

*ADDENDUM  
TO THE  
PROGRAM ENVIRONMENTAL IMPACT REPORT  
FOR THE  
CITY OF YORBA LINDA 2021-2029 HOUSING ELEMENT IMPLEMENTATION  
PROGRAMS  
(State Clearinghouse # 2022040574)*

# Yorba Linda Housing Element Update



**Prepared For:**

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## List of Acronyms

<b><u>Acronym</u></b>	<b><u>Definition</u></b>
AB	Assembly Bill
ACOE	Army Corps of Engineers
AHO	Affordable Housing Overlay
AQMP	Air Quality Management Plan
BMP	Best Management Practice
CadnaA	Computer Aided Noise Abatement
CalTrans	California Department of Transportation
CAAQS	California Ambient Air Quality Standards
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CLO	Congregational Land Overlay
CO	Carbon Monoxide
dBA $L_{eq}$	decibel A-weighted equivalent sound level
DSOD	Department of Water Resources Division of Safety of Dams
DTSC	Department of Toxic Substances Control
Du/ac	dwelling unit per acre
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FPP	Fire Protection Plan
GHG	Greenhouse Gas(es)
HCD	State Department of Housing and Community Development
HRA	Health Risk Assessment
Lbs/DU	pounds per dwelling unit
LSTs	localized significance thresholds
LUST	leaking underground storage tank
Lw	Reference Sound Power Levels
MBTA	Migratory Bird Treaty Act
MERV	maximum efficiency rating value
Mgd	million gallons per day
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MRZ	Mineral Resource Zone
MTCO <sub>2e</sub> /SP	Metric Tons of Carbon Dioxide Equivalent per service population
MUP	Mixed-Use Overlay
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission

## List of Acronyms

<b><u>Acronym</u></b>	<b><u>Definition</u></b>
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
OCFA	Orange County Fire Authority
OCSD	Orange County Sheriff's Department
OCSD	Orange County Sanitation District
PD	Planned Development
PEIR	Program Environmental Impact Report
PM	Evening
PM	Particulate Matter
PM <sub>2.5</sub>	Particulate Matter (2.5 microns in diameter)
PM <sub>10</sub>	Particulate Matter (10 microns in diameter)
Ppd	pounds per day
Ppm	parts per million
PPV	Peak Particle Velocity
RNHA	Regional Housing Needs Allocation
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SARQWCB	Santa Ana Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCH	State Clearinghouse
SFHA	Special Flood Hazard Area
SO <sub>x</sub>	sulfur oxides
SoCalGas	Southern California Gas Company
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
µg/m <sup>3</sup>	microgram per cubic meter
TACs	Toxic Air Contaminants
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
WQMP	Water Quality Management Plan
YLPL	Yorba Linda Public Library
YLWD	Yorba Linda Water District

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## **1.0 INTRODUCTION**

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## **1.0 INTRODUCTION**

### **1.1 Project Overview**

The City of Yorba Linda (hereinafter “City”) adopted the 2021–2029 Housing Element (Housing Element; Original Project) on February 9, 2022. On August 2, 2022, the Yorba Linda City Council approved the Original Project and certified the Program Environmental Impact Report for the City of Yorba Linda 2021-2029 Housing Element Implementation Programs (herein after as “2022 Certified PEIR”; SCH: 2022040574). The Original Project was subjected to the requirements of Measure B<sup>1</sup> and the City took a ballot measure (Measure Z) to the community on the November 8, 2022, general election ballot. However, Measure Z did not pass, with 75% of voters in opposition. Therefore, the City revised the Housing Element to reflect residents’ concerns and recommendations. The updated Housing Element (Revised Project) would continue to require a General Plan Amendment and Amendments to the Zoning Code and Zoning Map to implement the Revised Project. The General Plan Amendment would revise the Land Use Element to update the text and maps consistent with the proposed zoning. Amendments to the Zoning Code include modification to the text and maps to rezone 18 housing opportunity sites, including applicable planned development zones, and adoption of housing overlay zones (Affordable Housing Overlay, a Congregational Land Overlay, and a Mixed-Use Housing Overlay) consistent with the Housing Element. Under the Original Project, the proposed 27 housing opportunity sites resulted in a total net potential of 2,410 dwelling units. Under the Revised Project, the proposed 18 housing opportunity sites would result in a total net potential of 1,929 dwelling units, a decrease of 481 units from the 2022 Certified PEIR.

### **1.2 California Environmental Quality Act**

The California Environmental Quality Act (CEQA), a statewide environmental law contained in Public Resources Code Sections 21000-21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. CEQA requires that public agencies inform their decision-makers of the environmental consequences of their discretionary actions and to consider alternatives and mitigation measures (MMs) that could avoid or reduce the discretionary actions’ significant, adverse environmental effects. CEQA also gives other public agencies and the public an opportunity to participate in the environmental review process.

#### **1.2.1 *Prior CEQA Compliance***

Potential environmental impacts associated with buildout of the Housing Element were evaluated by the 2022 Certified PEIR. The 2022 Certified PEIR was prepared as a PEIR pursuant to CEQA Guidelines Section 15168. As defined by CEQA Guidelines Section 15168, a PEIR is “...an EIR which may be prepared on a series of actions that can be characterized as one large project and are related...”.

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<sup>1</sup> Measure B, or the Right-To-Vote Amendment (RTVA), is a citizen-sponsored, voter-approved initiative, incorporated within the City’s Municipal Code. It requires citywide elections for the approval of certain “Major Amendments” to the City’s Planning Policy Documents, including the Housing Element.

In certifying the 2022 Certified PEIR, the City Council found that the 2022 Certified PEIR adequately addressed the potential environmental impacts associated with planned buildout of the Housing Element. The 2022 Certified PEIR identified the following three (3) significant and unavoidable environmental impacts that would result from implementation of the Housing Element:

- Air Quality: The 2022 Certified PEIR found that the Original Project would result in an inconsistency with the South Coast Air Quality Management District's (SCAQMD's) Air Quality Management Plan. Additionally, the 2022 Certified PEIR found that the Original Project would result in potentially significant direct and cumulatively-considerable impacts with regards to long-term operational volatile organic compounds (VOC) and nitrous oxide (NO<sub>x</sub>) emissions, and construction-related emissions of carbon monoxide (CO), VOCs, NO<sub>x</sub>, sulfur oxides (SO<sub>x</sub>), Particulate Matter (10 microns in diameter) (PM<sub>10</sub>), and Particulate Matter (2.5 microns in diameter) (PM<sub>2.5</sub>). Further, the 2022 Certified PEIR found that the Original Project would result in potentially significant impacts to sensitive receptors during construction and operation. The Original Project would implement Mitigation Measures MM 4.1-1 and 4.1-2; however, no feasible mitigation measures exist to reduce these impacts to less than significant.
- Greenhouse Gas Emissions: The 2022 Certified PEIR determined that the Original Project would result in greenhouse gas emissions that exceed the established significance threshold (the SCAQMD screening threshold using a project-level efficiency target). Therefore, GHG emissions were determined to be potentially significant, and the Original Project would conflict with the California Air Resources Board (CARB) 2017 Scoping Plan. The Original Project would implement Mitigation Measures MM 4.1-1 and 4.1-2; however, these measures would not reduce the impact to less than significant.
- Noise: The 2022 Certified PEIR determined that the Original Project could result in an exceedance of construction-related noise thresholds. The Original Project would implement Mitigation Measures MM 4.6-1 through MM 4.6-3 which would contribute in minimizing construction-related noise. However, due to the unknown number of construction activities that could occur at one time, proximity of construction activities to sensitive receptors, and other factors that cannot be quantified at the time, such as the longevity of activities, construction related noise impacts may not be reduced to less than significant levels for some future development. Therefore, Original Project and cumulative impacts would remain significant and unavoidable.

In conjunction with certifying the 2022 Certified PEIR, the City Council adopted a Statement of Overriding Considerations for the Original Project, which stated that the benefits of the Housing Element outweighed the significant and unavoidable environmental impacts summarized above.

### **1.2.2 CEQA Rules and Requirements for an Addendum**

The CEQA Guidelines allow for the preparation of an Addendum to a previously approved/certified CEQA document when a subsequent project is within the scope of the analysis of the earlier approved CEQA document and when some changes or additions to the original CEQA document are necessary but none of the following conditions are met:

- a. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of environmental effects or a substantial increase in the severity of previously identified significant effects;
- b. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- c. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
  1. The project will have one or more significant effects not discussed in the previous EIR;
  2. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  3. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the MM or alternatives; or
  4. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the MM or alternative (*See CEQA Guidelines Section 15162*).

If none of the circumstances listed above occur and only minor technical changes or additions are necessary to update the previously approved/certified CEQA document, an Addendum may be prepared (*See CEQA Guidelines Section 15164*).

### **1.2.3 Finding for the Revised Project**

The City, serving as the CEQA Lead Agency for the Revised Project (*See CEQA Guidelines Sections 15050–15051*), determined in its independent judgment that the Revised Project does not meet any of the circumstances from CEQA Guidelines Section 15162 and that an Addendum to the 2022 Certified PEIR is the appropriate CEQA compliance document for the Revised Project. The City’s finding is based on the following facts:

- a. As demonstrated in Section 4.0 of this document, the Revised Project would not require major revisions to the previously-certified 2022 Certified PEIR because implementation of the Revised Project would neither result in any significant impacts to the physical environment that were not already disclosed in the 2022 Certified PEIR nor result in substantial increases in the severity of the environmental impacts previously disclosed in the 2022 Certified PEIR.
- b. Subsequent to the certification of the 2022 Certified PEIR, no substantial changes in the circumstances under which the Revised Project would be undertaken have occurred that would

require major revisions to the 2022 Certified PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

- c. There is no evidence in the public record that new information of substantial importance has become available that is applicable to the Revised Project and/or the City (Project site), was not known and could not have been known with the exercise of reasonable diligence at the time the 2022 Certified PEIR was certified and would alter the conclusions of the 2022 Certified PEIR.

### **1.3 Format and Content of this PEIR Addendum**

The following components comprise the PEIR Addendum in its totality:

- a. This *Introduction* (Section 1.0), the *Environmental Setting* (Section 2.0), and the *Project Description* (Section 3.0).
- b. The environmental impact analysis (Section 4.0), which concludes that implementation of the Revised Project would neither result in any new, significant environmental impacts that were not previously disclosed in the 2022 Certified PEIR nor substantially increase the severity of the significant environmental impacts beyond the levels disclosed in the 2022 Certified PEIR.
- c. Three (3) technical reports and other documentation that evaluate the Revised Project, which are attached as PEIR Addendum *Technical Appendices A-B*.

*Appendix B Noise Impact Analysis*

*Appendix C1 Traffic Impact Analysis*

*Appendix C2 Vehicle Miles Traveled Analysis*

- d. The Draft and Final 2022 Certified PEIR, accompanying Mitigation Monitoring and Reporting Program (MMRP), Technical Appendices to the 2022 Certified PEIR, Findings and Statement of Facts, Statement of Overriding Considerations, as well as all associated staff reports, memoranda, public comments and other materials relating to the originally approved project and 2022 Certified PEIR, which are all herein incorporated by reference pursuant to CEQA Guidelines Section 15150 and are available for review at City of Yorba Linda Planning Division; 4845 Casa Loma Avenue, Yorba Linda, CA 92886.

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## **2.0 ENVIRONMENTAL SETTING**

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## **2.0 ENVIRONMENTAL SETTING**

### **2.1 Project Location**

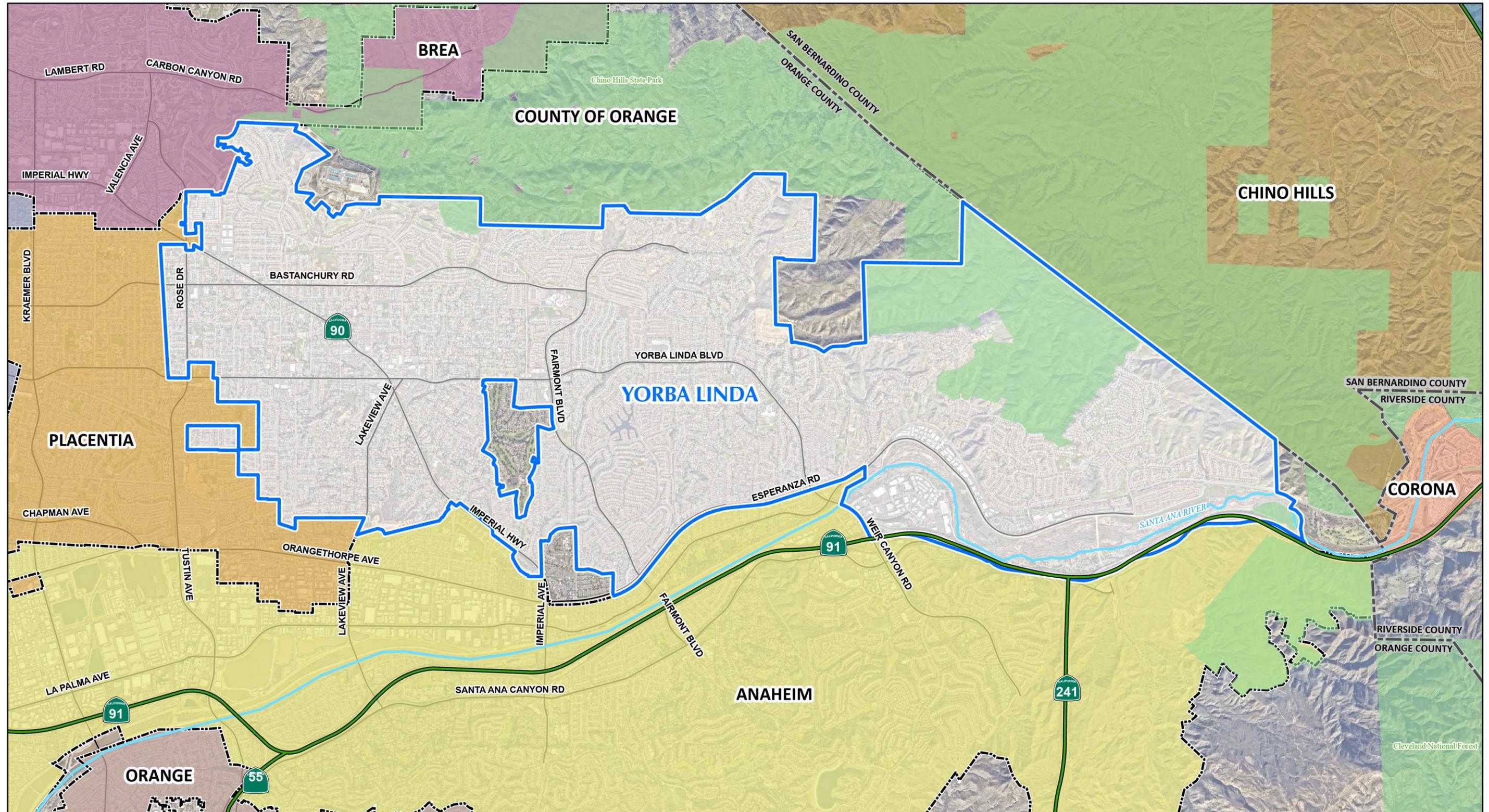
The Project site encompasses the entire City of Yorba Linda, which is located in the northeast portion of Orange County, California. The City is located approximately 38 miles southeast of the City of Los Angeles and 12 miles north of the City of Santa Ana. It is bounded by the cities of Corona to the east, Brea to the north, Placentia to the west and southwest, and Anaheim to the south. Chino Hills State Park is located to the north. Regional access to the City is provided primarily via State Routes 90 (SR-90), which runs north-south through the center of the City, and 91 (SR-91), which runs east-west along the southern boundary of the City. Local access is provided by various arterial highways that intersect the City, including Yorba Linda Boulevard and Bastanchury Road. See Figure 2-1, *Regional and Vicinity Map*, and Figure 2-2, *Aerial Photograph*.

### **2.2 Existing Land Use**

Incorporated in 1967, the City of Yorba Linda is predominately a suburban, low-density community. The City primarily consists of residential and open space uses. Residential uses comprise over 46 percent of the total acreage in the City, and open space and recreation uses comprise over 27 percent of the total acreage in the City. Open space is predominately located along the northern boundary of the City. Less than six percent of the land in the City is in public/institutional, commercial, office and industrial uses. Commercial corridors are focused along Imperial Highway, Yorba Linda Boulevard, and Savi Ranch. The majority of industrial uses are located in the Savi Ranch area in the southeastern portion of the City. Additionally, approximately 2,586 acres of vacant land is interspersed throughout the City (City of Yorba Linda, 2016b).

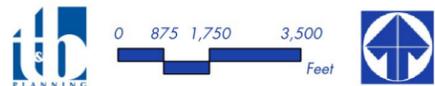
### **2.3 Geological Setting**

The City is located within the central, northernmost portion of the Santa Ana Mountains, which are part of the Peninsular Ranges Geomorphic Province. It is in Santa Ana Canyon on a low rolling plain formed by streams that drain the Puente Hills. The Puente Hills extend beyond the City to the north and east while the Santa Ana River forms a natural southern boundary. Yorba Linda can be divided into three terrain provinces: the eroded plain, the Santa Ana River floodplain, and the Puente Hills. The eroded plain area covers the majority of the City, extending from the edge of the Puente Hills to the Santa Ana River, and is characterized by low rounded ridges and knolls, separated by generally northeast-and southeast trending gullies and ravines. The Santa Ana floodplain is the relatively flat area between the Santa Ana Mountains and the floodplain to the north and is covered by relatively recent deposits of course-grained sand and gravel. The Puente Hills area is characterized by semi-to-well-rounded hills with rather deeply gashed drainage channels. The Puente Hills are mostly underlain by Cenozoic sedimentary bedrock formations consisting of sandstone, silt-stone, and shale. The eastern Puente Hills are made up of marine sedimentary rock units overlain in some areas by terrestrial sediments. Reviews of geologic maps indicate that sediments from the Late Miocene Yorba and Sycamore Canyon Members of the Puente Formation, Quaternary landslides, and older and younger Quaternary Alluvium underlie the eastern Puente Hills. (City of Yorba Linda, 2016b)

