required for this impact.

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Impact 5.4-2: Some development pursuant to the Proposed Project will not be compatible with the Southern California Gas Company's existing microwave tower.

It is anticipated that high-rise residential towers proposed as part of the A-Town Metro project north of the existing microwave tower would potentially interfere with the Southern California Gas Company's (SCG) microwave tower telecommunications function. However, A-Town Metro is an approved project with a signed Development Agreement and is not a part of the current project actions to increase the intensity in the Platinum Triangle. Therefore, the City cannot require any actions on A-Town Metro to reduce impacts to a less than significant level. Unless the property containing the microwave tower is redeveloped with mixed uses in the future, the microwave tower would not be relocated and the impacts would not be mitigated.

It is noted that the current PTMU Overlay Zone allows rooftop communications equipment within the Platinum Triangle so long as shielding is provided. Although there is a concern that the zoning provision on shielding may impede the functionality of the microwave tower, a variance for the non-screened microwave tower can be requested at the time of relocation.

Mitigation Measures:

No feasible mitigation measures are available to mitigate the potential conflict with the microwave tower's telecommunication function anticipated by the high-rise towers.

Finding: No feasible mitigation measures are available to avoid or substantially lessen potentially significant land use and planning impact for the reasons set forth in the Draft SEIR. Therefore, Impact 5.4-2 would remain Significant and Unavoidable and a Statement of Overriding Considerations is required.

Reference: FSEIR Section 5.4, Pages 5.4-16 through 5.4-18.

3.5 NOISE

Impact 5.5-1: Build-out of the Proposed Project would result in a substantial, permanent increase in ambient traffic noise levels within the vicinity of existing noise-sensitive receptors.

Based on the criteria used in the 2005 SEIR to determine level of significance (i.e., a 5 dBA increase in an ambient noise environment of less than 65 dBA CNEL or a 3 dBA noise increase in an ambient noise environment of 65 dBA CNEL or more), the Proposed Project would result in new significant noise increases along multiple roadway segments as shown in Table 5.5-9 of the DSEIR. As shown in the table, the Proposed Project would not substantially increase noise (+3 dB) beyond the noise levels shown in FSEIR No. 332. However, because FSEIR No. 332 identified significant increases in the ambient noise environment from existing conditions that exceed the thresholds outlined above, noise impacts along the roadway segments (bolded in the Table 5.5-9) in the vicinity of the project site would occur under the Adopted MLUP and the Proposed Project; and therefore, impacts would remain significant. Significant noise increases would occur at the following locations:

- Anaheim Way
- State College Boulevard to Orangewood Avenue

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- **Cerritos Avenue**
 - Anaheim Boulevard to Lewis Street
 - Lewis Street to State College Boulevard
 - State College Boulevard to Sunkist Street
 - Sunkist Street to Douglass Road
- **Collins Avenue**
 - Eckhoff Street to Main Street
 - Main Street to Batavia Street
- **Disney Way**
 - Harbor Boulevard to Clementine Street
- **Douglass Street**
 - Katella Avenue to Cerritos Avenue
- **Eckhoff Street**
 - Orangewood Avenue to Collins Avenue
- **Gene Autry Way**
 - I-5 Freeway to State College Boulevard
- **Haster Street**
 - I-5 Freeway to Ball Road
 - Ball Road to Vermont Street
- **Howell Avenue**
 - State College Boulevard to Sunkist Street
- **Katella Avenue**
 - Manchester Avenue to Anaheim Way
 - Anaheim Way to Lewis Street
 - SR-57 Freeway to Main Street
- **Lewis Street**
 - Gene Autry Way to Katella Avenue
 - Katella Avenue to Cerritos Avenue
 - Cerritos Avenue to Ball Road
- **Main Street**



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- Chapman Avenue to Orangewood Avenue
- Manchester Avenue
 - Compton Avenue to Orangewood Avenue
 - Orangewood Avenue to Katella Avenue
 - Katella Avenue to Anaheim Boulevard
- Orangewood Avenue
 - State College Boulevard to Rampart Street
 - Rampart Street to SR-57 Freeway
- Phoenix Club Drive
 - Honda Center to Ball Road
- Rampart Street
 - Chapman Avenue to Orangewood Avenue
- State College Boulevard
 - I-5 to Orangewood Avenue
 - Orangewood Avenue to Gene Autry Way
- Struck Avenue
 - Katella Avenue to Main Street
- Sunlight Street
 - Howell Avenue to Cerritos Avenue

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

No existing mitigation measures from MMP No. 106A apply.

Additional Mitigation

- 5-1 Prior to approval of street improvement plans for any project-related roadway widening, the City shall retain a qualified acoustic engineer to design project acoustical features that will limit traffic noise at noise sensitive uses to levels that are below the City's noise ordinance. These treatments shall be noted on the street improvement plans to the satisfaction of the Planning Department and may include, but are not limited to, the replacement of windows and doors at existing residences with acoustically rated windows and doors.

3. Findings on Potentially Significant Impacts

Findings: Mitigation measures are feasible and avoid or substantially reduce the potential noise impacts of the proposed project. However, some areas may experience noise levels in exceedance of the City's noise ordinance prior to implementation of roadway improvements and associated noise attenuation. Consequently, Impact 5.5-1 would remain significant and unavoidable.

Reference: FSEIR Section 5.5, Pages 5.5-19 through 5.5-42.

Impact 5.5-2: Build-out of the Platinum Triangle would not generate significant levels of stationary-source noise that exceeds the City of Anaheim's noise standards from truck loading/unloading activities and operation of HVAC systems.

Impact 5.5-2 was not found to be significant and no findings are required for this impact.

Impact 5.5-3: Noise-sensitive residential units proposed within the Platinum Triangle may be exposed to mobile- and stationary-source noise levels that exceed state and/or City standards.

Transportation-Source Noise

Table 5.5-9 in the DSEIR shows that that noise from roadways within the Platinum Triangle can exceed 65 dBA CNEL, resulting in noise levels that exceed the City's conditionally acceptable noise compatibility criterion for noise-sensitive residential uses. Noise from SR-57, I-5, and the Orange County Line also contributes to the exterior noise environment. FSEIR No. 332 identified potentially significant noise impacts for noise-sensitive uses placed in proximity to freeways and major arterials, as they may fall within the 65 dBA CNEL noise contour. Similarly, under the Proposed Project, because not all noise-sensitive areas constructed under individual development proposals under the Platinum Triangle may meet the City's noise compatibility standards and impacts would need to be evaluated on a case-by-case basis, any siting of sensitive land uses within the vicinity of major arterials and freeways represents a potentially significant impact and would require a separate noise study through the development review process to determine the level of impact and required mitigation. Consequently, impacts under the revised plan would be similar to those identified in FSEIR No. 332.



Adjacent Industrial-Source Noise

Residences within the Platinum Triangle could be exposed to stationary-source noise from activities conducted at the adjacent industrial areas. Noise from industrial uses could occur during the nighttime hours when residences are most sensitive to extraneous noise sources. As no manufacturing occurs within this area, the primary noise generators from these types of industrial/commercial uses include truck idling, loading, and unloading activities.

As part of the Noise Study for the FSEIR No. 332, noise measurements were taken at the Consolidated Volume Transfer Station and Recycling Facility (CVT) located at 1071 North Blue Gum Street in Anaheim. Noise sources during 15 minutes of noise monitoring included yard activities (truck engine starts, idling, bucket loader) from a green waste processing area. Noise measurements were taken at a distance of 50 feet from the noisiest portion of the truck (i.e., the side with the engine exposed), which resulted in noise levels of 73 dBA L_{max} . The use of multiple trucks could generate noise levels on the order of 80 dBA L_{max} , as measured at a distance of 50 feet. Process equipment and the use of pneumatic tools could also generate elevated noise levels, but this equipment is typically housed within the facilities and would not be expected to exceed the 80 dBA L_{max} projected for exterior trucks. If it is assumed that the 80 dBA L_{max}

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level were produced continually for eight hours during the day, the calculated CNEL is 75 dBA as measured at a distance of 50 feet. The 65 dBA CNEL contour would fall at a distance of 158 feet.

FSEIR No. 332 identified potentially significant impacts for any noise-sensitive uses sited in close proximity or adjacent to industrial uses. The Proposed Project would increase residential density within the City that may be developed in close proximity or adjacent to industrial or entertainment uses. Consequently, impacts associated with the Proposed Project would be similar to those identified in FSEIR No. 332. Impacts for both are considered potentially significant.

Anaheim Regional Transportation Intermodal Center (ARTIC)

The Institutional General Plan land use designation currently assigned to properties within the proposed ARTIC District includes a wide range of public and quasi-public uses including government office, transportation facilities, public or private colleges and universities, public utilities, hospitals, large assisted living facilities, community centers, museums, and public libraries. The proposed ARTIC District would allow up to 1.5 million square feet of institutional uses in addition to up to 520 residential units, 358,000 square feet of commercial uses and 2,202,803 square feet of office development. The current proposed use of the site is for the ARTIC project, which would be accommodated by both the existing Institutional land use designation and the proposed ARTIC District. The ARTIC project is a major regional intermodal transit center proposed under a partnership between the City of Anaheim and the OCTA. The ARTIC project would link rail, ground, and transit services in Orange County and would serve as a gateway for high speed and conventional rail, bus, and automobile travelers. Stationary sources of noise within the ARTIC District would include HVAC systems for the proposed ARTIC project and future land uses. As stated, installation of HVAC systems would be required to comply with the City's stationary noise standard of 60 dBA L_{50} . In addition, bus terminals and/or similar types of institutional development may generate substantial stationary-source noise (e.g., bus engine idling, back-up warning bells, parking lot activities, helipads). An intermodal facility with a bus and commuter train transit station in addition to a park and ride facility can generate noise levels of 86 dBA L_{50} at a distance of 50 feet (FTA 2007). The 65 dBA L_{50} noise contour would fall at a distance of 350 feet. There are no residential uses currently located in close proximity to the proposed ARTIC District. However, siting of noise sensitive land uses within this distance would exceed the City's normally acceptable noise compatibility standard and result in potentially significant noise impacts.

Railroad Noise

The Proposed Project would replace the existing General Plan Institutional land use designation for properties within the proposed ARTIC District with the Mixed Use land use designation. This designation would allow for transit oriented mixed-use development that would complement the proposed ARTIC project that would link rail, ground, and transit services in Orange County and would serve as a gateway for high speed and conventional rail, bus, and automobile travelers. Development of land uses in the Platinum Triangle, including in the ARTIC District, could result in demand for additional train trips on the Orange County Line (Metrolink and Amtrak). An increase in train trips would increase noise levels.

Placement of project-related noise-sensitive receptors in the vicinity of Orange County Line or major rail transportation centers, such as the proposed ARTIC project or the existing Metrolink/Amtrak station, could expose noise-sensitive receptors to substantial levels of noise from train activities. Noise modeling of railroad noise levels on the Orange County Line was modeled using the FRA's Grade Crossing Noise Model based on future train volumes and average train speed provided by the OCTA and Metrolink. Future rail projections on the Orange County Line are estimated at approximately 52 Metrolink, 36 Amtrak, and 12 freight trains operated by the UPRR or BNSF on a worst-case day (OCTA 2007; SCRFA 2007). The FRA Grade Crossing Noise Modeling predicts that the 65 dBA L_{50} noise contour would fall at

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a distance of approximately 951 feet from the centerline of the tracks when the horn is sounded, which is a quarter mile from the grade crossing. When there are no at-grade railroad crossings the 65 L_{dn} noise contour would be 765 feet from the centerline of the railroad tracks. Actual distances to these contours could be shorter where topography or structures block the line of sight to the rails. SEIR No. 332 evaluated noise impacts of the Orange County Line at Anaheim Stadium Metrolink/Amtrak Station, located adjacent to Angel Stadium south of Katella Avenue. According to FSEIR No. 332, operation along this line would put the 65 dBA L_{dn} noise contour at approximately 630 feet. Residential developments within 65 dBA L_{dn} noise contour with outdoor noise sensitive areas (e.g., ground floor patios and recreation areas) would exceed the City's normally acceptable noise compatibility criterion. Consequently, noise impacts associated with train activity on the Orange County Line under the Proposed Project would be similar to those identified in FSEIR No. 332 and considered potentially significant.

Stadium/Event Noise

Placement of noise-sensitive land uses within the vicinity of Angel Stadium of Anaheim would also expose residents to temporary increases in ambient noise environment during a stadium event. During a game day, cheering, PA systems, and fireworks (e.g., when the Angels hit a home run) would be audible at residential areas surrounding the stadium. These events typically occur in the evening hours and could last past 10:00 PM, which is considered the noise-sensitive portion of the night. The average baseball game lasts 2 hours and 47 minutes and each team plays 162 games per year (Wikipedia 2007). Temporary increases in the ambient noise environment during the baseball season, which lasts from April until potentially October, could result in nighttime awakenings for future residents.

Typical noise levels within the stadium during a sporting event range from 94 dBA to 114 dBA for spectators within the stadium, while fireworks shows are 150 dBA as measured at a distance of 10 feet (Berger, Neitzel, and Kladden 2006). The FICAN 1997 report gives the proportion of persons awakened by noise events at different SEL. Because some populations are more sensitive to noise events, the threshold for awakening typically used for airport analysis assumes impacts if 10 percent of the population is awakened. Based on the FICAN study, the interior noise level at which 10 percent of population is awakened by a loud event is when interior noise levels exceed 81 dBA SEL. For interior noise levels to exceed 81 dBA SEL, the exterior noise level would have to exceed 105 dBA SEL (based on standard construction). Without acoustically upgraded windows and doors, noise from sporting events at the stadium could result in a significant number of nighttime awakenings for projects located within the vicinity of the stadium. Any siting of sensitive land uses within the vicinity of the stadium that would be exposed to interior noise levels of 81 dBA SEL due to the stadium would result in a potentially significant noise impact.



Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measure was included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the SEIR No. 332 and is applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 5-2 Prior to issuance of a building permit ~~for any project generating over 400 peak-hour trips~~, the project property owner/developers shall submit a final acoustical report prepared to the satisfaction of the Planning Director. The report shall show that the development will be

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sound-attenuated against present and projected noise levels, including roadway, aircraft, helicopter, stationary sources (e.g., industrial, commercial, stadium, etc.), and railroad, to meet City interior standards as follows: (5.7-2)

- a) The report shall demonstrate that the proposed residential design will result in compliance with the 45 dBA CNEL interior noise levels, as required by the California Building Code and California Noise Insulation Standards (Title 24 and 25 of the California Code of Regulations).
- b) The report shall demonstrate that the Proposed Project residential design shall minimize nighttime awakening from stadium event noise and train horns such that interior single-event noise levels are below 81 dBA L_{max}.

The property owner/developer shall submit the noise mitigation report to the Planning Director for review and approval. Upon approval by the City, the project acoustical design features shall be incorporated into construction of the Proposed Project.

Additional Mitigation

- 5-3 Prior to the first final building and zoning inspection, the property owner/developer shall submit evidence to the satisfaction of the Planning Director that occupancy disclosure notices regarding the potential for exterior noise levels to be elevated during a stadium event will be provided to all future tenants in the Stadium District.
- 5-4 Prior to the first final building and zoning inspection, the property owner/developer shall submit evidence to the satisfaction of the Planning Director that occupancy disclosure notices regarding potential for exterior noise levels to be elevated during sounding of train horns will be provided to all future tenants facing an at-grade crossing of the Orange County Line.

Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant impacts related to noise. However, because the exterior noise environment may exceed the goals for noise compatibility established by the City and individual project compatibility with the exterior noise environment would be evaluated on a case-by-case basis, even with the implementation of the mitigation measures, impact 5.5-3 would remain Significant and Unavoidable and a Statement of Overriding Considerations is required.

Reference: FSEIR Section 5.5, Pages 5.5-26 through 5.5-42.

Impact 5.5-4: Building facades that are exposed to noise levels that exceed 69 dBA would require architectural improvements to achieve the required 45 dBA CNEL interior noise level limits.

Pursuant to the California Building Code, noise-sensitive habitable rooms would be required to be designed to achieve an interior noise standard of 45 dBA CNEL. In general, exterior-to-interior transmission loss from standard building construction results in a minimum attenuation of 24 dBA (SAE 1971). While the exact location of the office structures have not yet been determined, building facades that are exposed to noise levels that exceed 69 dBA would require architectural improvements, such as Sound Transmission Class (STC)-rated windows and doors, to achieve the required 45 dBA CNEL interior noise level limits. Because noise levels along major arterials could exceed these noise levels, the office buildings could require additional noise insulation to meet the 45 dBA CNEL standard. Compliance

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with the California Building Code would ensure that interior noise levels meet the required limits. Table 5.5-9 of the DSEIR shows that noise from roadways within the Platinum Triangle can exceed 69 dBA CNEL, resulting in elevated interior noise levels that do not meet the state's noise standards. Due to the high volumes of traffic and proximity of new noise-sensitive developments adjacent to the major arterials, freeways, and railroads, it may be necessary to provide architectural acoustic upgrades in the form of STC-rated windows and doors in new residential units. Therefore, siting of sensitive land uses within the vicinity of major arterials, freeways, railroads, or industrial uses that would result in building facades being exposed to noise levels that exceed 69 dBA would represent a potentially significant interior noise impact.

Mitigation Measures:

Same mitigation measures as Impact 5.5-3.

Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant impacts related to interior noise.

Reference: FSEIR Section 5.5, Pages 5.5-29 through 5.5-42.

Impact 5.5-5: Construction of the Proposed Project would generate substantial levels of groundborne vibration and groundborne noise in the vicinity of vibration-sensitive land uses.

Vibration Annoyance

Construction of individual land uses pursuant to the implementation of the Proposed Project would occur over a period of approximately 20 years. However, there would be considerable overlap in construction of individual development projects. While the majority of heavy construction equipment would not be in operation exactly at the property line, residences within and surrounding the Proposed Project site would be exposed to construction-related vibration during development.

Vibration is typically not perceptible in outdoor environments, but sensed at nearby structures when objects within the structure generate noise from the vibration, such as rattling windows or picture frames. Levels of vibration produced by construction equipment are evaluated against the FTA's significance threshold for vibration annoyance of 78 VdB for barely perceptible levels of vibration during the daytime. Vibration would primarily occur during the grading and foundation phases of construction. Construction activities would be restricted to daytime hours when people are the least sensitive to noise intrusions. However, as shown in Table 5.5-10, heavy construction equipment has potential to generate substantial levels of vibration that would cause annoyance at the on-site and off-site vibration-sensitive receptors.

Vibration-Induced Structural Damage

In addition to vibration-induced annoyance, project-related construction vibration was evaluated for its potential to cause structural damage in comparison to the FTA's structural damage criteria (see Table 5.5-6). The FTA threshold of 0.2 inch per second is the threshold at which there is a risk of architectural damage to normal houses with plastered walls and ceilings. The nearest sensitive uses for vibration-induced structural damage assessment are the on-site and the adjacent off-site residences. Typically, only construction equipment generating extremely high levels of vibration, such as pile drivers, has the potential for vibration-induced structural damage. Construction of buildings taller than 12 stories may require use of an impact pile driver, which generates substantial levels of vibration that can be perceived at even farther distances and could result in structural damage. Construction activities related to build-



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out of the Proposed Project could result in vibration levels exceeding the FTA's criteria for vibration-induced structural damage within the Platinum Triangle, and would be considered significant.

Mitigation Measure:

- 5-5 Prior to issuance of the first building permit, to reduce noise and vibration impacts from the impact pile driver, the construction contractor shall evaluate the feasibility of using auger cast piles or a similar system to drill holes to construct cast-in-place piles for a pile-supported transfer slab foundation system. This alternative construction method would reduce the duration necessary for use of the impact pile driver and/or eliminate the need to use pile drivers altogether. Proof of compliance with this measure shall be submitted to the Planning Department in the form of a letter from the construction contractor.

Finding: Mitigation Measure 5-5 is feasible and would reduce the duration necessary for use of the impact pile driver and/or eliminate the need to use pile drivers altogether. No additional mitigation measures are available to reduce vibration generated by heavy construction equipment operating within close proximity to proposed units within the Platinum Triangle. However, vibration impacts would be temporary, as they would only occur during construction activities and would cease by evening. During construction, Impact 5.5-5 would remain Significant and Unavoidable and a Statement of Overriding Considerations is required.

Reference: FSEIR Section 5.5, Pages 5.5-29 through 5.5-42.

Impact 5.5-6: Implementation of the Proposed Project could expose vibration-sensitive receptors to substantial levels of groundborne vibration and groundborne noise in the vicinity of the AMTRAK/MetroLink line.

Buildout of the Platinum Triangle MLUP could potentially expose people to the impacts of groundborne vibration or noise levels from transportation and industrial activities.

On-Road Mobile-Source Vibration Impacts

Caltrans has studied the effects of propagation of vehicle vibration on sensitive land uses. Caltrans notes that "heavy trucks, and quite frequently buses, generate the highest earthborne vibrations of normal traffic." Caltrans further notes that the highest traffic-generated vibrations are along the freeways and state routes. Their study finds that vibrations measured on freeway shoulders (five meters from the centerline of the nearest lane) have never exceeded 0.08 inch per second, with the worst combinations of heavy trucks. This level coincides with the maximum recommended safe level for ruins and ancient monuments (and historic buildings). Typically, trucks do not generate high levels of vibration because they travel on rubber wheels and do not have vertical movement which generates ground vibration. Vibrations from trucks may be noticeable if there are any roadway imperfections such as potholes (FTA 1995). Vibration-sensitive structures are not and will not be sited within five meters from the centerline of the nearest lane of I-5 or SR-57. Consequently, no significant impacts related to on-road mobile-source vibration impacts are anticipated.

Orange County Line Railroad Vibration Impacts

New vibration-sensitive land uses, including residential land uses, would be exposed to groundborne vibration from train operations along the Orange County Line. Vibration levels within the City from train-induced vibration are dependant on specific site conditions including geology and the condition of the

3. Findings on Potentially Significant Impacts

railroad track and train wheels. In addition, wood-framed structures could amplify vibration levels felt by occupants (FTA 2006). Vibration impacts from the Orange County Line are based on the potential for rail operations to cause perceptible levels of vibration. If current levels at the residential structure are less than perceptible to residents, future increases in rail traffic would not generate levels of vibration perceptible to residents, as the intensity of vibration would not increase, only the frequency of occurrence. However, vibration-sensitive land uses located in close proximity to the Orange County Line have the potential to be impacted by perceptible levels of vibration from rail operations. Vibration-sensitive land uses would be exposed to light rail and locomotive trains on the Orange County Line during both daytime and nighttime hours. Levels of vibration produced by construction equipment are evaluated against the FTA's frequent events significance threshold for vibration annoyance of 72 VdB for residential land uses.¹ Based on the FTA's generalize ground surface vibration curve, light rail trains would generate a vibration level of 72 VdB at a distance of 60 feet. Locomotive powered passenger or freight trains traveling at 50 miles per hour would generate a vibration level of 72 VdB at a distance of 200 feet (FTA 2006). Vibration-sensitive land uses located within 200 feet of the Orange County Line would result in a potentially significant impact.

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

No existing mitigation measures from MMP No. 106A apply.

Additional Mitigation

- 5-6 Prior to approval of any Final Site Plan, if new vibration-sensitive land uses are located in close proximity to the Orange County Line, the project applicant shall retain an acoustical engineer to conduct an acoustic analysis that includes a vibration analysis for potential impacts from vibration generated by operation of the rail line. If perceptible levels of vibration are detected, the acoustic analysis shall recommend site design features, such as setbacks and trenches, and/or required building improvements, such as harder building materials (e.g., steel framing vs. wood framing), to eliminate the potential for train operations to result in perceptible levels of vibration that cause human annoyance to future project residents. The site design features shall be identified on the Final Site Plan to the satisfaction of the Planning Director.



Finding: Mitigation measure is feasible and avoids or substantially lessens potentially significant noise impacts to a less than significant level for the reasons set forth in the Draft EIR.

Reference: FSEIR Section 5.5, Pages 5.5-31 through 5.5-42.

Impact 5.5-7: Development within the Platinum Triangle could result in a substantial temporary increase in noise levels in the vicinity of existing noise-sensitive land uses during construction activities.

Short-term noise impacts are impacts associated with site preparation, grading, and building construction of the proposed land uses. Two types of short-term noise impacts could occur during construction. First, the transport of workers and movement of materials to and from the site could incrementally increase noise levels along local access roads. The second type of short-term noise

¹ Frequent events is defined as more than 70 vibration events of the same source per day.

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impact is related to noise generated at the job site during demolition, site preparation, grading, and/or physical construction. Construction is performed in distinct steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. However, despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

It is probable that development of the proposed project would involve construction activities that occur within 50 feet of existing noise-sensitive uses. Project-related construction would temporarily increase the ambient noise environment. In addition, construction of buildings that are taller than 12 stories may require use of an impact pile driver, which can generate extremely high levels of noise. While the City of Anaheim restricts the hours of construction activities to the least noise-sensitive portions of the day, due to the extended length of construction activities and level of noise from the combination of construction activities, project-related construction noise would result in a significant noise impact.

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measure was included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the SEIR No. 332 and is applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikethrough~~ format. The mitigation reference numbers are shown in *(italics)*.

- 5-7 Ongoing during grading, demolition, and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise: *(5.7-1)*
- a) Noise generated by construction shall be limited by the property owner/developer to 60 dBA along the property boundaries, before 7:00 AM and after 7:00 PM, as governed by Chapter 6.7, Sound Pressure Levels, of the Anaheim Municipal Code.
 - b) Limit the hours of operation of equipment that produces noise levels noticeably above general construction noise levels to the hours of 10:00 AM to 4:00 PM.
 - c) All internal combustion engines on all of the construction equipment shall be properly outfitted with well-maintained muffler systems.

Additional Mitigation

- 5-8 Ongoing during construction activities, the property owner/developer shall be responsible for requiring project contractors to properly maintain and tune all construction equipment to minimize noise emissions.
- 5-9 Ongoing during construction activities, the property owner/developer shall be responsible for requiring project contractors to locate all stationary noise sources (e.g., generators, compressors, staging areas) as far from occupied noise-sensitive receptors as is feasible.
- 5-10 Ongoing during construction activities, material delivery, soil haul trucks, and equipment servicing shall also be restricted to the hours set forth in the City of Anaheim Municipal Code, Section 6.70.

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Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant noise impacts to the extent feasible. Construction noise impacts would be temporary, as they would only occur during construction activities and would cease by evening. However, due to the proximity of occupied units within the Platinum Triangle to construction activities and potential overlap in the construction schedule from individual development projects constructed within the Platinum Triangle, Impact 5.5-7 would remain Significant and Unavoidable and a Statement of Overriding Considerations is required.

Reference: FSEIR Section 5.5, Pages 5.5-32 through 5.5-42.

Impact 5.5-8: Heliports/helipads within and surrounding the Platinum Triangle would not significantly expose future residents and/or workers to substantial levels of airport-related noise.

Impact 5.5-8 was not found to be significant and no findings are required for this impact.

3.6 POPULATION AND HOUSING

Impact 5.6-1: The Proposed Project would result in direct population growth due to new housing and employment opportunities in the Project Area.

The Proposed Project would directly induce population growth through allowing additional residential development and indirectly induce population growth by allowing additional non-residential development in the Platinum Triangle. As shown in 5.6-6 in the DSEIR, build-out of the Proposed Project is anticipated to add 12,965 residents and 26,860 employees in the project area, increasing the total Platinum Triangle population to 28,364 and employees to 41,500. The jobs/housing balance is one indicator of a project's effect on growth and quality of life in the project area. Jobs/housing goals and ratios are advisory only and no ideal jobs/housing ratio is adopted in state, regional, or city policies. As shown in Table 5.6-6, build-out of the Adopted MLUP would create 1.43 jobs per one housing unit produced, compared to 2.19 jobs created for one housing unit with the Proposed Project. However, this is a significant improvement over the existing jobs/housing ratio within the Platinum Triangle, which is 13.47.



Regional Planning Policies

The City certified its Housing Element in 2009. The additional housing units proposed for the Platinum Triangle would contribute toward the City's effort to meet RHNA's fair share allocation goal of 9,498 units by 2014. In addition, development of the Proposed Project will generate additional redevelopment funds which can be used by the City in the future to develop additional affordable housing opportunities.