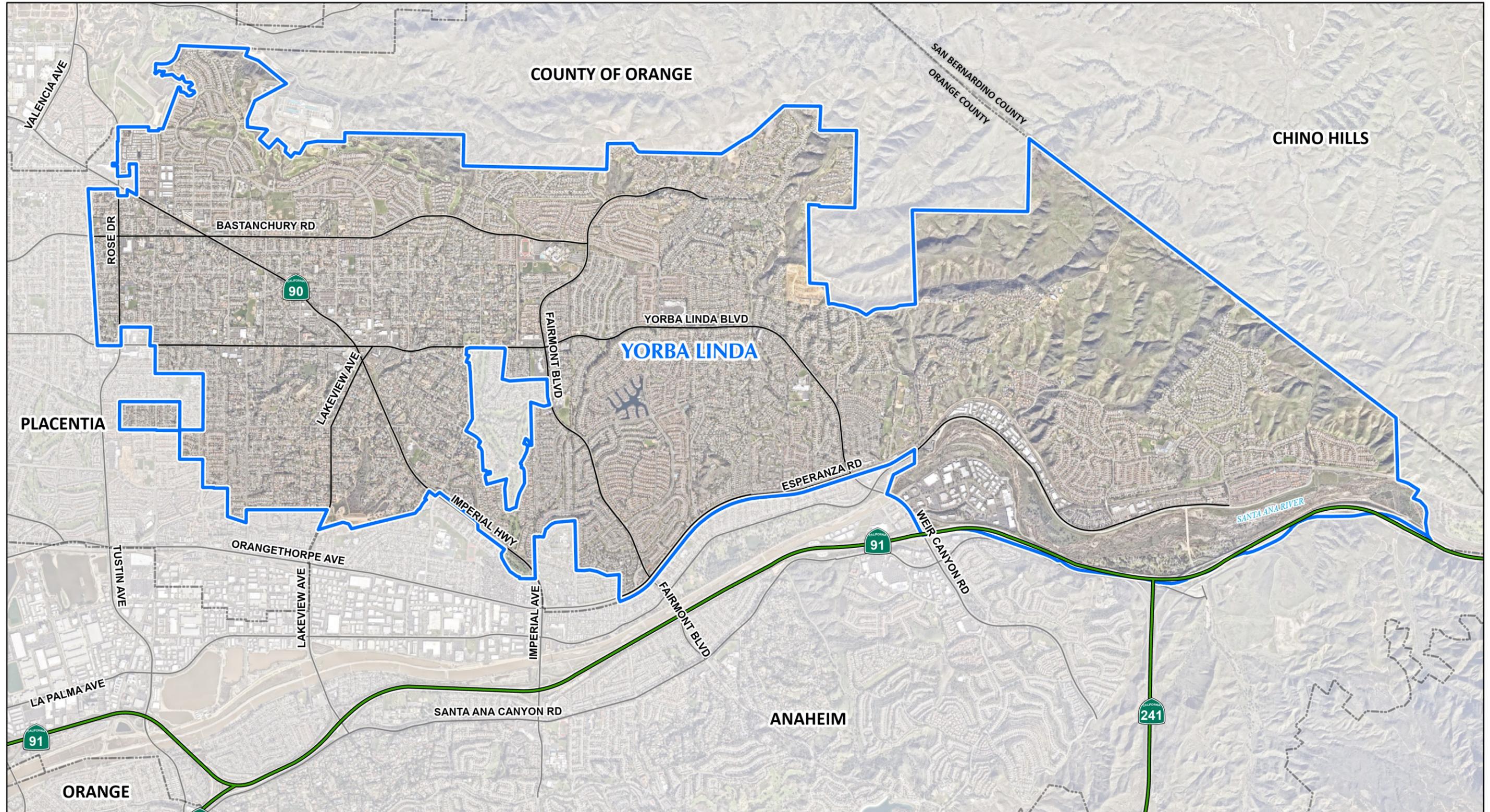


Source(s): ESRI, NearMap (February 2024), OC Landbase (2023), SB County (2023), City of Yorba Linda (02-2024)

Figure 2-1

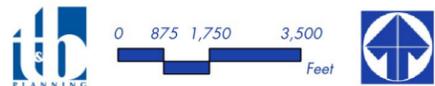


**Regional and Vicinity Map**



Source(s): ESRI, NearMap (February 2024), OC Landbase (2023), SB County (2023), City of Yorba Linda (02-2024)

Figure 2-2



Aerial Photograph

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## **3.0 PROJECT DESCRIPTION**

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### **3.0 PROJECT DESCRIPTION**

#### **3.1 Project Background**

State law recognizes the vital role local governments play in the availability, adequacy and affordability of housing. Every jurisdiction in California is required to adopt a long-range General Plan to guide its physical development; the Housing Element is one of the seven mandated elements of the General Plan. Housing Element law mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain housing production. Housing element statutes also require the State Department of Housing and Community Development (HCD) to review local housing elements for compliance with State law and to report their findings to the local government.

The City adopted the 2021–2029 Housing Element (Housing Element; Original Project) on February 9, 2022. On April 8, 2022, HCD approved the City’s Housing Element and found it to be in full compliance with State Housing Element Law (Government Code Article 10.6). In compliance with state law, the proposed ordinances required two readings by the City Council. On August 2, 2022, the City Council approved the Housing Element and certified the Final Program Environmental Impact Report for the City of Yorba Linda 2021-2029 Housing Element Implementation Programs [2022 Certified PEIR; State Clearinghouse (SCH) Number (No.): 2022040574], which included General Plan Amendment 2022-01, General Plan Amendment 2022-02, Zoning Code Amendment 2022-01, and Zoning Code Amendment 2022-02 to Implement Programs 8 – 11 from the Housing Element. The approval included the elimination of the four sites previously recommended for removal from the Housing Element rezone sites inventory by the Planning Commission (i.e., Sites S4-060 and S4-201, Site S4-053 and Site S7-005), deferred action on Sites S7-001, S3-207 and S5-008, and approved the rezoning of the remaining nineteen sites within the sites inventory (excluding Site S3-082, which had earlier failed to pass). In summary, the future housing development facilitated by the Original Project included a total net potential of 2,410 dwelling units on 27 housing opportunity sites.

In accordance with Measure B’s requirements, the City took a ballot measure (Measure Z) to the community on the November 8, 2022, general election ballot. Measure Z would have approved a change in City zoning to fulfill the commitment of the Housing Element; however, Measure Z did not pass, with 75% of voters in opposition. Therefore, the City has revised the previously approved Housing Element to reflect residents’ concerns and recommendations. In November 2024, City voters will decide any major zoning changes in accordance with the City’s Right-to-Vote Amendment (Measure B).

#### **3.2 Proposed Changes to the 2022 Certified PEIR**

The updated Housing Element (Revised Project) would continue to require a General Plan Amendment and Amendments to the Zoning Code and Zoning Map to implement the Revised Project. The General Plan Amendment would revise the Land Use Element to update the text and maps consistent with the proposed

zoning. Amendments to the Zoning Code include modification to the text and maps to rezone 18 housing opportunity sites, including applicable planned development zones, and adoption of housing overlay zones (Affordable Housing Overlay, a Congregational Land Overlay, and a Mixed-Use Housing Overlay) consistent with the Housing Element.

### **3.2.1 Housing Opportunity Sites**

The 2022 Certified PEIR stated that future housing development facilitated by the Project would result in a total net potential of 2,410 dwelling units on 27 housing sites. The total net potential represents maximum total capacity of rezone sites, as opposed to 2,100 units of realistic development capacity. The Revised Project proposes that future housing development facilitated by the Project would result in a total net potential of 1,929 dwelling units on 18 housing sites, a decrease of 481 units and 9 housing sites from the 2022 Certified PEIR. Additionally, the Revised Project proposes 1,747 units of realistic development capacity, a decrease of 353 units from the 2022 Certified PEIR. Table 3-1, *Changes to the Yorba Linda Housing Element Housing Opportunity Sites*, shows a comparison of the 2022 Certified PEIR housing opportunity sites and the changes to these sites as proposed by the Revised Project. Figure 3-1, *Housing Opportunity Sites under the 2022 Certified PEIR*, depicts the locations of each housing opportunity site within the City under the 2022 Certified PEIR. Figure 3-2, *Housing Opportunity Sites under the Revised Project*, depicts the locations of each housing opportunity site within the City under the Revised Project. The proposed changes to the housing opportunity sites are described below.

#### ***Affordable Housing Overlay (AHO)***

The 2022 Certified PEIR showed that the City identified a total of 7 sites under the Affordable Housing Overlay (AHO): six sites for rezoning to RM-20, and one to maintain its Planned Development zoning, and designation with an AHO. As part of the Revised Project, housing opportunity site S3-074 (Yorba Linda Preschool at 18132 Yorba Linda Boulevard) is proposed to be removed from the AHO category. Additionally, sites S6-015 (Prior John Force Racing at 22722 Old Canal Road) and S6-020 (Extended Stay America at 22711 Oak Crest Circle) are proposed to be moved from the AHO category to the RM-60 category. Site S3-207 (5300-5392 Richfield Road) is proposed to be moved to the RM category. No changes are proposed to sites S1-200 (SEC Rose Dr/Blake Rd); S3-082 (4791 and 4811 Eureka Avenue); and S4-075 (4742 Plumosa Drive).

#### ***RM-60 – between 20 to 60 units/acre***

One of the key modifications proposed under the Revised Project is to increase the allocation of residential units in the Savi Ranch Planned Development (PD-17) from 200 to 800 units to create a new residential and mixed-use Downtown-like space for Yorba Linda, consistent with the City's 2015 Vision Plan for the area. In order to achieve this goal, the City will amend the Savi Ranch PD to incorporate RM-60 development standards within the PD's Retail Commercial Subarea, providing increased densities up to 60 units/acre, 5 story residential building heights, and reduced parking. The City will work with its urban design consultant to establish RM-60 development standards designed to facilitate achieving maximum densities.

**Table 3-1 Changes to the Yorba Linda Housing Element Housing Opportunity Sites**

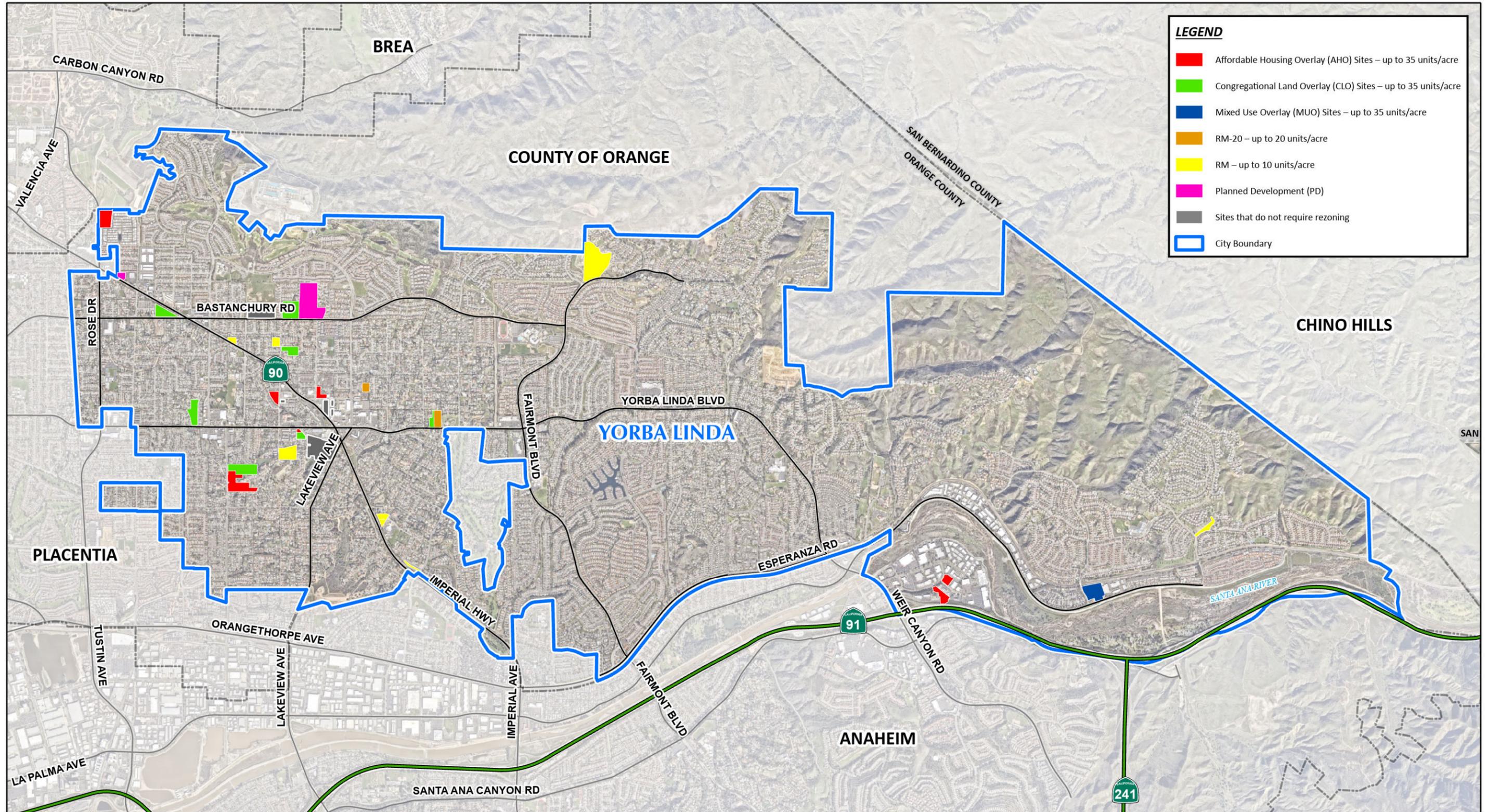
Site ID	Site Description and Address	Acres (Developable acres)	Existing		From 2022 Certified PEIR				Addendum to the 2022 Certified PEIR (Revised Project)				Proposed Change
			Current Zoning <sup>1</sup>	Current General Plan <sup>2</sup>	2022 PEIR Proposed Zoning Action	2022 PEIR Proposed General Plan	Total Net Unit Potential	Realistic Unit Potential	Proposed Zoning Action	Proposed General Plan	Total Net Unit Potential	Realistic Unit Potential	
<b>Affordable Housing Overlay (AHO) Sites – up to 35 units/acre</b>													
S1-200	SEC Rose Dr/Blake Rd	5.94	RE (1.8 du/ac) <sup>3</sup>	RML	RM-20 with AHO	RH	208	178	RM-20 with AHO	-	208	178	No change
S3-207	5300-5392 Richfield Rd	9.7	RU (4.0 du/ac)	RM	RM-20 with AHO	RH	340	291	-	-	-	-	Move site to RM category
S3-074	Yorba Linda Preschool 18132 Yorba Linda Blvd	0.42	CG	AP	RM-20 with AHO	AP	15	13	-	-	-	-	Remove site
S3-082	4791 and 4811 Eureka Ave	1.75	CG	AP	RM-20 with AHO	AP	61	53	RM-20 with AHO	-	61	53	No change
S4-075	4742 Plumosa Drive	1.62	CG	AP	RM-20 with AHO	AP	57	48	RM-20 with AHO	-	57	48	No change
S6-015	John Force Racing 22722 Old Canal Road	2.56	PD/Industrial R&D	IM	PD with AHO	IM	89	77	-	-	-	-	Move site to RM-60 category
S6-020	Extended Stay America 22711 Oak Crest Circle	10.35	PD/Office-Commercial	IM	RM-20 with AHO	IM	143	122	-	-	-	-	Move site to RM-60 category
<b>Total Realistic Unit Potential on AHO Sites:</b>							-	<b>782</b>	<b>Amended Total Realistic Unit Potential on AHO Sites:</b>	-	-	<b>279</b>	<b>Decrease of 503 units</b>
<b>Total Net Unit Potential on AHO Sites:</b>							<b>913</b>	-	<b>Amended Total Net Unit Potential on AHO Sites:</b>	-	<b>326</b>	-	<b>Decrease of 587 units</b>
<b>RM-60 – between 20 to 60 units/acre</b>													
S6-015	John Force Racing 22722 Old Canal Road	2.56	PD/Industrial R & D	IM	PD with AHO	IM	-	-	PD RM-60 standards	-	154	131	Move site from AHO category
S6-020	Extended Stay America 22711 Oak Crest Circle	10.35	PD/Office-Commercial	IM	RM-20 with AHO	IM	-	-	PD RM-60 standards	-	242	206	Move site from AHO category
S6-025	Bac Tran Savi Ranch Site	23 (8 net)	PD	-	-	-	-	-	PD RM-60 standards	IM	480	453	New site
<b>Total Realistic Unit Potential on RM-60 Sites:</b>							-	<b>N/A</b>	<b>Amended Total Realistic Unit Potential on RM-60 Sites:</b>	-	-	<b>790</b>	<b>Increase of 790 units</b>
<b>Total Net Unit Potential on RM-60 Sites:</b>							<b>N/A</b>	-	<b>Amended Total Net Unit Potential on RM-60 Sites:</b>	-	<b>876</b>	-	<b>Increase of 876 units</b>
<b>Congregational Land Overlay (CLO) Sites – up to 35 units/acre</b>													
S2-008	Friendship Baptist Church 17151 Bastanchury Rd	4.92 (2.01)	RE (1.8 du/ac)	RML	RE with CLO	RML	60	60	RE with CLO	-	60	60	No change
S3-012	Richfield Community Church 5320 Richfield Rd	9.48 (3.7)	RU (4.0 du/ac)	RM	RU with CLO	RM	55	55	RU with CLO	-	55	55	No change
S2-013	Messiah Lutheran Church 486 Liverpool St	6.2 (2.03)	RU (4.0 du/ac)	RMH	RU with CLO	RMH	40	40	RU with CLO	-	40	40	No change
S3-024	Friends Church Overflow Parking	17.45 (1.61)	RE (1.8 du/ac)	AP	RE with CLO	AP	48	48	RE with CLO	-	48	48	No change
S4-204A	Chabad Center 19045 Yorba Linda Blvd	1.85 (0.93)	RE (1.8 du/ac)	RML	RE with CLO	RML	17	17	-	-	-	-	Remove site
S3-033	Islamic Center of Yorba Linda 4382 Eureka Ave	3.88 (1.58)	RS (3.0 du/ac)	RM	RS with CLO	RM	30	30	-	-	-	-	Remove site

Site ID	Site Description and Address	Acres (Developable acres)	Existing		From 2022 Certified PEIR				Addendum to the 2022 Certified PEIR (Revised Project)				Proposed Change
			Current Zoning <sup>1</sup>	Current General Plan <sup>2</sup>	2022 PEIR Proposed Zoning Action	2022 PEIR Proposed General Plan	Total Net Unit Potential	Realistic Unit Potential	Proposed Zoning Action	Proposed General Plan	Total Net Unit Potential	Realistic Unit Potential	
S3-210	Shinnyo-En USA 18021-18111 Bastanchury Rd	9.23 (4.09)	PD/RA Standards	AP	PD-26 with CLO	AP	105	105	PD-26 with CLO	-	105	105	No change
<b>Total Realistic Unit Potential on CLO Sites:</b>							-	<b>355</b>	<b>Amended Total Realistic Unit Potential on CLO Sites:</b>	-	-	<b>308</b>	<b>Decrease of 47 units</b>
<b>Total Net Unit Potential on CLO Sites:</b>							<b>355</b>	-	<b>Amended Total Net Unit Potential on CLO Sites:</b>	-	<b>308</b>	-	<b>Decrease of 47 units</b>
<b>Mixed Use Overlay (MUO) Sites – up to 35 units/acre</b>													
S1-021	Vacant Parcel (W of 16951 Imperial Hwy) APN 322-121-07	1.76	CG-(I)	C	CG-(I) with MUO	C	62	53	CG-(I) with MUO	-	62	53	No change
S7-001	Bryant Ranch Shopping Center 23611-23801 La Palma Ave	9.15	CG	C	CG with MUO	C	320	272	-	-	-	-	Remove site
<b>Total Realistic Unit Potential on MUO Sites:</b>							-	<b>325</b>	<b>Amended Total Realistic Unit Potential on MUO Sites:</b>	-	-	<b>53</b>	<b>Decrease of 272 units</b>
<b>Total Net Unit Potential on MUO Sites:</b>							<b>382</b>	-	<b>Amended Total Net Unit Potential on MUO Sites:</b>	-	<b>62</b>	-	<b>Decrease of 320 units</b>
<b>RM-20 – up to 20 units/acre</b>													
S4-200	18597-18602 Altrudy Lane	2.0	RS (3.0 du/ac)	RM	RM-20	RH	40	40	RM-20	-	40	40	No change
S4-204B	19081-19111 Yorba Linda Blvd	3.90	RE (1.8 du/ac)	RML	RM-20	RH	78	66	RM-20	-	78	66	No change
<b>Total Realistic Unit Potential on RM-20 Sites:</b>							-	<b>106</b>	<b>Amended Total Realistic Unit Potential on RM-20 Sites:</b>	-	-	<b>106</b>	<b>No change</b>
<b>Total Net Unit Potential on RM-20 Sites:</b>							<b>118</b>	-	<b>Amended Total Net Unit Potential on RM-20 Sites:</b>	-	<b>118</b>	-	<b>No change</b>
<b>RM – up to 10 units/acre</b>													
S3-034	4341 Eureka Avenue	2.19	RS (3.0 du/ac)	RM	RM	RH	22	19	-	-	-	-	Remove site
S3-205A	5225-5227 Highland Ave	7.08	RE (1.8 du/ac)	RML	RM	RH	71	60	-	-	-	-	Remove site
S3-211	17651 Imperial Highway	2.32	RS (3.0 du/ac)	RM	RM	RH	23	20	RM	-	23	20	No change
S3-207	5300-5393 Richfield Road	8.83	RU	RM	RM-20 with AHO	RH	-	-	RM	RH	88	75	Move site from AHO category and RM-20 base zone to RM
S4-053	SWC Kellogg Dr/ Grandview Ave	0.98	RE (1.8 du/ac)	RML	RM	RH	10	9	-	-	-	-	Remove site
S4-060	5541 South Ohio St	0.96	RE (1.8 du/ac)	RML	RM	RH	10	9	-	-	-	-	Remove site
S4-201	5531 South Ohio St	1.82	RE (1.8 du/ac)	RML	RM	RH	18	15	-	-	-	-	Remove site
S5-008	Fairmont Blvd	23.01	PD/Church	RM/OS	Amend Yorba Linda Hills PD	RH/OS	230	196	-	-	-	-	Move site to PD category
S7-005	NWC Camino de Bryant/ Meadowland	3.06	RU (4.0 du/ac)	RH	RM	RH	30	10	-	-	-	-	Remove site

Site ID	Site Description and Address	Acres (Developable acres)	Existing		From 2022 Certified PEIR				Addendum to the 2022 Certified PEIR (Revised Project)				Proposed Change
			Current Zoning <sup>1</sup>	Current General Plan <sup>2</sup>	2022 PEIR Proposed Zoning Action	2022 PEIR Proposed General Plan	Total Net Unit Potential	Realistic Unit Potential	Proposed Zoning Action	Proposed General Plan	Total Net Unit Potential	Realistic Unit Potential	
<b>Total Realistic Unit Potential on RM Sites:</b>					-	338	<b>Amended Total Realistic Unit Potential on RM Sites:</b>		-	-	95	<b>Decrease of 243 units</b>	
<b>Total Net Unit Potential on RM Sites:</b>					414	-	<b>Amended Total Net Unit Potential on RM Sites:</b>		-	111	-	<b>Decrease of 303 units</b>	
<b>Planned Development (PD)</b>													
S5-008	Fairmont Blvd	9.0	PD	RM/OS	Amend Yorba Linda Hills PD	RH/OS	-	-	PD (RM standards at 3 du/ac)	RM/OS	30	27	Add site from RM – up to 10 units/acre for a maximum of 30 dwelling units & reduction in total developable acreage
S3-203	18101-19231 Bastanchury	<del>22.83</del> 19.58	PD/RA Standards	AP	Amend West Bastanchury PD	AP	228	194	PD	-	98	89	Decrease units & reduction in developable acreage
<b>Total Realistic Unit Potential on PD Sites:</b>					-	194	<b>Amended Total Realistic Unit Potential on PD Sites:</b>		-	-	116	<b>Decrease of 78 units</b>	
<b>Total Net Unit Potential on PD Sites:</b>					228	-	<b>Amended Total Net Unit Potential on PD Sites:</b>		-	128	-	<b>Decrease of 100 units</b>	
<b>Total Realistic Potential on all Opportunity Sites:</b>					-	2,100	<b>Amended Total Realistic Potential on all Opportunity Sites:</b>		-	-	1,747	<b>Decrease of 353 units</b>	
<b>Total Net Unit Potential on all Opportunity Sites:</b>					2,410	-	<b>Amended Total Net Unit Potential on all Opportunity Sites:</b>		-	1,929	-	<b>Decrease of 481 units</b>	

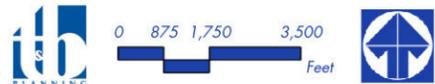
Notes:

- Zoning Map Acronyms: CG = Commercial General; PD = Planned Development; PD/RA = Planned Development/Residential Agriculture; R&D = Research and Development; RE = Residential Estate; RM = Residential Multiple; RS = Residential Suburban; RU = Residential Urban
- General Plan Land Use Map Acronyms: AP = Area Plan; C = Commercial; IM = Industrial Manufacturing; RH = Residential High; RH/OS = Residential High/Open Space; RM = Residential Medium; RMH = Residential Medium High; RML = Residential Medium Low; RM/OS = Residential Medium/Open Space
- Du/ac = dwelling units per acre

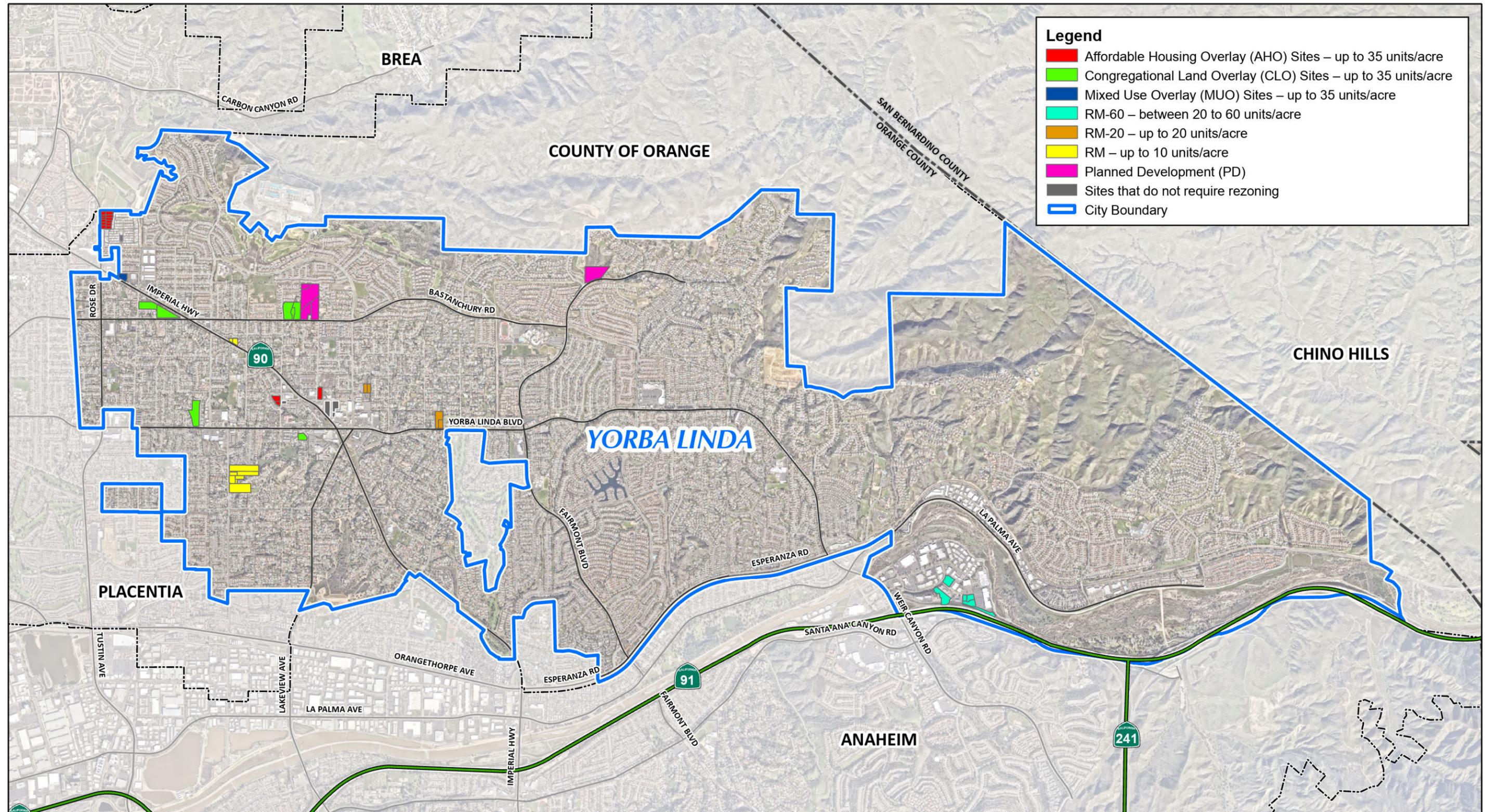


Source(s): ESRI, NearMap (February 2024), OC Landbase (2023), SB County (2023), City of Yorba Linda (02-2024)

Figure 3-1

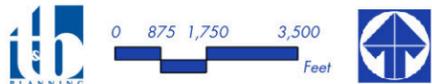


Housing Opportunity Sites under the 2022 Certified PEIR



Source(s): ESRI, NearMap (February 2024), OC Landbase (2023), SB County (2023), City of Yorba Linda (02-2024)

Figure 3-2



This category (RM-60) was not included in the 2022 Certified PEIR. As part of the Revised Project, sites S6-015 (John Force Racing at 22722 Old Canal Road) and S6-020 (Extended Stay America at 22711 Oak Crest Circle) are proposed to be moved from AHO to RM-60. Additionally, a new site, S6-025 (Bac Tran Savi Ranch), is proposed to be added to RM-60. The City will establish RM-60 development standards designed to facilitate development at the upper end of the density range.

***Congregational Land Overlay (CLO)***

The 2022 Certified PEIR showed that the City identified seven religious congregation sites as most viable for housing development within the planning period with religious use being retained. As part of the Revised Project, sites S4-204A (Chabad Center at 19045 Yorba Linda Boulevard) and S3-033 (Islamic Center of Yorba Linda at 4382 Eureka Avenue) are proposed to be removed from the CLO category. No changes are proposed to sites S2-008 (Friendship Baptist Church at 17151 Bastanchury Road); S3-012 (Richfield Community Church at 5320 Richfield Road); S2-013 (Messiah Lutheran Church at 486 Liverpool Street); S3-024 (Friends Church Overflow Parking); and S3-210 (Shinnyo-En USA at 18021-18111 Bastanchury Road).

***Mixed-Use Overlay (MUO)***

The 2022 Certified PEIR showed that the City identified two mixed-use sites. As part of the Revised Project, site S7-001 (Bryant Ranch Shopping Center at 23611-23801 La Palma Avenue) is proposed to be removed from the MUO category. No change is proposed to site S1-021 (Vacant Parcel west of 16951 Imperial Highway).

***RM-20 – up to 20 units/acre***

The 2022 Certified PEIR showed that the City identified two RM-20 sites: Sites S4-200 (18597-18602 Altrudy Lane) and S4-204B (19081-19111 Yorba Linda Boulevard). No change is proposed to either site as part of the Revised Project.

***RM – up to 10 units/acre***

The 2022 Certified PEIR showed that the City identified eight RM sites. As part of the proposed amendment, six sites are proposed to be removed which include Sites S3-034 (4341 Eureka Avenue); S3-205A (5225-5227 Highland Avenue); S4-053 (SWC Kellogg Drive/Grandview Avenue); S4-060 (5541 South Ohio St); S4-201 (5531 South Ohio St); and S7-005 (NWC Camino de Bryant/Meadowland). Site S5-008 (Fairmont Boulevard) is proposed to be modified and moved to PD. Site S3-207 (5300-5393 Richfield Road) is proposed to move from AHO to RM and S5-008 (Fairmont Boulevard) is proposed to move from the RM category to the Planned Development category. No change is proposed to site S3-211 (17651 Imperial Highway) as part of the Revised Project.

***Planned Development (PD)***

The 2022 Certified PEIR showed that the City identified two PD sites. As part of the Revised Project, site S7-001 (Bryant Ranch Shopping Center) is proposed to be removed. Additionally, site S3-203 (18101-19231 Bastanchury) total net unit potential is proposed to be decreased from 228 units to 98 units and the realistic unit potential is proposed to be decreased from 194 units to 89 units. Site S5-008 (Fairmont Boulevard) is

proposed to be modified and added to the PD category from the RM-up to 10 units/acre category and is proposed to allow no more than 30 total units.

### 3.3 Summary of Requested Actions

The City of Yorba Linda has the primary approval responsibility for the Revised Project. As such, the City is serving as the Lead Agency for this PEIR Addendum pursuant to CEQA Guidelines Section 15050. The City will consider the information contained in this PEIR Addendum and this PEIR Addendum’s Administrative Record in its decision-making processes. In the event of approval of the Revised Project and this PEIR Addendum, the City subsequently would issue administrative permits and approve any discretionary actions to implement the Revised Project. A list of the primary actions related to the Project under City jurisdiction and the jurisdiction of other agencies is provided in Table 3-2, *Summary of Project Approvals/Permits*. This PEIR Addendum covers all federal, state, local government, and quasi-government approvals which may be needed to construct or implement the Revised Project, whether or not they are explicitly listed in Table 3-2, or elsewhere in this PEIR Addendum (CEQA Guidelines Section 15124(d)).

**Table 3-2 Summary of Revised Project Approvals/Permits**

Public Agency	Approvals and Decisions
<b>City of Yorba Linda</b>	
Planning Commission	<ul style="list-style-type: none"> <li>• Provide recommendation to the City Council regarding whether to approve the PEIR Addendum.</li> <li>• Provide recommendations to the City Council regarding whether to approve:                             <ul style="list-style-type: none"> <li>○ General Plan Amendments</li> <li>○ Amendments to the Zoning Code</li> </ul> </li> </ul>
City Council	<ul style="list-style-type: none"> <li>• Approve the PEIR Addendum.</li> <li>• Approval or Adoption of:                             <ul style="list-style-type: none"> <li>○ General Plan Amendments</li> <li>○ Amendments to the Zoning Code</li> </ul> </li> </ul>
<b>Responsible Agencies – Approvals and Permits</b>	
California Department of Fish and Wildlife (CDFW)	<ul style="list-style-type: none"> <li>• Section 1602 Permit</li> </ul>
United States Army Corps of Engineers (ACOE)	<ul style="list-style-type: none"> <li>• Section 404 Permit</li> </ul>
Yorba Linda Water District (YLWD)	<ul style="list-style-type: none"> <li>• Approvals for construction of water infrastructure and connection to water distribution and wastewater system</li> </ul>
Regional Water Quality Control Board (RWQCB)	<ul style="list-style-type: none"> <li>• Issuance of a Construction Activity General Construction Permit</li> <li>• Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit</li> <li>• Issuance of a Section 401 Permit pursuant to the Clean Water Act</li> </ul>
Southern California Gas Company (SoCalGas) and Southern California Edison (SCE)	<ul style="list-style-type: none"> <li>• Issuance of approvals necessary for the installation of new SoCalGas and SCE facilities/connections to service the Revised Project</li> </ul>
South Coast Air Quality Management District	<ul style="list-style-type: none"> <li>• Issuance of permits that allow for the construction and operation of the proposed Revised Project</li> </ul>
<b>Trustee Agencies – Approvals and Permits</b>	

<b>Public Agency</b>	<b>Approvals and Decisions</b>
Native American Heritage Commission (NAHC)	<ul style="list-style-type: none"><li>• Ensuring California Native American tribes have accessibility to ancient Native American cultural resources on public lands overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the California Native American Graves Protection and Repatriation Act</li></ul>

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## **4.0 ENVIRONMENTAL ANALYSIS**

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## 4.0 ENVIRONMENTAL ANALYSIS

### 4.1 Aesthetics

*Would the Project:*

- a. *Have a substantial adverse effect on a scenic vista?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that future development would be subjected to Design Review, the goals and policies in the City's General Plan and would be required to comply with the provisions of the City's Municipal Code inclusive of the Zoning Code, including general development standards and sign regulations. In addition, all development or reuse activities would be subject to the restrictions imposed by the City's Municipal Code (Chapters 18.10 and 18.16) and the goals and policies included in the City's General Plan. With mandatory compliance to applicable rules, regulations, goals and policies, impacts to scenic vistas would be less than significant.

**Analysis of Revised Project:** The Revised Project includes a RM-60, which was not previously analyzed under the 2022 Certified PEIR. RM-60 allows development of up to 5 residential stories. No changes are being made to the height limits of the Affordable Housing Overlay and Mixed-Used Housing Overlay under the Revised Project. Consistent with the findings of the 2022 Certified PEIR, future development would be subjected to Design Review, City's General Plan, Municipal Code. These standards regulate the features of buildings and streets that affect the public realm and help guide the physical development of any development project within the City's boundaries. With mandatory compliance to applicable rules, regulations, goals and policies, the change in locations of housing opportunities sites and development of the RM-60 standards would not result in significant impacts to scenic vistas. Therefore, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the housing opportunity sites are not located within or near any officially designated state scenic highway nor are the sites visible from the Eligible portion of the State Route 91 (SR-91). As such, the Original Project would not damage scenic resources within a State scenic highway, and impacts would be less than significant.

**Analysis of Revised Project:** Under the Revised Project, the housing opportunities sites are not located within or near any officially designated state scenic highway. The nearest officially designated state scenic highway is SR-91, approximately 0.3-mile south of the City's boundary (Caltrans, 2024). Therefore, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- c. *In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the City is located within an urbanized area and implementation of the Original Project would rezone 27 sites and establish housing overlay zones to allow for an additional 2,410 residential units throughout the City. The sites subject to a rezone have been selected to present minimal conflict with the surrounding zoning designations and would be subject to the restrictions imposed by the City's Municipal Code and the goals and policies included in the City of Yorba Linda General Plan and 2021-2029 Housing Element. Accordingly, with mandatory compliance to applicable rules, regulations, goals and policies, impacts would be less than significant.

**Analysis of Revised Project:** As discussed above, the City is located in an urbanized area. Under the Revised Project, a total of 1,929 dwelling units would be allowed on 18 sites - a decrease of 481 units from the 2022 Certified PEIR. Consistent with the findings of the 2022 Certified PEIR, the selected housing opportunity sites that are subjected to rezoning would be required to comply with the applicable regulations under the City's Municipal Code and General Plan. Therefore, the Revised Project would not conflict with applicable zoning and other regulations governing scenic quality. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- d. *Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that future development and/or redevelopment activities throughout the housing opportunity sites would generate new sources of light and glare that could affect day or nighttime views in the City and surrounding communities. Sources of light and glare from new development or redevelopment would include street lighting and building illumination, security lighting, nighttime traffic, sign illumination, and lighting during with construction activities and potential glare from building and site improvement materials. Because most development would occur in currently developed portions of the City and would be required to comply with existing requirements to control lighting (Municipal Code Chapter 18.10.110), impacts are expected to be less than significant.

**Analysis of Revised Project:** Implementation of the Revised Project would allow for the development of 1,929 dwelling units, compared to the 2,410 units allowed under the Original Project. There are no changes to the type of development under the Revised Project. Source of light and glare would remain the same as the Original Project. Therefore, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

## 4.2 Agriculture and Forestry Resources

*Would the project:*

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

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the housing opportunity sites did not contain any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program. Thus, no impact would occur.

**Analysis of Revised Project:** Under the Revised Project, the housing opportunities sites do not contain any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program. (DOC, 2018) Consistent with the findings of the 2022 Certified PEIR, the Revised Project would not convert mapped farmland to nonagricultural use. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the City of Yorba Linda does not have land zoned for agricultural use nor is under any Williamson Acts contracts. Therefore, no impact would occur.