The Proposed Project would result in direct and indirect growth in the area and, at build-out, contribute towards a higher jobs/housing ratio for the City. Although a balanced jobs/housing growth is encouraged, SCAG also encourages job growth to be concentrated near transit services and transit nodes, and near existing freeways to facilitate existing and new residents' use of transit to get to their places of employment. The Platinum Triangle, due to its unique location with two freeways and ARTIC in close proximity, lends itself as an ideal candidate for a high employment center. Build-out of the Proposed Project would slightly increase the projected jobs/housing ratio in the City from 1.77 to 1.85. However, the Proposed Project would be consistent with regional growth management policies that facilitate future job growth at strategic points along the commuter rail, transit systems, and freeway corridors.

3. Findings on Potentially Significant Impacts

Although build-out of the Proposed Project would increase the jobs/housing ratio numerically, the Proposed Project would be consistent with many of SCAG's growth management policies. The policies aim to better coordinate infrastructure development with projected population, housing, and employment growth.

The Platinum Triangle, which is located within the 92805 and 92806 zip codes, and the Anaheim Resort are home to some of the City's major employment centers. Therefore, a majority of the City's affordable housing units, which are primarily located within the 92805 zip code, are in close proximity to these employment centers. As shown, on the exhibit entitled "Affordable Housing Projects" located in Appendix A of this FSEIR, the City's affordable units are concentrated near OCTA bus stops and routes, near major transportation facilities including the I-5 freeway, and near major employment centers including the Platinum Triangle and the Anaheim Resort. A substantial number of the City's affordable housing projects are located in the City's downtown area which is only 2.5 miles from the Platinum Triangle and less than one mile from the Anaheim Resort. According to SCAG, the average commute length in southern California is 19.2 miles.² As a result, by siting a large portion of the City's affordable housing projects in close proximity to transit and employment centers, the number of commute trips and commute trip lengths can be significantly reduced thereby reducing associated traffic, air quality, greenhouse gas emissions, and noise impacts. In addition, there is no prohibition on the development of Affordable Housing within the Platinum Triangle. Thus, the proposed project is entirely consistent with the Statewide prerogatives (such as SB 375) with respect to the reduction of vehicle miles traveled and vehicle trip lengths.

No significant impacts related to population and housing were identified and no findings are required.

3.7 PUBLIC SERVICES

Impact 5.7-1: The proposed project would require additional facilities to serve project development.

Additional population, density and usage generated by the Proposed Project would increase the demand for emergency medical services, ambulance transportation, and rescue operations for the City. Standard response times for the first engine are within five minutes to 90 percent of all incidents and 8 minutes to the remaining 10 percent. AFD also requires a maximum of ten minutes for truck company response to 100 percent of all incidents. The Proposed Project would delay AFD's response times for first engine response and increase demand for other operational sections of the AFD. Therefore, additional fire facilities, including new building construction and related infrastructure and staffing would be necessary to provide adequate fire protection services. As described in the project description, three fire stations, a first station (Battalion Headquarters Station) on Santa Cruz Street, a second station in the north central area of the Platinum Triangle, and a third station in an undetermined location, are anticipated by the project. However, the exact locations and the estimated timeframe for construction of the second and third stations have not been determined and would be dependent upon the level of development completed within the project area. Development of new fire stations would be required to comply with the standard environmental review process at the time of development and is not anticipated to result in a substantial adverse physical impact.

Provision of additional fire facilities and personnel would occur incrementally as the need arises. The Public Safety Impact Fee will be collected at the time of issuance of building permits for the proposed project to provide for construction of new fire facilities. Provided that all buildings are equipped with fire

² Southern California Association of Governments, State of the Commute Report, December 2006.

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sprinklers and appropriate fire facilities fees are paid, the proposed project would not result in a substantial adverse fire impact.

Mitigation Measures

Applicable Measure from MMP No. 106A

The following mitigation measure was included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report (SEIR) No. 332 and is applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 7-1 Prior to issuance of a Building Permit, plans ~~Plans~~ shall indicate that all buildings shall have fire sprinklers ~~installed by the property owner/developer~~ in accordance with the Anaheim Municipal Code. Said sprinklers shall be installed by the property owner/developer prior to each final Building and Zoning inspection. *(5.0-7)*

Additional Mitigation

- 7-2 Prior to issuance of a Building Permit, the property owner/developer shall pay the Public Safety Impact Fee, as amended from time to time, for fire facilities and equipment impact fees identified in Anaheim Municipal Code Chapter 17.36.

Finding: The mitigation measures are feasible and avoid or substantially lessen potentially significant fire services impacts to a less than significant level for the reasons set forth in the Draft SEIR.



Reference: FSEIR Section 5.7, Pages 5.7-5 through 5.7-7.

Impact 5.7-2: The proposed project would require increase in police facilities and staffing needs.

The Proposed Project will add to the number of service calls received and to the number of patrols and staff necessary to service the area. According to APD, Proposed Project will result in an annual increase of 36,216 calls for service. This will require an additional 108.5 Officers, 56.7 full-time and 25.9 part-time civilian support personnel. This increased staff will require an additional 43,189 square feet of office space, 48 vehicles and \$554,218 for assigned equipment.

In April 2005, the Fire and Police Departments prepared the Public Safety Services Master Facility Plan and Development Fee Calculation and Nexus Report to study the needs of the Fire and Police Departments to serve the growing and expanded development in the PTMU Overlay Zone. The purpose of establishing new Public Safety Impact Fees is to finance improvements and additions to facilities and equipment to support fire suppression and emergency and law enforcement and crime prevention services made necessary by new development and the expansion of and additions to existing development within the PTMU Overlay Zone (Resolution 2006-149).

It is anticipated that the overall increase in property tax revenue from the Proposed Project would be used to cover the additional staffing needs. The Public Safety Impact Fee will be collected at the time of issuance of building permits for the Proposed Project and levied fees would be used to provide for construction of new police facilities and procurement of necessary equipments.

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Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measures were included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the SEIR No. 332 and are applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 7-3 ~~The~~ **Prior to the approval of a Final Site Plan, the property owner/developer shall submit plans to the Anaheim Police Department for review and approval for the purpose of incorporating safety measures in the project design including implementation of Ordinance 6016 and the concept of crime prevention through environmental design (i.e., building design, circulation, site planning and lighting of parking structure and parking areas). Rooftop addresses shall be provided for all parking structures (for the police helicopter). Minimum size for numbers shall be four feet in height and two feet in width. The lines for the numbers shall be 6 inches thick and spaced 12 to 18 inches apart. All numbers shall have a contrasting color to the parking structure and shall face the street to which the structure is addressed. (5.9-2)**
- 7-4 ~~The~~ **Prior to the issuance of each Building Permit for a parking structure, the property owner/developer shall submit plans to the Anaheim Police Department for review and approval indicating the provision of closed circuit monitoring and recording or other substitute security measures as may be approved by the Anaheim Police Department. Said measures shall be implemented prior to final Building and Zoning inspections. (5.9-3)**
- 7-5 ~~The~~ **Prior to the approval of a Final Site Plan, the property owner/developer shall submit design plans that shall include parking lots and parking structures with controlled access points to limit ingress and egress if determined to be necessary by the Anaheim Police Department, and shall be subject to the review and approval of the Anaheim Police Department. (5.9-4)**
- 7-6 ~~If~~ **Ongoing during project operation, the Anaheim Police Department of Anaheim Traffic Management Center (TMC) personnel are required to provide temporary traffic control services, the property owner/developer shall reimburse the City, on a fairshare basis, if applicable, for reasonable costs associated with such services. (5.9-5)**

Additional Mitigation

- 7-7 **Prior to the issuance of each building permit, the property owner/developer shall pay the Public Safety Impact Fee, as amended from time to time, for police facilities and equipment impact fees identified in Anaheim Municipal Code Chapter 17.36.**

Finding: The mitigation measures are feasible and avoid or substantially lessen potentially significant police services impacts to a less than significant level for the reasons set forth in the Draft EIR.

Reference: FSEIR Section 5.7, Pages 5.7-9 through 5.7-12.

3. Findings on Potentially Significant Impacts

Impact 5.7-3: The Proposed Project would generate new students and require additional school facilities in the area.

Implementation of the Proposed Project would generate new students within the ACSD and AUHSD boundaries and necessitate the need for new school facilities. The project site is located within the general attendance area of Paul Revere Elementary School, South Junior High School, and Katella High School. Table 5.7-6 from the DSEIR shows the anticipated number of additional students generated by the Proposed Project. At build out, the Proposed Project is anticipated to generate additional 3,119 elementary school students, 899 middle school students, and 1,549 high school students. These students are in addition to the demand created by the adopted 10,266 dwelling units.

**Table 5.7-6
ACSD & AUHSD Student Generation Rates**

Proposed Additional Dwelling Units	Type	Generation Rates	Additional Students	Adopted GP (10,266 DU)	Platinum Triangle
8,643 DU	Elementary	0.3609	3,119	3,704	6,823
	Jr. High	0.1040	899	1,066	1,967
	High	0.1790	1,549	1,836	3,387
Total		0.7479	6,464	7,677	12,177

However, it should be noted that the generation factors used above are based on the number of students expected to be generated from the traditional housing types in the City such as single-family detached, single-family attached, multi-family, and mobile homes development, and therefore may not accurately reflect the probable number of students that would be generated by the type of housing to be offered by the Proposed Project. The type of high-density urban housing projects tends to generate fewer students for a number of reasons, including: (1) the majority of homes are one- and two-bedroom units; (2) the sizes of the units are generally smaller than the typical single-family detached homes with an equivalent number of bedrooms; and (3) there are other housing types in the area that are similar in cost but are more family-oriented, providing better choices for families with children.



For instance, the ACSD, through its demographic consultant conducted a survey of the current student generation rates for residential projects in Southern California that might be similar to the type of residential development that may occur in the Platinum Triangle in terms of cost, scale, first occupancy, and unit structure. The elementary school (K-6) student generation rate based on this study is 0.011, which would result in an additional 95 students. Although such data is very new and its validity not verified, it still emphasizes the point that the Platinum Triangle would generate fewer students than the number of students expected to be generated from the traditional housing types. The ACSD considers this number an absolute minimum of students which may be generated by the Proposed Project and is planning for a far greater number of students. Currently, there are no elementary schools in the limits of the Platinum Triangle; therefore, students from the Platinum Triangle would be sent to the school with available capacity. Prior to opening of a school within the Platinum Triangle, the District would have to bus all students generated from the Platinum Triangle to other District sites, therefore create the need for additional buses and supporting services. Development and operation of a new school would require a separate CEQA review and approval by the California Department of Education for impacts to students and the environment.

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Similar to the elementary school student generation rate, student generation rates for middle school and high school students are also expected to be lower than the traditional generation rates. South Junior High and Katella High Schools are currently overcrowded and would not be able provide adequate school services to the project.

Therefore, in order to mitigate the school-related impacts, the developer is required to pay school impact fees levied by ACSD and AUHSD. ACSD's Fee Justification Report for Residential and Commercial/Industrial Development (Report) set forth the school impact fees to \$2.97 per residential square foot and \$0.47 per commercial/industrial square foot. This funding program, established by Senate Bill 50 (Government Code [GC] Section 65995 [b][3] as amended) (SB 50), has been found by the Legislature to constitute "full and complete mitigation of the impacts" on the provision of adequate school facilities (GC 65995(h)). The SB 50 establishes three potential limits for school districts, depending on the availability of new school construction funding from the state and the particular needs of the individual school districts. ACSD and AUHSD qualify for imposing the level one fee, where this amount is typically allocated 50 percent to AUHSD and 50 percent to ACSD. SB 50 sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to demand mitigation of a project's impacts on school facilities in excess of fees set forth in Education Code 17620.

Although the increased demand for school facilities would result in substantial impact, payment of impact fees as adopted by the Board of Trustees of the AUHSD, in compliance with SB 50, would reduce the impacts to an acceptable level.

Mitigation Measures

Applicable Mitigation Measure from MMP No. 106A

The following mitigation measure was included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 and is applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 7-8 Ongoing, the ~~the~~ City of Anaheim will work cooperatively with school districts to identify opportunities for school facilities ~~sites-for-new-schools-and-school-expansions~~ in the Platinum Triangle. ~~(5.9-6)~~

Additional Mitigation

- 7-9 Prior to the issuance of each building permit, the property owner/developer shall pay the school impact fees as adopted by the Board of Trustees of the Anaheim Union High School District and Anaheim City School District in compliance with Senate Bill 50 (Government Code [GC] Section 65995 [b][3] as amended).

Finding: The mitigation measures are feasible and avoid or substantially lessen potentially significant school services impacts to a less than significant level for the reasons set forth in the Draft EIR.

Reference: FSEIR Section 5.7, Pages 5.7-17 through 5.7-19; Response to Comments Letter A3.

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Impact 5.7-4: The proposed project would increase the service needs for local libraries.

The increase in population due to the proposed project will increase demand for library collections, staff, space, and services from this area of Anaheim. Based on East Anaheim Library model, a 28,332 population requires the building of physical space for library services of approximately 10,000 square feet. In addition, to maintain current per capita levels and licensing agreements, additional physical and virtual resources need to be added to the Anaheim library system. Developer fees are assessed to allow a community to establish a financing mechanism to help to offset the increased service needs that occur when new housing units are built. It is anticipated that the fee will be reviewed annually and adjustments will be made based upon the inflation/deflation costs for library construction, land, library materials, and computers. Provided that appropriate library impact fees are assessed to fund the added library facilities, the impacts would be reduced to a less than significant level.

Mitigation Measure:

- 7-10 Prior to approval of the first Development Agreement with residential units within the Platinum Triangle following certification of SEIR No. 339, an update to the library facilities fee program included in the Standardized Development Agreement shall be submitted to the City Council for review and consideration to reflect the proposed project intensities.

Finding: The mitigation measure is feasible and avoids or substantially lessens potentially significant library services impacts to a less than significant level for the reasons set forth in the Draft EIR.

Reference: FSEIR Section 5.7, Page 5.7-21.



Impact 5.7-5: The Proposed Project would increase the service needs for local day care facilities.

Impact 5.7-5 was not found to be significant and no findings are required for this impact.

3.8 RECREATION

Impact 5.8-1: The proposed project would increase demands on existing parks and recreational facilities.

The City has a goal of providing two acres of parkland per 1,000 residents. The existing parks facilities are already impacted with overuse and additional demand created by the proposed project would further exacerbate the current deficiency.

The dedication of property to the City for park and recreation facilities, development and maintenance of pocket parks by the developer or homeowners' associations, and the payment of enhanced park-in-lieu fees as required under the City of Anaheim Municipal Code Section 18.20.110 would reduce impacts to park facilities. In addition, redevelopment of industrial areas and increased development intensities would relieve development pressure in other areas, thereby providing opportunities for larger recreation areas to develop. However, even with the compliance with the existing regulation, the proposed project will bring in residents and users that will exceed the capacity of the surrounding parks system. Recreational facilities developed in association with the Platinum Triangle would primarily be mini urban parks, and therefore would not alleviate the need for larger neighborhood parks or community parks with

3. Findings on Potentially Significant Impacts

recreational amenities such as turf ball fields. Therefore, additional effort to acquire and development additional parkland would be necessary.

Mitigation Measures

- 8-1 Ongoing during project implementation, the City shall continue to seek property acquisition opportunities for parkland in and adjacent to the project area.
- 8-2 Ongoing during project implementation, the City shall continue to work with developers to seek alternative means of providing recreational amenities.
- 8-3 Ongoing during project implementation, the City shall continue fostering partnerships with other public entities and private organizations to seek alternative means of providing various types of recreational opportunities.

Finding: The mitigation measures are feasible and avoid or substantially lessen potentially significant recreational facilities impacts to a less than significant level for the reasons set forth in the Draft EIR.

Reference: FSEIR Section 5.8, Pages 5.8-6 through 5.8-13.

Impact 5.8-2: Development of recreational facilities would not have adverse physical effect on the environment.

Impact 5.8-2 was not found to be significant and no findings are required for this impact.

3.9 TRANSPORTATION/TRAFFIC

Impact 5.9-1: Project-related trip generation would impact levels of service for the area roadway system.

2030 With Project

Intersection ICU Analysis (With Project 2030)

Intersection analysis describes the effect of future growth on the study area intersections, with the Proposed Project. As shown in Table 5.9-17 and Figure 5.9-5 of the DSEIR, the following intersections are forecast to operate at LOS E or F (five intersections in the City of Orange and one shared intersection between Anaheim and Orange).

- 1) Euclid Street at Katella Avenue (PM Peak Hour)/(I-1)
- 2) Ninth Street at Katella Avenue (AM and PM Peak Hour)/(I-2)
- 3) Disneyland Drive at Ball Road (PM Peak Hour)/(I-5)
- 4) Disneyland Drive/West Street at Katella Avenue (AM and PM Peak Hour)/(I-6)
- 5) Harbor Boulevard at Ball Road (AM and PM Peak Hour)/(I-8)
- 6) Harbor Boulevard at Katella Avenue (AM and PM Peak Hour)/(I-12)
- 7) Anaheim Boulevard at Vermont Avenue (AM Peak Hour)/(I-18)

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- 8) Anaheim Boulevard at Ball Road (PM Peak Hour)/(I-19)
- 9) Anaheim Boulevard at Cerritos Avenue (PM Peak Hour)/(I-20)
- 10) Anaheim Boulevard at I-5 NB Ramps (PM Peak Hour)/(I-21)
- 11) Anaheim Boulevard/Haster Street at Katella Avenue (PM Peak Hour)/(I-23)
- 12) Haster Street at Gene Autry Way (AM and PM Peak Hour)/(I-24)
- 13) Anaheim Way (I-5 Northbound Ramps) at Katella Avenue (AM Peak Hour)/(I-27)
- 14) Lewis Street at Cerritos Avenue (PM Peak Hour)/(I-31)
- 15) Lewis Street at Katella Avenue (PM Peak Hour)/(I-33)
- 16) Lewis Street at Anaheim Connector (future) (PM Peak Hour)/(I-35)
- 17) State College Boulevard at Cerritos Avenue (AM Peak Hour)/(I-47)
- 18) State College Boulevard at Katella Avenue (AM and PM Peak Hour)/(I-49)
- 19) State College Boulevard at Gateway Center Drive (AM and PM Peak Hour)/(I-50)
- 20) State College Boulevard at Gene Autry Way (AM Peak Hour)/(I-51)
- 21) State College Boulevard at Orangewood Avenue (Anaheim/Orange) (AM and PM Peak Hour)/(I-53)
- 22) State College Boulevard/The City Drive at Chapman Avenue (Orange) (PM Peak Hour)/(I-57)
- 23) Sunkist Street at Howell Avenue (PM Peak Hour)/(I-60)
- 24) Howell Avenue at Katella Avenue (PM Peak Hour)/(I-61)
- 25) Sportstown at Katella Avenue (PM Peak Hour)/(I-62)
- 26) Rampart Street at Orangewood Avenue (PM Peak Hour)/(I-64)
- 27) Orangewood Avenue at SR-57 Southbound Ramps (Orange) (PM Peak Hour)/(I-71)
- 28) Douglass Road at Katella Avenue (AM and PM Peak Hour)/(I-73)
- 29) Main Street at Collins Avenue (Orange) (PM Peak Hour)/(I-80)
- 30) Glassell Street at Katella Avenue (Orange) (PM Peak Hour)/(I-87)
- 31) The City Drive at Garden Grove Boulevard (Orange) (AM and PM Peak Hour)/(I-102)



City of Orange Facilities

The Proposed Project results in cumulative impacts to seven intersections located within the City of Orange and includes one shared intersection with Anaheim and two ramp termini intersections. Some of the identified improvements are not included within the City of Orange development impact fee program. The Proposed Project would contribute the associated intersection fair-share percentage toward the costs of the recommended improvements. The fair-share calculations, presented in Table 5.9-19, show that the Proposed Project contributes between 8 percent and 27 percent of trips to Orange intersections and 34 percent of trips to the shared Anaheim and Orange intersection. The Cities of Orange and Anaheim will need to enter into or amend an existing cooperative agreement to determine the implementation of these improvements.

Arterial Segment Daily LOS Analysis (With Project 2030)

The following arterial segments operate at a deficient LOS with implementation of the Proposed Project. As shown in Table 5.9-20 of the DSEIR, the traffic analysis found that there are 42 arterial segments with

3. Findings on Potentially Significant Impacts

significant impacts with implementation of the Proposed Project, including six segments in the City of Orange. These six arterial segments in the City of Orange will require mitigation to operate at an acceptable LOS through upgrading segment classification to provide additional capacity. For those deficient arterial segments in the City of Anaheim, a peak hour LOS analysis was performed for further analysis.

- 1) Anaheim Boulevard from I-5 to Cerritos Avenue/(A-2)
- 2) Anaheim Boulevard from Cerritos Avenue to Ball Road/(A-3)
- 3) Anaheim Way from Orangewood Avenue to Katella Avenue/(A-6)
- 4) Ball Road from Disneyland Drive to Harbor Boulevard/(A-9)
- 5) Ball Road from Harbor Boulevard to Anaheim Boulevard/(A-10)
- 6) Ball Road from Anaheim Boulevard to East Street/(A-11)
- 7) Ball Road from East Street to State College Boulevard/(A-12)
- 8) Ball Road from State College Boulevard to Sunkist Street/(A-13)
- 9) Ball Road from Sunkist Street to SR-57/(A-14)
- 10) Ball Road from SR-57 to Main Street (City of Orange segment)/(A-15)
- 11) Cerritos Avenue from Sunkist Street to Douglass Road/(A-19)
- 12) Collins Avenue from Main Street to Batavia Street (City of Orange segment)/(A-27)
- 13) Collins Avenue from Batavia Street to Glassell Street (City of Orange segment)/(A-28)
- 14) Douglass Road from Katella Avenue to Cerritos Avenue/(A-31)
- 15) Eckhoff Street from Orangewood Avenue to Collins Avenue (City of Orange segment)/(A-32)
- 16) Gene Autry Way from I-5 to State College Boulevard/(A-36)
- 17) Harbor Boulevard from Chapman Avenue to Orangewood Avenue/(A-37)
- 18) Harbor Boulevard from Orangewood Avenue to Convention Way/(A-38)
- 19) Harbor Boulevard from Convention Way to Katella Avenue/(A-39)
- 20) Harbor Boulevard from Katella Avenue to Disney Way/(A-40)
- 21) Harbor Boulevard from Disney Way to Manchester Avenue/(A-41)
- 22) Harbor Boulevard from Manchester Avenue to I-5/(A-42)
- 23) Howell Avenue from State College Boulevard to Sunkist Street/(A-47)
- 24) Katella Avenue from Euclid Street to Ninth Street/(A-49)
- 25) Katella Avenue from Ninth Street to Walnut Street/(A-50)
- 26) Katella Avenue from Walnut Street to Disneyland Drive/(A-51)
- 27) Katella Avenue from Disneyland Drive to Harbor Boulevard/(A-52)
- 28) Katella Avenue from Manchester Avenue to Anaheim Way/(A-56a)
- 29) Katella Avenue from Anaheim Way to Lewis Street/(A-56b)
- 30) Katella Avenue from Sportsdown to Howell Avenue/(A-59)
- 31) Katella Avenue from Howell Avenue to SR-57/(A-60)
- 32) Katella Avenue from SR-57 to Main Street/(A-61)
- 33) Lewis Street from Katella Avenue to Cerritos Avenue/(A-65)

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- 34) Manchester Avenue from Orangewood Avenue to Katella Avenue/(A-72)
- 35) Orangewood Avenue from Harbor Boulevard to Hazler Street/(A-74)
- 36) Orangewood Avenue from State College Boulevard to Rampart Street/(A-77)
- 37) Orangewood Avenue from Rampart Street to SR-57 Freeway/(A-78)
- 38) Phoenix Club Drive from Honda Center to Ball Road/(A-81)
- 39) Rampart Street from Chapman Avenue to Orangewood Avenue /(A-82)
- 40) State College Boulevard from Katella Avenue to Howell Avenue/(A-87)
- 41) Struck Avenue from Katella Avenue to Main Street (City of Orange segment)/(A-91)

Arterial Segment Peak Hour LOS Analysis (With Project 2030)

A peak hour LOS analysis was performed for 35 deficient arterial segments in the City of Anaheim as previously indicated and it determined that four arterial segments would have significant impact in either AM or PM peak hour as shown in Table 5.9-21. Table 5.9-22 compares these deficient segments under existing, No Project, and With Project conditions. The following lists deficient arterial segments that require improvements after the peak hour LOS analysis.

- 1) Cerritos Avenue from Sunkist Street to Douglass Road/(A-19)
- 2) Douglass Road from Katella Avenue to Cerritos Avenue/(A-31)
- 3) Katella Avenue from Manchester Avenue to Anaheim Way/(A-56a)
- 4) Lewis Street from Katella Avenue to Cerritos Avenue/(A-65)



The Proposed Project would result in significant impact to four arterial segments. However, with improvements as described in Table 5.9-23 of the DSEIR, all segments except for Lewis Street between Katella Avenue and Cerritos Avenue (A-65) would operate at acceptable levels. Although the arterial segment on Cerritos Avenue between State College Boulevard and Sunkist Avenue (A-18) was not identified as having a significant impact, improvements are necessary so that Cerritos Avenue has a consistent classification for its entire length and would be consistent with the Orange County Master Plan of Arterial Highways.

City of Orange Facilities

Table 5.9-24 of the DSEIR compares the deficient arterial segments in the City of Orange under existing, No Project, and With Project conditions. Future forecasts for the arterial segments in Orange are generally consistent with the forecast volumes presented by the City of Orange in their General Plan Update Traffic Analysis (Revised June 2009). As such, the segments of Ball Road (A-15, referred to as Taft Avenue in the Orange analysis) identified in Table 5.9-24 of the DSEIR was identified as deficient in the Orange General Plan Update Traffic Analysis with no specific capacity enhancing mitigation proposed. Rather, the City of Orange recommended monitoring this segment through peak hour intersection performance to ensure acceptable peak hour operations. Therefore, no specific road improvements are proposed for this arterial segment.

For arterial segment improvements within the City of Orange, the facilities identified in Table 5.9-25 would require improvements to ensure acceptable operations. Future forecasts for the arterial segments in Orange are generally consistent with the forecast volumes presented by the City of Orange in their General Plan Update Traffic Analysis (Revised June 2009). As such, the segments of Ball Road (referred to as Taft Avenue in the Orange analysis) identified in Table 5.9-25 of the DSEIR was identified as

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deficient in the Orange General Plan Update Traffic Analysis with no specific capacity enhancing mitigation proposed. Rather, the City of Orange recommended monitoring this segment through peak hour intersection performance to ensure acceptable peak hour operations. For the segment of Collins Avenue between Batavia Street and Glassell Street, improvements to a four-lane divided facility was recommended. The segments of Eckhoff Street and Struck Avenue were not found to be deficient in the Orange General Plan Update. Collins Avenue from Main Street to Batavia was also not found to be deficient in the Orange General Plan Update.

The City of Anaheim does not have jurisdiction over the deficient circulation system components in the City of Orange. Nevertheless, the City shall fund appropriate fair-shares of the identified improvements. The City shall endeavor to work with the City of Orange in developing a joint fee program whereby cross-municipal boundary impacts can be mitigated by development that is occurring in the adjoining jurisdiction. However, because the City of Anaheim cannot guarantee that the City of Orange will cooperate in the development of such a fee program or utilize funds collected by the City of Anaheim for City of Orange impacts for the intended purpose of such funds, a Statement of Overriding Considerations will be developed for the deficient Orange arterial segments in the Environmental Documentation.

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measures were included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 and are applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikethrough~~ format. The reference number for each measure from the MMP No. 106A is shown in *(italics)*.