**Analysis of Revised Project:** Under the Revised Project, none of the housing opportunities sites are zoned for agricultural uses. Furthermore, as concluded in the 2022 Certified PEIR, there is no Williamson Act contract in effect on the Project site. Therefore, no impacts to agricultural uses are anticipated, nor will there be any conflict with existing Williamson Act contracts. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- c. *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the City does not have any land zoned for forest land, timberland, or timberland zoned Timberland Production. Therefore, no impact would occur.

**Analysis of Revised Project:** Under the Revised Project, none of the housing opportunities sites are zoned for forest land or timberland. As concluded in the 2022 Certified PEIR, the City's Zoning Map does not designate any parcels of land in the Project area for forest land, timberland, or timberland zoned Timberland

Production. Therefore, implementation of the Revised Project would not conflict with, or cause the rezoning of, forest land or timberland. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

*d. Result in the loss of forest land or conversion of forest land to non-forest use?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that there is no forest land in the City. Therefore, no impact would occur.

**Analysis of Revised Project:** Under the Revised Project, none of the housing opportunities sites are currently occupied with forest land. Consequently, the Revised Project would not result in the loss or conversion of forest land. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

*e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that there are no agricultural or forest resources within the housing opportunity sites. Therefore, no impact would occur.

**Analysis of Revised Project:** As previously discussed above, the housing opportunity sites do not include Farmland (defined as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) or forest land and therefore, the Revised Project would not result in the conversion of Farmland to nonagricultural use of forest land to non-forest use. The Revised Project would not result in any impacts to agricultural and/or forestry resources. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

### **4.3 Air Quality**

*Would the project:*

*a. Conflict with or obstruct implementation of the applicable air quality plan?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that Project construction-source and operational-source emissions have the potential to exceed the applicable regional significance thresholds for criteria pollutants. Therefore, the Original Project would have the potential to result in or cause violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The Original Project would be inconsistent with Air Quality Management Plan (AQMP) Criterion No. 1 and 2. Implementation of Mitigation Measures MM 4.1-1 and MM 4.1-2 would reduce Project's construction-source and operational-source air pollutant emissions. However, it cannot be definitively stated that all future

development projects would not exceed the applicable thresholds. Therefore, impacts would remain significant and unavoidable.

**Analysis of Revised Project:** The Revised Project would result in an approximately 20% reduction of housing units (481 units) and vehicle trips compared to the Original Project. Due to the reduction of units and associated reduction in sources of criteria pollutants associated with motor vehicles, air quality impacts would be less than the Original Project. However, as discussed under Thresholds b and c below, the Revised Project would continue to exceed the South Coast Air Quality Management District's (SCAQMD's) thresholds for criteria pollutants. Therefore, the Revised Project would continue to be inconsistent with the first criterion. Moreover, the Revised Project would continue to intensify existing land use designations, which would also exceed applicable thresholds. Therefore, the Revised Project would continue to be inconsistent with the second criterion. Consistent with the findings of the 2022 Certified PEIR, the Revised Project would be required to comply with Mitigation Measures MM 4.1-1 and MM 4.1-2 to reduce criteria pollutant emissions. However, impacts would remain significant and unavoidable. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required or feasible. The following mitigation measures from the 2022 Certified PEIR are applicable to the Revised Project:

MM 4.1-1      Prior to issuance of grading permits, project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts (regional and localized) to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air pollutant emissions below the significant threshold during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City.

Mitigation measures to reduce construction-related emissions could include, but are not limited to:

- Require construction equipment that meets or exceeds CARB Certified Tier 3 or Tier 4 engine standards.
- Limit the idling time of diesel off-road construction equipment to no more than five (5) minutes.

- Require the use of “Super-Compliant” low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by South Coast AQMD’s Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, projects may utilize building materials that do not require the use of architectural coatings.
- The Construction Contractor shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site, if available rather than electrical generators powered by internal combustion engines.
- The Construction Contractor shall require the use of alternative fueled, engine retrofit technology, after-treatment products (e.g., diesel oxidation catalysts, diesel particulate filters), and/or other options as they become available, including all offroad and portable diesel-powered equipment.
- The Construction Contractor shall require that construction equipment be maintained in good operation condition to reduce emissions. The Construction Contractor shall ensure that all construction equipment is being properly serviced and maintained as per the manufacturer’s specification. Maintenance records shall be available at the construction site for City verification.

MM 4.1-2

Prior to issuance of a grading permit, project applicants shall prepare and submit a technical assessment evaluating potential project operation air quality impacts (regional and localized) to the City for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD’s adopted thresholds of significance, the City shall require that applicants for new development projects incorporate all feasible mitigation measures to reduce air pollutant emissions below significance thresholds during operational activities. The identified measures shall be included as part of the conditions of approval.

Possible mitigation measures to reduce operational emissions could include, but are not limited to the following:

- Increase in insulation such that heat transfer and thermal bridging is minimized;
- Limit air leakage through the structure and/or within the heating and cooling distribution system;
- Use of energy-efficient space heating and cooling equipment;
- Installation of electrical hook-ups at loading dock areas;
- Installation of dual-paned or other energy efficient windows;
- Use of interior and exterior energy efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards;
- Installation of automatic devices to turn off lights where they are not needed;

- Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings;
- Design of buildings with “cool roofs” using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors;
- Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems;
- Installation of ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products.
- Landscaping palette emphasizing drought tolerant plants;
- Use of water-efficient irrigation techniques;
- U.S. EPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads.
- Applicants for residential within 1,000 feet of a major sources of TACs (e.g., warehouses, industrial areas, freeways, roadways, and rail lines with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Yorba Linda prior to future discretionary Project approval. The HRA shall be prepared in accordance with policies and procedures of CEQA and the South Coast AQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM<sub>10</sub> concentrations exceed 2.5 microgram per cubic meter (µg/m<sup>3</sup>), PM<sub>2.5</sub> concentrations exceed 2.5 µg/m<sup>3</sup>, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:
  - Air intakes located away from high volume roadways and/or truck loading zones.
  - Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 13 or better).

*b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the operation-source air pollutant emissions would result in exceedances of regional thresholds for VOCs and NOx. Construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Notwithstanding, the 2022 Certified PEIR concluded that implementation of the Original Project has a potential to result in a significant impact with respect to construction activity associated with future

development projects particularly if multiple construction projects overlap for emissions of CO, VOCs, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Therefore, construction-source and operation-source emissions would be considered potentially significant on a project-specific and cumulative basis for those emissions. Despite the implementation of Mitigation Measures MM 4.1-1 and MM 4.1-2, it cannot be definitively stated that all future development projects would not exceed the applicable thresholds. Therefore, impacts would be significant and unavoidable.

**Analysis of Revised Project:** As discussed above, the Revised Project would result in a 20% reduction of housing units compared to the Original Project. The reduction of units would result in a proportional reduction in air quality emissions. However, there is uncertainty regarding the specific nature of construction activities that would be facilitated by future development projects and construction-related air quality emissions would be potentially significant. Additionally, because there would be a reduction of housing opportunity sites compared to the Original Project, there would also be an overall reduction in vehicle trips generated as a result of the Revised Project. However, operational emissions for VOCs and NO<sub>x</sub> would continue to exceed the regional threshold. Consistent with the findings of the 2022 Certified PEIR, the Revised Project would be required to comply with Mitigation Measures MM 4.1-1 and MM 4.1-2 to reduce cumulative air pollutant emissions. However, impacts would remain significant and unavoidable since it cannot be definitively stated that all future development projects would not exceed the applicable thresholds. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required or feasible. Mitigation Measures MM 4.1-1 and 4.1-2 would be applicable to the Revised Project.

*c. Expose sensitive receptors to substantial pollutant concentrations?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that emissions would not cause or contribute to a carbon monoxide (CO) “Hot Spot.” However, quantification of localized significance thresholds (LSTs) is not applicable for this program-level environmental analysis. Since Mitigation Measures MM 4.1-1 and MM 4.1-2 cannot guarantee that future development projects would reduce all of their impacts to less than significant, this impact is considered significant and unavoidable.

**Analysis of Revised Project:** Consistent with SCAQMD guidance an LST analysis can only be conducted at a project-level, and quantification of LSTs is not applicable for this program-level environmental analysis. Therefore, as with the Original Project, future development projects under the Revised Project have the potential to exceed LST emissions thresholds. An adverse CO concentration, known as a “hot spot”, would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. Based on data from the South Central Los Angeles County station, the ambient 1-hr and 8-hr CO concentration within the study area is estimated to be 4.5 ppm and 3.1 ppm, respectively. Therefore, CO “hot spots” are not an environmental impact of concern for the Revised Project. Consistent with the findings of the 2022 Certified PEIR, the Revised Project would be required to comply with

Mitigation Measures MM 4.1-1 and MM 4.1-2 to reduce cumulative air pollutant emissions. However, impacts would remain significant and unavoidable since it cannot be definitively stated that all future development projects reduce all of their impacts to less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required. Mitigation Measures MM 4.1-1 and 4.1-2 would be applicable to the Revised Project.

- d. *Result in other emissions (such as those leading to odors) adversely affecting substantial number of people?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that although short-term construction activities and long-term operational land uses could produce objectionable odors, compliance with standard construction requirements and regulations established by the City of Yorba Linda and the SCAQMD would reduce odor impacts to less-than-significant levels. Near- and long-term odor impacts would be less than significant.

**Analysis of Revised Project:** The Revised Project does not propose a change in land use compared to the Original Project. Residential uses typically are not land uses associated with emitting objectionable odors. Compliance with standard construction requirements and SCAQMD Rule 402 would be required. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.4 Biological Resources**

*Would the Project:*

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

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that two of the housing opportunity sites, Sites S5-008 and S7-005, are located within a natural habitat area. Future development on these two sites would have the potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. However, implementation of mitigation measures MM 4.2-1 through MM 4.2-4 would ensure that the Project's potential impacts to sensitive or protected biological resources would be mitigated through biological surveys and impact assessments by a qualified biologist. With implementation of the required

mitigation and General Plan goals and policies, the Project's potential impacts to sensitive or protected biological resources would be reduced to less than significant.

**Analysis of Revised Project:** The Revised Project would result in the removal of one of the housing opportunity sites which is currently located within a natural habitat area, Site S7-005. One new site, Site S6-025 (Bac Tran Savi Ranch Site), is proposed to be added as part of the Revised Project. Site S6-025 is not located within a natural habitat area according to Exhibit CN-2, Natural Habitat Areas, of the City's General Plan Conservation Element (City of Yorba Linda, 2016a), and no impact would occur due to the addition of this site. Consistent with the findings of the 2022 Certified PEIR, the Revised Project would be required to comply with Mitigation Measures MM 4.2-1 through MM 4.2-4 to reduce the Revised Project's potential impacts to sensitive or protected biological resources. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required. The following mitigation measures from the 2022 Certified PEIR are applicable to the Revised Project:

- MM 4.2-1 The City of Yorba Linda shall require applicants of future development projects on housing opportunity sites S5-008, S7-005, S3-203, and S4-053 to prepare a biological resources survey. The survey shall be conducted by a qualified biologist and shall be a reconnaissance level field survey of the sites for the presence and quality of biological resources potentially affected by project development. These resources include, but are not limited to, special status species or their habitat, sensitive habitats such as wetlands or riparian areas, and jurisdictional waters. If sensitive or protected biological resources are absent from the sites and adjacent lands potentially affected by the future development, the biologist shall submit a written report substantiating such to the City of Yorba Linda before issuance of a grading permit by the City, and the project may proceed without any further biological investigation. If sensitive or protected biological resources are present on the project site or may be potentially affected by the project, implementation of Mitigation Measure MM 4.2-2 shall be required.
- MM 4.2-2 A qualified biologist shall evaluate impacts to sensitive or protected biological resources from development. The impact assessment may require focused surveys that determine absence or presence and distribution of biological resources on the site. These surveys may include, but are not limited to: 1) focused special status animal surveys if suitable habitat is present; 2) appropriately timed focused special status plant surveys that will maximize detection and accurate identification of target plant species; and 3) a delineation of jurisdictional boundaries around potential wetlands, riparian habitat, and waters of the United States or State.
- MM 4.2-3 The results of these surveys will assess project impacts and develop site specific mitigation measures to avoid impacts to sensitive or protected biological resources. Depending on the resources potentially present on the project site, avoidance may

include: 1) establishing appropriate no-disturbance buffers around onsite or adjacent resources, and/or 2) initiating construction at a time when special status or protected animal species will not be vulnerable to project-related mortality (e.g., outside the avian nesting season or bat maternal or wintering roosting season). Consultation with relevant regulatory agencies may be required in order to establish suitable buffer areas. The qualified biologist shall substantiate the impact evaluation or the assumed presence of special-status species in all suitable habitats onsite in a written report submitted to the City of Yorba Linda before issuance of a grading permit by the City. If the project avoids all sensitive or protected biological resources, no further action is required. If avoidance of all significant impacts to sensitive or protected biological resources is not feasible, the project shall implement Mitigation Measure MM 4.2-4.

MM 4.2-4 The City of Yorba Linda shall require applicants to design development projects to minimize potential impacts to sensitive or protected biological resources to the greatest extent feasible, in consultation with a qualified biologist and/or appropriate regulatory agency staff. Minimization measures may include 1) exclusion and/or silt fencing, 2) relocation of impacted resources, 3) construction monitoring by a qualified biologist, and 4) an informative training program conducted by a qualified biologist for construction personnel on sensitive biological resources that may be impacted by project construction. If minimization of all significant impacts to sensitive or protected biological resources is infeasible, the project shall implement Mitigation Measure MM 4.2-5.

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

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that there is a forested/shrub riparian habitat within housing opportunity Site S3-203. Therefore, future development at this site has the potential to have substantial adverse effect on riparian habitat or other sensitive natural community, and impacts would be potentially significant. However, implementation of mitigation measures MM 4.2-1 through MM 4.2-5 would ensure that the Original Project's potential impacts to riparian habitats and wetlands would be mitigated through obtaining appropriate permit authorization(s). With implementation of the required mitigation and General Plan goals and policies, the Original Project's potential impacts to riparian habitats and wetlands would be reduced to less than significant.

**Analysis of Revised Project:** Under the Revised Project, the number of units under housing opportunity site S3-203 would be decreased, which would reduce the development impact area on this site and reduce impacts to riparian habitats. The new housing opportunity site under the Revised Project, Site S6-025, proposed to be added as part of the Revised Project is not located within any riparian habitat (USFWS, n.d.) or other sensitive natural community, and no impact would occur due to the addition of this site. Consistent with the findings of the 2022 Certified PEIR, the Revised Project would be required to comply with mitigation measures MM 4.2-1 through MM 4.2-5 to ensure that the Revised Project's potential impacts to riparian

habitats and wetlands would be mitigated through obtaining appropriate permit authorization(s). Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required. Mitigation Measures MM 4.2-1 through 4.2-4, provided previously, from the 2022 Certified PEIR would continue to apply. Additionally, the following mitigation measure from the 2022 Certified PEIR is applicable to the Revised Project:

MM 4.2-5 A qualified biologist will develop appropriate mitigations that will reduce project impacts to sensitive or protected biological resources to a less than significant level. The type and amount of mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigations may include, but are not limited to: 1) compensation for lost habitat or waters in the form of preservation or creation of in-kind habitat or waters, either onsite or offsite, protected by conservation easement; 2) purchase of appropriate credits from an approved mitigation bank servicing the Yorba Linda area; and 3) payment of in-lieu fees. Furthermore, project applicants shall obtain appropriate permit authorization(s) for impacts to jurisdictional waters, wetlands, and/or riparian habitats. The types of permits potentially required for impacts to jurisdictional waters are a Clean Water Act (Section 404) permit issued by the US Army Corps of Engineers, a California Water Certificate or Waste Discharge Order issued by the Regional Water Quality Control Board, and a Stream Alteration Agreement issued by the California Department of Fish and Wildlife.

- c. *Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that there are four areas of wetlands within the housing opportunity sites (Freshwater pond and riverine habitat on Site S7-005; Riverine habitat on Site S5-008; Freshwater Forested/Shrub Wetland and Riverine habitat on Site S4-053; and Freshwater Forested/Shrub Wetland and Riverine habitat on Site S3-203). Accordingly, Project implementation would have the potential to involve direct removal, filling, hydrological interruption, or other direct or indirect impact to wetlands under jurisdiction of regulatory agencies, and impacts would be potentially significant. However, implementation of Mitigation Measure MM 4.2-5 would ensure the Original Project's potential impacts to riparian habitats and wetlands would be mitigated through obtaining appropriate permit authorization(s). With implementation of the required mitigation and General Plan goals and policies, the Original Project's potential impacts to riparian habitats and wetlands would be reduced to less than significant.

**Analysis of Revised Project:** As discussed previously, the Revised Project would result in the removal of two of the housing opportunity sites (S7-005 and S4-053) containing areas of wetlands. Thus, impacts to the

Freshwater Forested/Shrub Wetlands and riverine habitats would not occur under the Revised Project. Site S5-008 and Site S3-203 would remain the same under the Revised Project and consistent with the findings of the 2022 Certified PEIR, implementation of Mitigation Measure MM 4.2-5 would ensure the Revised Project's potential impacts to riparian habitats and wetlands would be mitigated through obtaining appropriate permit authorization(s). Housing opportunity site S6-025 is proposed to be added as part of the Revised Project. Site S6-025 does not contain State or federally protected wetlands, and no impact would occur due to the addition of this site. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required. Mitigation Measure MM 4.2-5 (provided above) from the 2022 Certified PEIR is applicable to the Revised Project.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that future development undertaken in accordance with the Original Project would be required to comply with the Migratory Bird Treaty Act (MBTA). Therefore, the Original Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant.

**Analysis of Revised Project:** Under the Revised Project, development would be required to comply with the MBTA. Additionally, housing opportunity site S6-025 is proposed to be added as part of the Revised Project and does not include a wildlife corridor or wildlife nursery site. Consistent with the findings of the 2022 Certified PEIR, the Revised Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR stated that the trees in the City of Yorba Linda are protected under Chapter 16.08 (Tree Preservation) of the City's Municipal Code, which regulates the planting, maintenance, and removal of trees in the City. Future development would be required to comply with provisions of the City's Municipal Code, and impacts would be less than significant.

**Analysis of Revised Project:** Under the Revised Project, development would be required to comply with provisions of the City’s Municipal Code. Consistent with the findings of the 2022 Certified PEIR, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

*f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that none of the housing opportunity sites are located within the boundaries of a Natural Communities Conservation Plan and Habitat Conservation Plan (NCCP/HCP). Therefore, the Original Project would not conflict with the provisions of approved local, or state habitat conservation plan or natural community conservation plan and no impact would occur.

**Analysis of Revised Project:** Under the Revised Project, none of the housing opportunity sites are located within the boundaries of a NCCP/HCP. As such, consistent with the findings of the 2022 Certified PEIR, the Revised Project would not conflict with the provisions of approved local, or state habitat conservation plan or natural community conservation plan and no impact would occur. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.5 Cultural Resources**

*Would the Project:*

*a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the City of Yorba Linda Citywide Historic Property Survey: Historic Context and Survey Report identifies historical resources throughout the City. There are 3 properties are listed on the National Register of Historic Places (NRHP), 3 properties which appear eligible for the NRHP as an individual property, 1 district is eligible for the NRHP, 1 district that qualifies as a City of Yorba Linda Local Historic District, and 26 properties that appear to be individually eligible for the Local Historical Register. None of the properties listed or eligible for listing in the NRHP are included within the housing opportunity sites. Further, no sites within the Original Project are included as appearing eligible for the Local Historical Register. Accordingly, impacts would be less than significant.

**Analysis of Revised Project:** Under the Revised Project, none of the properties listed or eligible for listing in the NRHP are included within the housing opportunity sites. Further, no sites within the Revised Project are included as appearing eligible for the Local Historical Register (GPA, 2010). Consistent with the findings of the 2022 Certified PEIR, impacts from the Revised Project would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those

previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that a potentially significant impact would occur if a known or unknown archaeological resource were removed, altered, or destroyed as a result of the proposed development. The majority of the City is developed with urban uses where ground has been previously disturbed by construction of those uses; however, archaeological resources could still be present in soils that have been previously disturbed. The City's General Plan includes a number of policies to protect archaeological resources. Additionally, compliance with City Standard Condition Planning No. 06, which requires that unknown resources be adequately addressed, would ensure that impacts to such resources are less than significant. As such, impacts were determined to be less than significant.

**Analysis of Revised Project:** Under the Revised Project, a potentially significant impact would occur if a known or unknown archaeological resource were removed, altered, or destroyed as a result of the proposed development. Consistent with the Original Project, the Revised Project would comply with City Standard Condition Planning No. 06, which requires that unknown resources be adequately addressed, and would ensure that impacts to such resources are less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- c. Disturb any human remains, including those interred outside of formal cemeteries?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that due to the level of past disturbance in the City, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. Thus, discovery of human remains is unlikely during construction due to Project implementation. In the unlikely event human remains are encountered during ground-disturbing activities, mandatory compliance with the California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98(b), and Public Resources Code Section 5097.98 would ensure that impacts to human remains would be less than significant.

**Analysis of Revised Project:** As with the Original Project, discovery of human remains under the Revised Project is unlikely during construction due to the level of past disturbance in the City. Consistent with the findings of the 2022 Certified PEIR, the Revised Project would comply with the California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98(b), and Public Resources Code Section 5097.98 would ensure that impacts to human remains would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

## 4.6 Energy

*Would the Project:*

- a. *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Original Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Original Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, impacts would be less than significant.

**Analysis of Revised Project:** The Revised Project would result in a reduction of housing opportunities sites and 481 fewer units compared to the Original Project. Due to the reduction of units, the Revised Project would result in reduced energy demand compared to the Original Project. The Revised Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. As such, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Project would not conflict with any state or local plans for renewable energy or energy efficiency, and impacts would be less than significant.

**Analysis of Revised Project:** As discussed above, the Revised Project would result in a reduction of housing opportunities sites and 481 units compared to the Original Project. The reduction of units would result in a reduction in energy used during construction and operation. Therefore, consistent with the findings of the 2022 Certified PEIR, the Revised Project would not conflict with any state or local plans for renewable energy or energy efficiency; impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

## 4.7 Geology and Soils

*Would the Project:*

- a. *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:*

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42); or strong seismic ground shaking or seismic-related ground failure, including liquefaction; or landslides?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that one Alquist-Priolo earthquake fault zone, Whittier-Elsinore Fault Zone, passes through the City and also is within the northern portion of housing opportunity Site S5-008. There are several known active faults in the region, including the Whittier-Elsinore Fault, as well as the San Andreas Fault about 30 miles to the northeast and the Sierra Madre Fault about 20 miles to northwest. Of the 27 housing opportunity sites, one site S5-008 is located within a landslide zone. Future development pursuant to the City of Yorba Linda 2021-2029 Housing Element would be consistent with the City's adopted Public Health and Safety Element, which contains goals and policies to protect residents from geologic and seismic hazards. Additionally, any future development projects pursuant to the Original Project would be required to comply with all applicable Building and Safety Division requirements, which includes avoiding the siting of housing within a fault zone. Future development shall be designed and built in compliance with the California Building Code (CBC) (as adopted and amended by the City of Yorba Linda). Further, the City's Building Code (Yorba Linda Municipal Code, Title 15) requires future development to submit an engineering geology report and soils engineering report to identify and mitigate geology conditions and hazards. Compliance with the CBC (as adopted and amended by the City of Yorba Linda) and City's Building Code would ensure impacts would be less than significant.

**Analysis of Revised Project:** Under the Revised Project, housing opportunity site S5-008 is no longer under the Whittier-Elsinore Fault Zone due to a reduction in developable acreage from 23.01 acres to 9 acres. The Revised Project proposes one new site, Site S6-025. S6-025 is not located near an earthquake fault zone according to Figure B-22: Earthquake Fault Zones in Yorba Linda of the City's General Plan Housing Element (City of Yorba Linda, 2022). Therefore, no sites under the Revised Project would be within an Alquist-Priolo earthquake fault zone. Nevertheless, consistent with the Original Project, future development of the Revised Project would be consistent with the City's adopted Public Health and Safety Element. Additionally, any future development projects pursuant to the Revised Project would be required to comply with all applicable Building and Safety Division requirements, the CBC (as adopted and amended by the City of Yorba Linda), and the City's Building Code (Yorba Linda Municipal Code, Title 15). Compliance with the CBC and City's Building Code would ensure impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. Result in substantial soil erosion or the loss of topsoil?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that although soils at the housing opportunity sites could experience erosion during construction and development, implementation of the Original Project would not cause substantial soil erosion. Future development within the City would be required to comply with the National Pollutant Discharge Elimination System (NPDES) permit by preparing and implementing a

Stormwater Pollution Prevention Plan (SWPPP) specifying Best Management Practices (BMPs) for minimizing pollution of stormwater with soil and sediment during Project construction. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. Therefore, impacts related to substantial soil erosion, or the loss of topsoil would be less than significant.

**Analysis of Revised Project:** Consistent with the findings of the 2022 Certified PEIR, under the Revised Project, implementation would not cause substantial soil erosion. The proposed change in housing opportunity sites and reduction in units would not result in an increase in impacts related to soil erosion. Future development under the Revised Project would continue to be required to comply with the NPDES permit, including implementing a SWPPP specifying BMPs. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. Therefore, impacts related to substantial soil erosion, or the loss of topsoil would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

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

**2022 Certified PEIR Finding:** The 2022 Certified PEIR stated that development under the Original Project may occur on soil that is unstable due to these factors and may result in significant impacts. Development proposing structures for human occupancy would be required to have a geotechnical investigation conducted per CBC, Chapter 18 and the California Building Code (as adopted and amended by the City of Yorba Linda). The geotechnical investigation would include site-specific assessment of hazards from subsidence and collapsible soils. Additionally, development along hillsides would be required to comply with the standards in Chapter 18.30, Hillside Development, of the City's Municipal Code. Each project would be required to comply with recommendations in the geotechnical investigation report for that project ensuring that impacts are less than significant.

**Analysis of Revised Project:** Consistent with the Original Project, development under the Revised Project may occur on soil that is unstable due to these factors and may result in significant impacts. The proposed change in housing opportunity sites would not result in an increase in impacts related to unstable soils. Future development would continue to be required to have a geotechnical investigation conducted pursuant to CBC, Chapter 18 of the California Building Code, and the City's Building Code. Additionally, development along hillsides would be required to comply with the standards in Chapter 18.30, Hillside Development, of the City's Municipal Code. Compliance with the recommendations in the geotechnical investigation report and the City's Municipal Code would ensure that impacts under the Revised Project are less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- d. Be located on expansive soil, as defined in Table 18-1- B of the Uniform Building Code (since renamed as the California Building Code), creating substantial direct or indirect risks to life or property?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that future development built in accordance with the Original Project would be required to comply with applicable Building and Safety regulations and the CBC, as adopted and amended by the City of Yorba Linda. The geotechnical investigation would be prepared and include site-specific assessment of hazards from the potential for expansive soils. Each project would be required to comply with recommendations in the geotechnical investigation report for that project to ensure there would be no significant risks to life or property due to expansive soils.

**Analysis of Revised Project:** Consistent with the Original Project, development under the Revised Project would be required to comply with applicable Building and Safety regulations and the CBC as adopted and amended by the City of Yorba Linda. The proposed change in housing opportunity sites and reduction units would not result in an increase in impacts related to expansive soil. The Revised Project would be required to comply with recommendations in the geotechnical investigation report to ensure there would be no significant risks to life or property due to expansive soils. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that there are existing sewers serving the entire urbanized portions of the City of Yorba Linda. Projects developed in accordance with the Original Project would include sewer laterals and would not rely on septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur.

**Analysis of Revised Project:** Consistent with the Original Project, development in accordance with the Revised Project would include sewer laterals and would not rely on septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the majority of the City is developed with urban uses where ground has been previously disturbed by construction of those uses. However, paleontological resources could still be present in soils that have not been previously disturbed. Compliance General Plan Policies HR-2.5 and OR-6.1 through 6.5 discussed above with Standard Condition Planning No. 06, which requires that unknown resources be adequately addressed, would ensure that impacts to such resources are less than significant.

**Analysis of Revised Project:** Consistent with the Original Project, the Revised Project would comply with General Plan Policies HR-2.5 and OR-6.1 through 6.5 and Standard Condition Planning No. 06, which would ensure that impacts to paleontological resources are less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.8 Greenhouse Gas Emissions**

*Would the Project:*

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project total GHG emissions of 2.93 Metric Tons of Carbon Dioxide Equivalent per service population (MTCO<sub>2</sub>e/SP) per year would exceed the screening threshold of 1.44 MTCO<sub>2</sub>e/SP per year. Additionally, the 2022 Certified PEIR concluded that the Original Project would not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories. However, since the Original Project would exceed the efficiency based GHG emissions target, the Original Project has the potential to conflict with the 2017 Scoping Plan. Additionally, there is uncertainty regarding the specific nature of the construction and operational activities that would be facilitated under implementation of the Original Project. Mitigation Measures MM 4.1-1 and MM 4.1-2 would require the preparation of project-specific construction and operational air quality analysis and incorporation of mitigation if emissions levels are shown to be above South Coast AQMD recommended thresholds of significance. Resulting mitigation would not only reduce criteria pollutant emissions but would also generally reduce GHG emissions. However, it cannot be definitively known or stated at this time what level of emissions reductions future development projects occurring under implementation of the Original Project would achieve via the implementation of these mitigation measures. While the implementation of Mitigation Measures MM 4.1-1 and MM 4.1-2 would reduce GHG emissions, it cannot be definitively known or stated at this time if future emissions in the City would be reduced to levels that are below applicable thresholds. Therefore, impacts would remain significant and unavoidable despite the implementation of applicable regulatory requirements and policies that have been incorporated with the intent of reducing GHG emissions and the incorporation of Mitigation Measures MM 4.1-1 and MM 4.1-2.

**Analysis of Revised Project:** The Revised Project would result in a reduction of housing opportunities sites and 481 fewer units compared to the Original Project. Under the Revised Project, GHG emissions<sup>2</sup> impacts

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<sup>2</sup> Based on a 1,929 housing units proposed under the Revised Project, the Revised Project would result in an approximate 20% reduction of housing units and vehicle trips. Total MT CO<sub>2</sub>e per year under the Revised Project would result in approximate 20% reduction in GHG emissions, from 20,773.74 MT CO<sub>2</sub>e per year under the Original Project to approximately 16,627.61 under the Revised Project. Service

would be similar to the Original Project and continue to exceed the screening threshold of 1.44 MTCO<sub>2</sub>e/SP per year. Since the Revised Project would exceed the efficiency based GHG emissions target, the Revised Project continues to have a potential to conflict with the 2017 Scoping Plan. Thus, the Revised Project-related emissions would have a potentially significant direct or indirect impact on GHG and climate change. Consistent with the findings of the 2022 Certified PEIR, the Revised Project would be required to comply with air quality Mitigation Measures MM 4.1-1 and MM 4.1-2 which would also reduce GHG emissions. However, it cannot be definitively known or stated at this time what level of emissions reductions future development projects occurring under implementation of the Revised Project would achieve via the implementation of these mitigation measures and thus, impacts would remain significant and unavoidable. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required or feasible. Mitigation Measures MM 4.1-1 and MM 4.1-2 from the 2022 Certified PEIR, provided above under the Air Quality section, are applicable to the Revised Project.

#### **4.9 Hazards and Hazardous Materials**

*Would the Project:*

- a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Furthermore, strict adherence to all emergency response plan requirements set forth by the City of Yorba Linda and Orange County Fire Authority (OCFA) would be required throughout the duration of the Original Project's construction and operation. Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during construction and operation would be less than significant.

**Analysis of Revised Project:** The proposed change in housing opportunity sites and reduction in units would not result in new or increased significant impacts related to hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur as a result of the Revised Project. The Revised Project would comply with applicable laws and regulations governing the use, storage, and transportation of hazardous materials to ensure that all potentially hazardous materials are used and handled in an appropriate manner. The Revised Project would also adhere to all emergency response plan requirements set forth by the City of Yorba Linda and OCFA during construction and operation. As such, consistent with the findings of

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Population: Based on 2.94 persons per household (consistent with the VMT analysis), the Revised Project would generate a future population of approximately 5,671.26 people. Therefore, the total CO<sub>2</sub>e per SP is 2.93.

the 2022 Certified PEIR, the Revised Project impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR stated that the use and transport of hazardous materials to and from the potential housing sites during construction and operation would be less than significant. Additionally, the Public Health and Safety Element of the General Plan contains measures designed to maintain strict control of the transport of such substances so as to ensure public safety. As such, impacts on the likelihood of accidents involving the release of hazardous materials into the environment would be less than significant.

**Analysis of Revised Project:** The proposed change in housing opportunity sites and reduction in units would not result in new or increased significant impacts related to the release of hazardous materials into the environment due to no change in the proposed land uses. Consistent with the findings of the 2022 Certified PEIR, the use and transport of hazardous materials to and from the potential housing sites during construction and operation of the Revised Project would be less than significant. Additionally, the Revised Project would comply with the measures provided in the Public Health and Safety Element of the City's General Plan. As such, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that development that could be allowed with implementation of the Original Project does not involve hazardous emissions or handling of substantial amounts of hazardous materials within one-quarter mile of an existing or proposed school. Substances used for maintenance and landscaping, such common cleaners, solvents, paints, fertilizer, and pesticides, would be subject to all applicable regulations. In addition, subsequent projects would be reviewed for their potential impacts related to hazardous materials issues in accordance with CEQA and OCFA requirements, and an appropriate investigation would be conducted based on the individual circumstances involved. Therefore, no impacts related to this issue are anticipated.

**Analysis of Revised Project:** The proposed change in housing opportunity sites and reduction in units would not result in new or increased significant impacts related to the emission of hazardous materials within one-quarter mile of an existing or proposed school due to no change in the proposed land uses. Additionally, there are no existing or proposed schools within one-quarter mile of the new Site S6-025 (Bac Tran Savi Ranch Site) proposed with the Revised Project. Consistent with the findings of the 2022 Certified PEIR, development

that could be allowed with implementation of the Revised Project does not involve hazardous emissions or handling of substantial amounts of hazardous materials. Consistent with the Original Project, substances used for maintenance and landscaping would be subject to all applicable regulations. In addition, subsequent projects under the Revised Project would be reviewed for their potential impacts related to hazardous materials issues in accordance with CEQA and OCFA requirements, and an appropriate investigation would be conducted based on the individual circumstances involved. Therefore, no impacts related to this issue are anticipated. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

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

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that based on the results of the database search, there are multiple hazardous material site listings that are listed within 0.25-mile of the housing opportunity sites. These sites consist of primarily closed leaking underground storage tank (LUST) cleanup sites and are located mostly along the SR-91 and Yorba Linda Boulevard. Therefore, these offsite locations will not pose a threat to the Project site. Moreover, none of the housing opportunity sites are identified on any of the databases; therefore, the Project site is not identified as a hazardous materials site pursuant to Government Code Section 65962.5 and the Original Project will not create a hazard to the public. As such, impacts would be less than significant.

**Analysis of Revised Project:** California Government Code Section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. Further evaluation in the PEIR is required to identify whether hazardous materials sites exist on or in the vicinity of the potential sites. The following five databases were reviewed for hazardous material site listings onsite or within 0.25 mile of the potential sites:

- GeoTracker, State Water Resources Control Board
- EnviroStor, Department of Toxic Substances Control
- EnviroMapper, US Environmental Protection Agency
- EJScreen, US Environmental Protection Agency
- Solid Waste Information System (SWIS), California Department of Resource Recovery and Recycling

Site S6-025 proposed as part of the Revised Project, is not located on the Department of Toxic Substances Control's (DTSC) EnviroStor site (DTSC, n.d.). Consistent with the findings of the 2022 Certified PEIR, none of the housing opportunity sites are identified on any of the databases. Therefore, the Revised Project site is not identified as a hazardous materials site pursuant to Government Code Section 65962.5 and the Revised

Project will not create a hazard to the public. As such, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the nearest public-use airport to the City is the Fullerton Municipal Airport approximately 10 miles to the west. No portion of the City is within an airport land use plan or within two miles of an airport. Thus, implementation of the Original Project would not result in safety hazards related to aircraft operations and no impact would occur.

**Analysis of Revised Project:** Under the Revised Project, no portion of the City is within an airport land use plan or within two miles of an airport. Thus, consistent with the findings of the 2022 Certified PEIR, implementation of the Revised Project would not result in safety hazards or excessive noise for people residing or working in the Project area, and no impact would occur. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.10 Hydrology and Water Quality**

*Would the Project:*

- a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that future development under the Original Project is subject to the requirements of the State Water Resources NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities. Construction-related water quality impacts would be minimized through compliance with the NPDES Permit. Therefore, water quality impacts associated with construction activities would be less than significant. The City requires new development and significant redevelopment projects within the City to address stormwater quality impacts through incorporation of permanent (post-construction) BMPs in project design. Water Quality Management Plans (WQMPs) are required for private and public new development and significant redevelopment projects. The City requires the project applicant to submit a project WQMP at the project processing and permitting stages. In general, the WQMPs shall follow guidelines set forth in Model WQMP, provided in the Orange County Drainage Area Management Plan. Additionally, the Original Project would be required to comply with the City's Municipal Code Section 16.04, Water Quality Control. Compliance with the local standards would ensure water quality impacts associated with operation would be less than significant.

**Analysis of Revised Project:** The Revised Project would not alter impacts related to hydrology and water quality. Construction activities would be consistent with those previously anticipated and therefore would not result in increased impacts. Consistent with the Original Project, construction-related water quality impacts due to future development under the Revised Project would be minimized through compliance with the NPDES Permit. The Revised Project results in a decrease in housing units and does not proposed a change in land uses. Thus, the amount and quality of runoff from the Revised Project development would be comparable to that previously analyzed. The Revised Project would comply with City requirements regarding incorporation of permanent (post-construction) BMPs in project design and the preparation of WQMPs. Additionally, the Revised Project would comply with the City's Municipal Code Section 16.04, Water Quality Control. Compliance with the local standards would ensure water quality impacts associated with construction and operation of the Revised Project would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project does not propose the use of any wells or other groundwater extraction activities. Therefore, the Original Project would not directly draw water from the groundwater table. Accordingly, implementation of the Original Project has no potential to substantially deplete or decrease groundwater supplies and the Original Project's impact to groundwater supplies would be less than significant.