- 9-1 Prior to the first final building and zoning inspection for each building with commercial, office, and/or institutional uses, the property owners/developer shall record a covenant on the property requiring that ongoing during project implementation, ~~the~~ **the** property owner/developer shall implement and administer a comprehensive Transportation Demand Management (TDM) program for all employees. The form of the covenant shall be approved by the City Attorney's Office. Objectives of the TDM program shall be: *(5.10-2)*
- Increase ride-sharing and use of alternative transportation modes by guests.
 - Provide a menu of commute alternatives for employees to reduce project-generated trips.
 - Conduct an annual commuter survey to ascertain trip generation, trip origin, and Average Vehicle Ridership.
- 9-2 Prior to the first Final Building and Zoning inspection for each building with commercial, office, or institutional uses, ~~and ongoing during project operation,~~ the property owner/developer shall provide to the City of Anaheim Public Works Department for review and approval a menu of TDM program strategies and elements for both existing and future employees' commute options, to include, but not be limited to, the list below. The property owner/developer shall also record a covenant on the property requiring that the approved TDM strategies and elements be implemented ongoing during project

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operation. The form of the covenant shall be approved by the City Attorney's Office prior to recordation. **following: (5.10-2)**

- On-site services such as the food, retail, and other services be provided.
- Ridesharing. Develop a commuter listing of all employee members for the purpose of providing a "matching" of employees with other employees who live in the same geographic areas and who could rideshare.
- Vanpooling. Develop a commuter listing of all employees for the purpose of matching numbers of employees who live in geographic proximity to one another and could comprise a vanpool or participate in the existing vanpool programs.
- Transit Pass. Southern California Rapid Transit District and Orange County Transportation Authority (including commute rail) passes be promoted through financial assistance and on-site sales to encourage employees to use the various transit and bus services from throughout the region.
- Shuttle Service. A commuter listing of all employees living in proximity to the project be generated, and a local shuttle program offered to encourage employees to travel to work by means other than the automobile.
- Bicycling. A Bicycling Program be developed to offer a bicycling alternative to employees. Secure bicycle racks, lockers, and showers be provided as part of this program. Maps of bicycle routes throughout the area be provided to inform potential bicyclists of these options.
- Guaranteed Ride Home Program. A program to provide employees who rideshare, or use transit or other means of commuting to work, with a prearranged ride home in a taxi, rental car, shuttle, or other vehicle, in the event of emergencies during the work shift.
- Target Reduction of Longest Commute Trip. An incentive program for ridesharing and other alternative transportation modes to put highest priority on reduction of longest employee commute trips.
- Stagger work shifts.
- Develop a "compressed work week" program, which provides for fewer work days but longer daily shifts as an option for employees.
- Explore the possibility of a "telecommuting" program that would link some employees via electronic means (e.g., computer with modem).
- Develop a parking management program that provides incentives to those who rideshare or use transit means other than single-occupant auto to travel to work.
- Access. Preferential access to high occupancy vehicles and shuttles may be provided.



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- Financial Incentive for Ridesharing and/or Public Transit. (Currently, federal law provides tax-free status for up to \$65 per month per employee contributions to employees who vanpool or use public transit including commuter rail and/or express bus pools.)
- Financial Incentive for Bicycling. Employees offered financial incentives for bicycling to work.
- Special "Premium" for the Participation and Promotion of Trip Reduction. Ticket/passes to special events, vacation, etc. be offered to employees who recruit other employees for vanpool, carpool, or other trip reduction programs.
- Design incentive programs for carpooling and other alternative transportation modes so as to put highest priority on reduction of longest commute trips.

Every property owner and/or lessee shall designate an on-site contact who will be responsible for coordinating with the ATN and implementing all trip mitigation measures. The on-site coordinator shall be the one point of contact representing the project with the ATN. The TDM requirements shall be included in the lease or other agreement with all of the project participants.

- 9-3 Prior to the first final building and zoning inspection, for each building with office and/or commercial uses, ~~The~~ property owner/developer shall join and financially participate in a clean fuel shuttle program, if established and, shall participate in the Anaheim Transportation Network/Transportation Management Association in conjunction with the on-going operation of the project. The property owner/developer shall also record a covenant on the property that requires participation in the program ongoing during project operation. The form of the covenant shall be approved by the City Attorney's Office prior to recordation. (5.10-3)
- 9-4 Prior to issuance of the first building permit for each building, the property owner/developer shall pay the appropriate ~~Appropriate~~ Traffic Signal Assessment Fees, Traffic Impact and Improvement Fees, and Platinum Triangle Impact Fees ~~shall be paid by the property owner/developer~~ to the City of Anaheim in amounts determined by the City Council Resolution in effect at the time of issuance of the building permit with credit given for City-authorized improvements provided by the property owner/developer; and participate in all applicable reimbursement or benefit districts which have been established. (5.10-5)
- 9-5 Prior to approval of the first final subdivision map or issuance of the first building permit, whichever occurs first, ~~The~~ property owner/developer shall irrevocably offer for dedication (with subordination of easements), including necessary construction easements, the ultimate arterial highway right(s)-of-way adjacent to their property as shown in the Circulation Element of the Anaheim General Plan ~~adjacent to their property~~ and consistent with the Adopted Platinum Triangle Master Land Use Plan. (5.10-6)

Additional Mitigation Measures

- 9-6 Prior to approval of a Development Agreement for any project forecast to generate 100 or more peak hour trips, as determined by the City Traffic and Transportation Manager utilizing Anaheim Traffic Analysis Model Trip Generation Rates, property owner/developers shall prepare traffic improvement phasing analyses to identify when the improvements identified in the Revised

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Platinum Triangle Expansion Project Draft Traffic Study, Parsons Brinckerhoff, August 2010 (Appendix F of this SEIR) shall be designed and constructed. The Development Agreement Conditions of Approval shall require the property owner/developer to implement traffic improvements as identified in the project traffic study to maintain satisfactory levels of service as defined by the City's General Plan, based on thresholds of significance, performance standards and methodologies utilized in SEIR No. 339, Orange County Congestion Management Program and established in City of Anaheim Traffic Study Guidelines. The improvement phasing analyses will specify the timing, funding, construction and fair-share responsibilities for all traffic improvements necessary to maintain satisfactory levels of service within the City of Anaheim and surrounding jurisdictions. The Development Agreement Conditions of Approval shall require the property owner/developer to construct, bond for or enter into a funding agreement for necessary circulation system improvements, as determined by the City Traffic and Transportation Manager, unless alternative funding sources have been identified.

- 9-7 In conjunction with the preparation of any traffic improvement phasing analyses as required in Mitigation Measure 9-6, property owners/developers will analyze to determine when the intersection improvements shall be constructed, subject to the conditions identified in Mitigation Measure 9-6.

The improvement phasing analyses will specify the timing, funding, construction and fair-share responsibilities for all traffic improvements necessary to maintain satisfactory levels of service within the City of Anaheim and surrounding jurisdictions. At minimum, fair-share calculations shall include intersection improvements, rights-of-way, and construction costs, unless alternative funding sources have been identified to help pay for the improvement.

The Development Agreement Conditions of Approval shall require the property owner/developer to construct, bond for or enter into a funding agreement for necessary circulation system improvements, as determined by the City Traffic and Transportation Manager, unless alternative funding sources have been identified.

- 9-8 In conjunction with the preparation of any traffic improvement phasing analyses as required in Mitigation Measure 9-6, the following actions shall be taken in cooperation with the City of Orange:

- a) The traffic improvement phasing analysis shall identify any impacts created by the project on facilities within the City of Orange. The fair-share percentage responsibility for mitigating these impacts shall be calculated in this analysis.
- b) The City of Anaheim shall estimate the cost of the project's fair-share responsibility in cooperation with the City of Orange.
- c) The Proposed Project shall pay the City of Anaheim the fair-share cost prior to issuance of a building permit. The City of Anaheim shall hold the amount received in trust, and then, once a mutually agreed upon joint program is executed by both cities, the City of Anaheim shall allocate the fair-share contribution to traffic mitigation programs that result in improved traffic flow at the impacted locations, via an agreement mutually acceptable to both cities.
- d) The City shall work with the City of Orange to amend the JCFA to ensure that fair share fees collected to mitigate arterial and intersection impacts in the City of Orange are mitigated to the extent feasible.



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- 9-9 In conjunction with the preparation of any traffic improvement phasing analyses as required in Mitigation Measure 9-6, and assuming that a regional transportation agency has not already programmed and funded the warranted improvements to the impacted freeway mainline or freeway ramp locations, property owners/developers and the City will take the following actions in cooperation with Caltrans:
- a) The traffic study will identify the Project's proportionate impact on the specific freeway mainline and/or freeway ramp locations and its fair-share percentage responsibility for mitigating these impacts based on thresholds of significance, performance standards and methodologies utilized in SEIR No. 339 and established in the Orange County Congestion Management Program and City of Anaheim Traffic Study Guidelines.
 - b) The City shall estimate the cost of the project's fair-share responsibility in cooperation with Caltrans.
- 9-10 Prior to the approval of the final subdivision map or issuance of a Building Permit, whichever occurs first, the property owner/developer shall pay the identified fair-share responsibility as determined by the City as set forth in Mitigation Measure 9-9. The City shall allocate the property owners/developers fair-share contribution to traffic mitigation programs that result in improved traffic flow on the impacted mainline and ramp locations, via an agreement mutually acceptable to Caltrans and the City.
- 9-11 Prior to approval of the first final subdivision map or issuance of the first building permit, whichever occurs first, the property owner/developer shall irrevocably offer for dedication (with subordination of easements), including necessary construction easements, the ultimate arterial highway right(s)-of-way adjacent to their property as shown in the Circulation Element of the Anaheim General Plan and consistent with the Adopted Platinum Triangle Master Land Use Plan, regardless of the level of impacts generated by the project.

Transportation Fee Program

- 9-12 Subsequent to the certification of the FEIR, and prior to the approval of the first Development Agreement, if the costs of the identified improvements in this traffic study cannot be covered by the total funding allocation under the existing Community Facilities District (CFD), an update to the CFD or an update to the City's traffic impact fee program or other fee programs shall be developed by the City of Anaheim to ensure completion of the recommended improvements. Any updated CFD or City traffic fee program shall include the costs of implementing identified intersection and/or arterial improvements in the City of Orange.

Transportation Demand Management (TDM) Program

- 9-13 Prior to the first final building and zoning inspection for each building with commercial, office, and/or institutional uses, the property owners/developer shall record a covenant on the property requiring that ongoing during project implementation, the property owner/developer shall implement and administer a comprehensive Transportation Demand Management (TDM) program for all employees. The form of the covenant shall be approved by the City Attorney's Office. Objectives of the TDM program shall be:
- Increase ridesharing and use of alternative transportation modes by guests.
 - Provide a menu of commute alternatives for employees to reduce project-generated trips.

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- Conduct an annual commuter survey to ascertain trip generation, trip origin, and Average Vehicle Ridership.

Participation In the Anaheim Transportation Network (ATN)

9-14 Prior to the first final building and zoning inspection, for each building with office and/or commercial uses, the property owner/developer shall submit proof to the Public Works, Transit Planning Division that the property owner/developer has entered into an agreement with the Anaheim Transportation Network (ATN) for the provision of a transit shuttle service between the project, the existing Metrolink Station and future Anaheim Regional Transportation Intermodal Center (ARTIC) as well as major activity centers in between. The agreement shall be recorded in the Official Records of the Office of the County Recorder, Orange County, California. The form of the agreement shall be approved by the City Attorney's Office prior to recordation. The agreement shall provide for the following:

- a. A shuttle route plan, approved by the Public Works Department, Transit Planning Division and ATN, shall be attached and incorporated into the agreement. The plan shall include co-location of stops with Orange County Transportation Authority bus stop locations and other properties in the Platinum Triangle where feasible and determined appropriate by the Public Works Transit Planning Division and ATN. The property owner/developer shall pay all costs associated with the preparation of the shuttle route plan.
- b. The property owner/developer shall provide the full cost associated with providing the shuttle, including, but not limited to, purchasing the shuttle vehicle and all costs associated with operating and marketing the shuttle route.
- c. The agreement shall provide a mechanism for the property owner/developer to request fair-share participation from other major activity centers to be served by this shuttle route. The mechanism shall be subject to the approval of the ATN.
- d. The agreement shall set forth a schedule for commencement of operation of the shuttle service.
- e. The agreement shall provide that the property owner/developer's obligations to fund the shuttle service may be cancelled only upon prior written approval from the Public Works Department, Transit Planning Division's once a new transit service has taken its place.
- f. That to the extent permitted by law the terms of this agreement shall constitute covenants which shall run with the property for the benefit thereof, and the benefits of this agreement shall bind and inure to the benefit of the parties and all successors in interest to the parties hereto.



Intersection and Arterial Segment Impacts

Based upon the ICU methodology established by the Cities of Anaheim and Orange, the study determined that 31 intersections are impacted by the Proposed Project and require mitigation. As shown in Table 5.9-37 in the FSEIR, improvements have been proposed for all 31 locations and all intersections within the study area would operate at an acceptable LOS with the implementation of the mitigation strategies. Additionally, as shown in Table 5.9-37 of the FSEIR, mitigation measures have been provided for four arterial segments in the City of Anaheim and six arterial segments in the City of Orange that are impacted by the Proposed Project. One arterial segment (A-18, Cerritos Avenue between State College

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Boulevard and Sunkist Street) is recommended for improvement to allow for continuity on a key east-west corridor although no significant impact was identified.

Implementation of Mitigation 9-1 through 9-14, in conjunction with the recommended improvements in Table 5.9-37 of the FSEIR would reduce impacted intersections LOS to a less than significant level. However, as indicated in Table 5.9-37 of the FSEIR, mitigation measures recommended for 13 impacted intersections are infeasible and project impact would remain significant and unavoidable. Although recommended, not all identified improvements are feasible due to a number of reasons such as the inability to undertake right-of-way acquisitions as a matter of policy to preserve existing businesses, environmental constraints, or jurisdictional consideration. In addition, although cost estimates have not been completed at this time, it is anticipated that a number of improvements would be economically infeasible due to the anticipated costs of some of the improvements. Inasmuch as the primary responsibility for approving and/or completing certain improvements located outside of Anaheim lies with agencies other than the City of Anaheim (i.e., City of Orange and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the City of Anaheim's control (e.g., the City of Anaheim cannot undertake or require improvements outside of Anaheim's jurisdiction or the City cannot construct improvements in the Caltrans right-of-way without Caltrans approval). Should that occur, the project's traffic impact would remain significant. Table 5.9-37 of the FSEIR presents mitigation measures identified through analysis of the Proposed Project traffic impacts, including those locations that are expected to remain significant due to infeasibility.

**Table 5.9-37 (from the FSEIR)
Recommended Mitigation Measures**

<i>ID</i>	<i>Location</i>	<i>Jurisdiction</i>	<i>Level of Impact</i>	<i>Mitigation</i>	<i>Comments</i>
Intersections					
I-1	Euclid Street / Katella Avenue	Anaheim	Project	Restripe NBR to NBT, widen NB departure for 400 feet	Infeasible
I-2	Ninth Street / Katella Avenue	Anaheim	Project	Add 2nd NBL (Restripe #1 SB lane)	
I-5	Disneyland Drive / Ball Road	Anaheim	Project	Add NBL; Restripe NB to 2L, 2T, 1R and SB to 2L, 2T; Remove Split Phase	Infeasible
I-6	Disneyland Drive / West Street / Katella Avenue	Anaheim	Project	Restripe EBR to EBT, Restripe WBR to WBT and add 4th WB lane to the Simba parking lot entrance	Partially Infeasible
I-8	Harbor Boulevard / Ball Road	Anaheim	Project	Add NBT, SBT, EBT, EBR	Infeasible
I-18	Anaheim Boulevard / Vermont Avenue	Anaheim	Project	Add SBT	
I-19	Anaheim Boulevard / Ball Road	Anaheim	Project	Add NBR, EBL, EBR	
I-20	Anaheim Boulevard / Cerritos Avenue	Anaheim	Project	Add NBL, SBL, WBR, Restripe WB approach to 2L, 1TR, 1R	
I-21	Anaheim Boulevard / I-5 Northbound Ramps	Anaheim	Project	Add SBT (in median)	
I-23	Anaheim Boulevard / Haster Street / Katella Avenue	Anaheim	Project	Add WBR	Infeasible
I-24	Haster Street / Gene Autry Way	Anaheim	Project	Add WBL, SBL, SBR	
I-27	Anaheim Way (I-5 Northbound Ramps) / Katella	Anaheim	Project	Add EBT, WBT	
I-31	Lewis Street / Cerritos Avenue	Anaheim	Project	Add WBR	

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**Table 5.9-37 (from the FSEIR)
Recommended Mitigation Measures**

ID	Location	Jurisdiction	Level of Impact	Mitigation	Comments
I-33	Lewis Street / Katella Avenue	Anaheim	Project	Add NBL, NBT, SBL, SBR, WBT; Restripe SB to 2L, 1T, 1TR, 1R	
I-35	Lewis Street / Anaheim Connector (future)	Anaheim	Project	Add EBL	
I-47	State College Boulevard / Cerritos Avenue	Anaheim	Project	Add NBL, SBL, EBL	
I-49	State College Boulevard / Katella Avenue	Anaheim	Project	Add WBR, EBR; Restripe SB to 2L, 2T, 2R; EB to 3L, 3T, 1R	Partially Infeasible
I-50	State College Boulevard / Gateway Center Drive	Anaheim	Project	Add WBL and NBR	
I-51	State College Boulevard / Gene Artry Way	Anaheim	Project	Add SBR	
I-53	State College Boulevard / Orangewood Avenue	Anaheim/ Orange	Project	Add NBR and WBT	Infeasible
I-57	State College Boulevard / The City Drive / Chapman	Orange	Project	Restripe WBT to WBTR	Override
I-60	Sunkist Street / Howell Avenue	Anaheim	Project	Add SBL, restripe SB to 1L, 1LT, 1R	
I-61	Howell Avenue / Katella Avenue	Anaheim	Project	Add WBR	
I-62	Sportstown / Katella Avenue	Anaheim	Project	Restripe NBTR to NBT, NBTL, Add Lane	
I-64	Rainpart Street / Orangewood Avenue	Anaheim/ Orange	Project	Add NB Free Right, Add SBL	
I-71	Orangewood Avenue / SR-57 Southbound Ramps	Orange	Project	Add WBL (Restripe)	Override



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**Table 5.9-37 (from the FSEIR)
Recommended Mitigation Measures**

ID	Location	Jurisdiction	Level of Impact	Mitigation	Comments
I-73	Douglass Road / Katella Avenue	Anaheim	Project	Add NBT and SBT; Reconfigure NBTR to NBT, Reconfigure SBTR to SBT; Add EBT and WBR	
I-80	Main Street / Collins Avenue	Orange	Project	Add 2nd WBL	Override
I-87	Glassell Street / Katella Avenue	Orange	Project	Restripe SBR to SBT and Widen SB departure for 400 feet	Override
I-102	The City Drive / Garden Grove Boulevard	Orange	Project	Add SBL by Restriping #1 NB lane); Restripe EBT to EBL	Override
Transverse Intersections					
I-21	Anaheim Boulevard / I-5 NB Ramps	Anaheim	Project	Add 4th SBT*	
I-26	Manchester Avenue (I-5 Southbound Ramps) / Katella	Anaheim	Project	Add 4th EBT, Add 4th	
I-27	Anaheim Way (I-5 Northbound Ramps) / Katella	Anaheim	Project	Add 4th EBT, Add 5th	
I-71	Orangewood Avenue / SR-57 Southbound Ramps	Orange	Project	Add WBL (Restripe)*	Override
I-98	SR-22 Westbound Ramps/ Metropolitan Drive	Orange	Cumulative	Restripe WBT to 3 rd WBL	Override
Arterial Intersections					
A-18	Cerritos Avenue (between State College Boulevard and Sunbelt Street)	Anaheim	Project	Upgrade to 4 lane primary arterial w/ bike lanes	
A-19	Cerritos Avenue (between Sunbelt Street and Douglass Road)	Anaheim	Project	Upgrade to 4 lane primary arterial w/ bike lanes	
A-31	Douglass Road (between Katella Avenue and Cerritos Avenue)	Anaheim	Project	Upgrade to 4 lane primary arterial w/ bike lanes	
A-56a	Katella Avenue (between Manchester Avenue and Anaheim Way)	Anaheim	Project	Upgrade to 8 lane Stadium Smartstreet	
A-65	Lewis Street (between Katella Avenue and Cerritos Avenue)	Anaheim	Project	Upgrade to 4 lane primary arterial w/ bike lanes	
A-15	Ball Road (between SR-57 Freeway and Main Street)	Orange	Project	No mitigation	Override
A-27	Collins Avenue (between Main Street and Batavia Street)	Orange	Project	Upgrade to 4-lane divided arterial	Override
A-28	Collins Avenue (between Batavia Street and Glassell Street)	Orange	Project	Upgrade to 4-lane divided arterial	Override
A-32	Eckhoff Street (between Orangewood Avenue and Collins Avenue)	Orange	Project	Upgrade to 4-lane divided arterial	Override
A-62	Katella Avenue (between Main Street and Batavia Street)	Orange	Project	No mitigation	Override
A-91	Struck Avenue (between Katella Avenue and Main Street)	Orange	Project	Upgrade to 4-lane undivided arterial	Override

Note: * Intersection identified as deficient under both ICU and HCM analysis.

The following City of Anaheim intersection improvements are not feasible due to right-of-way or other constraints.

- 1) Intersection I-1: Euclid Street/Katella Avenue—Restripe Northbound Right turn lane to Northbound through lane

The improvement at Euclid Street and Katella Avenue is infeasible due to the presence of a large number of existing and newly constructed businesses including a recently rebuilt mini-mall on the

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northeast corner of the intersection, which support economic development for the City of Anaheim. The potential right-of-way required for receiving lane on the northeast corner of the intersection would significantly impact the business and parking on the east side of Euclid Street, north of Katella Avenue.

- 2) **Intersection I-5: Disneyland Drive/Ball Road—Add NBL: Restripe NB to 2L, 2T, 1R and SB to 2L, 2T; Remove Split Phase**

The improvement is infeasible due to the presence of a large number of Anaheim Resort supportive land uses that contribute to the economic development of the City. In order to accommodate the proposed improvement, the intersection would likely need to be expanded, potentially impacting the HOV ramp overpass to the Disneyland Resort. Both the City and Disney have invested heavily in supporting The Anaheim Resort and altering the street system in the area would be a cost prohibitive undertaking and disruptive to the effective operation of The Anaheim Resort.

- 3) **Intersection I-6: Disneyland Drive/West Street/Katella Avenue—Restripe WBR to WBT and add 4th WB lane to the Simba parking lot entrance**

The improvement is infeasible due to the presence of a large number of immediately adjacent Anaheim Resort supportive land uses that contribute to the economic development of the City. This access to the Disneyland Resort has been significantly reconfigured in recent years to accommodate new development at the park and adjacent parking areas. The addition of lane capacity at this intersection would require substantial right-of-way and affect the attractive gateway that the Disneyland Resort has created through extensive landscaping.

- 4) **Intersection I-8: Harbor Boulevard/Ball Road—Add Northbound Through lane, Southbound Through lane, Eastbound Through lane, and Eastbound Right-turn lane**

The improvements are infeasible due to the presence of a large number of immediately adjacent Anaheim Resort supportive land uses that contribute to the economic development of the City. To accommodate the proposed improvements, the intersection would have to be substantially expanded impacting the right-of-way of several hotel buildings including the Days Inn Suites and Hotel Ménége. Altering the street system in the area would be a cost prohibitive undertaking and disruptive to the effective operation of The Anaheim Resort.

- 5) **Intersection I-23: Anaheim Boulevard/Haaster Street/Katella Avenue—Add Westbound Right-turn lane**

The City has invested heavily in supporting development in The Anaheim Resort and reconfiguring an intersection in this area would be disruptive to those goals. This improvement also serves a turning movement that could be considered redundant, as most of the vehicles using this movement would be better served using Anaheim Way to the east to access Anaheim Boulevard.

- 6) **Intersection I-49: State College Boulevard/Katella Avenue—Restripe Eastbound to 3 left turn lanes, 3 through lanes, and 1 right turn lane**

This proposed restripe will reduce the number of through lanes on eastbound Katella Avenue from four lanes to three lanes. This proposed change will negatively affect signal coordination and timing for both streets. Katella Avenue is identified as an eight lane smart street by OCTA. All through lanes must be kept to ensure the higher capacities envisioned by OCTA on its smart street corridors. To add a third eastbound left turn lane without removing a through lane will significantly impact a



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recently developed residential mixed-use development on the northwest corner and a gas station on the southwest corner. This widening will also make Katella Avenue difficult for pedestrians to cross, as with this improvement, pedestrian traffic would have to cross 12 lanes.

- 7) Intersection I-53: State College Boulevard/Orangewood Avenue—Add Northbound Right turn lane and Westbound Through lane.

The improvement is infeasible due to the presence of a large number of immediately adjacent existing structures, including several high-density office buildings within close proximity to the public right-of-way. These types of higher density buildings are consistent with the goals of the Platinum Triangle of internal trip capture and promotion of transit use. Additionally, State College Boulevard is a designated BRT corridor. Improvements to the circulation system in this area should be consistent with the goals of promoting transit use and limiting increased auto trips to this area.

All of these intersections have a project related impact under the 2030 With Project scenario. As set forth above, there are numerous physical constraints associated with the proposed improvements, including private properties, extensive circulation landscaping and mature trees, and a variety of hotels and other businesses that would likely be impacted. These physical constraints limit the ability to ensure that impacts at these locations can be mitigated to less than significant levels. Therefore, impacts would remain significant and unavoidable.

City of Orange Facilities

The following intersections within the City of Orange have a project related impact under the 2030 With Project scenario. As noted, there are physical constraints associated with the proposed improvements, including impacts to private properties, businesses, and residences, and natural impediments such as the Santa Ana River. These physical constraints limit the ability to ensure that the improvements necessary to mitigate the project traffic impacts at these locations can be mitigated to level of less than significant. Since the City of Anaheim does not control the improvements that Orange chooses to implement in their City, the City of Anaheim will need to enter into or amend an existing agreement with Orange to contribute a fair-share to the improvements identified within the City of Orange. This fair-share would reflect an appropriate nexus between the additional traffic caused by the Proposed Project and the regional traffic contributing to future deficiencies in Orange. Intersections that are shared between the City of Anaheim and Orange will be dealt with in the same fashion.

- 8) Intersection I-53: State College Boulevard/Orangewood Avenue (shared intersection between Anaheim and Orange)—Add Northbound Right and Westbound through lanes (same as included in the City of Anaheim).

As identified above, this improvement would significantly impact the high-density office buildings at the southeast and northwest corners of the intersection. These mitigation measures do not impact any area within the City of Orange.

- 9) Intersection I-57: State College Boulevard/The City Drive/Chapman Avenue—Restripe Westbound Through to Shared Westbound Through Right.

Since the westbound right turn does not have an overlap right turn phase, this mitigation measure will cause no impact.

- 10) Intersection I-71: Orangewood Avenue/SR-57 Southbound Ramps—Restripe intersection to add Westbound Left.

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The existing curb lines up with the curb of the new bridge that will cross the Santa Ana River. The number 1 lane will become a left turn lane at this intersection, leaving two through lanes without an offset. Only signal loops, striping, and timing changes are required at this intersection, and there are no impacts to right-of-way.

11) Intersection I-80: Main Street/Collins Avenue—Add 2nd Westbound Left Turn Lane

The improvement may be infeasible due to the fact that there are significant right-of-way impacts to adding additional capacity at the intersection. Existing businesses on the east side of Main Street would be disrupted by construction and right-of-way impacts. The City of Anaheim would need to work with the City of Orange to determine the most appropriate strategy for future improvements at this location.

12) Intersection I-87: Glassell Street/Katella Avenue—Restripe Southbound Right to Southbound Through and Widen Southbound departure for 400 feet

The improvement would require right-of-way and would likely disrupt existing businesses at the southwest corner of the intersection. Although the proposed improvement is a restriping, receiving lane accommodations may impact existing property.

13) Intersection I-102: The City Drive/Garden Grove Boulevard—Add Southbound Left by Restriping #1 Northbound Lane. Restripe Eastbound Through to Eastbound Left Turn Lane.

This improvement will result in only two northbound through lanes on The City Drive until the southbound left turn pocket tapers to its standard cross section. No impacts to right-of-way are required at this intersection.



Additionally, the following one intersection in the City of Orange was identified as deficient under the HCM methodology. This location should be monitored to determine appropriate strategies toward improving flow through signal timing and coordination. However, because the intersection falls under the jurisdiction of the City of Orange, although operational improvements may be feasible, the impacts would remain significant and unavoidable.

14) Intersection I-98: SR-22 Westbound Ramps at Metropolitan Drive—Restripe Westbound Through to 3rd Westbound Left Turn Lane.

The following six arterial segments identified as deficient are located within corridors that are built out and right-of-way constraints include existing businesses, extensive landscaping, and in the case of Struck Avenue, several homes. The City of Orange has not included these segments in a current capital improvement program to fund construction of these improvements; but should the City of Orange decide to implement improvements along these corridors, the City of Anaheim will need to contribute a fair-share. The City of Anaheim will continue to work with the City of Orange to develop the most appropriate strategy toward improving the locations impacted by the Proposed Project.

15) Arterial Segment A-15: Ball Road from SR-57 Freeway to Main Street—No mitigation measures are recommended.

16) Arterial Segment A-27: Collins Avenue from Main Street to Batavia Street—Upgrade to 4-lane divided arterial.