**Analysis of Revised Project:** Consistent with the Original Project, the Revised Project does not propose the use of any wells or other groundwater extraction activities. Therefore, the Revised Project would not directly draw water from the groundwater table. Accordingly, implementation of the Revised Project has no potential to substantially deplete or decrease groundwater supplies and the Revised Project's impact to groundwater supplies would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- c. Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - i. result in substantial erosion or siltation on- or off-site?**

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the majority of any new development that would occur under the Original Project would occur in areas that are already developed and as such would not alter the existing course of a stream or river. Although soils at the housing sites could experience erosion during construction and development of individual projects pursuant to the Original Project, implementation of the Original Project would not cause substantial soil erosion. A SWPPP specifying BMPs for minimizing pollution of stormwater with soil and sediment during construction would be prepared and

implemented. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from grading and construction activities. Therefore, impacts related to substantial soil erosion or siltation would be less than significant.

**Analysis of Revised Project:** Consistent with the Original Project, the majority of any new development that would occur under the Revised Project, including at the now proposed Site S6-025, would occur in areas that are already developed and as such would not alter the existing course of a stream or river. Implementation of the Revised Project would not cause substantial soil erosion. A SWPPP specifying BMPs for minimizing pollution of stormwater with soil and sediment during the Revised Project construction would be prepared and implemented. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from the Revised Project-related grading and construction activities. Therefore, impacts related to substantial soil erosion or siltation would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- ii. Substantially increase the rate or amount of surface run off in a manner which would result in flooding on- or off-site?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that according to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps, the northwestern corner of housing opportunity sites S6-020, the northwestern portion of S6-015 and the southern portion of S7-001 are designated as 0.2% annual chance flood hazard, areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile (Zone X); and the southeastern portion of S4-053 is designated as areas subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies (Zone A). Zone A is identified as a Special Flood Hazard Area and Zone X is identified as a moderate flood hazard area. The 2022 Certified PEIR concluded that implementation of the Original Project may result in an increase in impervious surfaces. However, existing requirements for future development include review by the City Engineer to ensure adequate drainage facilities are provided that meet City design and requirements and prevent flooding. Additionally, implementation of the WQMP and associated BMPs would reduce runoff from the site and would provide runoff controls and treatments. Implementation of the Original Project would not substantially alter the existing drainage pattern, nor is the potential increase in surface runoff anticipated to be substantial. Therefore, impacts related to flooding on- or -site due to an increase in the rate or amount of surface runoff would be less than significant.

**Analysis of Revised Project:** Under the Revised Project, sites S7-001 [designated as 0.2% annual chance flood hazard, areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile (Zone X)] and S4-053 [designated as areas subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies (Zone A)] would be removed. As shown in Figure 4-1, *Flood Hazard Zone - S6-015, S6-020, and S6-025*, the northern half of the proposed new site under the Revised Project Site S6-025 is designated as Zone X. A small portion of the eastern edge of Site S6-025 is designated as Zone A (FEMA, 2024). Consistent with the Original Project, implementation of the Revised Project may result in an increase in impervious surfaces. However, existing

requirements for future development include review by the City Engineer to ensure adequate drainage facilities are provided that meet City design and requirements and prevent flooding. Additionally, implementation of the WQMP and associated BMPs would reduce runoff from the site and would provide runoff controls and treatments. Implementation of the Revised Project would not substantially alter the existing drainage pattern, nor is the potential increase in surface runoff anticipated to be substantial. Therefore, impacts related to increase in the rate or amount of surface runoff would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

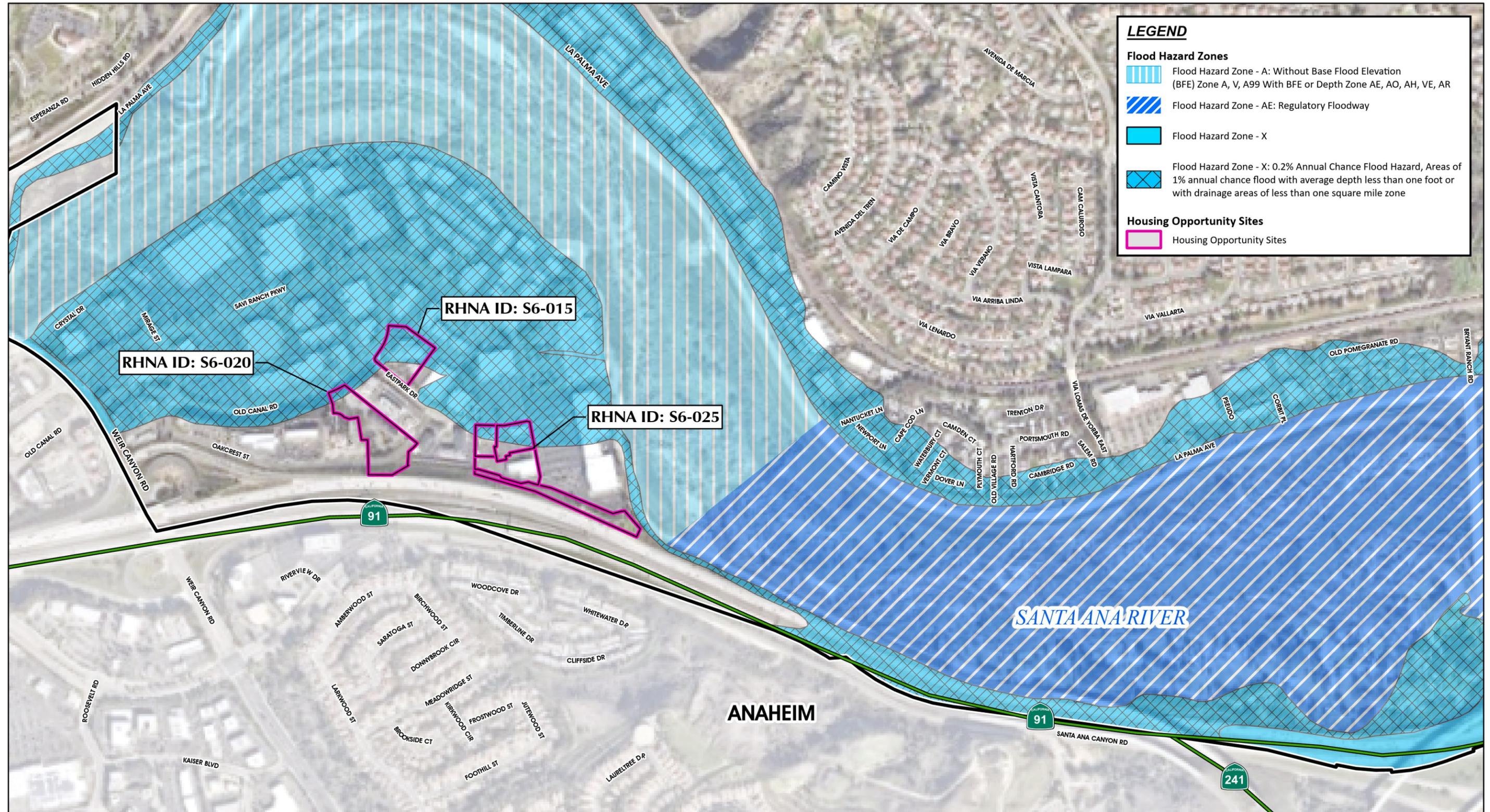
*iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that in general, the housing opportunity sites drain to the existing storm drain system. Future development would require the study of localized conditions and construction of additional storm drains based on site-specific conditions and proposed development plans. City standards require developed storm flows to be less than or equal to existing storm flows. There is potential that upgrades to the existing storm drain system in the City would be required as result of new development and redevelopment that could occur under the Original Project. However, as concluded in the General Plan EIR, the cost of such improvements would be offset through the payment of developer fees to the City. As such, impacts were determined to be less than significant.

**Analysis of Revised Project:** Consistent with the Original Project, under the Revised Project, the housing opportunity sites would drain to the existing storm drain system. The proposed new housing opportunity site, Site S6-025, is currently developed with commercial uses and covered with impervious surfaces. Therefore, development of housing onsite would not substantially alter the amount of stormwater runoff. Future development would require the study of localized conditions and construction of additional storm drains based on site-specific conditions and proposed development plans. The Revised Project would comply with City standards and the cost of potential improvements would be offset through the payment of developer fees to the City. As such, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

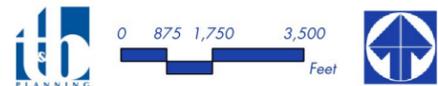
*iv. Impede or redirect flood flow?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR stated that the City of Yorba Linda has adopted local standards for construction in floodplain areas. Construction within Special Flood Hazard Areas (SFHAs) is governed by the City's Municipal Code Chapter 15.12, Flood Damage Protection. Section 15.12.110 sets forth construction requirements for development that would minimize flood hazard risks. With compliance with Federal and local regulatory requirements, impact would be less than significant.



Source(s): ESRI, NearMap (February 2024), OC Landbase (2024), SB County (2024), City of Yorba Linda (02-2024)

Figure 4-1



Flood Hazard Zone - S6-015, S6-020, and S6-025

**Analysis of Revised Project:** As discussed above, the northern half of the proposed new site under the Revised Project Site S6-025 is designated as Zone X. A small portion of the eastern edge of Site S6-025 is designated as Zone A (FEMA, 2024). Additionally, sites S7-001 and S4-053 would be removed. Consistent with the Original Project, the Revised Project would comply with Federal and local regulatory requirements regarding construction within SFHAs, and as such, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

*d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that there are four sites within Zone A and Zone X flood hazard zones. The Original Project would comply with the City’s Municipal Code Chapter 15.12, Flood Damage Protection, which sets forth construction requirements for development within a SFHA to minimize flood hazard risks. With compliance with Federal and local regulatory requirements, impacts would be less than significant. Therefore, impacts related to risk of pollutant release due to inundation from a flooding event would be less significant. Additionally, although there are no large water tanks in the area that could impact the potential sites, there are dams in the region that could create flooding impacts. The potential sites are not in a dam inundation area. Therefore, there is no risk of pollutant release due to inundation from a seiche. No impact would occur. Finally, the City is approximately 19 miles inland from the Pacific Ocean, outside of the tsunami hazard zone identified by the California Governor’s Office of Emergency Services. Therefore, there is no possibility of the City being affected by a tsunami; there is no risk of pollutant release due to inundation from a tsunami. No impact would occur.

**Analysis of Revised Project:** Under the Revised Project, there are three sites within Zone A and Zone X flood hazard zones. Consistent with the Original Project, the Revised Project would comply with the City’s Municipal Code Chapter 15.12, Flood Damage Protection. With compliance with Federal and local regulatory requirements, impacts would be less than significant. Therefore, impacts related to risk of pollutant release due to inundation from a flooding event would be less significant. Consistent with the Original Project, according to the Department of Water Resources Division of Safety of Dams (DSOD), none of the housing opportunity sites (including the proposed new site under the Revised Project Site S6-025) are located within a dam inundation area (DSOD, n.d.). Thus, there is no risk of pollutant release due to inundation from a seiche.

Additionally, there is no possibility of the City being affected by a tsunami; there is no risk of pollutant release due to inundation from a tsunami. Consistent with the Original Project, impacts regarding the risk release of pollutants during Project inundation would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- e. Conflict with or obstruct implementation of water quality control plan or sustainable groundwater management plan?*

**2022 Certified PEIR Finding:** The City is under the jurisdiction of Santa Ana Regional Water Quality Control Board (SARQWCB) and development in the City is subject to the requirements outlined in the Santa Ana River Basin Plan (Basin Plan). The City is in the Orange County Basin and the Basin has a Groundwater Basin Master Plan, which is intended to identify projects and programs to enhance basin replenishment, increase the reliability of groundwater resources, improve, and protect groundwater quality, and ensure that the groundwater supplies are suitable for beneficial uses. The 2022 Certified PEIR concluded that the Original Project would be required to comply with the NPDES standards and the City's Water Quality Control regulations to ensure pollutant loads are minimized for downstream receiving waters. The City and the SARQWCB would also require a WQMP to be prepared for future development and implementation of BMPs for site-specific runoff controls and treatments. Conformance with the Basin Plan would be ensured during the permitting process. Therefore, the Original Project would not obstruct implementation of applicable plans, and impacts would be less than significant.

**Analysis of Revised Project:** As discussed above, the Revised Project would not substantially alter impacts related to hydrology and water quality. Consistent with the Original Project, the Revised Project would comply with the NPDES standards and the City's Water Quality Control regulations to ensure pollutant loads are minimized for downstream receiving waters. The Revised Project would also comply with the SARQWCB requirements regarding a WQMP. Therefore, implementation of the Revised Project would not conflict or obstruct with the Basin Plan. Additionally, compliance with General Plan Policies CN-4.6 and PSU-6.1 would ensure the protection of groundwater. Therefore, the Revised Project would not result in a conflict with the Groundwater Basin Master Plan. The Revised Project would not obstruct implementation of applicable plans, and impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.11 Land Use and Planning**

*Would the Project:*

- a. Physically divide an established community?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the implementation of the Original Project is not anticipated to physically divide an established community and impacts would be less than significant.

**Analysis of Revised Project:** Consistent with the findings of the 2022 Certified PEIR, under the Revised Project, the proposed residential development would involve the development of vacant land, intensification of existing land uses, and/or the introduction of new residential land uses on parcels throughout the City. The proposed new housing opportunity site, Site S6-025, is currently developed with commercial uses. Development would occur within existing urban areas and infill sites, which is not expected to divide an

established community. Therefore, the implementation of the Revised Project is not anticipated to physically divide an established community and impacts are less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that implementation of the Original Project would not result in an inconsistency with the General Plan, Zoning Code, or Connect SoCal. Although the Original Project would result in a change to the General Plan land use designations for the housing opportunity sites, the Original Project would not result in significant land use and planning conflicts in the context of compliance with applicable environmental plans, policies, and regulations beyond those identified in other subsections of the 2022 Certified PEIR and impacts would be less than significant.

**Analysis of Revised Project:** Consistent with the findings of the 2022 Certified PEIR, implementation of the Revised Project would not result in an inconsistency with the General Plan, Zoning Code, or Connect SoCal. The Revised Project would not result in significant land use and planning conflicts in the context of compliance with applicable environmental plans, policies, and regulations beyond those identified in other subsections of this PEIR Addendum and impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.12 Mineral Resources**

*Would the Project:*

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that mineral resources present in the City are petroleum and aggregate materials and that the majority of the potential sites are not located within the California Geological Survey (CGS) mineral resource zones (MRZ). Three of the sites are located within the City's Oil Production Zone (S3-201; S3-210; and S3-203). However, as reflected on the Department of Conservation Well Finder Maps, all oil wells located on these sites are plugged and sealed and have since been developed over. Therefore, the 2022 Certified PEIR concluded that implementation of the Original Project would not cause the loss of availability of mineral resources valuable to the region or state, and no impact would occur.

**Analysis of Revised Project:** Under the Revised Project, Site S6-025 is proposed to be added. According to Exhibit CN-3 of the City's General Plan Conservation Element, a small portion along the eastern boundary of

Site S6-025 is located within a MRZ (City of Yorba Linda, 2016a). Site S6-025 is not located within the City's Oil Production Zone and no wells are present according to the Department of Conservation Well Finder (DOC, n.d.). Site S6-025 is currently developed with commercial uses. Because the site is currently developed, redevelopment of this site would not cause the loss of availability of mineral resources and no impact to mineral resources from the addition of this site would occur. Consistent with the Original Project, the Revised Project would not cause the loss of availability of mineral resources valuable to the region or state, and no impact would occur. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that implementation of the Original Project would not change or impact ongoing oil operations, including oil extraction activities. Development in accordance with the Original Project would not expand into mineral resource recovery sites or currently utilized oil fields. Therefore, the Original Project would not result in the loss of availability of a locally important mineral resource. No impact would occur.

**Analysis of Revised Project:** Consistent with the Original Project, development under the Revised Project would not expand into mineral resource recovery sites or currently utilized oil fields. Therefore, the Revised Project would not result in the loss of availability of a locally important mineral resource. No impact would occur. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.13 Noise**

*Would the Project result in:*

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project that future development would likely occur in close proximity to noise sensitive receptors and elevate the ambient noise environment. Therefore, construction noise impacts would be potentially significant. Mitigation Measures MM 4.6-1 through MM 4.6-3 would reduce construction-related noise. However, due to the unknown number of construction activities that could occur at one time, proximity of construction activities to sensitive receptors, and other factors that cannot be quantified at this time, such as the longevity of activities, construction-related noise impacts may not be reduced to less than significant levels for some future development. Therefore, construction-related noise impacts were determined to remain significant and unavoidable.

The 2022 Certified PEIR concluded that the Original Project would not result in a significant impact from operational off-site traffic increases. However, future development could result in a significant impact from operation stationary source activities. The existing noise sensitive receivers located within 50 feet of parking lot activities, trash enclosures, dog parks, pool/spas, or other similar source of outdoor activity may experience unmitigated exterior noise levels exceeding the exterior noise level limits. Therefore, the stationary source noise impacts due to Project-related stationary source activities would be potentially significant. With the implementation of Goal N-4 of the City of Yorba Linda General Plan Noise Element and compliance with the exterior noise level limits outlined in the City of Yorba Linda Municipal Code Section 8.32.060 and Mitigation Measure MM 4.6-5, the Project stationary source impacts would be reduced to less than significant impacts.

**Analysis of Revised Project:** A Noise and Vibration Impact Analysis (*Technical Appendix B*) was prepared by Urban Crossroads, Inc. (Urban Crossroads) to evaluate the Revised Project in comparison to the Original Project.

***Construction Noise Impact Analysis***

As with the Original Project, construction under the Revised Project would likely occur in close proximity to existing noise sensitive receivers and elevate the ambient noise environment. Furthermore, the construction of future development projects could last for prolonged periods and result in a substantial or periodic increase in the ambient noise levels. Consistent with the conclusions of the Original Project, even with the implementation of Mitigation Measures MM 4.6-1 through MM 4.6-3, construction-related impacts under the Revised Project would remain significant and unavoidable.

***Operational Noise Impact Analysis – Stationary Noise***

To demonstrate compliance with local noise regulations, the Revised Project stationary source noise levels are evaluated against the exterior noise level limits outlined in City of Yorba Linda Municipal Code Section 8.32.060. As shown on Table 4-1, *Revised Project Stationary Source Noise Level Compliance*, operational noise levels associated with the Revised Project would be the same as the Original Project and would satisfy the City of Yorba Linda daytime and nighttime exterior noise level limits at distances of greater than 50 feet from the stationary noise source activity. However, the existing noise sensitive receivers located within 50 feet of residential air conditioning units, parking lot activities, trash enclosures, dog parks, pool/spas, or other similar source of outdoor activity may experience unmitigated exterior noise levels exceeding the exterior noise level limits. Therefore, the unmitigated stationary source noise impacts due to Project-related stationary source activities are considered potentially significant.

**Table 4-1 Revised Project Stationary Source Noise Level Compliance**

Distance to Noise Source (Feet)	Original Project Operational Noise Levels (dBA Leq) <sup>1</sup>	Revised Project Operational Noise Levels (dBA Leq)	Noise Level Limits (dBA Leq) <sup>2</sup>		Noise Level Limits Exceeded? <sup>3</sup>	
			Daytime	Nighttime	Daytime	Nighttime
25'	61.2	61.2	55	50	Yes	Yes
50'	53.6	53.6	55	50	No	Yes
100'	44.8	44.8	55	50	No	No
150'	34.5	34.5	55	50	No	No
200'	30.5	30.5	55	50	No	No

<sup>1</sup> Highest potential stationary source noise activity (Table 9-1 of the Noise and Vibration Impact Analysis).

<sup>2</sup> Exterior noise standards (Municipal Code, Section 8.32.060).

<sup>3</sup> Do the estimated Project stationary source noise activities exceed the noise level limits?

“Daytime” = 7:00 a.m. – 10:00 p.m.; “Nighttime” = 10:00 p.m. – 7:00 a.m.

Source: (Urban Crossroads, 2024a)

As with the Original Project, implementation of Goal N-4 of the City of Yorba Linda General Plan Noise Element, which includes policies designed to minimize the potentially significant stationary source noise, and compliance with the exterior noise level limits outlined in the City of Yorba Linda Municipal Code Section 8.32.060 and Mitigation Measure MM 4.6-5, the Revised Project stationary source impacts are considered less than significant.

**Off-Site Traffic Noise Analysis**

As shown in Table 4-2, *Existing with Revised Project Traffic Noise Level Increases*, as with the Original Project, the Revised Project traffic noise would not exceed the City’s applicable significance threshold under the Existing with Project traffic conditions.

As shown in Table 4-3, *Horizon Year (2045) Traffic Noise Levels*, Revised Project off-site traffic noise level increases would range from 0.0 to 0.3 dBA CNEL. As with the Original Project, development under the Revised Project would not exceed the City’s applicable significance threshold under the Horizon Year (2045) traffic conditions and therefore, would experience less than significant noise level impacts from Project-related off-site traffic noise levels, consistent with the conclusions of the 2009 Certified PEIR Findings.

**Table 4-2 Existing with Revised Project Traffic Noise Level Increases**

ID	Road	Segment	Original Project CNEL at Receiving Land Use (dBA) <sup>1</sup>			Revised Project CNEL at Receiving Land Use (dBA)			Incremental Noise Level Increase Threshold <sup>2</sup>	
			No Project	With Project	Project Addition	No Project	With Project	Project Addition	Limit	Exceeded?
1	Rose Dr.	s/o Imperial Hwy.	71.6	71.9	0.3	72.2	72.5	0.3	1.5	No
2	Imperial Hwy.	e/o Rose Dr.	77.4	77.6	0.2	N/A	N/A	N/A	1.5	No
3	Imperial Hwy.	w/o Prospect Av.	77.6	77.7	0.1	77.5	77.5	0.0	1.5	No
4	Imperial Hwy.	e/o Prospect Av.	77.3	77.4	0.1	77.3	77.3	0.0	1.5	No
5	Imperial Hwy.	n/o Bastanchury Rd.	77.1	77.2	0.1	N/A	N/A	N/A	1.5	No
6	Bastanchury Rd.	w/o Imperial Hwy.	72.3	72.9	0.6	72.5	72.6	0.1	1.5	No
7	Bastanchury Rd.	e/o Imperial Hwy.	73.0	73.5	0.5	73.4	73.5	0.1	1.5	No
8	Imperial Hwy.	n/o Lemon Dr.	76.8	76.9	0.1	76.8	76.8	0.0	1.5	No
9	Imperial Hwy.	s/o Lemon Dr.	76.6	76.7	0.1	76.5	76.5	0.0	1.5	No
10	Lakeview Av.	n/o Buena Vista Av.	68.9	69.3	0.4	69.1	69.2	0.1	1.5	No
11	Lakeview Av.	s/o Buena Vista Av.	68.2	68.6	0.4	68.5	68.6	0.1	1.5	No
12	Buena Vista Av.	w/o Lakeview Av.	67.1	68.1	1.0	67.5	67.8	0.3	1.5	No
13	Bastanchury Rd.	e/o Plumosa Dr.	72.6	72.7	0.1	N/A	N/A	N/A	1.5	No
14	Bastanchury Rd.	w/o Plumosa Dr.	N/A	N/A	N/A	72.6	72.6	0.0	1.5	No
15	Lakeview Av.	s/o Bastanchury Rd.	68.1	68.7	0.6	68.2	68.5	0.3	1.5	No
16	Bastanchury Rd.	w/o Lakeview Av.	72.4	72.9	0.5	72.6	72.9	0.3	1.5	No
17	Bastanchury Rd.	e/o Lakeview Av.	73.1	73.3	0.2	73.4	73.4	0.0	1.5	No
18	Lakeview Av.	n/o Yorba Linda Bl.	69.6	70.0	0.4	N/A	N/A	N/A	1.5	No
19	Lakeview Av.	s/o Yorba Linda Bl.	68.9	69.3	0.4	68.7	68.9	0.2	1.5	No
20	Yorba Linda Bl.	w/o Lakeview Av.	74.6	74.7	0.1	74.7	74.7	0.0	1.5	No
21	Bastanchury Rd.	w/o Fairmont Bl.	72.5	72.6	0.1	N/A	N/A	N/A	1.5	No
22	Gypsum Canyon Rd.	s/o La Palma Av.	69.6	70.3	0.7	69.5	69.9	0.4	1.5	No
23	La Palma Av.	e/o Gypsum Canyon Rd.	70.2	71.2	1.0	70.1	70.5	0.4	1.5	No

**Table 4-3 Horizon Year (2045) Traffic Noise Levels**

ID	Road	Segment	Original Project CNEL at Receiving Land Use (dBA) <sup>1</sup>			Revised Project CNEL at Receiving Land Use (dBA)			Incremental Noise Level Increase Threshold <sup>2</sup>	
			No Project	With Project	Project Addition	No Project	With Project	Project Addition	Limit	Exceeded?
1	Rose Dr.	s/o Imperial Hwy.	72.3	72.6	0.3	73.1	73.2	0.1	1.5	No
2	Imperial Hwy.	e/o Roase Dr.	77.9	78.1	0.2	N/A	N/A	N/A	1.5	No
3	Imperial Hwy.	w/o Prospect Av.	77.9	78.0	0.1	78.0	78.0	0.0	1.5	No
4	Imperial Hwy.	e/o Prospect Av.	77.6	77.8	0.2	77.7	77.8	0.1	1.5	No
5	Imperial Hwy.	n/o Bastanchury Rd.	77.7	77.8	0.1	N/A	N/A	N/A	1.5	No
6	Bastanchury Rd.	w/o Imperial Hwy.	73.5	73.9	0.4	73.0	73.1	0.1	1.5	No
7	Bastanchury Rd.	e/o Imperial Hwy.	74.2	74.5	0.3	74.2	74.2	0.0	1.5	No
8	Imperial Hwy.	n/o Lemon Dr.	77.1	77.2	0.1	77.3	77.3	0.0	1.5	No
9	Imperial Hwy.	s/o Lemon Dr.	76.9	77.0	0.1	77.0	77.0	0.0	1.5	No
10	Lakeview Av.	n/o Buena Vista Av.	69.6	69.9	0.3	69.9	70.1	0.2	1.5	No
11	Lakeview Av.	s/o Buena Vista Av.	68.4	68.8	0.4	69.1	69.2	0.1	1.5	No
12	Buena Vista Av.	w/o Lakeview Av.	67.8	68.6	0.8	67.9	68.2	0.3	1.5	No
13	Bastanchury Rd.	e/o Plumosa Dr.	72.9	73.1	0.2	N/A	N/A	N/A	1.5	No
14	Bastanchury Rd.	w/o Plumosa Dr.	N/A	N/A	N/A	73.0	73.1	0.1	1.5	No
15	Lakeview Av.	s/o Bastanchury Rd.	68.2	68.8	0.6	68.6	68.9	0.3	1.5	No
16	Bastanchury Rd.	w/o Lakeview Av.	73.1	73.6	0.5	73.3	73.6	0.3	1.5	No
17	Bastanchury Rd.	e/o Lakeview Av.	73.6	73.8	0.2	73.9	73.9	0.0	1.5	No
18	Lakeview Av.	n/o Yorba Linda Bl.	70.2	70.6	0.4	N/A	N/A	N/A	1.5	No
19	Lakeview Av.	s/o Yorba Linda Bl.	69.6	69.9	0.3	69.6	69.7	0.1	1.5	No
20	Yorba Linda Bl.	w/o Lakeview Av.	74.1	74.2	0.1	74.1	74.1	0.0	1.5	No
21	Bastanchury Rd.	w/o Fairmont Bl.	72.9	73.1	0.2	N/A	N/A	N/A	1.5	No
22	Gypsum Canyon Rd.	s/o La Palma Av.	72.2	72.6	0.4	70.0	70.0	0.0	1.5	No
23	La Palma Av.	e/o Gypsum Canyon Rd.	72.6	73.2	0.6	70.5	70.6	0.1	1.5	No

**Conclusion**

Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required or feasible. The following mitigation measures from the 2022 Certified PEIR are applicable to the Revised Project:

- MM 4.6-1 Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity.
- MM 4.6-2 The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity.
- MM 4.6-3 The construction contractor shall limit haul truck deliveries to the same hours specified for construction equipment Section 8.32.090[D] of the City of Yorba Linda Municipal Code. The contractor shall design delivery routes to minimize the exposure of sensitive land uses to delivery truck noise.
- MM 4.6-5 Prior to issuance of any construction permits, applicants for individual projects that are within 50 feet of a sensitive receptor, shall prepare and submit to the City of Yorba Linda Planning Department a study to evaluate potential operational-related stationary source noise impacts. The noise report shall be prepared by an acoustical engineer using the ISO 9613-2 protocol in the CadnaA (Computer Aided Noise Abatement) computer program. If the study determines a potential exceedance of the City's thresholds (55 dBA  $L_{eq}$  daytime, or 50 dBA  $L_{eq}$  nighttime), measures shall be identified that ensure noise levels are reduced to below the thresholds. Identified measures shall be included on all construction and building documents and submitted for verification to the City of Yorba Linda Planning Department

*b. Generation of excessive ground borne vibration or ground borne noise levels?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR disclosed that the Original Project's construction activities would potentially result in a perceptible groundborne vibration or noise. Mitigation Measure MM 4.6-4 would reduce construction-related vibration impacts to acceptable levels and ensure that construction would not exceed the maximum acceptable continuous vibration threshold for fragile buildings of 0.10 PPV (in/sec). Therefore, impacts would be less than significant. Additionally, residential development is not expected to include any specific type of stationary vibration sources.

**Analysis of Revised Project:**

**Operational – Stationary Source**

Consistent with the Original Project, the Revised Project’s residential development is not expected to include any specific type of stationary vibration sources, and therefore, the potential stationary source vibration impacts are considered less than significant.

**Construction Vibration**

Table 4-4, *Revised Project Construction Equipment Vibration Levels* presents the expected Revised Project-related vibration levels at distances ranging from 25 to 200 feet from construction activity. Based on maximum acceptable continuous vibration threshold of 0.3 Peak Particle Velocity (PPV) (in/sec), the typical revised Project construction vibration levels for nearby “older residential structures” will fall below the building damage thresholds at 25 feet. However, consistent with the Original Project, individual projects may be located at distances of less 25 feet from existing nearby sensitive receivers or adjacent to nearby fragile buildings, and the construction-related vibration impacts may exceed the maximum acceptable continuous vibration threshold for fragile buildings of 0.10 PPV (in/sec) for some projects resulting in a potentially significant impact. The Revised Project’s construction-related vibration impacts would be less than significant with mitigation incorporated. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Table 4-4 Revised Project Construction Equipment Vibration Levels**

Distance to Const. Activity (Feet)	Typical Construction Vibration Levels PPV (in/sec) <sup>1</sup>						Thresholds PPV (in/sec) <sup>2</sup>	Thresholds Exceeded? <sup>3</sup>
	Vibratory Roller	Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Highest Vibration Level		
25'	0.210	0.210	0.035	0.076	0.089	0.210	0.3	No
50'	0.074	0.074	0.012	0.027	0.031	0.074	0.3	No
100'	0.026	0.026	0.004	0.010	0.011	0.026	0.3	No
150'	0.014	0.014	0.002	0.005	0.006	0.014	0.3	No
200'	0.009	0.009	0.002	0.003	0.004	0.009	0.3	No

<sup>1</sup> Based on the Vibration Source Levels of Construction Equipment included on Table 10-1 of the Noise and Vibration Impact Analysis

<sup>2</sup> Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.

<sup>3</sup> Does the peak vibration exceed the acceptable vibration thresholds?

“PPV” = Peak Particle Velocity

Source: (Urban Crossroads, 2024a)

**Mitigation:** No additional mitigation required or feasible. The following mitigation measures from the 2022 Certified PEIR are applicable to the Revised Project:

MM 4.6-4 Prior to issuance of any construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, within 25 feet of sensitive receptors (e.g., residences and fragile structures), shall prepare and submit to the City of Yorba Linda Planning Department a study to evaluate potential construction-related vibration impacts. The vibration assessment shall be prepared by an acoustical engineer and be based on recognized vibration-induced architectural damage criterion. If the study determines a potential exceedance of the thresholds, measures shall be identified that ensure vibration levels are reduced to below the thresholds. Identified measures shall be included on all construction and building documents and submitted for verification to the City of Yorba Linda Planning Department.

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Project site would not be exposed to excessive noise levels from airport operations, and no impact would occur.

**Analysis of Revised Project:** The City is not located within two miles of an airport or airstrip. The closest airports are the Fullerton Municipal Airport approximately 10 miles to the west and John Wayne Airport located roughly 13 miles southwest of the City. Consistent with the Original Project, the Revised Project would not be exposed to excessive noise levels from airport operations, and no impact would occur. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.14 Population and Housing**

*Would the Project:*

- a. *Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project's construction phases would not result in a long-term increase in employment which could induce substantial unplanned population growth from short-term construction activities. Therefore, the Original Project would not directly or indirectly induce substantial population growth in the City during construction. The 2022 Certified PEIR also concluded that Original Project buildout would not result in substantial unplanned growth in the area since 1) Southern California Association of Governments (SCAG) assigned Regional Housing Needs Allocation (RNHA) obligations and would update its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to reflect planned growth consistent with the Housing Element, 2) the planned housing responds to an existing unmet need, and 3) the housing opportunity sites are infill development with adequate nearby

infrastructure. Therefore, the Original Project would not result in substantial unplanned population growth. Impacts would be less than significant.

**Analysis of Revised Project:** Under the Revised Project, a total of 1,929 dwelling units would be allowed – a decrease of 481 units from the Original Project evaluated in the 2022 Certified PEIR. Utilizing the average household size of 2.94 residents per unit, which was utilized in the 2022 Certified PEIR, under the Revised Project, future housing development would result in population growth of approximately 5,671 residents – a decrease of 1,414 residents from the 2022 Certified PEIR. Consistent with the findings of the 2022 Certified PEIR, Revised Project buildout would not result in substantial unplanned growth in the area. Impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

*b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project is not expected to displace a substantial amount of existing housing or people, and it would increase the number of dwelling units and population by allowing higher intensity residential uses. As a result, impacts would be less than significant.

**Analysis of Revised Project:** The Revised Project would allow for approximately 1,929 additional residential units – a decrease of 481 units from the 2022 Certified PEIR. The Revised Project is not expected to displace a substantial amount of existing housing or people, in fact, the Revised Project would displace 5 less residences as compared to the Original Project. The Revised Project would remove the following sites which currently have homes on them: Site S3-034 (1 single-family home); Site S3-205A (2 single-family homes); Site S4-060 (1 single-family home); and Site S4-201 (1 single-family home). Consistent with the Original Project, the Revised Project would increase the number of dwelling units and population by allowing higher intensity residential uses. As a result, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.15 Public Services**

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

i. *Fire Protection;*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that because the Original Project does not include construction of new fire station facilities and does not generate a need for additional facilities, Project-related impacts to fire protection services are evaluated as less than significant. Impacts would be less than significant.

**Analysis of Revised Project:** The Revised Project would allow for approximately 1,929 additional residential units – a decrease of 481 units from the Original Project evaluated in the 2022 Certified PEIR. Under the Revised Project, future housing development would result in a population growth of approximately 5,671 residents – a decrease of 1,414 residents from the Original Project evaluated in the 2022 Certified PEIR. Consistent with the Original Project, implementation of the Revised Project is not expected to result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impact. Additionally, future development associated with the Revised Project would occur in an area of the City already served by OCFA; therefore, the Revised Project would not result in an expansion of OCFA’s service area. Further, the future development would be required to comply with all applicable fire code and ordinances for construction, access, water mains, fire flows, and fire hydrants. Compliance with OCFA requirements would ensure adequate provision of resources. Additionally, project applicants for future development under the Revised Project would be required to enter into a Secured Fire Protection Agreement with OCFA to address any incremental impacts to fire facilities and services. Because the Revised Project does not include construction of new fire station facilities and does not generate a need for additional facilities, the Revised Project-related impacts to fire protection services are evaluated as less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

ii. *Police Protection;*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded because the Original Project does not include construction of new police facilities and does not generate a need for additional facilities, and future development will be required to pay development impacts fees that will provide its fair share of future police needs; increases in demands for police protection resulting from implementation of the Original Project would not have significant impacts on the Orange County Sheriff’s Department (OCSD) services.

**Analysis of Revised Project:** Consistent with the findings of the 2022 Certified PEIR, the increase in demands on police services resulting from the implementation of the Revised Project, which would result in fewer units and residents than the Original Project, would not adversely impact OCSD’s existing resources. The increase in potential services needed would not require the construction of a new police station or improvements to the existing station that serves the City. As with the Original Project, implementation of the Revised Project would result in an increase in calls for service; however, OCSD has indicated that this increase would not adversely impact OCSD’s existing resources. Additionally, OCSD contract with the City allows the City to expand services, if needed, and if authorized. OCSD would work closely with the City to determine

proper level of law enforcement staffing based on best practices for population and crime statistics. Moreover, development impact fees will be paid to OCSD to accommodate new demand for police protection services to the Revised Project area. Because the Revised Project does not include construction of new police facilities and does not generate a need for additional facilities, and future development will be required to pay development impacts fees that will provide its fair share of future police needs; increases in demands for police protection resulting from implementation of the Revised Project would not have significant impacts on OCSD services. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

iii. *Schools;*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that there is sufficient capacity to accommodate and serve the students generated by the Original Project, and impacts would be less than significant. Additionally, the Original Project would be required to pay appropriate impact fees per Government Code Section 65995.

**Analysis of Revised Project:** As previously discussed, the Revised Project would result in a decrease in residential units and population compared to the Original Project pay appropriate 2022 Certified PEIR. Therefore, there would be a corresponding reduction in student generation. Because there was sufficient capacity to accommodate the Original Project-generated students, and the Revised Project would generate less students than the Original Project, it can be determined that there is sufficient capacity to accommodate and serve the Revised Project-generated students, and impacts would be less than significant. Additionally, the Revised Project would be required to pay appropriate impact fees per Government Code Section 65995. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

iv. *Parks; or*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or recreational facilities or the need for new or physically altered parks or recreational facilities.

**Analysis of Revised Project:** Consistent with the Original Project, under the Revised Project, all residential developments within the City would be required to pay impact fees to offset the cost to expand or construct new park and recreational space and facilities to adequately serve the City's growing population, which are reinforced in Section 15.56, Park and Recreation Impact Fees, of the City's Municipal Code. Construction of new park and/or recreational facilities would occur within the housing opportunity sites, or within land use designations that allow such facilities. Therefore, as with the Original Project, the Revised Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or recreational facilities or the need for new or physically altered parks or recreational facilities. Accordingly,

the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

v. *Other Public Facilities?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that Original Project buildout would increase the City's population by an estimated 7,085 residents, thus increasing demand for library services. Original Project impacts on the Yorba Linda Public Library (YLPL) system would include needs for increased staffing, increased collection budget, and increased operating hours. The City has indicated that demand on library services would be incremental and would not require the need for new or expanded physical library facilities, the construction of which could cause a substantial adverse impact. Therefore, impacts to library services would be less than significant.