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- 17) Arterial Segment A-28: Collins Avenue from Batavia Street to Glassell Street—Upgrade to 4-lane divided arterial.
- 18) Arterial Segment A-32: Eckhoff Street to Orangewood Avenue to Collins Avenue—Upgrade to 4-lane divided arterial.
- 19) Arterial Segment A-02: Katella Avenue from Main Street to Batavia Street—No mitigation measures are recommended.
- 20) Arterial Segment A-01: Struck Avenue from Katella Avenue to Main Street—Upgrade to 4-lane undivided arterial.

Finding: The mitigation measures are feasible and avoid or substantially lessen project-related traffic impacts to a less than significant level for the reasons set forth in the Draft SEIR. However, as noted above several intersection and roadway improvements are infeasible due to right of way constraints. In addition, if the mitigation programs identified above are not implemented by the agencies with the responsibility to do so, including Caltrans and the City of Orange, the project's intersection, freeway ramp, and mainline impacts would remain Significant and Unmitigated and a Statement of Overriding Considerations would be required.

Reference: FSEIR Section 5.9, Pages 5.9-39 through 5.9-126; FSEIR Responses to Comments Appendix B and C.

Impact 5.9-2: The Proposed Project would increase traffic volumes on Caltrans facilities.

With Project (Year 2030)

Caltrans Ramp Termini Intersection Analysis (With Project 2030)

The ramp termini intersections have previously been evaluated based on the ICU methodology as shown in Table 5.9-17 of the DSEIR, *Year 2030 Peak Hour Intersection Summary*, and in general, the analysis LOS results are consistent. However, two ramp termini intersections operate at different levels of service when comparing the ICU and HCM analysis: Manchester Avenue (I-5 Southbound Ramps) at Katella Avenue (I-26) and SR-22 Westbound at Metropolitan Drive (I-98). These intersections are deficient only under the HCM analysis, indicating that the deficiency is generally the result of operational issues, such as insufficient or excessive signal timings for pedestrian crossings. Three locations, I-21, Anaheim Boulevard at I-5 Northbound Ramps, I-27, Anaheim Way (I-5 Northbound Ramps) at Katella Avenue, and I-71, Orangewood Avenue at SR-57 Southbound Ramps correlate to intersection deficiencies already identified through the ICU analysis. Table 5.9-29 of the DSEIR displays the freeway ramp termini locations where implementation of the Proposed Project results in a deficient LOS. The following five freeway ramp termini are deficient under HCM analysis.

- 1) Anaheim Boulevard at I-5 NB Ramps (PM peak hour)/(I-21)
- 2) Manchester Avenue (I-5 Southbound Ramps) at Katella Avenue (PM peak hour)/(I-26)
- 3) Anaheim Way (I-5 Southbound Ramps) at Katella Avenue (PM peak hour)/(I-27)
- 4) Orangewood Avenue at SR-57 Southbound Ramps (PM peak hour)/(I-71)
- 5) SR-22 Westbound Ramps at Metropolitan Drive (PM peak hour)/(I-98)

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Under future No Project conditions many Caltrans facilities operate at a deficient level of service. The implementation of the Platinum Triangle Overlay Zone results in continued deficient operations on the freeway ramp facilities within the study area. Table 5.9-30 of the DSEIR displays the freeway ramp termini locations where implementation of the Proposed Project results in deficient operations as compared to acceptable operations under No Project conditions. Three locations, I-21, Anaheim Boulevard at I-5 Northbound Ramps, I-27, Anaheim Way (I-5 Northbound Ramps) at Katella Avenue, and I-71, Orangewood Avenue at SR-57 Southbound Ramps correlate to intersection deficiencies already identified through the ICU analysis. Improvements to these intersections should mitigate the identified deficiencies under both the capacity (ICU) and operational (Synchro) analysis methodology. Table 5.9-31 of the DSEIR shows the freeway ramp termini intersection with the mitigation measures have been identified through the ICU analysis. Manchester Avenue (I-5 Southbound Ramps) / Katella Avenue was not previously identified as deficient under the ICU analysis but is deficient under the HCM analysis under With Project conditions and acceptable under No Project conditions.

As noted above, Katella Avenue is expected to be widened to eight lanes between Manchester Avenue, and Anaheim Way as part of the improvement for intersection #27, and upgraded to an eight-lane Stadium Smart Street to facilitate traffic operations. The proposed improvement for intersection #26, Manchester Avenue (I-5 Southbound Ramps) at Katella Avenue would be affected by this arterial upgrade and the intersection widened to add a 4th Eastbound and 4th Westbound through lane. This improvement strategy returns the intersection to an acceptable LOS under the Synchro analysis. The implementation of the mitigation measures for these ramp termini intersections will return all to an acceptable LOS.

For ramp termini intersections within the City of Orange, the facilities identified in Table 5.9-32 would require improvements to ensure acceptable operations. However, as the City of Orange did not utilize the HCM methodology in their General Plan, the operational deficiencies described were not addressed. Locations that operate at an acceptable LOS under the ICU analysis should be monitored to determine appropriate strategies toward improving flow through signal timing and coordination.



The City of Anaheim does not have jurisdiction over the deficient circulation system components in the City of Orange. Should the City of Orange decide to improve the operational capacity of any of the locations above, the City of Anaheim will be subject to a fair-share contribution towards the improvement cost.

Caltrans Ramp Termini Off-Ramp Queuing (With Project 2030)

Table 5.9-33 of the DSEIR presents the off-ramp queue lengths and control delay determined by Synchro for the study area off-ramp termini intersections under 2030 With Project conditions. The analysis indicates that no Caltrans Ramp intersections are forecast to have a queuing length that is greater than the off-ramp storage length.

Caltrans Freeway Ramp HCM Analysis (With Project 2030)

Table 5.9-34 summarizes HCM analysis results for the study area ramps for the AM and PM peak hours. Per the Caltrans Highway Design Manual, a 2-lane on or off-ramp should be provided where volumes exceed 1,500 vehicles per hour during either the AM or PM peak hour. The Southbound SR-57 Off-Ramp to Ball Road forecast volume exceeds these criteria during the AM peak hour and should be monitored; however there is no difference between the No Project and With Project volumes at this location, therefore the project has no responsibility for improvements at this location. According to the analysis the following freeway ramps are deficient under either the AM or PM peak hour 2030 With Project conditions:

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- 1) I-5 Northbound Connector from SR-22 Eastbound (PM Peak Hour)
- 2) I-5 Northbound Off-Ramp to Chapman Avenue (PM Peak Hour)
- 3) I-5 Northbound Off-Ramp to State College Boulevard (PM Peak Hour)
- 4) I-5 Northbound On-Ramp from State College Boulevard/Chapman Avenue (PM Peak Hour)
- 5) I-5 Northbound Off-Ramp to Katella Avenue (PM Peak Hour)
- 6) I-5 Northbound HOV On-Ramp from Gene Autry Way (PM Peak Hour)
- 7) I-5 Northbound On-Ramp from Anaheim Boulevard (PM Peak Hour)
- 8) I-5 Northbound Off-Ramp to Harbor Boulevard (PM Peak Hour)
- 9) I-5 Northbound On-Ramp from Harbor Boulevard (PM Peak Hour)
- 10) I-5 Southbound Off-Ramp to Katella Avenue/Orangewood Avenue (PM Peak Hour)
- 11) I-5 Southbound On-Ramp from Katella Avenue (PM Peak Hour)
- 12) I-5 Southbound On-Ramp from Orangewood Avenue (PM Peak Hour)
- 13) I-5 Southbound Connector to SR-22 Westbound (PM Peak Hour)
- 14) SR-57 Northbound Off-Ramp to Ball Road (PM Peak Hour)
- 15) SR-57 Southbound Off-Ramp to Ball Road (AM Peak Hour)
- 16) SR-57 Southbound Off-Ramp to Katella Avenue (AM and PM Peak Hour)
- 17) SR-57 Southbound On-Ramp from Orangewood Avenue (PM Peak Hour)
- 18) SR-22 Eastbound Off-Ramp to Fairview Street (PM Peak Hour)
- 19) SR-22 Eastbound On-Ramp from Fairview Street (PM Peak Hour)
- 20) SR-22 Eastbound Connector to I-5/SR-57/The City Drive/Bristol Street (PM Peak Hour)
- 21) SR-22 Eastbound Collector/Distributor Off-Ramp to The City Drive (PM Peak Hour)
- 22) SR-22 Westbound On-Ramp from Haister Street (PM Peak Hour)

As compared to the No Project scenario, there are three additional deficient ramps under the With Project scenario. Operationally, adding a lane to either of these ramps does not result in acceptable ramp operations under 2030 With Project conditions. Impacts to freeway ramp facilities are the result of high forecast volumes on the ramps themselves coupled with high forecast volumes on the freeway mainline adjacent to the ramp facilities, therefore, the traffic on the mainline must be reduced or the capacity of the mainline facility must be enhanced through the addition of an auxiliary lane to improve freeway ramp performance.

- I-5 Southbound On-ramp from Katella Avenue (PM Peak)
- SR-57 Northbound Off-Ramp to Ball Road (PM Peak)
- SR-57 Southbound On-Ramp from Orangewood Avenue (PM Peak)

Caltrans Freeway Mainline HCM Analysis (With Project 2030)

Table 5.9-35 shows 2030 AM and PM peak hour LOS results for study area deficient mainline segments with project implementation. The following freeway mainline segments are deficient under either the AM and/or PM peak hours. When comparing the No Project and With Project scenarios, there are no

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additional deficiencies under With Project conditions. Caltrans currently does not have any additional improvements identified or planned for the identified deficient segments on the I-5, SR-57, and SR-22 freeways. According to the most current Route Concept Reports for I-5 and SR-22, and consistent with the future proposed improvements to SR-57, improvements to these facilities are contingent on the availability of revenue from regional, state, and federal transportation funding sources. In addition, the City does not have jurisdiction over the State Highway System and, therefore, cannot directly implement mitigation measures associated with project related impacts on mainline segments.

- 1) I-5 Northbound between SR-91 and Brookhurst Street (PM Peak Hour)/(F-1)
- 2) I-5 Northbound between Brookhurst Street and Euclid Street (PM Peak Hour)/(F-2)*
- 3) I-5 Northbound between Euclid Street and Lincoln Avenue (PM Peak Hour)/(F-3)*
- 4) I-5 Southbound between Euclid Street and Lincoln Avenue (AM and PM Peak Hour)/(F-3)*
- 5) I-5 Northbound between Lincoln Avenue and Harbor Boulevard (PM Peak Hour)/(F-4)*
- 6) I-5 Northbound between Harbor Boulevard and Katella Avenue (PM Peak Hour)/(F-5)
- 7) I-5 Northbound between SR-22 and 17th Street (PM Peak Hour)/(F-8)*
- 8) I-5 Southbound between SR-22 and 17th Street (AM and PM Peak Hour)/(F-8)*
- 9) I-5 Northbound between 17th Street and Grand Avenue (PM Peak Hour)/(F-9)*
- 10) I-5 Southbound between 17th Street and Grand Avenue (PM Peak Hour)/(F-9)*
- 11) I-5 Northbound between Grand Avenue and 4th Street (PM Peak Hour)/(F-10)*
- 12) I-5 Southbound between Grand Avenue and 4th Street (PM Peak Hour)/(F-10)*
- 13) I-5 Northbound between 4th Street and SR-55 (PM Peak Hour)/(F-11)*
- 14) SR-57 Southbound between Katella Avenue and Ball Road (AM and PM Peak Hour)/(F-14)*
- 15) SR-57 Northbound between Ball Road and Lincoln Avenue (PM Peak Hour)/(F-15)*
- 16) SR-57 Northbound between SR-91 and Lincoln Avenue (PM Peak Hour)/(F-16)*
- 17) SR-22 Eastbound between Brookhurst Street and Euclid Street (PM Peak Hour)/(F-17)*
- 18) SR-22 Westbound between Brookhurst Street and Euclid Street (PM Peak Hour)/(F-17)*
- 19) SR-22 Eastbound between Euclid Street and Harbor Boulevard (PM Peak Hour)/(F-18)*
- 20) SR-22 Westbound between Euclid Street and Harbor Boulevard (PM Peak Hour)/(F-18)*
- 21) SR-22 Eastbound between Harbor Boulevard and Fairview Street (PM Peak Hour)/(F-19)*
- 22) SR-22 Westbound between Harbor Boulevard and Haster Street (PM Peak Hour)/(F-19)*
- 23) SR-22 Westbound between Haster Street and The City Drive/I-5 (PM Peak Hour)/(F-20)*



Caltrans Freeway Weaving HCM Analysis (With Project 2030)

Table 5.9-36 of the DSEIR shows deficient freeway weaving segments with the Proposed Project. The following weaving segments identified as being deficient in either the AM or PM peak hours. Coordination with Caltrans will be required for proposed capacity or operational improvements to the freeway mainline segments or ramps, which may improve the weaving LOS.

- 1) I-5 Northbound between Lincoln Avenue On-Ramp and Euclid Street Off-Ramp (PM Peak Hour)
- 2) I-5 Northbound between Disneyland Drive On-Ramp and Lincoln Avenue Off-Ramp (PM Peak Hour)

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- 3) I-5 Southbound between Disneyland Drive On-Ramp and Harbor Boulevard Off-Ramp (PM Peak Hour)
- 4) I-5 Northbound between Anaheim Boulevard On-Ramp and Harbor Boulevard Off-Ramp (PM Peak Hour)
- 5) I-5 Northbound between State College Boulevard On-Ramp and Katella Avenue Off-Ramp (PM Peak Hour)
- 6) I-5 Southbound between Katella Avenue On-Ramp and State College Boulevard Off-Ramp (PM Peak Hour)
- 7) I-5 Northbound between SR-22 Connector and Chapman Avenue Off-Ramp (PM Peak Hour)
- 8) I-5 Southbound between State College Boulevard / Chapman Avenue On-Ramp and SR-22 Connector (PM Peak Hour)
- 9) I-5 Northbound between Main Street On-Ramp and SR-22 WB Connector (PM Peak Hour)
- 10) I-5 Northbound between 17th Street On-Ramp and Main Street Off-Ramp (PM Peak Hour)
- 11) I-5 Southbound between Main Street On-Ramp and 17th Street / Penn Way Off-Ramp (AM and PM Peak Hour)
- 12) I-5 Northbound between Grand Avenue On-Ramp and 17th Street Off-Ramp (PM Peak Hour)
- 13) I-5 Southbound between Penn Way On-Ramp and Santa Ana Boulevard Off-Ramp (AM and PM Peak Hour)
- 14) I-5 Northbound between Fourth Street On-Ramp and Grand Avenue Off-Ramp (PM Peak Hour)
- 15) I-5 Southbound between Santa Ana Boulevard On-Ramp and Fourth Street Off-Ramp (PM Peak Hour)
- 16) I-5 Northbound between SR-55 Connector and First Street Off-Ramp (PM Peak Hour)
- 17) I-5 Southbound between First Street On-Ramp and SR-55 Southbound Connector (PM Peak Hour)
- 18) SR-57 Southbound between Orangewood Avenue On-Ramp and Chapman Avenue Off-Ramp (PM Peak Hour)
- 19) SR-57 Southbound between Katella Avenue On-Ramp and Orangewood Avenue Off-Ramp (PM Peak Hour)
- 20) SR-57 Northbound between Katella Avenue On-Ramp and Ball Road Off-Ramp (PM Peak Hour)
- 21) SR-57 Southbound between Ball Road On-Ramp and Katella Avenue Off-Ramp (AM and PM Peak Hour)
- 22) SR-57 Northbound between Lincoln Avenue On-Ramp and SR-91 Eastbound Connector (PM Peak Hour)
- 23) SR-57 Southbound between SR-91 Eastbound Connector and Lincoln Avenue Off-Ramp (PM Peak Hour)
- 24) SR-22 Westbound between Harbor Boulevard On-Ramp and Euclid Street Off-Ramp (PM Peak Hour)
- 25) SR-22 Eastbound between Fairview Street / Garden Grove Boulevard On-Ramp and Collector / Distributor The City Drive Off-Ramp (AM and PM Peak Hour)
- 26) SR-22 Westbound between Metropolitan Drive On-Ramp and Haster Street Off-Ramp (PM Peak Hour)
- 27) SR-22 Eastbound Collector / Distributor between The City Drive On-Ramp and Bristol Street Off-Ramp (AM and PM Peak Hour)

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- 28) SR-22 Westbound between La Veta Avenue On-Ramp and Metropolitan Drive Off-Ramp (AM and PM Peak Hour)
- 29) SR-22 Eastbound Collector / Distributor between Bristol Street On-Ramp and I-5 Southbound Connector (AM and PM Peak Hour)
- 30) SR-22 Eastbound between SR-57 Southbound Connector and Town and Country Road Off-Ramp (PM Peak Hour)
- 31) SR-22 Westbound between La Veta Avenue On-Ramp and I-5 / SR-57 Northbound Connector (PM Peak Hour)
- 32) SR-22 Eastbound between Town and Country Road On-Ramp and Glassell Street Off-Ramp (PM Peak Hour)

Due to the high forecast mainline traffic activity, most freeway weaving segments are deficient under the 2030 No Project scenario. Two weaving segments become deficient under 2030 With Project conditions that were not forecast to be deficient under 2030 No Project conditions:

- I-5 Southbound between Katella Avenue On-Ramp and State College Boulevard Off-Ramp (PM Peak Hour)
- SR-57 Northbound between Katella Avenue On-Ramp and Ball Road Off-Ramp (PM Peak Hour)

It should be noted that one weaving segment improves to acceptable levels under 2030 With Project conditions. Since freeway weaving segment operations are dependent upon mainline and ramp capacities, reducing congestion on these facilities contributes to higher weaving speeds and could lead to an improved weaving LOS. Improving weaving facilities through the addition of auxiliary lanes within the weaving area could provide additional capacity and reduce the weaving density. Operational improvements through improved signage or other ITS measures may also be developed in consultation with Caltrans in order to improve the weaving LOS.



Mitigation Measures

Three freeway ramps, I-5 Southbound On-Ramp from Katella Avenue, SR-57 Northbound Off-Ramp to Ball Road and SR-57 Southbound On-Ramp from Orangewood Avenue, are deficient under 2030 With Project conditions in the PM Peak Hour and operate at acceptable levels of service under 2030 No Project conditions. Operationally, adding a lane to either of these ramps does not result in acceptable ramp operations under 2030 With Project conditions. Impacts to freeway ramp facilities are the result of high forecast volumes on the ramps themselves coupled with high forecast volumes on the freeway mainline adjacent to the ramp facilities, therefore, the traffic on the mainline must be reduced or the capacity of the mainline facility must be enhanced through the addition of an auxiliary lane to improve freeway ramp performance.

The traffic on the State Highway System is regional in nature and the deficiencies are the result of expected regional growth. Caltrans has not entered into an agreement with the City and Caltrans has not adopted a program by which Caltrans can ensure that developer fair-share contributions will assist in the funding of potential capacity or operational improvements on the study area State Highway System. Because the I-5 and SR-22 are at their conceptual build-out, and OCTA and State funding is committed to the planned widening of SR-57, there is no guarantee that impact fees from the Proposed Project will be dedicated to the improvements of the study area State Highway System.

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Caltrans Ramp Termini Intersection

Mitigation measures as shown below have been recommended for the impacted Caltrans ramp termini, which are the same mitigation measures identified for ICU analysis. However, the City of Anaheim does not have jurisdiction over the deficient circulation system components in the City of Orange. Should the City of Orange decide to improve the operational capacity of any of the impacted locations, the City of Anaheim will be subject to designated fair-share contribution towards the improvement cost.

- Intersection I-21: Anaheim Boulevard/I-5 Northbound Ramps (Anaheim) – Add 4th Southbound Through Lane.
- Intersection I-26: Manchester Avenue (I-5 Southbound Ramps)/Katella Avenue (Anaheim) – Add 4th Eastbound Through Lane and add 4th Westbound Through Lane.
- Intersection I-27: Anaheim Way (I-5 Northbound Ramps)/Katella Avenue (Anaheim) – Add 4th Eastbound Through Lane and add 5th Westbound through lane.
- Intersection I-71: Orangewood Avenue/SR-57 Southbound Ramps (Orange) – Add 2nd Westbound Lane (fair-share contribution of 36.1 percent).
- Intersection I-98: SR-22 Westbound Ramps/Metropolitan Drive (Orange) – Restripe Westbound Through Lane to 3rd Westbound Lane (fair-share contribution of 7.4 percent).

Caltrans Ramp Termini Off-Ramp Queuing

No mitigation measures are necessary.

Caltrans Freeway Ramp HCM

Three freeway ramps, I-5 Northbound On-Ramp from State College Boulevard/Chapman Avenue (R-5), SR-57 Northbound Off-Ramp to Ball Road (R-36), and SR-57 Southbound On-Ramp from Orangewood Avenue (R-46) during PM peak hour are deficient under 2030 With Project conditions.

Standard capacity improvements, through the addition of one or more lanes on the freeway ramps, will not necessarily result in acceptable ramp operations for ramps that are forecast to operate deficiently. The density of the ramps is influenced by both the mainline and ramp volume, therefore, the traffic on the mainline must be reduced or the capacity of the mainline facility must be enhanced through the addition of an auxiliary lane to improve freeway ramp performance. Proposed project fair-share percentages for the ramps noted above range from 17 percent to 40 percent.

Freeway ramp performance is directly related to the performance of the mainline segments for freeways, and as such, mitigation to increase ramp capacity likely would not mitigate cumulative traffic deficiencies, as the mainline volumes would still result in deficient operations.

Caltrans Freeway Mainline HCM Analysis

Proposed Project fair-share percentages have been computed for the two segments of I-5 that are deficient under 2030 With Project conditions and acceptable under No Project conditions. The shares have been computed per the methodology outlined in the Caltrans Guide for the Preparation of Traffic Impact Studies. Appendix "B" of the guidelines directs users to use a formula to calculate equitable share responsibility for the traffic impacts of proposed projects. The guidelines are not intended to

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establish a legal standard for determining equitable responsibility, but rather to provide a starting point for discussions with Caltrans to address the traffic mitigation and fair-share responsibilities. The project shares for the two segments on I-5 are 10 percent and less than 0.5 percent, respectively.

Caltrans Freeway Weaving HCM Analysis

Two weaving segments are deficient under the Proposed Project. Potential improvements include implementation of an auxiliary lane within the weaving area to improve operations.

The weaving analysis revealed that several weaving areas operate at deficient levels of service under 2030 With and No Project conditions as a result of high mainline forecast volumes and cumulative growth. To address cumulative deficiencies associated with the freeway mainline and weaving segments, freeway capacity enhancements such as widening the facilities by one lane in each direction would require consideration:

- I-5 between SR-91 and SR-55 – widen by 1 lane each direction (fair-shares range from approximately 2-12%)
- SR-57 Northbound between SR-91 and Katella Avenue – widen by 1 lane each direction (fair-shares range from approximately 13-19%)
- SR-57 Southbound between SR-91 and SR-22 Ramps – widen by 1 lane each direction (fair-share approximately 16%)
- SR-22 Westbound between Brookhurst Street and Main Street – widen by 1 lane each direction (fair-shares range from approximately 8-13%)
- SR-22 Eastbound between Brookhurst Street and Glassell Street – widen by 1 lane each direction (fair-share negligible)



Mitigation strategies have been recommended to reduce the level of impact to less than significant levels. Potential additional capacity enhancements include the implementation of auxiliary lanes within weaving areas to improve operations on the merge/diverge areas as well as the mainline and weaving areas. However, this does not satisfy the capacity needs of the corresponding and adjacent mainline segment and no additional improvements are feasible.

Finding: The mitigation measures listed above are feasible except where noted and avoid or substantially lessen project-related traffic impacts to a less than significant level for the reasons set forth in the Draft SEIR. However, this does not satisfy the capacity needs of the corresponding and adjacent mainline segment and no additional improvements are feasible. In addition, if these programs are not implemented by the agencies with the responsibility to do so, including Caltrans, the project's freeway ramp, and mainline impacts would remain Significant and Unmitigated and a Statement of Overriding Considerations would be required.

Reference: FSEIR Section 5.9, Pages 5.9-72 through 5.9-126, FSEIR Responses to Comments Appendix B and C.

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Impact 5.9-3: The Proposed Project would result in the construction of residential uses within close proximity to several heliports.

There are two heliports in the project vicinity: the North Net Training Facility and UC Irvine Medical Center. The Anaheim Police Department also uses the parking lot at the Angel Stadium of Anaheim for helicopter training exercises. There are no private airstrips within the City.

Impact 5.9-3 was not found to be significant and no findings are required for this impact.

Impact 5.9-4: Proposed Project would not substantially increase hazards due to a design feature (sharp curves, etc.) or potentially conflicting uses.

Development of the Proposed Project would intensify the land uses in the project area. However, the Proposed Project is not anticipated to substantially alter the backbone circulation system and arterial connections compared to the Adopted MLUP. The proposed increase in development intensities is consistent with the visions of the Platinum Triangle and would not result in any potential conflicting uses. Furthermore, development of the Proposed Project would not create sharp curves, dangerous intersections, or any other inherently hazardous design features.

It should be noted that delays caused by heavy turning movements, including the pedestrian component of the Proposed Project, are not factored into ICU calculations, and therefore are not reflected in the deficient LOS analysis performed in the traffic study.

Heavy right-turn volumes without exclusive right-turn lanes are projected at several intersections with acceptable levels of service. With high pedestrian volumes expected within the project area, through movements and the right-turn movements are projected to be heavily delayed. The addition of a right-turn lane will result in increased pedestrian crossing times, but will improve pedestrian and vehicular safety. The identified right-turn movements at the following intersections have peak-hour right-turn volumes in excess of 300 vehicles without an exclusive right-turn lane and are located in mixed-use districts where heavy pedestrian volumes are expected:

- Lewis Street/ Gene Autry Way – Westbound right turn lane
- Anaheim Way/ Orangewood Avenue – Westbound second right turn lane
- State College Boulevard/ Howell Avenue – Northbound right turn lane
- State College Boulevard/ Gateway – Westbound right-turn
- State College Boulevard/ Artisan Court – Westbound right-turn
- Dupont Drive/ Orangewood Avenue – Eastbound right-turn

Additionally, heavy left-turn volumes are projected at intersections with only one left-turn lane. Excessive queue lengths at left-turn lanes can result in through-moving vehicles being blocked by left-turning vehicles. An additional left-turn lane can accommodate about 180 percent of the volume that can be served by a single left-turn lane with the same amount of green time. The reduction in green time for the left turn allows for more time to be assigned to other movements. The second left-turn lane would result in fewer delays for all movements and a smaller left-turn pocket, increasing the length of the landscaped median. The following locations are recommended to have an additional left-turn lane:

- State College Boulevard and Howell Avenue – Southbound second left turn lane
- Orangewood Avenue/ Rampart Street – Westbound second left-turn lane

3. Findings on Potentially Significant Impacts

Certain interactions will have an unbalanced share of turning volumes between the AM and PM peak hours. Additionally, events at Angel Stadium and Honda Center can generate traffic patterns that are unique for events only. Dynamic lane assignment signs will allow for some lanes to operate as through lanes during certain times and turn lanes during other times. The following locations will benefit from these signs in place of capacity enhancements:

- State College Boulevard/Katella Avenue – Southbound and Eastbound approaches
- State College Boulevard/Gene Autry Way – Eastbound approach
- Orangewood Avenue/SR-57 SB Ramps – Eastbound approach
- Douglass Road/ Katella Avenue – Eastbound and southbound approaches

OCTA operates five transit routes in the project area. While there are no inherent safety hazards, construction of bus turnouts will be considered in addition to far side bus stops to minimize delay effects and provide a safe environment for pedestrians. Each development project within the Platinum Triangle would be reviewed per the planned circulation system and would be required to provide necessary improvements in accordance with the determination of the Traffic and Transportation Division.

Furthermore, in coordination with OCTA, a railroad undercrossing is being planned along State College Boulevard between Katella Avenue and Howell Avenue to further improve traffic flow and safety. It should also be noted that in accordance with the proposed Updated and Modified Mitigation Monitoring Program No. 106C, the property owner/developer will dedicate, including necessary construction easements, the ultimate arterial highway right(s)-of-way as shown in the Circulation Element of the Anaheim General Plan adjacent to their property to maintain adequate levels of service and access with the Platinum Triangle. Therefore, the Proposed Project would not substantially increase hazards due to a design feature.



Mitigation Measures

- 9-15 In conjunction with the preparation of any traffic improvement phasing analyses as required in Mitigation Measure 9-6, property owners/developers will analyze to determine when the intersection improvements identified under Impact 5.9-4 shall be constructed, subject to the conditions identified in Mitigation Measure 9-6.
- 9-16 Prior to the approval of a Final Site Plan, the property owner/developer shall meet with the Traffic and Transportation Manager to determine whether a bus stop(s) is required to be placed adjacent to the property. If a bus stop(s) is required, it shall be placed in a location that least impacts traffic flow and may be designed as a bus turnout or a far side bus stop as required by the Traffic and Transportation Manager and per the approval of the Orange County Transportation Authority (OCTA).

Finding: The mitigation measures are feasible and avoid or substantially lessen project-related impacts related to traffic safety to a less than significant level for the reasons set forth in the Draft SEIR.

Reference: FSEIR Section 5.9, Pages 5.9-105 through 5.9-126, FSEIR Responses to Comments Appendix B and C.

Impact 5.9-5: The Proposed Project would not result in inadequate emergency access.

Impact 5.9-4 was not found to be significant and no findings are required for this impact.

3. Findings on Potentially Significant Impacts

Impact 5.9-6: The Proposed Project would promote alternative forms of transportation.

Impact 5.9-4 was not found to be significant and no findings are required for this impact.

3.10 UTILITIES AND SERVICE SYSTEMS

Impact 5.10-1: Project-generated sewage could be adequately treated by the sewer service provider for the Proposed Project.

In June 2009, CH2M HILL prepared a technical memorandum entitled the Combined Central Anaheim Area Master Plan of Sanitary Sewers (CCAAMPSS) for the Revised Platinum Triangle Expansion Project – Draft Subsequent Environmental Impact Report No. 339 (June 2009 CCAAMPSS), included in Appendix G of this DSEIR. This technical memorandum incorporated the development intensities analyzed by the June 2006 sewer study and subsequent revisions to the project. For modeling purposes of the June 2009 CCAAMPSS, the permitted development intensities were distributed into subareas to accurately reflect the total increased development intensity. Because this modeling approach removed the need to generalize numbers, some subareas showed less development intensities when compared to the June 2006 sewer study even though the overall intensity amount was greater. The distribution of the development intensities is shown in Attachment 1 of the June 2009 CCAAMPSS. The June 2009 CCAAMPSS ran 12 models (Models 15, 28B, 47, 115, 116, 117, 118, 119, 120, 121, 122, and 123) following the sanitary flow modeling methodology of the CCAAMPSS, which is based on using diurnal curves, rather than using the traditional peaking factor method. The diurnal curve method better represents the pattern of sanitary wastewater flows generated by a type of land use over a 24-hour period. The new model run incorporated the three stretches of new backbone sewers in Models 117, 28b, and 47. The proposed amendment to the Anaheim Resort Specific Plan (DSEIR No. 340) was incorporated into Model 15 for the cumulative impact.

The June 2009 CCAAMPSS determined that the Proposed Project would require upsizing of 7,373 linear feet of sewer pipe in Models 15, 28B, 47, 119, 120, 121, and 122. Table 5.10-7 shows the length, capacity, and location of the required sewer pipes. There are no improvements proposed for Models 115, 116, 117, 118, and 123. Figure 5.10-4, *Proposed Sewer Improvements*, shows recommended sewer improvements to the Proposed Project.

Mitigation Measures

Impact 5.10-1 (Sewer)

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measures were included in the Updated and Modified Mitigation Monitoring Program (MMP) No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 and are applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 10-1 **The City Engineer shall review the location of each project to determine if it is located within an area served by deficient sewer facilities, as identified in the latest updated sewer study for the Platinum Triangle-Sewer-Study. If the project will increase sewer flows beyond those programmed in the appropriate master plan sewer study for the area or if the project**

3. Findings on Potentially Significant Impacts

currently discharges to an existing deficient sewer system or will create a deficiency in an existing sewer line, the property owner/developer shall be required to guarantee mitigation of the impact to adequately serve the area to the satisfaction of the City Engineer and City Attorney's Office. ~~The property owner/developer shall be required to install the sanitary sewer facilities, as required by the City Engineer to mitigate the impacts of the proposed development based upon the Benefit Parcels and Development Mitigation (Appendix D of The Platinum Triangle Sewer Study), prior to acceptance for maintenance of public improvements by the City or final Building and Zoning inspection for the building/structure, whichever occurs first.~~ Prior to approval of a final subdivision map or issuance of a grading or building permit for each development project, whichever occurs first, the property owner/developer shall be required to install the sanitary sewer facilities, as required by the City Engineer, to mitigate the impacts of the proposed development based upon the latest updated sewer study for the Platinum Triangle. Additionally, the property owner/developer shall participate in the Infrastructure Improvement (Fee) Program, if adopted for the project area, as determined by the City Engineer, which could include fees, credits, reimbursements, construction, or a combination thereof. (5.11-5)

- 10-2 Prior to the approval and ongoing during construction of any street improvement plans within the Platinum Triangle, which encompass area(s) where Orange County Sanitation District (OCSD) will be upsizing trunk lines and/or are making other improvements, the City and/or property owner/developer shall coordinate with the OCSD to ensure that all improvements and construction schedules are coordinated. (5.11-7)

Additional Mitigation



- 10-3 Prior to approval of a final subdivision map or issuance of a grading or building permit for each development project, whichever occurs first, the property owner/developer shall contact Orange County Sanitation District (OCSD) regarding sewer capacity. Additionally, if requested by the OCSD, the property owner/developer shall place up to three flow monitoring devices for up to a month to verify capacity and ensure consistency with the OCSD's modeling results.
- 10-4 Prior to approval of sanitary sewer connections for each development project, the property owner/developer shall be required to install the sanitary sewer facilities, as required by the City Engineer, to prevent the sewer spill for below-grade structures of the proposed development based upon the latest updated sewer study for the Platinum Triangle. Where requested by the City Engineer, sewer improvements shall be constructed with larger than recommended diameter to maintain the surcharge levels within the pipe and the invert elevation of sewer laterals shall be located above the hydraulic grade line elevation of the surcharge levels when they are above the pipe crown.
- 10-5 Prior to the approval and ongoing during construction of any street improvement plans within the Platinum Triangle, which encompass area(s) where OCSD will be upsizing truck lines and/or are making other improvements, the City and/or property owner shall coordinate with OCSD to ensure that backflow prevention devices are installed at the lateral connections to prevent surcharge flow from entering private properties.
- 10-6 Prior to final design approval, additional analysis shall be performed for each individual project using flow, wet-weather data, and other information specific for that project in order to obtain more accurate results of the surcharge levels for final design.

3. Findings on Potentially Significant Impacts

Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant wastewater services impacts to a less than significant level for the reasons set forth in the Draft EIR.

Reference: FSEIR Section 5.10, Pages 5.10-22 through 5.10-27, FSEIR Appendix H.

Impact 5.10-2: Water supply and delivery systems are adequate to meet project requirements.

As shown in Table 5.10-9, the build-out of the Platinum Triangle would result in a total demand of 5,249 afy, which includes (i) the existing demands from the arena, stadium, and landscape irrigation of afy that have been a part of, and included in, the existing citywide demand; (ii) the 2,656 afy from the February 2005 WSA, which was included in the 2005 UWMP; and (iii) the 1,804 afy of additional demand addressed in the 2009 WSA. As shown, when subtracting the existing water use by the existing uses onsite (landscape irrigation, arena, and stadium) and the permitted Platinum Triangle development intensities as included in 2005 UWMP, the additional water demand for the Proposed Project would be 1,804 afy.

<i>Land Use</i>	<i>Units</i>	<i>Demand Factor¹</i>	<i>Demand</i>	
			<i>Gallons Per Day</i>	<i>afy</i>
Residential	18,909 du	105 gpd/unit	1,985,445	2,224
Commercial	4,909,682 sf	195 gpd/ksf	957,386	1,072
Office	14,340,522 sf	60 gpd/ksf	860,431	964
Institutional	1,500,000 sf	60 gpd/ksf	90,000	101
Parks	9.07 ac	3,500 gpd/ac	31,745	36
		<i>Subtotal</i>	<i>3,925,009</i>	<i>4,397</i>
Less Existing Industrial ¹	2,272,155 sf		(-89,473)	(-100)
		<i>Total</i>	<i>3,836,536</i>	<i>4,297</i>
3.8 % Losses				163
Existing Landscape Irrigation ²	164 ac	3,000 gpd/ac	492,000	551
Existing Arena (Honda Center) and Angel Stadium of Anaheim ³				238
		<i>Total Platinum Triangle Water Demand⁴</i>		<i>5,249</i>
Less Existing Landscape Irrigation				(-551)
Less Existing Arena and Stadium				(-238)
Less February 2005 WSA Additional Demand (included in 2005 UWMP)				(-2,656)
		<i>Water Demand Increase</i>		<i>1,804</i>

Source: FSWWS, 2009

Based on Average Day Demand

Includes cumulative projects that are approved and under construction.

du = defined as dwelling unit

ksf = 1,000 square feet of building area

¹ These industrial demands were derived from average of past three years of water meter readings from the subject industrial parcels.

² Existing Landscape Irrigation demand calculated based on 20% of gross acreage of the Platinum Triangle (820 acres) being landscaped and irrigated. Demand factor based on typical application rate for medium, perimeter and onsite landscaping typical to the existing land uses. Since this demand is included in existing water usage figures in February 2005 WSA and 2005 UWMP (and not anticipated to change due to future land use intensification), it was not included in determining Water Demand Increase.

³ Existing Honda Center Arena and Angel Stadium demands are not included in the projections above but are included in the currently approved Platinum Triangle plan. Since this demand is included in existing water usage figures in the February 2005 WSA and 2005 UWMP (and not anticipated to change due to future land use intensification), it was not included in determining Water Demand Increase.

3. Findings on Potentially Significant Impacts

⁴ Total water demand for the Proposed Project includes 2,656 afy from existing and/or previously approved development included for the densities anticipated by the previous version of the Platinum Triangle plan, which was included in the 2005 UWWMP, the existing landscape irrigation demand described in footnote 2, the existing Arena and Stadium demand described in footnote 3, and 1,804 afy additional demands shown here and addressed in this WSA. Thus this WSA analyzes the full 5,249 afy water demand projected for the overall Platinum Triangle proposed development intensities.

Water Supply and Demand

According to the WSA prepared for the Proposed Project, the City's average water demand for 2009/10 is approximately 76,170 afy and is projected to increase to 81,960 afy by 2029/30 without the Platinum Triangle. However, as shown in Table 5.10-10, there are adequate water supplies from now through 20-year planning period to meet the City's water demand. As discussed above in Environmental Setting, OCWD establishes the BPP each water year based on groundwater conditions, availability of imported water supplies, ideal precipitation, Santa Ana River runoff, and basin management objectives. The BPP was initially established in 1969 and has generally ranged from 60 to 80 percent. The average BPP for the past 20 years is 72.9 percent and the City's water supply projection assumed an average BPP of 67 percent groundwater and 33 percent imported. At the end of the 20-year planning period for this WSA, as required by SB 610, City water demand for 2029/30 is projected to be approximately 88,520 afy. This projection includes future demands from the City based on the overall projected growth rate, as well as added demands from the Proposed Project, the Kaiser Permanente Medical Center Project, and the amendment to the Anaheim Resort Specific Plan and Convention Center Expansion, all of which have been, or are being, addressed in other WSAs prepared since the 2005 UWWMP. Implementation of the Proposed Project would require an additional 90 afy in 2009/10, 540 afy by 2014/15, 990 afy by 2019/20, 1,440 afy by 2024/25, and 1,800 afy by build-out year 2029/30 (all numbers have been rounded to the nearest 10). Comparison of projected demand and supply concluded that there are adequate water supplies to meet the water demand created by the Proposed Project. The WSA concluded that there would be surplus water through the 20-year planning period. Table 5.10-10 shows the projected water supply and demand with the proposed increase in development intensities. As shown in Table 5.10-10, forecasts indicate that APUD would continue to have a supply surplus of potable water through 2030 under Normal, Single Dry, and Multiple Dry Year conditions.



**Table 5.10-10
With Project Water Supply and Demand (afy)**

Annual Year	2010	2015	2020	2025	2030
Supply					
MWD Imported ¹	29,090	30,430	29,560	29,640	29,640
Local (Groundwater) ²	52,110	54,500	56,460	58,360	59,310
Total Supply	81,200	84,930	86,020	88,000	88,950
Demand Without TPT Expansion³					
Demand Without TPT Expansion ³	76,170	76,040	79,760	81,500	81,960
Existing plus Approved TPT Demand ⁴	1,440	1,940	2,450	2,950	3,450
Additional TPT Expansion Demand ⁵	90	540	990	1,440	1,800
Additional KPMC Demand ⁶	40	210	330	330	330
Additional ARSP Demand ⁷	30	610	740	880	980
Total Demand	77,770	81,340	84,270	87,190	88,520
Supply/Demand Difference	3,430	3,590	1,750	900	430
Single Dry Year					
Supply					
MWD Imported	38,390	40,570	41,140	40,590	40,010

3. Findings on Potentially Significant Impacts

**Table 5.10-10
With Project Water Supply and Demand (afy)**

Source	2010	2015	2020	2025	2030
Local (Groundwater)	54,970	57,500	59,560	61,570	62,570
Total Supply	83,360	88,878	100,790	102,160	102,580
Demand Without TPT Expansion	80,360	82,340	84,140	85,980	86,470
Existing plus Approved TPT Demand	1,520	2,050	2,580	3,110	3,640
Additional TPT Expansion Demand	90	570	1,040	1,520	1,900
Additional KPMC Demand	40	220	350	350	350
Additional ARSP Demand	30	640	700	930	1,030
Total Demand	82,040	86,820	88,850	91,890	93,390
Supply/Demand Difference	11,320	12,058	11,940	10,270	9,190
Multiple Dry Year					
Supply					
MWD Imported	30,680	31,310	31,690	31,600	31,390
Local (Groundwater)	54,970	56,130	57,830	59,480	60,130
Total Supply	85,650	87,440	89,520	91,080	91,520
Demand Without TPT Expansion	80,650	82,340	84,140	85,980	86,470
Existing plus Approved TPT Demand	1,520	2,050	2,580	3,110	3,640
Additional TPT Expansion Demand	90	570	1,050	1,520	1,900
Additional KPMC Demand	40	220	350	350	350
Additional ARSP Demand	30	640	700	920	1,030
Total Demand	82,040	83,770	86,320	88,770	89,750
Supply/Demand Difference	3,610	3,670	3,200	2,310	1,770

Source: WSA 2009

afy = acre feet per year. All afy rounded to nearest 10.

A full discussion of current and under-development water supply entitlements, water rights, and water service contracts can be found in the WSA. Supply Assumptions:

¹ Impacted water supply is the result of the "MWD Average Year Supply" times the Level 10, (1.18%) allocation percentage for the City of Anaheim from MWD's 2009 Water Supply Allocation Model.

The "MWD Average Year Supply" that was taken from the MWD 2006 IIP Implementation Report includes a 22% reduction in SWP supply based on 2007 MWD IIP Implementation Report. This 22% reduction in SWP supply is the amount of SWP water MWD has forecast would be reduced for delivery to MWD and its customers due to pumping restrictions that may be imposed to protect the Delta smelt and due to potential future impacts from climate change. Thus, the impacted supply numbers included in this water supply assessment include the potential for a reduction in total SWP deliveries to MWD as a result of judicial and regulatory actions designed to protect Delta smelt as well as amount for future climate change impacts.

The Level 10 allocation percentage for the City of Anaheim was obtained from MWD. This allocation percentage, which is based on MWD's Water Supply Allocation Model, corresponds to a 50% reduction in regional supply. This is conservative in that the proposed allocation for Year 2009/10, which is the first year MWD has enforced an allocation program, is set at Level 2, corresponding to a 10% reduction in regional supply.

² Groundwater supply is estimated to equal 67% of total demand.

Demand Assumptions:

³ Demand projections are consistent with the OCP-2006 housing and population projections released in December 2006, adjusted to reflect current (2006-2008) water demand data provided by the City with all Platinum Triangle demand excluded. The demand includes unaccounted for water.

⁴ This demand includes the additional demand for the Platinum Triangle addressed previously in the February 2005 WSA (2,656 afy at build-out) as well as existing landscape irrigation demand (551 afy) and existing demands for the Arena (Florida Center) and Angel Stadium of Anaheim (238 afy) that were not specifically addressed in the February 2005 WSA, except within the overall existing Citywide demands as they were to remain unchanged by any land use intensification.

⁵ This demand refers to the additional demand necessitated by the revised project description. Total Project demand equals 5,249 afy at build-out, which includes existing landscape irrigation demand of 551 afy, existing Arena and Stadium demand of 238 afy, 2,656 afy from the February 2005 WSA plus 1,804 afy from the current WSA. See Table 5.10-7, Total Water Demand.

⁶ Project demand assumptions and phasing are from May 2007 WSA.

⁷ Additional project demand assumptions are discussed in concurrent ARSP WSA.

3. Findings on Potentially Significant Impacts

Water Reliability

The City's water supply projection assumed up to 67 percent groundwater and 33 percent imported, which has been confirmed as reliable by MWD. Additionally, analyses of normal, single-dry, and multiple-dry year scenarios demonstrate the City's ability to meet demand during the 20-year analysis period. Finally, an analysis was conducted utilizing assumed temporary shortages in MWD's water supply, which demonstrates the City's ability to meet demand under reasonably foreseeable temporary allocations to deal with cutbacks in SWP deliveries due to Delta smelt and other environmental issues.

There are a number of water supply challenges for MWD and its service area, such as critical dry conditions and protective measures for the delta smelt in the Sacramento-San Joaquin River Delta which resulted in uncertainty about future pumping operations from the SWP due to ruling in the federal courts in August 2007. However, the Platinum Triangle WSA includes, as a worse-case scenario, an analysis under the assumption that SWP deliveries will be reduced by both 35 and 40 percent. Table 5.10-11 shows the worst case scenario demand and supply comparison under temporary 40 percent reduction in SWP water supply. This level of evaluation goes beyond the scope and requirements of SB 610. In the event that the SWP water supply is temporarily reduced by 40 percent, the project's water demand would be met by implementing water conservation in the range of 0.3 to 3 percent, as shown in Table 5.10-11. Should extraordinary circumstances require it, the City can meet its water demand by (1) increasing production of groundwater beyond the BPP up to the basin safe yield, (2) increasing imported water purchases from available storage programs, and/or (3) decreasing demand through water conservation measures. Moreover, under temporary MWD allocation shortages, the City would trigger its Conservation Ordinance and call for at least a 10 percent reduction in usage by all customer classes with rate penalties if users exceed 90 percent of their previous year's water use. With planned water supplies and facilities, there is adequate water to serve the Proposed Project.



**Table 5.10-11
With Project Water Demand and Supply (afy*)
Under Temporary 40 Percent SWP Water Supply Shortage
Multiple Dry Years 2011-2030**

Water Sources	Normal Years		Dry Years ²		
	2011	2012	2013	2014	2015
SUPPLY					
Imported ¹	26,260	26,260	20,910	20,910	20,910
Local (Groundwater) ²	51,460	51,000	55,730	54,830	56,130
Total Supply	77,720	78,060	84,540	83,740	86,040
DEMAND					
Total City Demand without Proposed Project, KPMC and ARSP ³	76,540	76,920	82,470	80,540	82,340
Existing plus Approved Platinum Triangle Demand ⁴	1,540	1,640	1,860	1,910	2,050
Additional Proposed Project Demand ⁵	180	270	380	470	570
Additional Kaiser Medical Center Demand ⁶	40	40	220	220	220
Additional ARSP Demand ⁷	50	80	110	610	640
% of Normal Year Demand	100.0	100.0	106.7	103.7	105.5
Total Multiple Year Demand	78,810	77,310	83,180	81,940	83,770
Supply/Demand Difference	910	750	1,460	1,900	1,270
2016					
Imported ¹	25,270	25,270	29,120	29,120	29,120
Local (Groundwater) ²	53,510	53,810	57,750	56,450	57,830
Total Supply	78,780	79,080	86,870	85,570	86,950

3. Findings on Potentially Significant Impacts

Table 5.10-11
With Project Water Demand and Supply (afy)^a
Under Temporary 40 Percent SWP Water Supply Shortage
Multiple Dry Years 2011-2030

	2021	2022	2023	2024	2025
Total Multiple Year Demand	79,870	80,328	85,288	84,258	86,328
Supply/Demand Difference	-1,090	-1,240	670	1,320	630
Percent Conservation Required	1.4%	1.5%			
	2021	2022	2023	2024	2025
Imported^d	25,360	25,360	29,020	29,020	29,020
Local (Groundwater)^e	55,130	55,440	59,490	58,140	59,400
Total Supply	80,490	80,800	88,510	87,160	88,500
Total Multiple Year Demand	82,290	82,788	88,798	86,778	88,778
Supply/Demand Difference	-1,790	-1,950	-200	390	-270
Percent Conservation Required	2.2%	2.4%	0.3%		0.3%
	2026	2027	2028	2029	2030
Imported^d	25,360	25,360	28,020	28,020	28,020
Local (Groundwater)^e	59,510	56,660	60,600	59,050	60,130
Total Supply	81,870	82,020	88,620	87,070	88,950
Total Multiple Year Demand	84,350	84,550	90,450	88,130	89,750
Supply/Demand Difference	-2,480	-2,540	-1,030	-260	-600
Percent Conservation Required	2.9%	3.0%	1.1%	0.3%	0.6%

Source: WSA 2003.

^aafy rounded to nearest 10.

¹ This figure represents a Level 10 Allocation (1.18% of MWD's Multiple Dry Year Supply) consistent with the preceding MWD WSAF discussion. MWD's Multiple Dry Year Supply set forth in MWD's 2005 IIP Implementation Report with 40% reduction in SWP supply. MWD Multi Dry Year Supply: 2,225,800 (year 2011); 2,225,800 (year 2012); 2,450,200 (year 2013); 2,450,200 (year 2014); 2,450,200 (year 2015); 2,148,800 (year 2016); 2,148,800 (year 2017); 2,467,600 (year 2018); 2,467,600 (year 2019); and 2,467,600 (year 2020); 2,148,800 (year 2021); 2,148,800 (year 2022); 2,459,600 (year 2023); 2,459,600 (year 2024); 2,459,600 (year 2025); 2,148,800 (year 2026); 2,148,800 (year 2027); 2,442,600 (year 2028); 2,442,600 (year 2029); 2,442,600 (year 2030).

² This figure represents 67% of total Anaheim Water Demand based on the anticipated IIP forecasts as discussed previously in this WSA.

³ This figure represents normal year demand updated to reflect recent (up to 2008) water use data, current growth projections, and excludes any of the Proposed Project Demand.

⁴ This figure includes additional demand for the Platinum Triangle addressed previously in the February 2005 WSA (2,656 afy at build-out) as well as existing landscape irrigation demand and existing demands for the Honda Center and Angel Stadium of Anaheim that were also included in the February 2005 WSA as part of the overall existing Citywide demands, as they were to remain unchanged by any land use intensification.

⁵ This figure represents additional demand based on increase in land use intensification as a result of the revised project description that was not included in the 2005 UWMF. Total project demand equals 5,249 afy at build-out, which includes (1) 2,656 afy from the February 2005 WSA plus (2) existing demands of 551 afy and 238 afy for existing landscape irrigation and the Honda Center/Angel Stadium of Anaheim, respectively, which were included as existing demands in the February 2005 WSA and the 2005 UWMF and (3) 1,804 afy from the current WSA.

⁶ Based on demands from May 2007 WSA.

⁷ This figure represents additional demand based on increase in land use intensification proposed in a WSA being processed concurrently by the City.

⁸ Multi dry year demand = (normal year demand) x (106.7%, 103.7%, and 105.5% for years 1, 2, and 3 multiple dry year demand factors developed by MWD/OC in their 2005 UWMF).

Water Delivery System

Rule 15-D of Anaheim's Water Rules, Rates and Regulations specifies approved water facility improvements in the project vicinity that have either been completed or are in planning stages. The following improvements have been approved but have not yet been constructed.

- A 16-inch water main in Orangewood Avenue from Santa Cruz to State College Boulevard (1,400 LF)

3. Findings on Potentially Significant Impacts

- A 16-inch water main in State College Boulevard from Orangewood Avenue to Gene Autry Way (1,250 LF)
- A 16-inch water main in Katella Avenue at State College to Well #45 (1,300 LF)
- A new water well adjacent to the planned Fire Station No. 12 between Anaheim Way and Santa Cruz Street south of Stanford Court

Furthermore, the APUD indicated that the proposed increase in development intensities would require the following improvements to the current water facilities.

- A new transmission main in Orangewood Avenue from State College Boulevard to State Route 57 (SR-57)
- A new transmission main in Douglass Road from Katella to the Anaheim Stadium loop
- A new transmission main in State College Boulevard from Orangewood south to the City limits
- A new transmission main in the Lewis Street Connector
- One new 3,000 GPM water well, location to be determined

Rule 15-D of Anaheim's Water Rules, Rates and Regulations (Plan No. W2524D) specifies the water facility improvements required to accommodate the projected land use water demands within the City, including the Platinum Triangle. Under Rule 15-D, a new 3,500 gallons per minute (gpm) Well No. 45 was constructed in 2003, and currently supplies most of the demands in and around the Platinum Triangle area.



Ultimately, changes in land use projections and addition of water facilities will require updating Rule 15-D; however, under existing Rule 15-D, the projected demands for new office, commercial, and industrial land uses have already been accounted for in determining water facility improvements. The only significant changes, in terms of projected demand quantity for the Proposed Project, were the demands resulting from new residential dwelling units.

Once the City approves the necessary improvements, Rule 15-D and associated rates and figures will be revised. Compliance with the amended Rule 15-D would ensure that adequate water facilities are provided to serve the Proposed Project. Implementation of the Platinum Triangle Master Land Use Plan would not adversely impact the water delivery system.

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measures were included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 and are applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikes out~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 10-7 Prior to issuance of a building permit, submitted landscape plans shall demonstrate compliance with the City of Anaheim adopted Landscape Water Efficiency Guidelines. This

3. Findings on Potentially Significant Impacts

ordinance is in compliance with the State of California Model Water Efficient Landscape Ordinance (AB 1881) ~~Conservation in Landscaping Act (AB 985)~~.

Among the measures to be implemented with the project are the following:

- Use of water-conserving landscape plant materials wherever feasible;
- Use of vacuums and other equipment to reduce the use of water for wash down of exterior areas;
- Low-flow fillings, fixtures and equipment including low flush toilets and urinals;
- Use of self-closing valves for drinking fountains;
- Use of efficient irrigation systems such as drip irrigation and automatic systems which use moisture sensors;
- Infrared sensors on sinks, toilets and urinals;
- Low-flow shower heads in hotels;
- Infrared sensors on drinking fountains;
- Use of irrigation systems primarily at night, when evaporation rates are lowest;
- Water-efficient ice machines, dishwashers, clothes washers, and other water using appliances;
- Cooling tower recirculating system;
- Use of low-flow sprinkler heads in irrigation system;
- Use of waterway recirculation systems;
- Provide information to the public in conspicuous places regarding water conservation; and
- Use of reclaimed water for irrigation and washdown when it becomes available.

In conjunction with submittal of landscape and building plans, the applicant shall identify which of these measures have been incorporated into the plans. (5.11-7)

- 10-8 Prior to the issuance of the first building permit, the property owner/developer shall provide engineering studies, including network analysis, to size the water mains for ultimate development within the project. This includes detailed water usage analysis and building plans for Public Utilities Water Engineering reviews and approval in determining project water requirements and appropriate water assessment fees. (5.11-2)
- 10-9 Prior to the issuance of the first building permit or grading permit, whichever occurs first, the property owner/developer shall indicate on plans installation of a separate irrigation meter

3. Findings on Potentially Significant Impacts

when the total landscaped area exceeds 2,500 square feet. (City of Anaheim Water Conservation Measures) (5.11-3)

- 10-10 Prior to the issuance of the first building permit or grading permit following certification of SEIR No. 204339, whichever occurs first, the property owner/developer shall comply with Rule 15D of the Water Utilities Rates, Rules, and Regulations. ~~Rule 15D shall be amended to include construction of a new well with a minimum 1,500-GPM capacity within The Platinum Triangle.~~ (5.11-4)

Additional Mitigation

- 10-11 Ongoing, the City shall continue to collaborate with the Metropolitan Water District of Southern California, its member agencies, and Orange County Water District to ensure that available water supplies meet anticipated demand. If it is forecast that water demand exceeds available supplies, the City shall trigger application of its Water Conservation Ordinance, Municipal Code Section 10.18, as prescribed, to require mandatory conservation measures as authorized by Section 10.18.070 through 10.18.090, as appropriate.
- 10-12 Prior to issuance of a building permit, submitted landscape plans for all residential, office and commercial landscaping shall demonstrate the use of drought tolerant plant materials pursuant to the publication entitled "Water Use Efficiency of Landscape Species" by the U.C. Cooperative Extension, August 2000.
- 10-13 Prior to issuance of a building permit or grading permit, whichever occurs first, the property owner/developer shall indicate on plans water efficient design features including, but not limited to (as applicable to the type of development at issue) waterless water heaters, waterless urinals, automatic on and off water faucets, and water efficient appliances.
- 10-14 Prior to issuance of a building permit or grading permit, whichever occurs first, the property owner/developer shall indicate on plans installation of a separate irrigation lines for recycled water. All irrigation systems shall be designed so that they will function properly with recycled water.
- 10-15 Prior to approval of a project that exceeds the statutory thresholds set forth in SB 610 and SB 221, the applicant shall demonstrate to the City Engineer that adequate water supply exists to serve the Proposed Project. If it cannot be demonstrated that adequate water exists to serve the specific project, the project shall not be approved.
- 10-16 Prior to issuance of the first building permit or grading permit following certification of SEIR No. 339, whichever occurs first, shall be revised, updated and amended to include a new 3,000 gallon per minute water well, revised facilities costs and the total Gross Floor Building Area of the Projected Total Development of SEIR No. 339.



Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant water services impacts to a less than significant level for the reasons set forth in the Draft EIR.

Reference: FSEIR Section 5.10, Pages 5.10-27 through 5.10-33, FSEIR Appendix G.

3. Findings on Potentially Significant Impacts

Impact 5.10-3: The Proposed Project would result in the construction of new storm water drainage facilities.

According to the Master Plan of Storm Drainage for East Garden Grove Wintersburg Channel Tributary Area prepared in January 2006, the existing storm drainage system under current condition in the Platinum Triangle is deficient. Therefore, in addition to local facilities needed as part of a specific development, a downstream facility requirement or deficiency need must be addressed as part of the development. Specific project will be evaluated by the City Engineer to determine if it is located within an area served by deficient drainage facilities as identified in the appropriate drainage study and the developments in the Platinum Triangle will be required to incorporate into their plans additional local systems to meet the City's current drainage criteria in terms of street flooding limits and other surface flow parameters. Construction of these facilities would occur in compliance with the standard engineering rules and regulations and would not result in a significant environmental effects.

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measures were included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 and are applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikethrough~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 10-17 **Prior to approval of a final subdivision map or issuance of a grading or building permit, whichever occurs first, the City Engineer shall review the location of each project to determine if it is located within an area served by deficient drainage facilities, as identified in the ~~Platinum Triangle Drainage Study Master Plan of Storm Drainage for East Garden Grove Wintersburg Channel Tributary Area.~~ If the project will increase stormwater flows beyond those programmed in the appropriate master plan drainage study for the area or if the project currently discharges to an existing deficient storm drain system or will create a deficiency in an existing storm drain, the property owner/developer shall be required to guarantee mitigation of the impact to adequately serve the area to the satisfaction of the City Engineer and City Attorney's Office. The property owner/developer shall be required to install the drainage facilities, as required by the City Engineer to mitigate the impacts of the proposed development based upon the Development Mitigation within Benefit Zones ~~(Appendix E of the Platinum Triangle Drainage Study)~~ of the Master Plan of Storm Drainage for East Garden Grove Wintersburg Channel Tributary Area, prior to acceptance for maintenance of public improvements by the City or final Building and Zoning inspection for the building/ structure, whichever occurs first. Additionally, the property owner/developer shall participate in the Infrastructure Improvement (Fee) Program, if adopted for the Project Area, as determined by the city Engineer, which could include fees, credits, reimbursements, construction, or a combination thereof. *(5.5-3)***

Reference: FSEIR Section 5.10, Page 5.10-33.

3. Findings on Potentially Significant Impacts

Impact 5.10-4: Existing and/or proposed facilities would be able to accommodate project-generated solid waste and comply with related solid waste regulations.

Development of the Proposed Project would increase the service demand for solid waste disposal beyond existing conditions and would provide more solid waste to the Olinda Alpha Landfill. Typical waste would include, but is not limited to, green waste (i.e., lawn and tree trimmings), cardboard, paper, glass, plastic, aluminum cans, diapers, food, and household hazardous waste (paint, motor oil, antifreeze, batteries), etc. Table 5.10-12 shows projected solid waste demands for residential, commercial, office, and institutional uses.

**Table 5.10-12
Projected Solid Waste Demand**

<i>Land Use</i>	<i>Proposed Additional Unit</i>	<i>Generation Factor</i>	<i>Daily Waste Generated</i>
Proposed Project			
Residential	8,643 DU	90 lbs/unit/week	111,124 lbs (50 tons)
Commercial	2,645,282 sq. ft.	0.046 lbs/sq. ft./day	121,683 lbs (55 tons)
Office	9,284,972 sq. ft.	1 lb/100 sq. ft./day	92,850 lbs (42 tons)
Institutional	1,580,000 sq. ft.	3.12 lbs/100 sq. ft./day	49,600 lbs (21 tons)
Total			372,457 lbs. (168 tons)

The additional 8,643 residential units would generate approximately 111,124 pounds per day or 5,562 tons per day (tpd). The proposed increase in commercial, office, and institutional uses would generate additional 55.19 tpd, 42.12 tpd, and 21.23 tpd of solid waste, respectively. Olinda Alpha Landfill is the main disposal site for the waste generated in the City of Anaheim. Olinda Alpha Landfill is located in the City of Brea and is permitted through 2013 with an operational life of 2021. The current daily tonnage at Olinda Alpha is approximately 5,600 tons and is permitted for 8,000 tons per day. The Proposed Project would generate an additional 168.94 tons of solid waste per day, which would constitute about 2.4 percent of the permitted capacity. Therefore, the proposed increase would not have a substantial impact on the Olinda Alpha landfill capacity or the MRF processing. In addition, the FRB Landfill in the City of Irvine and the Prima Deshecha Landfill in the City of San Capistrano each provides landfill capacity through 2053 and 2067, respectively. The proposed residential uses are expected to generate the typical range of recyclable and nonrecyclable waste. The Orange County Landfill system is required to have available disposal capacity for a projected period of 15 years. The Orange County Landfill System has demonstrated this capacity and regularly imports solid waste from Los Angeles County. There is available landfill capacity in the Orange County landfills to accommodate the anticipated solid waste stream generated by the Proposed Project, individually and cumulatively.

The City has increased its diversion rate from 44 percent in 1995 to 51 percent in 2004. Diversion rates for later years are not yet approved. Implementation of the Proposed Project would generate increased construction and operation solid waste in the area. However, each development project in the project area would be required to submit project plans to the Streets and Sanitation Division of the Public Works Department for review and approval to ensure that the plans comply with AB 939, the Solid Waste Reduction Act of 1989, and the County of Orange and City of Anaheim Integrated Waste Management Plans as administered by the City of Anaheim. Development projects in the project area are required to comply with the City's existing recycling and diversion programs, which would reduce impacts generated by the additional development density to a less than significant level.

3. Findings on Potentially Significant Impacts

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measures were included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 and are applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.

- 10-18 Prior to the final building and zoning inspections of each development, ~~the~~ **the property owner/developer shall submit project plans to the Streets and Sanitation Division of the Public Works Department for review and approval to ensure that the plans comply with AB 939, and the Solid Waste Reduction Act of 1989, and the County of Orange and City of Anaheim Integrated Waste Management Plans as administered by the City of Anaheim. Implementation of said plan shall commence upon occupancy and shall remain in full effect as required by the Street and Sanitation Division and may include, at its discretion, the following plan components: (5.11-8)**
- Detailing the locations and design of on-site recycling facilities.
 - ~~Providing on-site recycling receptacles to encourage recycling.~~
 - Participating in the City of Anaheim's "Recycle Anaheim" program or other substitute program as may be developed by the City or governing agency.
 - Facilitating cardboard recycling (especially in retail areas) by providing adequate space and centralized locations for collection and bailing.
 - Providing trash compactors for nonrecyclable materials whenever feasible to reduce the total volume of solid waste and number of trips required for collection.
 - Providing on-site recycling receptacles accessible to the public to encourage recycling for all businesses, employees, and patrons where feasible.
 - Prohibiting curbside pick-up.
 - Ensuring hazardous materials disposal complies with federal, state, and city regulations.
- 10-19 Ongoing during project operations, ~~the~~ **the following practices shall be implemented, as feasible, by the property owner/developer. (5.11-9)**
- Usage of recycled paper products for stationery, letterhead, and packaging.
 - Recovery of materials, such as aluminum and cardboard.
 - Collection of office paper for recycling.

3. Findings on Potentially Significant Impacts

- Collection of glass, plastics, kitchen grease, laser printer toner cartridges, oil, batteries, and scrap metal for recycling or recovery.

10-20 Prior to the approval of each grading plan (for import/export plan) and prior to issuance of demolition permits (for demolition plans), the ~~the~~ property owner/developer shall submit a Demolition and Import/Export Plans, if determined to be necessary by the Public Works Department, Traffic Engineering Division, and/or Street and Sanitation Division. The plans shall include identification of off-site locations for material export from the project and options for disposal of excess material. These options may include recycling of materials on-site, sale to a broker or contractor, sale to a project in the vicinity or transport to an environmentally cleared landfill, with attempts made to move it within Orange County. The property owner/developer shall offer recyclable building materials, such as asphalt or concrete for sale or removal by private firms or public agencies for use in construction of other projects, if all cannot be reused on the project site. (5.11-10)

Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant solid waste services impacts to a less than significant level for the reasons set forth in the Draft SEIR.

Reference: FSEIR Section 5.10, Pages 5.10-33 through 5.10-34.

Impact 5.10-5: Existing and/or proposed facilities would be able to accommodate project-generated electricity demands.

Development pursuant to the proposed amendments would increase the electrical load on existing facilities and require upgrades to the existing 12 kV distribution systems. The impact would include, but may not be limited to, increasing conductor sizes, locating the conductors underground, installing new high and low voltage conductors, and installing new voltage transformation facilities, including one electrical substation. As described in the project description, a new electrical substation is proposed adjacent to Fire Station No. 12 between Anaheim Way and Santa Cruz Street, south of Stanford Court. This new substation would have capacity between 112 and 168 megawatts (MW) and connect to new and existing electrical transmission and distribution lines. All installations would be located in City streets, City property and rights-of-ways, or on customer-provided easements. Distribution and transmission systems would be installed to coincide with street improvements, or as needed by a development, whichever comes first.

According to APUD, the City currently consumes approximately 590,000 MWh for residential use and 630,000 MWh for commercial/office use, and APUD anticipates that a new substation would be installed when project electrical loads exceed the existing electrical capacity in the Platinum Triangle by 20 MW. The owner or developer would be required to submit plans showing that each structure will comply with the State Energy Efficiency Standards for Nonresidential Buildings (Title 24, Part 6, Article 2, California Code of Regulations) and will consult with the APUD Business and Community Program Division in order to review Title 24 measures prior to each final Building and Zoning inspection to incorporate into the project design energy and water efficiency and sustainability practices. Therefore, APUD anticipates that impacts resulting from the Proposed Project are within the expansion capabilities of the existing service and such expansion would not be detrimental to the environment.

APUD has specified electric utility improvements in the project vicinity that have been completed or are in the planning stages:



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- Relocate Southern California Edison transmission line underground on Katella Avenue from west of the Union Pacific Railroad to Lewis Street (850 feet)
- Relocate Southern California Edison communication line underground on Katella Avenue from Lewis Street to east of State College. (2,400 feet)
- A new distribution duct bank on Katella Avenue from Lewis Street to 700 feet west of State College Boulevard (2,400 feet)
- Relocate distribution circuits underground on Katella Avenue from Lewis Street to 700 feet west of State College Boulevard (2,400 feet)
- A new distribution duct bank on Orangewood Avenue from Anaheim Way to State College Boulevard (1,500 feet)
- Relocate a distribution circuit underground on Orangewood Avenue from State College Boulevard to west of the Santa Ana River (1,600 feet)
- A new distribution duct bank on Gene Autry Way from I-5 to State College Boulevard (2,500 feet)
- A new distribution duct bank on Anaheim Way from 700 feet north of Katella Avenue to Orangewood Avenue (3,400 feet)
- A new distribution duct bank on Lewis Street from Katella Avenue to Gene Autry Way (950 feet)
- Relocate a distribution circuit underground on Douglas Street from Katella Avenue to Cerritos Avenue (1,000 feet)

Furthermore, the APUD indicated that the proposed increase in development intensities would require the following improvements to the current electric facilities:

- Two new distribution duct banks on Katella Avenue from Anaheim Way to Lewis Street (800 feet)
- A new distribution duct bank on Katella Avenue from Douglas Road to Howell Avenue (2,000 feet)
- A new distribution duct bank on State College Boulevard from Cerritos Avenue to Katella Avenue (2,600 feet)
- A new distribution duct bank on Orangewood Avenue from I-5 to the Santa Ana River (4,800 feet)
- A new distribution duct bank on Gene Autry Way from Haster Street to the east side of I-5 (2,500 feet)
- A new distribution duct bank on Gene Autry Way from I-5 to State College Boulevard (2,500 feet)
- A new transmission duct bank on Anaheim Way from 700 feet north of Katella Avenue to Orangewood Avenue (3,400 feet)

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- A new transmission duct bank on Lewis Street and Santa Cruz Street from Katella Avenue to Orangewood Avenue (3,000 feet)
- A new distribution duct bank on the east side of the Angel Stadium parking lot from Orangewood Avenue to the SR-57 (2,000 feet)
- A new distribution duct bank on Douglas Road from SR-57 to Cerritos Avenue (4,000 feet)

The electrical substation will be required when project electrical loads exceed the existing electrical capacity in the project area by 20 MW of customer load. The existing electric system capacity in the Platinum Triangle area is approximately 40 MW. To meet this increased electrical demand, the electric utility had determined that a new electrical substation in the project area would be required.

A suitable site for the substation has been secured at the City-owned property at Orangewood Avenue and Anaheim Way, on the same parcel where the new fire station and water well will be located. Therefore, provided that a new electrical substation is constructed to meet increased electrical demand, and new electrical distribution and transmission lines are constructed, implementation of the PT MLUP would not adversely impact the electrical supply and the impacts would be less than significant.

Mitigation Measures

Applicable Mitigation Measures from MMP No. 106A

The following mitigation measures were included in the Updated and Modified Mitigation Monitoring Program No. 106A for the Platinum Triangle, adopted by the City Council on October 25, 2005, as part of the Subsequent Environmental Impact Report No. 332 and are applicable to the Proposed Project. Additions are shown in bold and deletions are indicated in ~~strikeout~~ format. The mitigation reference numbers from MMP No. 106A are shown in *(italics)*.



- 10-21 ~~Prior to the issuance of each building permit, the~~ **The property owner/developer shall submit plans showing that each structure will ~~comply with~~ exceed the State Energy Efficiency Standards for Nonresidential Buildings (Title 24, Part 6, Article 2, California Code of Regulations) by a minimum of 10 percent and will consult with the City of Anaheim Public Utilities Resource Efficiency Department Business and Community Programs Division, ~~in order to review Title 24 measures incorporated into the project design including energy efficient designs. This consultation shall take place during project design in order to review Title 24 measures that are incorporated into the project design energy efficient practices efficiency and allow potential systems alternatives such as thermal energy storage air-conditioning, lighting, and building envelope options. Plans submitted for building permits shall show the proposed energy efficiencies and systems alternatives. (5.11-11)~~**
- 10-22 ~~Prior to the issuance of each building permit, in order to conserve energy, the property owner/developer shall indicate on plans implement energy-saving practices that will be implemented with the project in compliance with Title 24, which may include the following:~~
- High-efficiency air-conditioning with EMS (computer) control.
 - Variable Air Volume (VAV) air distribution.
 - Outside air (100 percent) economizer cycle.

3. Findings on Potentially Significant Impacts

- Staged compressors or variable speed drives to flow varying thermal loads.
- Isolated HVAC zone control by floors/separable activity areas.
- Specification of premium-efficiency electric motors (i.e., compressor motors, air-handling units, and fan-coil units).
- Use of occupancy sensors in appropriate spaces.
- Use of compact fluorescent lamps in-place-of-incandescent-lamps.
- Use of cold cathode fluorescent lamps.
- Use of Energy Star exit lighting or exit signage.
- Use of T-8 lamps and electronic ballasts where applications of standard fluorescent fixtures are identified.
- Use of lighting power controllers in association with metal-halide or high-pressure sodium (high intensity discharge) lamps for outdoor lighting and parking lots.
- Consideration of thermal energy storage air conditioning for spaces or hotel buildings, meeting facilities, theaters, or other intermittent-use spaces or facilities that may require air-conditioning during summer, day-peak periods.
- Consideration for participation in Resource-Efficiency's Advantage Services Programs such as:
 - New construction design review, in which the City cost-shares engineering fees for up to ~~\$10,000~~ \$15,000 for design of energy efficient buildings and systems.
 - Energy-Save-for New Construction – Cash incentives ~~(\$150-300 to \$400 per kW reduction in load) for efficiency that exceeds \$400 per Kw or \$0.15 per kWh saved for each measure and up to \$200,000 per facility for efficiency that exceed Title 24 requirements.~~
 - Green Building Program – Offers accelerated plan approval, financial incentives, waived plan check fees and free technical assistance.
 - Thermal Energy Storage Feasibility Study – Cost sharing of up to \$5,000 for the feasibility study of TES applied to new facilities. (5.11-12)
- Use of high efficiency toilets (1.28 gallons per flush (gpf) or less).
- Use of zero to low water use urinals (0.0 gpf to 0.25 gpf).
- Use of weather-based irrigation controllers for outdoor irrigation.
- Use of drought-tolerant and native plants in outdoor landscaping.

10-23 ~~Prior to issuance of each building permit or grading permit, whichever occurs first, for any buildings requiring a change in electrical service, the property owner/developer shall~~

3. Findings on Potentially Significant Impacts

install their portion of the an underground electrical service from the Public Utilities Distribution System as determined by the City of Anaheim Public Utilities Department. The Underground Service will be installed in accordance with the Electric Rules, Rates, Regulations and Electrical Specifications for of Underground Systems. Electrical Service Fees service fees and other applicable fees will be assessed in accordance with the Electric Rules, Rates, Regulations or another financial mechanism approved by the City and Electrical Specifications for Underground Systems. The underground electrical service will consist of the following improvements to the current electric facilities: (5.11-13)

- Relocate Southern California Edison transmission line underground on Katella Avenue from west of the Union Pacific Railroad to Lewis Street (850 feet).
- Relocate Southern California Edison communication line underground on Katella Avenue from Lewis Street to east of State College Boulevard (2,400 feet).
- A new distribution duct bank on Katella Avenue from Lewis Street to 700 feet west of State College Boulevard (2,400 feet).
- Relocate distribution circuits underground on Katella Avenue from Lewis Street to 700 feet west of State College Boulevard (2,400 feet).
- A new distribution duct bank on Orangewood Avenue from Anaheim Way to State College Boulevard (1,500 feet).
- Relocation a distribution circuit underground on Orangewood Avenue from State College Boulevard to west of the Santa Ana River (1,600 feet).
- A new distribution duct bank on Gene Autry Way from I-5 to State College Boulevard (2,500 feet).
- A new distribution duct bank on Anaheim Way from 700 feet north of Katella Avenue to Orangewood Avenue (3,400 feet).
- A new distribution duct bank on Lewis Street from Katella Avenue to Gene Autry Way (950 feet).
- Relocate a distribution circuit underground on Douglas Street from Katella Avenue to Cerritos Avenue (1,000 feet).



- 10-24 Prior to the issuance of each building permit, the The property owner/developer shall submit plans for review and approval which shall ensure that buildings are in conformance with exceed the State Energy Conservation Efficiency Standards for Nonresidential buildings (Title 24, Part 6, Article 2, California Administrative Code) by a minimum of 10 percent. (5.11-14)

Additional Mitigation

- 10-25 Prior to issuance of each building permit or grading permit, whichever occurs first, the property owner/developer shall install their portion of the underground electrical service from the Public Utilities Distribution System as determined by the City of Anaheim Public Utilities

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Department. The Underground Service will be installed in accordance with the Electric Rules, Rates, Regulations and Electrical Specifications of Underground Systems. Electrical service fees and other applicable fees will be assessed in accordance with the Electric Rules, Rates, Regulations or another financial mechanism approved by the City. The underground electrical service will consist of the following improvements to the current electric facilities:

- Two new distribution duct banks on Katella Avenue from Anaheim Way to Lewis Street (800 feet).
- A new distribution duct bank on Katella Avenue from Douglas Road to Howell Avenue (2,000 feet).
- A new distribution duct bank on State College Boulevard from Cerritos Avenue to Katella Avenue (2,600 feet).
- A new distribution duct bank on Orangewood Avenue from I-5 to the Santa Ana River (4,800 feet).
- A new distribution duct bank on Gene Autry Way from Haster Street to the east side of I-5 (2,500 feet).
- A new distribution duct bank on Gene Autry Way from I-5 to State College Boulevard (2,500 feet).
- A new transmission duct bank on Anaheim Way from 700 feet north of Katella Avenue to Orangewood Avenue (3,400 feet).
- A new transmission duct bank on Lewis Street and Santa Cruz Street from Katella Avenue to Orangewood Avenue (3,000 feet).
- A new distribution duct bank on the east side of the Angel Stadium parking lot from Orangewood Avenue to the SR-57 (2,000 feet).
- A new distribution duct bank on Douglas Road from SR-57 to Cerritos Avenue (4,000 feet).

10-26 Prior to issuance of each building permit or grading permit, the property owner/developer shall provide an electrical load analysis to the City of Anaheim Public Utilities Department (APUD). The analysis shall include a load schedule and maximum electrical coincident demand. Should the property owner/developer's load analysis result in a contributed load forecasted to exceed 20 MVA above the existing 40 MVA capacity of the electrical system currently serving the Platinum Triangle area, the APUD will initiate construction of a new electrical substation within the Platinum Triangle project area. Electrical service fees and other applicable fees for the electrical substation will be assessed in accordance with the Electric Rules, Rates, Regulations or another financial mechanism approved by the City.

Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant electricity impacts to a less than significant level for the reasons set forth in the Draft SEIR.

Reference: FSEIR Section 5.10, Pages 5.10-34 through 5.10-36.

3. Findings on Potentially Significant Impacts

Impact 5.10-6: Existing and/or proposed facilities would be able to accommodate project-generated natural gas demands.

Development pursuant to the amendments would increase the natural gas demand in the project area. The project area is served by SCG but would require substantial upgrades to the existing system. SCG has indicated that the Proposed Project would require an additional 1.5 miles of 465 pounds per square inch gauge (psig) large-diameter gas transmission pipelines, along with placement of at least two additional pressure limiting stations in the area, and alteration of at least three miles of existing gas main in the area to increase capacity.

Gas service will be added to the existing system by SCG as necessary to meet the requirements of individual development projects within the project site. It is anticipated that with necessary system upgrades and facility improvements, SCG would be able to service the project site with natural gas, which would be provided in accordance with the SCG's policies and extension rules on file with the Public Utilities Commission when the contractual arrangements are made. The availability of natural gas service is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the California Public Utilities Commission and federal regulatory agencies. Should these agencies take any action that affects gas supply, or the conditions under which service is available, gas service would be provided in accordance with revised conditions.

Although the Proposed Project would create additional demands on natural gas supplies and distribution infrastructure, the increased demands are projected to be within the service capabilities of SCG provided necessary improvements are made in coordination with SCG.

Increased building densities and heights in the project area could interfere with the communication function of a microwave tower at the corner of Gene Autry Way and State College Boulevard. However, the current PTMU Overlay Zone would allow a noncreened rooftop microwave communications tower with a variance, if relocation of the microwave tower is necessary.

Mitigation Measures

10-27 The City shall coordinate all future street and infrastructure improvements within the Platinum Triangle with other service providers including Southern California Gas Company and the Orange County Sanitation District so that required infrastructure upgrades maybe constructed concurrently.

Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant natural gas impacts to a less than significant level for the reasons set forth in the Draft SEIR.

Reference: FSEIR Section 5.10, Pages 5.10-36 through 5.10-37.



3. Findings on Potentially Significant Impacts

3.11 GREENHOUSE GAS EMISSIONS

Impact 5.10-6: The Proposed Project would generate substantially more greenhouse gas emissions compared to the Adopted Master Land Use Plan and cumulatively contribute to climate change impacts in California. However, the Proposed Project would be consistent statewide and regional greenhouse gas reductions goals.

Project-Related GHG Emissions

The Proposed Project is a regionally significant project pursuant to SCAG's Intergovernmental Review (IGR) criteria and the CEQA Guidelines. The emissions inventory assumes both residential and employment trips to be associated with land uses in the Platinum Triangle. Therefore, all the vehicle miles traveled (VMT) generated by those trips are considered to be part of the City's GHG inventory even if part of the trip end is external to the City. In comparison, the Regional Target Advisory Committee for SB 375 is recommending that in scenarios where employment trips are split between jurisdictional boundaries, only 50 percent of the trip length be included as part of that region's GHG inventory. What this means is the vehicle trip may originate in the City of Los Angeles, but end in the Platinum Triangle (or vice-versa). The City considers this whole trip length and trip to be associated with the Proposed Project. Because the Platinum Triangle GHG inventory does not split trips associated with residential uses and trips associated with nonresidential uses, this correction is not included in the GHG emissions inventory and results in an overestimation of VMT and trips generated by the Platinum Triangle alone.

The development contemplated by the Proposed Project would contribute to global climate change through direct emissions of GHG from on-site area sources, off-site energy production required for on-site activities and water use, and vehicle trips generated by the Proposed Project. Lifecycle emissions are not included in this analysis because no information is available for the Proposed Project and therefore lifecycle GHG emissions would be speculative.³ Project-related GHG emissions from operation activities were calculated using the URBEMIS2007 and EMFACE2007 computer models, energy usage factors and emission rates from the EIA, and GHG emission rates from waste disposal from the USEPA.

For the operations phase, the project's GHG emissions are separated into emission sources for the applicable GHG emissions sectors established by CARB. Transportation Sector emissions are produced from vehicular travel to and from the project site. Electricity Sector sources are indirect GHG emissions from the energy (purchased energy and energy from water use) that is produced off-site.⁴ In accordance with Appendix F of the CEQA Guidelines, these sources of GHG emissions are evaluated. Recycling and Waste Sector are emissions associated with waste disposal generated by the project. Area Sources Sector (Commercial and Residential Sector emissions sources) are owned or controlled by the project (e.g., natural gas combustion, boilers, furnaces) and produced on-site. Project-related construction activities would consume fuel and result in the generation of GHG emissions.

GHG emissions from operational activities associated with the Proposed Project at build-out year 2030 are shown in Table 5.11-4. In general, project-related Transportation Sector emissions represent the largest proportion of emissions associated with the Proposed Project. While development patterns can

³ Lifecycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. Because of the programmatic nature of the Platinum Triangle MLUP development, evaluation and quantification of raw material usage and production are unknown.

⁴ Potable water use consumes large amounts of energy associated with water conveyance, treatment, distribution, end use, and wastewater treatment.

3. Findings on Potentially Significant Impacts

influence travel behavior and travel modes, these emissions are indirect sources of GHG emissions that are not directly controlled by future applicants for new development in the Platinum Triangle. The second largest source of emissions is from the Electricity Sector, followed by area sources associated with the Commercial and Residential Sector, construction activities, and Recycling and Waste. These direct sources of emissions can be controlled by new development by ensuring that structures are built efficiently to reduce demand on energy use, that nonpotable/recycled water is used where available to reduce demand of potable water use, and that recycling is available on-site to decrease the amount of waste sent to landfills.

As shown in this table, the Proposed Project would generate an increase in 492,597 MTons of GHG emissions compared to the Adopted MLUP and 816,608 MTons from existing conditions. The emissions estimates do not take into account the GHG emission reductions associated with changes to the Building and Energy Efficiency standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, California low carbon-content fuel legislation, Corporate Average Fuel Economy (CAFE) standards, and other early action measures in the Scoping Plan to reduce GHG emissions. Hence, the emissions inventory included in this table represents the Proposed Project's BAU emission scenario. Business as usual is defined as emission levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. The FSEIR No. 332 for the Adopted MLUP did not analyze potential impacts from GHG emissions. The Adopted MLUP would generate an increase of 357,161 MTons from existing conditions. Emissions generated by the Adopted MLUP and the Proposed Project would both be substantial and therefore potentially significantly contribute to climate change impacts in California. The Proposed Project would further increase GHG emissions by 492,597 MTons compared to the Adopted MLUP; however, per-capita emissions would decrease. GHG emissions associated with the Proposed Project would be substantially greater under the Proposed Project compared to the Adopted MLUP and therefore impacts are considered significant.



CARB Scoping Plan Consistency

While California alone cannot stabilize the climate, the state's actions set an example and drive global progress toward reduction of GHG. If the industrialized world were to follow the emission reduction targets established by California, and industrializing nations reduced emissions according to the lower emissions path (lower emissions IPCC scenario B1), medium or higher warming ranges of global temperature increases might be avoided, along with the most severe consequences of global warming. In 2007 the CEC published *The Role of Land Use in Meeting California's Energy and Climate Change Goals*. In this publication, the CEC acknowledged that California's land use patterns shape energy use and the production of GHG. Transportation contributes a large percentage of the state's GHG emissions and research shows that increasing a community or development's density and accessibility to job centers are the two most significant factors for reducing vehicle miles traveled through design (CEC 2007). CARB adopted the Scoping Plan in December 2008. CARB's Scoping Plan identifies that reducing GHG emissions to 1990 levels means "cutting approximately 30 percent from business-as-usual emissions levels projected for 2020, or about 15 percent from today's levels." According to the Scoping Plan, a hard and declining cap will cover 85 percent of California GHG emissions reductions. The early actions and the percentage toward the GHG reduction goal of 169 MTons that they achieve were shown in Table 5.11-3. Consequently, the emissions inventory in Table 5.11-4 would be reduced as a result of the GHG emissions reduction under the cap-and-trade program.

In accordance with AB 32, CARB developed the Scoping Plan to outline the state's strategy to achieve 1990 level emissions by year 2020. To estimate the reductions necessary, CARB projected year statewide 2020 BAU GHG emissions (i.e., GHG emissions in the absence of statewide emission reduction measures). CARB identified that the state as a whole would be required to reduce GHG

3. Findings on Potentially Significant Impacts

emissions by 30 percent from year 2020 BAU. Therefore, the Scoping Plan defines the future baseline emissions scenario to mean in the absence of the statewide emissions reduction strategy. In order to determine whether the project's GHG emissions are consistent with the overall goal of AB 32, emissions shown previously in Table 5.11-4 are compared to GHG emissions with implementation of the Scoping Plan GHG emissions reduction measures. Additionally, the Scoping Plan identified several early action measures to reduce GHG emissions in the State of California. These early action measures include:

- **Green Building:** Implementation of newer, more energy-efficient California Building Standards within the California Building Code (CBC). The new 2008 Building and Energy Efficiency Standards are 15 percent more energy efficient than the 2005 standards.
- **Renewable Energy Portfolio:** Requiring that California use renewable energy to represent 33 percent of California's energy portfolio. Renewable energy currently comprises 12 percent of the state's energy portfolio.
- **Per-Capita Water Reduction:** Reducing per-capita water use by approximately 20 percent. The draft 20X2020 water conservation plan identifies strategies to reduce water use in the state. In addition, plumbing and landscaping codes amended with the new CBC result in a 50 percent reduction of water use for new commercial and residential plumbing fixtures.
- **Low Carbon Fuel Standard:** Adoption of a new Low Carbon Fuel Standard (LCFS). The LCFS requires the carbon content of fuels sold in California to be reduced by 10 percent by year 2020.
- **Pavley Fuel Efficiency Standards:** Adoption of higher fuel efficiency standards (Pavley Fuel Efficiency Standards). The United States Environmental Protection Agency granted the waiver to California to implement higher fuel efficiency standards on July 1, 2009. California's fuel efficiency standards require the average fleet fuel economy of cars to be 43 miles per gallon (mpg) by year 2020. This results in an increase in fuel efficiency of 42.8 percent from the current 23 mpg average fleet economy in California.

Table 5.11-5 shows the GHG emissions inventory at build-out of the Proposed Project with the associated GHG emissions reductions and the percent reduction from BAU. As described previously, to be consistent with GHG reduction targets of AB 32 for year 2020, the City would need to reduce GHG emissions by 30 percent from BAU by year 2020. As shown in this table, the statewide GHG emissions reduction measures identified in the Scoping Plan and that are being implemented over the next 10 years would reduce GHG emissions by 353,237 MTons, or 35 percent, from the BAU scenario. Because the GHG emissions reductions for transportation, buildings, energy, and other economic sectors would be implemented by year 2020, the percent reduction associated with the Scoping Plan for the project for 2030 would be similar for forecast year 2020 (see Appendix C). This is because no additional emissions control measures are assumed for years 2020 through years 2030 for the purpose of this analysis.

3. Findings on Potentially Significant Impacts

**Table 5.11-5
2030 Annual GHG Emissions Inventory for the Proposed Project with Scoping Plan Reductions**

Source	CO ₂ Emissions Mtons Per Year		Percent of Total
	Proposed Project (BAU Scenario)	Proposed Project W/Scoping Plan Reductions	
Transportation Sector ¹	665,969	380,934	56%
Electricity Sector			
Water Demand and Treatment ^{2, 3}	5,249	4,147	1%
Purchased Energy ³	190,628	132,362	20%
Total Energy Emissions	195,877	136,509	21%
Recycling and Waste Sector	27,441	27,441	4%
Area Sources Sector ⁴	69,933	61,898	9%
Annual Average Construction ⁴	48,394	48,394	7%
Total GHG Inventory	1,007,613	664,376	100%
Per Service Population ⁴	16.8 Mtons/SP	10.1 Mtons/SP	NA
Percent Decrease from BAU		36%	
Scoping Plan Reductions		363,237	

Mtons = million tons. The emissions inventory does not include emissions from existing industrial land uses.

¹ Based on a 42.8 percent increase in fuel efficiency in passenger vehicles from 2008 to 2020 in the CARB 2008 Technical Advisory. Parkway 2 would require an average fleet fuel economy of new cars of 42.5 mpg by 2020 compared to an existing average of 24.4 mpg (CARB 2008b).

² Based on an increase in renewable energy use from 12 percent to 33 percent by 2020. (CARB 2008b)

³ Based on an increase in 15 percent energy efficiency from the 2005 to 2008 Building and Energy Efficiency Standards (Title 24, California Building Code).

⁴ Service population includes people who live (residents) and work (employees) in the Platinum Triangle. The Adopted MLUP generates 15,399 residents and 14,640 employees for a service population of 30,039 people. The Proposed Project would generate 23,364 residents and 41,500 employees for a service population of 64,864 people.



Relative to Measure T-3 of the Scoping Plan, which is the measure encompassing the requirements of SB 375, local governments have the ability to directly influence both the siting and design of new residential and commercial developments in a way that reduces per capita greenhouse gases associated with vehicle travel, energy, water, and waste. SB 375 enhances existing processes by which governments coordinate with the regional planning agencies in order to demonstrate GHG emission reductions through integrated development patterns, improved transportation planning, and other transportation measures and policies. The Proposed Project would mix high- and medium-density housing units with office, retail, and entertainment uses within the vicinity of major transportation corridors, including State Route 22, Interstate 5, and State Route 57, and therefore would be considered consistent with intent of similar regional planning efforts focused on efficient land use that strive to integrate jobs centers and housing opportunities specifically to reduce VMT and therefore GHG emissions.

Regional GHG emissions reduction targets have not yet been established by CARB and the Sustainable Communities Strategy (SCS) element of the RTP that are required by SB 375 will not be adopted by the SCAG region until the 2012 RTP is adopted. At this time, the only regional growth document that has been incorporated into a regional growth policy is SCAG's Compass Blueprint. If the Compass Blueprint were to be fully implemented, VMT per household would be expected to decrease (SCAG 2009b). The Proposed Project includes land use features designed to reduce VMT within southern California and the SoCAB through development of the Proposed Project, including the ARTIC District. The ARTIC District replaces the existing institutional land use designation on the eastern project boundary with a mixed use land use designation. This designation would allow for a variety of uses in addition to ARTIC, which is envisioned as a major regional intermodal transit center proposed under a partnership between the City

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of Anaheim and the Orange County Transportation Authority. The regional intermodal transit center would link rail, ground, and transit services in Orange County and would serve as a gateway for high speed and conventional rail, bus, and automobile travelers. Development of ARTIC project and the ARTIC District would facilitate the use of transit by residents in the Platinum Triangle and the surrounding region and would, therefore, improve mobility in the southern California region and could reduce transportation derived CO₂ emissions in the air basin.

As shown in Table 5.11-5, full implementation of transportation and energy measures of CARB's Scoping Plan would reduce emissions by 35 percent, or 353,237 MTons of CO_{2e}, from BAU. Coupled with statewide measures to reduce GHG emissions from electric producers, vehicles, fuel, and the cap-and-trade program, the project would achieve GHG reductions consistent with the 30 percent reduction consistent with the GHG reduction goals of AB 32, as described in the statewide GHG emissions reduction strategy outlined in the Scoping Plan.

Mitigation Measures

Impact 5.11-1

Applicable Mitigation Measures from Other EIR Sections

Below is a list of mitigation measures included in other environmental topical sections of this EIR that also would reduce GHG emissions associated with the project and are consistent with the California Attorney General's mitigation measures for energy efficiency, renewable energy and storage, water conservation and efficiency, solid waste, land use, transportation and motor vehicle, and agriculture and forestry measures. It should also be noted that the proposed project is a mixed-use infill project that is consistent with the Attorney General's recommended measures for land use. In addition, several of the mitigation measures incorporate several categories of the California Attorney General's recommended measures (i.e., energy efficiency and water efficiency measures are occasionally incorporated in the same mitigation measure).

Solid Waste Measures

- 2-3 Prior to approval of each grading plan (for Import/Export Plan) and prior to issuance of demolition permits (for Demolition Plans), the property owner/developer shall submit Demolition and Import/Export Plans detailing construction and demolition (C&D) recycling and waste reduction measures to be implemented to recover C&D materials. These plans shall include identification of off-site locations for materials export from the project and options for disposal of excess material. These options may include recycling of materials on-site or to an adjacent site, sale to a soil broker or contractor, sale to a project in the vicinity or transport to an environmentally cleared landfill, with attempts made to move it within Orange County. The property owner/developer shall offer recyclable building materials, such as asphalt or concrete for sale or removal by private firms or public agencies for use in construction of other projects if not all can be reused at the project site. (5.2-3)
- 10-18 Prior to the final building and zoning inspections of each development, the property owner/developer shall submit project plans to the Streets and Sanitation Division of the Public Works Department for review and approval to ensure that the plans comply with AB 939, and the Solid Waste Reduction Act of 1989, and the County of Orange and City of Anaheim Integrated Waste Management Plans as administered by the City of Anaheim. Implementation of said plan shall commence upon occupancy and shall remain in full effect

3. Findings on Potentially Significant Impacts

as required by the Street and Sanitation Division and may include, at its discretion, the following plan components: (5.11-8)

- Detailing the locations and design of on-site recycling facilities.
- ~~Providing on-site recycling receptacles to encourage recycling.~~
- Participating in the City of Anaheim's "Recycle Anaheim" program or other substitute program as may be developed by the City or governing agency.
- Facilitating cardboard recycling (especially in retail areas) by providing adequate space and centralized locations for collection and bailing.
- Providing trash compactors for nonrecyclable materials whenever feasible to reduce the total volume of solid waste and number of trips required for collection.
- Providing on-site recycling receptacles accessible to the public to encourage recycling for all businesses, employees, and patrons where feasible.
- Prohibiting curbside pick-up.
- Ensuring hazardous materials disposal complies with federal, state, and city regulations.

10-19 Ongoing during project operations, the ~~the~~ following practices shall be implemented, as feasible, by the property owner/developer: (5.11-9)

- Usage of recycled paper products for stationery, letterhead, and packaging.
- Recovery of materials, such as aluminum and cardboard.
- Collection of office paper for recycling.
- Collection of glass, plastics, kitchen grease, laser printer toner cartridges, oil, batteries, and scrap metal for recycling or recovery.

10-20 Prior to the approval of each grading plan (for import/export plan) and prior to issuance of demolition permits (for demolition plans), the ~~the~~ property owner/developer shall submit a Demolition and Import/Export Plans, if determined to be necessary by the Public Works Department, Traffic Engineering Division, and /or Street and Sanitation Division. The plans shall include identification of off-site locations for material export from the project and options for disposal of excess material. These options may include recycling of materials on-site, sale to a broker or contractor, sale to a project in the vicinity or transport to an environmentally cleared landfill, with attempts made to move it within Orange County. The property owner/developer shall offer recyclable building materials, such as asphalt or concrete for sale or removal by private firms or public agencies for use in construction of other projects, if all cannot be reused on the project site. (5.11-10)



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Transportation and Motor Vehicle Measures

- 2-5 In accordance with the timing required by the Traffic and Transportation Manager, but no later than prior to the first final Building and Zoning inspection, the property owner/developer shall implement the following measures to reduce long-term operational CO, NO_x, ROG, and PM₁₀ emissions: (5.2-5)
- Traffic lane improvements and signalization as outlined in the Revised Platinum Triangle Expansion Project Draft Traffic Study Report by Parsons Brinckerhoff, August 2010, traffic study and Master Plan of Arterial Highways (MPAH) shall be implemented as required by the Traffic and Transportation Manager.
 - The property owner/contractor shall place bus benches and/or shelters as required by the Traffic and Transportation Manager at locations along any site frontage routes as needed.
- 9-1 Prior to the first final building and zoning inspection for each building with commercial, office, and/or institutional uses, the property owners/developer shall record a covenant on the property requiring that ongoing during project implementation, the property owner/developer shall implement and administer a comprehensive Transportation Demand Management (TDM) program for all employees. The form of the covenant shall be approved by the City Attorney's Office. Objectives of the TDM program shall be: (5.10-2)
- Increase ridesharing and use of alternative transportation modes by guests.
 - Provide a menu of commute alternatives for employees to reduce project-generated trips.
 - Conduct an annual commuter survey to ascertain trip generation, trip origin, and Average Vehicle Ridership.
- 9-2 Prior to the first Final Building and Zoning inspection for each building with commercial, office, or institutional uses, and ~~ongoing during project operation~~, the property owner/developer shall provide to the City of Anaheim Public Works Department for review and approval a menu of TDM program strategies and elements for both existing and future employees' commute options, to include, but not be limited to, the list below. The property owner/developer shall also record a covenant on the property requiring that the approved TDM strategies and elements be implemented ongoing during project operation. The form of the covenant shall be approved by the City Attorney's Office prior to recordation. ~~following~~: (5.10-2)
- On-site services such as the food, retail, and other services be provided.
 - Ridesharing. Develop a commuter listing of all employee members for the purpose of providing a "matching" of employees with other employees who live in the same geographic areas and who could ridehare.
 - Vanpooling. Develop a commuter listing of all employees for the purpose of matching numbers of employees who live in geographic proximity to one another and could comprise a vanpool or participate in the existing vanpool programs.

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- **Transit Pass.** Southern California Rapid Transit District and Orange County Transportation Authority (including commute rail) passes be promoted through financial assistance and on-site sales to encourage employees to use the various transit and bus services from throughout the region.
- **Shuttle Service.** A commuter listing of all employees living in proximity to the project be generated, and a local shuttle program offered to encourage employees to travel to work by means other than the automobile. ~~Event-shuttle-service-will-be-available-for-the-guests.~~
- **Bicycling.** A Bicycling Program be developed to offer a bicycling alternative to employees. Secure bicycle racks, lockers, and showers be provided as part of this program. Maps of bicycle routes throughout the area be provided to inform potential bicyclists of these options.
- **Guaranteed Ride Home Program.** A program to provide employees who rideshare, or use transit or other means of commuting to work, with a prearranged ride home in a taxi, rental car, shuttle, or other vehicle, in the event of emergencies during the work shift.
- **Target Reduction of Longest Commute Trip.** An incentive program for ridesharing and other alternative transportation modes to put highest priority on reduction of longest employee commute trips.
- **Stagger work shifts.**
- **Develop a "compressed work week" program, which provides for fewer work days but longer daily shifts as an option for employees.**
- **Explore the possibility of a "telecommuting" program that would link some employees via electronic means (e.g., computer with modem).**
- **Develop a parking management program that provides incentives to those who rideshare or use transit means other than single-occupant auto to travel to work.**
- **Access.** Preferential access to high occupancy vehicles and shuttles may be provided.
- **Financial Incentive for Ridesharing and/or Public Transit.** (Currently, federal law provides tax-free status for up to \$65 per month per employee contributions to employees who vanpool or use public transit including commuter rail and/or express bus pools.)
- **Financial Incentive for Bicycling.** Employees offered financial incentives for bicycling to work.
- **Special "Premium" for the Participation and Promotion of Trip Reduction.** Ticket/passes to special events, vacation, etc. be offered to employees who recruit other employees for vanpool, carpool, or other trip reduction programs.



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- Design incentive programs for carpooling and other alternative transportation modes so as to put highest priority on reduction of longest commute trips.

Every property owner and/or lessee shall designate an on-site contact who will be responsible for coordinating with the ATN and implementing all trip mitigation measures. The on-site coordinator shall be the one point of contact representing the project with the ATN. The TDM requirements shall be included in the lease or other agreement with all of the project participants.

- 9-14 Prior to the first final building and zoning inspection, for each building with office and/or commercial uses, the property owner/developer shall submit proof to the Public Works, Transit Planning Division that the property owner/developer has entered into an agreement with the Anaheim Transportation Network (ATN) for the provision of a transit shuttle service between the project, the existing Metrolink Station and future Anaheim Regional Transportation Intermodal Center (ARTIC) as well as major activity centers in between. The agreement shall be recorded in the Official Records of the Office of the County Recorder, Orange County, California. The form of the agreement shall be approved by the City Attorney's Office prior to recordation. The agreement shall provide for the following:
- a. A shuttle route plan, approved by the Public Works Department, Transit Planning Division and ATN, shall be attached and incorporated into the agreement. The plan shall include co-location of stops with Orange County Transportation Authority bus stop locations and other properties in the Platinum Triangle where feasible and determined appropriate by the Public Works Transit Planning Division and ATN. The property owner/developer shall pay all costs associated with the preparation of the shuttle route plan.
 - b. The property owner/developer shall provide the full cost associated with providing the shuttle, including, but not limited to, purchasing the shuttle vehicle and all costs associated with operating and marketing the shuttle route.
 - c. The agreement shall provide a mechanism for the property owner/developer to request fair share participation from other major activity centers to be served by this shuttle route. The mechanism shall be subject to the approval of the ATN.
 - d. The agreement shall set forth a schedule for commencement of operation of the shuttle service.
 - e. The agreement shall provide that the property owner/developer's obligations to fund the shuttle service may be cancelled only upon prior written approval from the Public Works Department, Transit Planning Division's once a new transit service has taken its place.
 - f. That to the extent permitted by law the terms of this agreement shall constitute covenants which shall run with the property for the benefit thereof, and the benefits of this agreement shall bind and inure to the benefit of the parties and all successors in interest to the parties hereto.
- 9-16 Prior to the approval of a Final Site Plan, the property owner/developer shall meet with the Traffic and Transportation Manager to determine whether a bus stop(s) is required to be placed adjacent to the property. If a bus stop(s) is required, it shall be placed in a location that least impacts traffic flow and may be designed as a bus turnout or a far side bus stop as

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required by the Traffic and Transportation Manager and per the approval of the Orange County Transportation Authority (OCTA).

Energy Efficiency

2-6 Prior to issuance of a building permit, the property owner/architect shall submit energy calculations used to demonstrate compliance with the performance approach to the California Energy Efficiency Standards to the Building Division that shows each new structure exceeds the applicable Building and Energy Efficiency Standards by a minimum of 10 percent. Plans shall show the following:

- a) Energy-efficient roofing systems, such as vegetated or "cool" roofs, that reduce roof temperatures significantly during the summer and therefore reduce the energy requirement for air conditioning. Examples of energy efficient building materials and suppliers can be found at <http://eetd.lbl.gov/CoolRoofs> or similar websites.
- b) Cool pavement materials such as lighter-colored pavement materials, porous materials, or permeable or porous pavement, for all roadways and walkways not within the public right-of-way, to minimize the absorption of solar heat and subsequent transfer of heat to its surrounding environment. Examples of cool pavement materials are available at http://www.epa.gov/heatfield/images/extra/level3_pavingproducts.html or similar websites.
- c) Energy saving devices that achieve the existing 2008 Appliance Energy Efficiency Standards, such as use of energy efficient appliances (e.g., EnergyStar® appliances) and use of sunlight-filtering window coatings or double-paned windows.
- d) Electrical vehicle charging stations for all commercial structures encompassing over 50,000 square feet.
- e) Shady trees strategically located within close proximity to the building structure to reduce heat load and resulting energy usage at residential, commercial, and office buildings.



~~Implementation of energy conservation techniques (i.e., installation of energy saving devices, construction of electrical vehicle charging stations, use of sunlight filtering window coatings or double-paned windows, utilization of light colored roofing materials as opposed to dark colored roofing materials, and placement of shady trees next to habitable structures) shall be indicated on plans. (5.2-6)~~

10-21 Prior to the issuance of each building permit, the ~~The~~ property owner/developer shall submit plans showing that each structure will ~~comply with~~ exceed the State Energy Efficiency Standards for Nonresidential Buildings (Title 24, Part 6, Article 2, California Code of Regulations) by a minimum of 10 percent and will consult with the City of Anaheim Public Utilities Resource Efficiency Department Business and Community Programs Division. ~~in order to review Title 24 measures incorporated into the project design including energy efficient designs.~~ This consultation shall take place during project design in order to review Title 24 measures that are incorporated into the project design energy efficient practices ~~efficiency~~ and allow potential systems alternatives such as thermal energy storage

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air-conditioning, lighting, and building envelope options. Plans submitted for building permits shall show the proposed energy efficiencies and systems alternatives. (5.11-11)

10-22 Prior to the issuance of each building permit, ~~in order to conserve energy~~ the property owner/developer shall indicate on plans ~~implement energy-saving practices that will be implemented with the project in compliance with Title 40 24, which may include the following:~~

- High-efficiency air-conditioning with EMS (computer) control.
- Variable Air Volume (VAV) air distribution.
- Outside air (100 percent) economizer cycle.
- Staged compressors or variable speed drives to flow varying thermal loads.
- Isolated HVAC zone control by floors/separable activity areas.
- Specification of premium-efficiency electric motors (i.e., compressor motors, air-handling units, and fan-coil units).
- Use of occupancy sensors in appropriate spaces.
- Use of compact fluorescent lamps ~~in place of incandescent lamps.~~
- Use of cold cathode fluorescent lamps.
- Use of Energy Star exit lighting or exit signage.
- Use of T-8 lamps and electronic ballasts where applications of standard fluorescent fixtures are identified.
- Use of lighting power controllers in association with metal-halide or high-pressure sodium (high intensity discharge) lamps for outdoor lighting and parking lots.
- Consideration of thermal energy storage air conditioning for spaces or ~~hotel buildings, meeting facilities, theaters, or other intermittent-use spaces or facilities~~ that may require air-conditioning during summer, day-peak periods.
- Consideration for participation in ~~Resource—Efficiency's~~ Advantage Services Programs such as:
 - New construction design review, in which the City cost-shares engineering fees for up to \$15,000 for design of energy efficient buildings and systems.
 - ~~Energy-Save-for New Construction~~ – Cash incentives \$400 per kW or \$0.15 per kWh saved for each measure up to \$200,000 per facility for efficiency that exceed Title 24 requirements.
 - Green Building Program – Offers accelerated plan approval, financial incentives, waived plan check fees and free technical assistance.

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- ~~Thermal Energy Storage Feasibility Study—Cost sharing of up to \$5,000 for the feasibility study of TEG applied to new facilities. (5.11-12)~~
- Use of high efficiency toilets (1.28 gallons per flush (gpf) or less).
- Use of zero to low water use urinals (0.0 gpf to 0.25 gpf).
- Use of weather-based irrigation controllers for outdoor irrigation.
- Use of drought-tolerant and native plants in outdoor landscaping.

10-24 ~~Prior to the issuance of each building permit, the property owner/developer shall submit plans for review and approval which shall ensure that buildings are in conformance with exceed the State Energy Conservation—Efficiency Standards for Nonresidential buildings (Title 24, Part 6, Article 2, California Administrative Code) by a minimum of 10 percent. (5.11-14)~~

Water Conservation and Efficiency

10-7 Prior to issuance of a building permit, submitted landscape plans shall demonstrate compliance with the City of Anaheim adopted Landscape Water Efficiency Guidelines. This ordinance is in compliance with the State of California Model Water Efficient Landscape Ordinance (AB 1881) ~~Conservation in Landscaping Act (AB 305)~~.

Among the measures to be implemented with the project are the following:

- Use of water-conserving landscape plant materials wherever feasible;
- Use of vacuums and other equipment to reduce the use of water for wash down of exterior areas;
- Low-flow fittings, fixtures and equipment including low flush toilets and urinals;
- Use of self-closing valves for drinking fountains;
- Use of efficient irrigation systems such as drip irrigation and automatic systems which use moisture sensors;
- Infrared sensors on sinks, toilets and urinals;
- Low-flow shower heads in hotels;
- Infrared sensors on drinking fountains;
- Use of irrigation systems primarily at night, when evaporation rates are lowest;
- Water-efficient ice machines, dishwashers, clothes washers, and other water using appliances;
- Cooling tower recirculating system;



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- Use of low-flow sprinkler heads in irrigation system;
- Use of waterway recirculation systems;
- Provide information to the public in conspicuous places regarding water conservation; and
- Use of reclaimed water for irrigation and washdown when it becomes available.

In conjunction with submittal of landscape and building plans, the applicant shall identify which of these measures have been incorporated into the plans. (5.11-1)

- 10-9 Prior to the issuance of the first building permit or grading permit, whichever occurs first, the property owner/developer shall indicate on plans installation of a separate irrigation meter when the total landscaped area exceeds 2,500 square feet. (City of Anaheim Water Conservation Measures) (5.11-3)
- 10-12 Prior to issuance of a building permit, submitted landscape plans for all residential, office and commercial landscaping shall demonstrate the use of drought tolerant plant materials pursuant to the publication entitled "Water Use Efficiency of Landscape Species" by the U.C. Cooperative Extension, August 2000.
- 10-13 Prior to issuance of a building permit or grading permit, whichever occurs first, the property owner/developer shall indicate on plans water efficient design features including, but not limited to (as applicable to the type of development at issue) waterless water heaters, waterless urinals, automatic on and off water facets, and water efficient appliances.
- 10-14 Prior to issuance of a building permit or grading permit, whichever occurs first, the property owner/developer shall indicate on plans installation of a separate irrigation lines for recycled water. All irrigation systems shall be designed so that they will function properly with recycled water.

Additional Mitigation

No additional mitigation measures are available.

Finding: Mitigation measures are feasible and avoid or substantially lessen potentially significant greenhouse gas emissions impacts to the extent feasible for the reasons set forth in the Draft SEIR. However, as shown in Table 5.11-6, implementation of the project would generate a substantial increase (463,371 Mtons or 243 percent) in GHG emissions from existing conditions. Therefore, while the project would be consistent with GHG reduction goals of the Scoping Plan, GHG emissions generated by the project would be significant and unavoidable.

Reference: FSEIR Section 5.11, Pages 5.11-14 through 5.11-31.

4. Statement of Overriding Considerations

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" (State CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 [b]). The agency's statement is referred to as a "Statement of Overriding Considerations." The following sections provide a description of the each of the project's significant and unavoidable adverse impacts and the justification for adopting a statement of overriding considerations.

4.1 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

The following adverse impacts of the project are considered significant and unavoidable based on Draft SEIR No. 339, the Final EIR, Mitigation Monitoring Program No. 106C, and the findings discussed in Sections 2.0 and 3.0 of this document.

Air Quality

Impact 5.2-1

Implementation of Mitigation Measures 2-1 through 2-4 would reduce construction emissions associated with new development projects in the Platinum Triangle. However, due to the magnitude of construction activities that could take place with build-out of the Proposed Project, emissions of Carbon monoxide (CO), nitrogen oxides (NO_x), volatile organic compounds (VOC), coarse inhalable particulate matter (PM₁₀), and fine inhalable particulate matter (PM_{2.5}) would continue to exceed the South Coast Air Quality Management District's (SCAQMD) regional construction regional emissions thresholds and cumulatively contribute to the O₃ and particulate matter (PM₁₀ and PM_{2.5}) nonattainment designations of the South Coast Air Basin (SoCAB). As a result, Impact 5.2-1 would remain significant and unavoidable.

Impact 5.2-2

Implementation of Mitigation Measures 2-4 through 2-6 would reduce operational phase emissions of the project. However, due to the magnitude of new air pollutant emissions sources that could result with build-out of the Proposed Project, emissions would exceed the SCAQMD's regional significance thresholds and cumulatively contribute to the O₃ and particulate matter (PM₁₀ and PM_{2.5}) nonattainment designations of the SoCAB. As a result, Impact 5.2-2 would remain significant and unavoidable.

Impact 5.2-3

Mitigation Measures 2-1 through 2-4 would reduce on-site construction emissions to the extent feasible. However, due to the magnitude of the construction grading activities, the probability that multiple construction activities could occur at the same time, and the proximity of existing and future sensitive receptors within the Platinum Triangle, construction emissions may exceed the SCAQMD localized significance thresholds. As a result, Impact 5.2-3 would remain significant and unavoidable.



4. Statement of Overriding Considerations

Impact 5.2-5

Placement of sensitive uses near major pollutant sources would result in significant air quality impacts from the exposure of persons to substantial concentrations of toxic air pollutant contaminants. However, implementation of Mitigation Measure 2-7 and 2-8 would ensure that residences within the Platinum Triangle are not located in close proximity to major stationary sources of air pollution identified by California Air Resources Board (CARB). As a result, no significant impact would occur. Implementation of Mitigation Measure 2-7 would reduce the potential indoor health risk. While long-term maintenance associated with replacement of the minimum efficiency reporting value filters is not in the control of the developer for indoor air quality impacts, Mitigation Measure 2-7 would require the property manager (rentals) and homeowner's association (HOA) to require homeowners to replace filters to reduce health risk associated with diesel particulates from being located within 500 feet of Interstate 5 and State Route 57. As a result, implementation of Mitigation Measures 2-7 and 2-8 would ensure that residents within the Platinum Triangle would not be exposed to levels of toxic air contaminants that exceed the ambient concentrations in the project vicinity, which are 931 to 1,086 in a million in the Platinum Triangle area (SCAQMD 2009).

While Mitigation Measure 2-9 would reduce the potential outdoor health risk for parks within close proximity to the freeway, development projects may include outdoor private recreational areas within the CARB-recommended distance of 500 feet. Therefore, placement of private outdoor recreational areas would expose people to elevated levels of toxic air contaminants that exceed the ambient concentrations in the project vicinity, which are 931 to 1,086 a million in the Platinum Triangle (SCAQMD 2008), and impacts would be potentially significant. Impact 5.2-5 would be significant and unavoidable.

Land Use

Impact 5.4-2

No mitigation measures are available to reduce significant impacts to operation of the Southern California Gas Company's microwave tower. The A-Town Metro project north of the microwave tower was approved on October 25, 2005, and is not a part of the current project actions to increase the intensity in the Platinum Triangle. Unless the property containing the microwave tower is redeveloped with a future mixed use and the tower is relocated, high-rise residential towers north of the microwave tower will conflict with the tower's operation and this impact is considered significant and unavoidable.

Noise

Impact 5.5-1

Mitigation Measure 5-1 will reduce impacts related traffic noise increases to the extent feasible. However, some areas may experience noise levels in exceedance of the City's noise ordinance prior to implementation of roadway improvements and associated noise attenuation. Consequently, Impact 5.5-1 would remain significant and unavoidable.

Impact 5.5-3

Mitigation Measures 5-2 through 5-4 would reduce exterior noise levels at noise-sensitive exterior areas from roadway source noise, railroad noise, and from stadium events. However, the exterior noise environment may still exceed the goals for noise compatibility established by the City and would require evaluation of individual project compatibility with the exterior noise environment on a case-by-case basis. Consequently, Impact 5.5-3 would remain significant and unavoidable.

4. Statement of Overriding Considerations

Impact 5.5-6

Mitigation Measure 5-5 would reduce vibration impacts from pile driving, but would not eliminate vibration generated by heavy construction equipment operating within close proximity to existing or proposed units within the Platinum Triangle. Therefore, Impact 5.5-5 would remain significant and unavoidable.

Impact 5.5-7

Mitigation Measures 5-7 through 5-10 would reduce noise levels from construction activities to the extent feasible. Construction noise impacts would be temporary as they would only occur when construction activities are occurring and would cease by evening. However, due to the proximity of occupied units within the Platinum Triangle to construction activities and potential overlap in the construction schedule from individual development projects constructed within the Platinum Triangle, Impact 5.5-7 would remain significant and unavoidable.

Transportation and Traffic

Impact 5.9-1

Implementation of Mitigation Measure 9-1 through 9-17 provides means to implement traffic improvements to reduce impacted intersections and arterial segments level of service to a less than significant level. However, although recommended, not all identified improvements are feasible. Where the primary responsibility for approving and/or completing certain improvements located outside of Anaheim lies with agencies other than the City of Anaheim such as the City of Orange and California Department of Transportation (Caltrans), recommended measures may not be implemented for reasons beyond the City's control. The City of Anaheim cannot undertake or require improvements outside of Anaheim's jurisdiction and the City cannot construct improvements in the Caltrans's right-of-way without Caltrans approval. Should that occur, the project's traffic impact would remain significant.



Recommended improvements on the following City of Anaheim intersections are not feasible and impacts would remain significant and unavoidable.

- 1) Intersection I-1: Euclid Street/Katella Avenue
- 2) Intersection I-5: Dianeyland Drive/Ball Road
- 3) Intersection I-6: Dianeyland Drive/West Street/Katella Avenue
- 4) Intersection I-8: Harbor Boulevard/Ball Road
- 5) Intersection I-23: Anaheim Boulevard/Hastler Street/Katella Avenue
- 6) Intersection I-49: State College Boulevard/Katella Avenue
- 7) Intersection I-53: State College Boulevard/Orangewood Avenue

Recommended improvements on the following City of Orange intersections are not feasible because the City of Anaheim does not have jurisdiction over the implementation of these improvements; and, therefore, impacts would remain significant and unavoidable.

- 8) Intersection I-53: State College Boulevard/Orangewood Avenue (shared intersection between Anaheim and Orange)
- 9) Intersection I-57: State College Boulevard/The City Drive/Chapman Avenue
- 10) Intersection I-71: Orangewood Avenue/SR-57 Southbound Ramps
- 11) Intersection I-80: Main Street/Collins Avenue
- 12) Intersection I-87: Glassell Street/Katella Avenue

4. Statement of Overriding Considerations

- 13) Intersection I-102: The City Drive/Garden Grove Boulevard
- 14) Intersection I-98: SR-22 Westbound Ramps at Metropolitan Drive

The following five arterial segments within the City of Orange are identified as deficient and are located within corridors that are built out and have right-of-way constraints include existing businesses, extensive landscaping, and in the case of Struck Avenue, several homes. The City of Orange has no plans to widen the identified segments within the foreseeable future but should the City of Orange decide to implement improvements along these corridors, the City of Anaheim will need to contribute a fair-share. The City of Anaheim will continue to work with the City of Orange to develop the most appropriate strategy toward improving the locations impacted by the Proposed Project.

- 15) Arterial Segment A-15: Ball Road from SR-57 Freeway to Main Street
- 16) Arterial Segment A-27: Collins Avenue from Main Street to Batavia Street
- 17) Arterial Segment A-28: Collins Avenue from Batavia Street to Glassell Street
- 18) Arterial Segment A-32: Eckhoff Street to Orangewood Avenue to Collins Avenue
- 19) Arterial Segment A-91: Struck Avenue from Kalella Avenue to Main Street

Impact 5.9-2

Since the major freeway facilities within the study area, I-5, SR-22, and SR-57 have reached their design capacity or will have reached it by 2030 and the required physical improvements are largely the result of background regional traffic, consultation between the City of Anaheim and Caltrans will be necessary to reach consensus on any potential operational improvement measures. State highway facilities within the study area are not within the jurisdiction of the City of Anaheim. Improvements to State Highway Systems are deemed to be matters of federal, State, regional, and local concern and are planned, funded, and constructed by the State of California through a legislative and political process involving the State Legislature; the California Transportation Commission; the California Business, Transportation, and Housing Agency; Caltrans; and OCTA. Therefore, impacts to Caltrans facilities would remain significant and unavoidable.

Greenhouse Gas Emissions

Impact 5.11-1

As described in Impact 5.11-1, build-out of the project would be consistent with the goals of the Scoping Plan and best management practices identified for development project to reduce VMT through integrating land use and transportation and would achieve GHG reductions consistent with the 30 percent reduction associated with CARB's Scoping Plan. In addition, the mitigation measures identified in Section 5.11.7 would reduce greenhouse gas emissions to the extent feasible. However, as shown in Table 5.11-6, implementation of the project would generate a substantial increase (463,371 MTons or 243 percent) in GHG emissions from existing conditions. Therefore, while the project would be consistent with GHG reduction goals of the Scoping Plan, GHG emissions generated by the project would be significant and unavoidable.

4. Statement of Overriding Considerations

4.2 CONSIDERATIONS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The following section describes the benefits of the project that outweigh the project's unavoidable adverse effects and provides specific reasons for considering the project acceptable even though the Final EIR has indicated that there will be significant project impacts that are infeasible to mitigate.

Provision of Needed Housing

The City certified its Housing Element in 2009. The additional housing units proposed for the Platinum Triangle would contribute toward the City's effort to meet RHNA's fair share allocation goal of 9,498 units by 2014. In addition, development of the Proposed Project will generate additional redevelopment funds which can be used by the City in the future to develop additional affordable housing opportunities.

According to the U.S. Census Bureau, 2,752 units in the City were vacant in 2000, representing a 2.76 percent vacancy rate. In 2005, the vacancy rate was estimated to be slightly lower at 2.68 percent. Since the vacancy rate is a measure of the availability of housing in a community, these low rates suggest high housing demand in Anaheim. A low vacancy rate suggests that households may have difficulty finding housing for purchase within their price range; a high supply of vacant units may indicate either the existence of a high number of desired units, or an oversupply of units. Orange County as a whole has a 3.5 percent vacancy rate, which indicates that the City of Anaheim has a tighter housing market and that there is an undersupply of housing units. The City of Anaheim is an almost built-out city with undeveloped areas in the outlying areas of the City only. Therefore, provision of high density units that match the existing and future job base in the Platinum Triangle and other areas of the City is a desired and necessary development pattern. The proposed project presents opportunities for the City to provide needed housing in an area where there is a high demand. In addition, the DSEIR demonstrated that there are adequate utility and infrastructure capacities to accommodate the proposed increased density with additional mitigation measures. Provision of additional housing units would relieve development pressure in other areas of the City where there may not be adequate infrastructure support. The proposed project is located near existing transportation and transit facilities and near major regional job concentrations and is organized in a manner conducive to walking, biking and transit alternatives to automobile travel, in accordance with SCAG policies. The flat, buildable character of the proposed project area further contributes to providing higher density housing and more housing opportunities for workers within the City. These siting advantages will provide balance between employment, retail, and residential uses; a range of housing opportunities; reduced traffic congestion; and fewer emissions related to congestion. The Platinum Triangle meets these specific objectives for the provision of additional housing opportunities.



Consistency with the City's Adopted Housing Element

The following are the policy considerations included in the City of Anaheim 2006-2014 Housing Element:

Policy Consideration 1.0: Growth Needs

The City of Anaheim's Regional Housing Needs Assessment allocation for the 2006-2014 Housing Element is 9,498 units. In comparison to other cities in Orange County, Anaheim's allocation represents a large share of the County's overall need. Limited land resources, construction costs and other funding/financing considerations significantly influence the ability of the private market to provide a variety of housing choices to meet the needs for a variety of income levels.

4. Statement of Overriding Considerations

Policy Consideration 2.0: Utilization of Existing Resources for Housing

The available funding and staffing to address projected housing need is limited. Therefore, the City must anticipate and pursue comprehensive and strategic utilization of funding sources, prioritize programs and maximize coordinated participation between public, private and non-profit entities.

Policy Consideration 3.0: Community Design and Sustainability

Anaheim's community members and stakeholder groups have identified the maintenance and enhancement of quality of life as an important factor to address when planning for the City's future housing needs. The preservation and enhancement of that quality of life can be accomplished through community design and sustainability concepts that consider the function and livability of Anaheim's existing and planned neighborhoods and can provide financial benefits, as well. Establishment of a holistic approach to community design and sustainability can have a positive effect on the quality of life in Anaheim.

Policy Consideration 4.0: Affordable Housing Opportunities for Anaheim's Residents

Programs providing fair housing counseling, education and enforcement have been identified as means to provide affordable housing opportunities for Anaheim's residents. The City of Anaheim should strategically address the specific needs of Anaheim residents through utilization of existing resources in combination with County, State, Federal private and non-profit resources. Specifically, consideration of homelessness, housing access, affordability issues and rental housing opportunities can be best addressed at the local level through target policies and programs sponsored and/or administered by the City.

Policy Consideration 5.0: Community Education and Outreach

Outreach to all segments of the community and education on housing and housing related topics is important to the success of the City's housing projects and programs. Through education and outreach, especially through non-traditional means, the City can ensure that information is available for interested community members and maximize participation in housing programs.

Policy Consideration 6.0: Housing Availability and Affordability

The demand for housing in Anaheim remains high due to employment opportunities, its strategic location and local amenities. Housing costs in Anaheim and the surrounding region continue to remain higher than what is affordable for many households, especially the lower-income segments of the population. Additionally, the need for housing suitable for special needs groups is not always fulfilled by the housing options currently available. Providing policies and programs to increase available housing for all segments of the population will help ensure that current residents and those who work in Anaheim have the opportunity to remain in the City.

Policy Consideration 7.0: Infill and Redevelopment

Anaheim is essentially "built-out." There are very few areas of undeveloped land remaining in the City. The City must rely on infill and redevelopment opportunities to accommodate growth. Policies should allow and encourage creative solutions to maximize the potential in redeveloping areas of Anaheim.

4. Statement of Overriding Considerations

To address the Policy Considerations identified above, the City has established Guiding Principles that provide the primary policy direction to address its identified needs. The table below identifies the Guiding Principles and analyzes the proposed project's consistency with these principles.

Guiding Principles	Proposed Project
<p>Guiding Principle A: The provision of a high quality, well maintained housing stock is a primary contributor to quality of life in Anaheim.</p>	<p>The proposed project will increase the permitted amount of housing within the Platinum Triangle. Development within this area is guided by the Platinum Triangle Master Land Use Plan and regulated by the Platinum Triangle Mixed Use Overlay Zone, which have detailed guidelines and standard intended to provide a high quality, well maintained housing stock.</p>
<p>Guiding Principle B: The availability of a range of housing choices for a variety of incomes in Anaheim contributes to a balanced community and community investment.</p>	<p>The proposed project provides the opportunity to increase the permitted amount of multi-family residential development within the City and provide housing for a variety of incomes.</p> <p>In 2007, the distribution of housing type amongst the 101,510 housing units within the City was 43% single family detached, 8.9% single-family attached, 43.7% multi-family, and 4.3% mobile homes. Build out of the proposed project would increase the percentage of multi-family units to 52.5% of the housing stock.</p> <p>Developers within Platinum Triangle have the same opportunity to seek and utilize Anaheim's numerous incentive programs for developing affordable housing as they do throughout the rest of the City; and, therefore the proposed project does not limit the ability to provide housing for a variety of income levels.</p>
<p>Guiding Principle C: Persons with special housing needs should have access to a variety of housing choices that are integrated within the community.</p>	<p>The proposed project will increase the supply of housing within the City and as a result increase the housing choices for persons with special needs.</p>
<p>Guiding Principle D: Sustainable design and the efficient utilization of resources create more livable neighborhoods and can have both environmental and financial benefits.</p>	<p>The proposed project encourages sustainable design and the efficient utilization of resources. For example, the proposed project will require development to exceed Title 24 energy standards by a minimum of 10%.</p> <p>Continued implementation of the Platinum Triangle Master Land Use Plan will create more livable neighborhoods that will have both environmental and financial benefits.</p>
<p>Guiding Principle E: Community education and outreach is of fundamental importance to establishing a well-informed, educated community that can participate directly in the provision, conservation and preservation of housing in Anaheim.</p>	<p>The Notice of Preparation for the Revised Platinum Triangle Expansion Project was posted on December 11, 2008, advertised in the Orange County Register and mailed to agencies and other interested parties. A public scoping meeting was held on January 9, 2009. Comments received during the public review period are summarized in Table 2-1 of DSEIR No. 339 and contained in Appendix B of the DSEIR.</p> <p>A Notice of Availability for the Draft EIR was released on August 13, 2010 and the document was made available at City Hall, Sunlight Branch Library, and Anaheim Central Library and on the internet for a 45-day public review period, which ended on September 27, 2010. During the public review period, the City received comments from sixteen agencies and interested parties. These comments and associated responses are documented in the Final EIR, which will be released to the public at least ten days prior to the City Council's review of the EIR.</p>



4. Statement of Overriding Considerations

	Public Hearings for the proposed project were held before the Planning Commission on October 11, 2010 and will be held before the City Council on October 26, 2010.
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Locate Jobs and Housing Growth near Activity Centers and Transportation Corridors

The project concentrates employment and housing growth in an area near transportation corridors. The project site is close to major employment centers in the City of Anaheim and the Orange County Council of Governments (OCCOG) region, and it provides new housing opportunities adjacent to Interstate 5 (I-5) and State Route 57 (SR-57). The proposed project is served by major transportation corridors, including I-5, SR-57, and the future Anaheim Regional Transportation Intermodal Center (ARTIC). The proposed project does not include any designated housing units for very low or lower income population. However, development of ARTIC within the walking distance of employment opportunities within the Platinum Triangle would allow workers who could not afford to live within the Platinum Triangle to commute to work while avoiding the negative environmental effects associated with long commutes and traffic congestion.

Table 5.6-7 of the DSEIR shows the growth forecast for the City and for the County without the Proposed Project. By build-out year 2035, the City is projected to grow by approximately 27 percent in housing, 31 percent in population, and 11 percent in employment. With strong growth in the number of households, the forecast shows the City becoming increasingly balanced with time from 2.02 jobs/housing ratio in 2003 to 1.77 by 2035. Unlike the City, the County is anticipated to become more jobs-rich as a whole, changing from 1.57 jobs/housing ratio in 2003 to 1.72 by 2035.

Table 5.6-8 of the DSEIR compares the existing build-out statistics to the adjusted build-out statistics for the City with the build-out of the Proposed Project. The most significant change is the increase in employment by 13 percent from 224,136 jobs without the project to 250,998 jobs with project condition. Creating more jobs than housing would result in an increased jobs/housing ratio: 1.76 without the project to 1.85 with the project in 2035. With or without the project, the City of Anaheim is anticipated to have a higher jobs/housing ratio compared to the County (1.71) and the southern California (1.33) area. However, the projected jobs/housing ratio for the City with the Proposed Project shows a decrease from the 2.02 ratio in 2003.

It is anticipated that ARTIC District would provide easy access to public transportation for in-commuting workers from other communities, thereby alleviating traffic congestion problems typically associated with a high jobs/housing ratio. Even in a balanced community, the benefits of reduced travel would not occur without adequate alternative transportation systems to complement private vehicles. The proposed project provides carefully maintained pedestrian streets, transit connections, and arterial access that are conducive to walking, biking, and transit alternatives, thereby minimizing distances and time traveled for residents and workers of the Platinum Triangle. In addition, the travel demand would be further reduced through providing retail, service, and entertainment uses in close proximity to residential units. Although the proposed project would increase the jobs/housing ratio, project attributes such as the proximity to ARTIC, carefully designed street connections, and its mixed-use nature would allow the proposed project to provide more jobs without the negative effects of increased congestion.

The Platinum Triangle, which is located within the 92805 and 92806 zip codes, and the Anaheim Resort are home to some of the City's major employment centers. Therefore, a majority of the City's affordable housing units, which are primarily located within the 92805 zip code, are in close proximity to these employment centers. As shown, on the exhibit entitled "Affordable Housing Projects" located in Appendix A of the FSEIR Response to Comments, the City's affordable units are concentrated near

4. Statement of Overriding Considerations

OCTA bus stops and routes, near major transportation facilities including the I-5 freeway, and near major employment centers including the Platinum Triangle and the Anaheim Resort. A substantial number of the City's affordable housing projects are located in the City's downtown area which is only 2.5 miles from the Platinum Triangle and less than one mile from the Anaheim Resort. According to SCAG, the average commute length in southern California is 19.2 miles.⁵ As a result, by siting a large portion of the City's affordable housing projects in close proximity to transit and employment centers, the number of commute trips and commute trip lengths can be significantly reduced thereby reducing associated traffic, air quality, greenhouse gas emissions, and noise impacts. In addition, there is no prohibition on the development of Affordable Housing within the Platinum Triangle. Thus, the proposed project is entirely consistent with the Statewide prerogatives (such as SB 375) with respect to the reduction of vehicle miles traveled and vehicle trip lengths.

Match Housing to Job Opportunities

A community with a highly educated technical job base requires a greater proportion of moderate and upper income housing to encourage residents to work locally and reduce the environmental impacts associated with long commutes. The proposed project provides opportunities for technical job centers and matching high quality attached housing and multifamily housing, housing types that are responsive to the types of workers that would be employed in the Platinum Triangle and other major employment centers in the City of Anaheim, such as The Anaheim Resort, and also other retail, office, commercial, and industrial businesses throughout Orange County.

The Platinum Triangle is located in the southern portions of the 92805 and 92806 zip codes. The average income in the 92805 zip code is \$60,386⁶. The average income in the 92806 zip code is \$62,322. These salaries fall in the Moderate Income range for one and two person households. To date, in excess of 8,300 housing units have been approved within The Platinum Triangle. A significant portion of these units are anticipated to meet the affordability requirements for moderate income families.



In addition, although the City's proposed sites to meet its RHNA target for lower income households did not include any of the properties within the Platinum Triangle, this does not preclude this type of housing from being developed within the Platinum Triangle. Developers within Platinum Triangle have the same opportunity to seek and utilize Anaheim's numerous incentive programs for developing affordable housing as they do throughout the rest of the City.

As shown, on the exhibit entitled "Affordable Housing Projects" located in Appendix A of the FSEIR Response to Comments, nearly all of the City's affordable housing projects are located within five miles of the City's major employment centers including the Platinum Triangle and the Anaheim Resort. A substantial number of the City's affordable housing projects are located in the City's downtown area which is only 2.5 miles from the Platinum Triangle and less than one mile from the Anaheim Resort. Thus, workers at the stated income levels have housing opportunities well within the area adjacent to the project site.

Implements the Objectives Established for the Project

The following objectives have been established for the Platinum Triangle project. The implementation of these project objectives is a legal prerogative of the City.

⁵ Southern California Association of Governments, State of the Commute Report, December 2008.

⁶ EMSI Complete Employment - 3rd Quarter 2010.

4. Statement of Overriding Considerations

- Provide for a wide range of housing opportunities in close proximity to jobs and a regional transportation center.
- Provide a mix of quality, high-density urban housing that is integrated into the area through carefully maintained pedestrian streets, transit connections, and arterial access.
- Create a development plan that encourages residents of Anaheim to work and shop in close proximity to their homes, minimizing use of their automobiles.
- Encourage extensive office development along the highly visible periphery of the area to provide a quality employment center.
- Foster mixed-use development that serves to reduce vehicle miles traveled by promoting alternatives to driving, such as walking, biking, and use of mass transit.
- Provide on-site open space and recreation amenities that further enhance the mixed-use environment of the area for both residents and employees working in the Platinum Triangle.
- Encourage high density mixed use development that is synergistic with the entertainment and employment uses already established in the Platinum Triangle.
- Maximize opportunities to increase tax increment received from the Redevelopment Project Area.
- Allow for the continued development of the Platinum Triangle and accommodate future market demand through amendments to the General Plan and Platinum Triangle Master Land Use Plan.

Provides Employment Opportunities for Highly Skilled Workers

The implementation of the Project will provide employment opportunities for a highly skilled workforce. Not only will the Project increase the opportunities for professional, medical and other job opportunities, but the Project will also provide opportunities for the trades and construction industries.

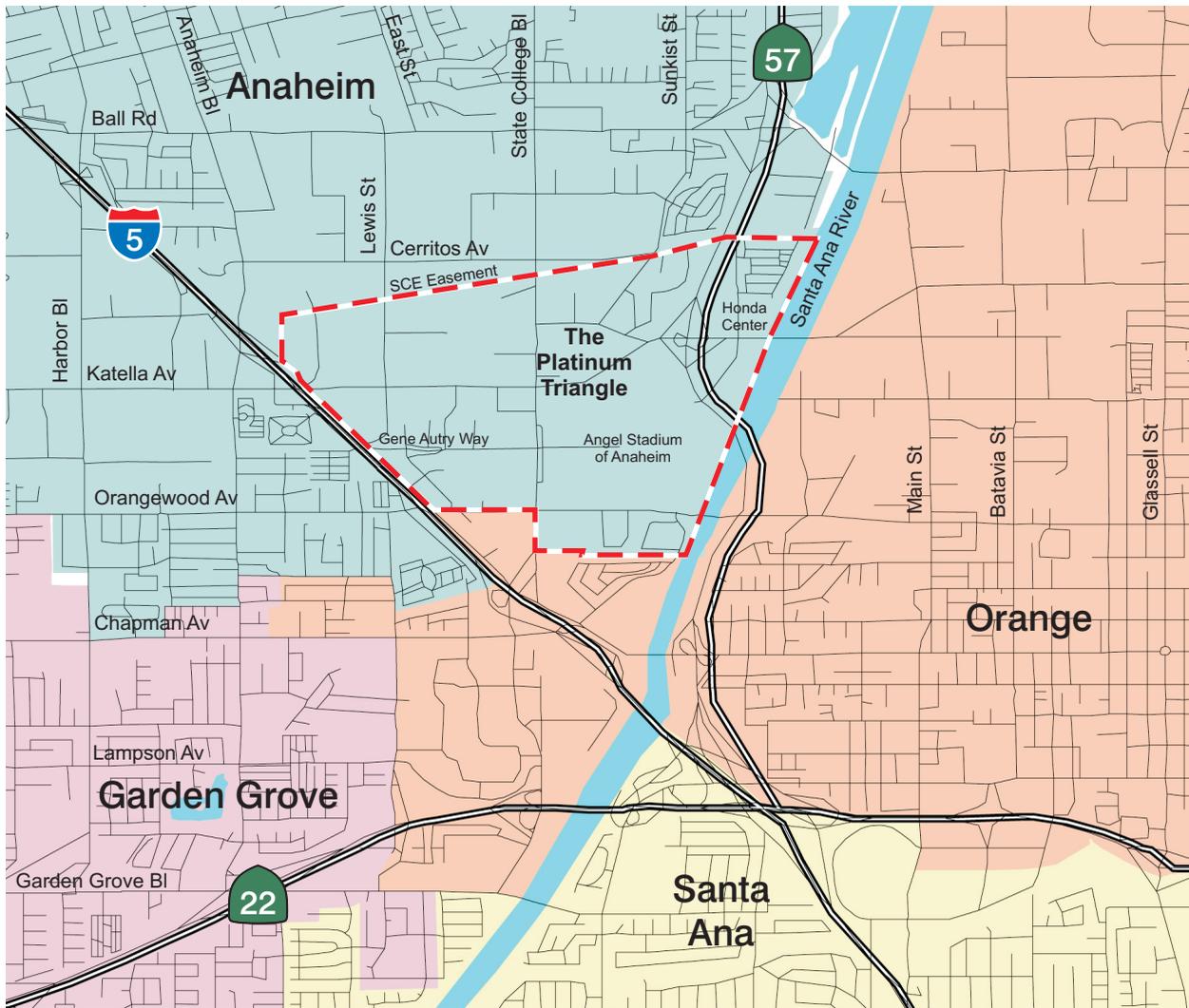
As of July 2010, unemployment in the City stood at approximately 12.5 percent and unemployment in Orange County stood at 9.8 percent (Employment Development Department, 2010). California and the United States have faced the most severe recession since the great depression. The construction sector was particularly affected. For example, construction work in Orange County saw a 12.6 percent decrease in revenue during the past year, totaling approximately \$6.4 billion (Orange County Business Journal, 2010). Construction of ARTIC alone will provide needed construction jobs. ARTIC is expected to create approximately 5,000 estimated jobs based upon project costs of \$184 million. It is anticipated that build out of the Project will provide 26,860 jobs over the course of 20 years. It is a social and legal prerogative of the City to provide employment opportunities for highly skilled workers.

Conclusion

For the foregoing reasons, the implementation of Amendment to the Platinum Triangle Master Land Use Plan (MLUP) project and the associated project actions will contribute toward a beneficial mix of residential, commercial, industrial, institutional, recreation, and open space uses in the Platinum Triangle, providing significant housing, recreational, and public services benefits of local and regional significance, as well as various public infrastructure improvements, all of which outweigh the unavoidable environmental impacts.

3. Project Description

Local Vicinity Map



— — — The Platinum Triangle