**Analysis of Revised Project:** As previously discussed, the Revised Project would result in a decrease in residential units and population compared to the Original Project evaluated in the 2022 Certified PEIR. Consistent with the Original Project, the City has indicated that demand on library services would be incremental and would not require the need for new or expanded physical library facilities, the construction of which could cause a substantial adverse impact. Therefore, impacts to library services from implementation of the Revised Project would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.16 Recreation**

*Would the Project:*

- a. *Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b. *Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that although the Original Project would result in an increase in residents, and that new residential development would be required to pay Park and Recreation Impact Fees, as applicable. Additionally, there are regional and joint uses park and recreational facilities to supplement the need for additional recreational facilities. Accordingly, implementation of the Original Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and impacts would be less than significant. Additionally, impacts associated with the construction or expansion of recreational facilities would be less than significant.

**Analysis of Revised Project:** As previously discussed, the Revised Project would result in a decrease in residential units and population compared to the Original Project evaluated in the 2022 Certified PEIR. Using the City's goal of 3 acres of local city parkland per 1,000 residents, the net increase in demand for parkland due to the buildout of the Revised Project (5,671 new residents) would be approximately 17.01 acres – a decrease of 4.25 acres compared to the Original Project evaluated in the 2022 Certified PEIR. Consistent with the findings of the 2022 Certified PEIR, although the City does not meet its current park ratio requirement, there are approximately 14,770 acres of regional parks and 61.6 acres of joint-use parks that would serve future project residents. There are also two planned local parks for a total of 15 acres. In addition, the City requires developers to pay impact fees to offset the cost to expand or construct new park and recreational space and facilities to adequately serve the City's growing population, which are reinforced in the City's Municipal Code, Section 15.56, Park and Recreation Impact Fees. Therefore, as with the Original Project, impacts to existing parks and recreational facilities under the Revised Project would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.17 Transportation**

*Would the Project:*

- a. Conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant.

**Analysis of Revised Project:** A Traffic Analysis was prepared by Urban Crossroads (*Technical Appendix C1*) for the Revised Project. The Revised Project's Traffic Analysis satisfies the City of Yorba Linda's traffic study requirements and ensures that the Revised Project would not conflict with a program, plan, ordinance or policy addressing the circulation system. Compliance with the General Plan policies related to transportation would ensure that the Revised Project would not conflict with any programs, plans, ordinances, or policies addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities. Due to the reduction of units, impacts would decrease but would remain less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

**2022 Certified PEIR Finding:** The Original Project's Vehicle Miles Traveled (VMT) analysis, identified the VMT per service population (SP) of the combined traffic analysis zone (TAZs) of the Original Project in the base year (2016) plus project and cumulative year (2045) plus project conditions. The 2022 Certified PEIR

concluded that the Original Project would not exceed the City’s VMT per employee impact threshold for baseline and cumulative conditions by 5.16% and 3.87%, respectively. Additionally, as shown in Table 4-5, *Citywide VMT Per Service Population*, citywide VMT per SP was found to decrease under cumulative conditions and would also have a less than significant impact.

**Table 4-5 Citywide VMT Per Service Population**

	Base Year (2016) No Project	Base Year (2016) With Project	Cumulative (2045) No Project	Cumulative (2045) With Project
Service Population	91,267	98,352	97,814	104,899
VMT	1,446,176	1,495,953	1,673,239	1,703,753
VMT/SP	15.85	15.21	17.11	16.24
Change in VMT	-0.64		-0.86	

Therefore, the 2022 Certified PEIR concluded that the Original Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and impacts would be less than significant.

**Analysis of Revised Project:** A VMT analysis was prepared by Urban Crossroads (*Technical Appendix C2*) to evaluate the Revised Project’s potential VMT impacts that may result from the implementation of the rezoning and changes to land use. The Revised Project’s VMT analysis included additional cumulative projects, changes in TAZs due to the change in housing opportunities sites, and updated methodology due to current industry standards practices. The VMT analysis identified the VMT per SP of the combined traffic analysis zone (TAZs) of the Project in the baseline (2024) plus project and cumulative year (2045) plus project conditions.

As shown in Table 4-6, *“Plus Project” VMT Per Service Population*, the Revised Project would not exceed the City’s VMT per service population impact threshold for both Baseline (2024) and Cumulative (2045) conditions. Consistent with the findings of the 2022 Certified PEIR, the Revised Project’s VMT impacts and cumulative VMT would be less than significant.

**Table 4-6 “Plus Project” VMT Per Service Population**

	Baseline (2024)	Cumulative (2045)
Service Population	85,341	90,794
Total VMT	3,006,527	3,318,148
VMT per SP	35.2	36.6
City Threshold	37.2	37.2
Potentially Significant?	No	No
<b>Comparison to the 2022 Certified PEIR</b>		
Percentage Change – Original Project	-5.16%	-3.87%
Percent Change – Revised Project	-5.37%	-1.62%

Source: (Urban Crossroads, 2024c)

Additionally, similar to the Original Project, the Revised Project would result in a reduction in VMT under baseline and cumulative conditions with Project. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- d. Result in inadequate emergency access?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) and impacts would be less than significant. The 2022 Certified PEIR concluded that the Original Project would not result in inadequate emergency access and impacts would be less than significant.

**Analysis of Revised Project:** Consistent with the Original Project, buildout of the Revised Project would result in some changes to the City's circulation network. The Revised Project would result in improvements to the regional and local roadway, bicycle, pedestrian, and transit network. All future roadway system improvements associated with development and redevelopment activities under the Revised Project would be designed in accordance with the established roadway design standards incorporated into the City's Circulation Element. These improvements will be subject to review and future consideration by the City of Yorba Linda, Public Works Department. Implementation of the Revised Project would not result in hazardous conditions, create conflicting uses, or cause a detriment to emergency vehicles access. Additionally, future development would be required to comply with all applicable fire code and ordinances for construction, access, water mains, fire flows, and fire hydrants. Impacts would be less than significant, consistent with the conclusions of the 2022 Certified PEIR. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.18 Tribal Cultural Resources**

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

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

*In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that implementation of the Original Project has the potential to cause a substantial adverse change in the significance of tribal cultural resources that may be buried beneath the housing opportunity sites' surface. Implementation of Mitigation Measure MM 4.10-1 would ensure that grading and other ground-disturbing activities during construction are monitored by a qualified archaeologist as well as tribal monitors. The mitigation measure further requires the proper treatment of any resources that may be uncovered, and the avoidance of disturbance in areas where potential resources are uncovered. With implementation of the required mitigation measure, the Original Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and potential Project and cumulative impacts would be reduced to less than significant levels.

**Analysis of Revised Project:** As described previously under the Cultural Resources Section, under the Revised Project, none of the properties listed or eligible for listing in the NRHP are included within the housing opportunity sites. Further, no sites within the Revised Project are included as appearing eligible for the Local Historical Register. Consistent with the findings of the 2022 Certified PEIR, implementation of the Revised Project has the potential cause a substantial adverse change in the significance of tribal cultural resources that may be buried beneath the housing opportunity sites' surface or in on-site vegetation prior to mitigation. Implementation of Mitigation Measure MM 4.10-1 would ensure that grading and other ground-disturbing activities during construction are monitored by a qualified archaeologist as well as tribal monitors. With implementation of the required mitigation measure, the Revised Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and potential Revised Project and cumulative impacts would be reduced to less than significant levels. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required. The following mitigation measures from the 2022 Certified PEIR are applicable to the Revised Project:

- MM 4.10-1 Prior to the commencement of any ground disturbing activity at the Project sites, the Project Applicant shall retain a Native American Monitor approved by the NAHC. A copy of the executed contract shall be submitted to the City of Yorba Linda Planning Department prior to the issuance of any permit necessary to commence a ground- disturbing activity. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities into areas of undisturbed soils. The Tribal Monitor will complete daily

monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources.

Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by Project activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. Work may continue on other parts of the Project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources.

#### **4.19 Utilities and Service Systems**

*Would the Project:*

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, telecommunication facilities, the construction or relocation of which could cause significant environmental effects?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the Original Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

**Analysis of Revised Project:** Consistent with the findings of the 2022 Certified PEIR, existing water delivery and wastewater collection infrastructure is available to all housing opportunity sites and the City has adequate water and wastewater capacity to accommodate the 1,929 residential units – a decrease of 481 units from the Original Project evaluated in the 2022 Certified PEIR. Under the Original Project, the existing sewer lines on Linda Verde would need to be extended to accommodate housing opportunity sites S4-060 and S4-201. However, under the Revised Project, sites S4-060 and S4-201 are proposed to be removed, thus no extension of existing sewer lines on Linda Verde would be necessary. One new site (Site S6-025) proposed

under the Revised Project is currently developed with commercial uses and thus, infrastructure already exists in the area. As such, no housing opportunity sites are constrained by infrastructure availability.

Consistent with the Original Project, wastewater generated by the Revised Project would flow by gravity to Orange County Sanitation District's (OCSD) Reclamation Plant No. 1. Together with Treatment Plant No. 2, the two facilities are designed to treat 332 million gallons per day (mgd) average dry weather flow (ADWF) to secondary standards and 591 mgd average wet weather flow to secondary standards. Under dry weather conditions, ADWF is 207 mgd without reclamation, and 152 mgd with reclamation. As with the Original Project, the wastewater that would be generated by implementation of the Revised Project would reflect a small portion of the capacity of these facilities and would be accommodated within the remaining capacity of the combined facilities, and with a reduction in residential units the Revised Project would generate less wastewater. The Revised Project would be assessed fees for new sewer provision facilities by the Yorba Linda Water District (YLWD). Individual developments would be reviewed by the City and OCSD in order to determine if sufficient local and trunk sewer capacity exists to serve the specific development. The City and OCSD would ensure that new development does not exceed the capacity of wastewater conveyance and treatment facilities, and that new development pays its fair share to increase capacity of those facilities. The City's General Plan includes policies and implementation actions to support projects, programs, policies and regulations to ensuring that development is appropriate in scale to current and planned infrastructure capabilities (Policy PSU-5.1). The Capital Improvement Plan (CIP) would be used to evaluate and prioritize infrastructure maintenance, replacement, and improvement projects (Action PSU-5.3). Further, future development projects under the Revised Project would be required to comply with the City's Municipal Code and YLWD regulations, in order to connect to the City's sewer system, including payment of a sewer maintenance fee in order to construct new sewer infrastructure and/or incremental expansions to the existing sewerage system to accommodate individual development, which would mitigate the impact of the development on the sewerage system. Thus, impacts would be less than significant.

Consistent with the Original Project, the Revised Project would be served by Southern California Edison (SCE) for electricity and Southern California Gas Company (SoCalGas) for the provision of natural gas. As with the Original Project, the anticipated service demands created by implementation of the Revised Project, which would have fewer residential units, are within the service parameters of SCE and SoCalGas current transmission and service infrastructure. SCE and SoCalGas would update existing facilities or add new facilities in the City based upon specific requests for service from end users. Future developments that require new infrastructure would be required to pay any applicable fees assessed by SCE and SoCalGas necessary to accommodate the specific project site. Therefore, impacts would be less than significant.

As such, consistent with the findings of the 2022 Certified PEIR, the Revised Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the YLWD would have sufficient water supplies available to serve the Original Project and reasonably foreseeable future development during normal, dry and multiple dry years. Impacts would be less than significant.

**Analysis of Revised Project:** The Revised Project would have fewer residential units compared to the Original Project and therefore reduced water demand. Consistent with the findings of the 2022 Certified PEIR, the YLWD would have sufficient water supplies available to serve the Revised Project and reasonably foreseeable future development during normal, dry and multiple dry years. Impacts would be less than significant. As growth is evaluated and accounted for in its General Plan, SCAG forecasts are updated, and these numbers will be reflected in the City's 2024 Urban Water Management Plan (UWMP). Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- c. Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that the wastewater generated by buildout of the Original Project would not exceed the capacity of the YLWD or OCSD. Impacts would be less than significant.

**Analysis of Revised Project:** As discussed previously under Threshold a above, consistent with the findings of the 2022 Certified PEIR, the wastewater generated by buildout of the Revised Project would not exceed the capacity of the YLWD or OCSD. As such, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid wastes reduction goals?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that there would be adequate capacity in the landfill system to serve buildout of the Original Project. Additionally, the City has actively pursued programs to comply with federal, state, and local regulations related to solid waste which minimize impacts from project-generated solid waste. Therefore, impacts would be less than significant.

**Analysis of Revised Project:** The Revised Project could result in up to 1,929 new residential units – a decrease of 481 units compared to the Original Project evaluated in the 2022 Certified PEIR. Applying the General Plan Draft EIR's daily solid waste generation factor residential uses of 12.23 pounds per dwelling unit (lbs/DU), the

Revised Project would generate an additional 23,591.67 pounds per day (ppd) of solid waste – a decrease of 5,882.63 ppd compared to the solid waste generation estimate identified in the 2022 Certified PEIR. This represents approximately less than a percent of the remaining daily capacity at the Olinda Alpha Landfill. The Olinda Alpha Landfill has a permitted disposal capacity of 8,000 tons per day with a remaining capacity of 17,500,000 tons. The Olinda Alpha Landfill is estimated to reach capacity, at the earliest time, in the year 2036 (CalRecycle, n.d.). Therefore, there would be adequate capacity in the landfill to serve buildout of the Revised Project. Consistent with the findings of the 2022 Certified PEIR, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- e. Comply with federal, State, and local management and reduction statutes and regulations related to solid wastes?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR concluded that implementation of mandatory requirements such as Assembly Bill (AB) 939, Senate Bill (SB) 2202, SB 1016 and the California Solid Waste Reuse and Recycling Act of 1991 would reduce the amount of solid waste generated by the Original Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Original Project would be required to comply with all applicable solid waste statutes and regulations. Impacts would be less than significant.

**Analysis of Revised Project:** Consistent with the Original Project, the Revised Project would be required to comply with all applicable solid waste statutes and regulations. Impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.20 Wildfire**

*If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:*

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?*
- e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**2022 Certified PEIR Finding:** The 2022 Certified PEIR stated that the City utilizes an Emergency Operations Plan (EOP) that establishes emergency organization, assigns tasks, specifies policies and general procedures, and provides for coordination of planning efforts of the various emergency staff and service elements. There is potential that the increase in dwelling units could lead to changes in mobility patterns; therefore, potentially impair implementation of or physically interfere with the City of Yorba Linda or Orange County's emergency response or evacuation plans. The increase in dwelling units for opportunity sites S7-005 and S5-

008, which are located within a Very High Fire Hazard Severity Zone (FHSZ) could potentially impair implementation of or physically interfere with the City's or Orange County's emergency response or evacuation plans. Therefore, Original Project-related impacts would be potentially significant. Implementation of Mitigation Measure MM 4.11-1 would ensure the proper evaluation of emergency evacuation during wildfires. With implementation of the required mitigation and General Plan goals and policies, General Plan EIR mitigation measure PS-2 ( which requires the developer of any new construction to complete the project roadways in accordance with applicable OCFA and/or County design standards in the area prior to building permit issuance and project finalization), the Original Project's potential impacts to an adopted emergency response or emergency evacuation route would be reduced to less than significant.

**Analysis of Revised Project:** Consistent with the findings of the 2022 Certified PEIR, future development that has the potential to occur with Revised Project implementation would not interfere with the implementation of the EOP and any of the daily operations of the City's Emergency Management Division, OCFA, or OCSD. During Revised Project construction activities, travel lanes along existing roadways would be maintained, and construction materials and equipment would be staged on-site. All construction activities under the Revised Project would be required to be performed per the City's and OCFA's standards and regulations. Future development would be required to provide the necessary on and offsite access and circulation for emergency vehicles and services during the construction and operation phases. Future developments would also be required to go through the City's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations, as set forth by OCFA and in the Chapter 15.08 (Fire Code) of the City's Municipal Code, to ensure that they do not interfere with the provision of local emergency services (e.g., provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.). Future projects would be subject to an environmental review process and federal, state, and local regulations that support emergency response and evacuation plans and would be required to mitigate for fire-related impacts. Moreover, future developments would be required to comply with goals and policies of the City's General Plan and mitigation measure PS-2 from the City's General Plan EIR.

Under the Revised Project, one of the sites (Site S7-005) located within a Very High FHSZ is proposed to be removed. Site S5-008 still remains under the Revised Project and could potentially impair implementation of or physically interfere with the City's or Orange County's emergency response or evacuation plans. Therefore, Project-related impacts would be potentially significant prior to mitigation. The new site proposed under the Revised Project, Site S6-025, is not located in a FHSZ according to Exhibit PS-6 of the City's General Plan Health and Safety Element (City of Yorba Linda, 2016c). Implementation of Mitigation Measure MM 4.11-1 would ensure the proper evaluation of emergency evacuation during wildfires. With implementation of the required mitigation and General Plan goals and policies, EIR mitigation measure PS-2, the Revised Project's potential impacts to an adopted emergency response or emergency evacuation route would be reduced to less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required. The following mitigation measure from the 2022 Certified PEIR is applicable to the Revised Project:

**MM 4.11-1** Prior to issuance of a grading permit for sites within or adjacent to a Very High FHSZ, the project applicant shall prepare a Fire Evacuation Analysis. The Fire Evacuation Analysis shall assess the time required for emergency evacuation under Existing and Existing with Project Conditions, assuming a worst case, wind-driven fire. The Fire Evacuation Analysis shall also identify how much the project would increase evacuation times by; how long it would take residents to evacuate; and how emergency response times would be affected by a mass evacuation under multiple scenarios. The Fire Evacuation Analysis shall be subject to the review and approval from the City of Yorba Linda and OCFA. The analysis shall demonstrate how the Project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- b. Due to slope, prevailing winds, and other factors exacerbate wildfire risks and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- f. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

**2022 Certified PEIR Findings:** The 2022 Certified PEIR concluded that future development located within a Very High FHSZ would add people and structures that could be at risk from wildfire. Therefore, impacts would be potentially significant. Implementation of Mitigation Measure MM 4.11-2 would ensure the Original Project's potential impacts to wildland fire hazards be mitigate through the installation of fire systems, fire-resistant landscaping and appropriate defensible space around structures, and water availability to serve to the Project site. With implementation of the required mitigation and General Plan goals and policies, and EIR mitigation measure PS-1 (which require fuel modification easements to list OCFA as an authorized user) through PS-3 (which requires a service letter from water agency to be submitted and approved by OCFA to ensure fire flow during major wildfire incident), the Original Project's potential impacts to exacerbate wildfire risk would be reduced to less than significant.

**Analysis of Revised Project:** Under the Revised Project, one site (Site S7-005) is proposed to be removed and S5-008 would still remain within a Very High FHSZ. Buildout of the Revised Project would allow for the development of 1,929 additional residential units – a decrease of 481 units from the 2022 Certified PEIR. Consistent with the findings of the 2022 Certified PEIR, future development pursuant to the Revised Project would add people and structures that could be at risk from wildfire. Future projects would be subject to an environmental review process and federal, state, and local regulations that minimize wildfire risk. Moreover, future development would be required to comply with goals and policies of the City's General Plan and mitigation measure PS-1 through PS-3 from the City's General Plan EIR. However, the increase in dwelling units for the site located within a Very High FHSZ could potentially impact wildfire risk and pollutant exposure. Therefore, impacts would be potentially significant prior to implementation of mitigation. Implementation of Mitigation Measure MM 4.11-2 would ensure the Revised Project's potential impacts to wildland fire

hazards be mitigate through the installation of fire systems, fire-resistant landscaping and appropriate defensible space around structures, and water availability to serve to the Revised Project site. With implementation of the required mitigation and General Plan goals and policies, and EIR mitigation measure PS-1 through PS-3, the Revised Project's potential impacts to exacerbate wildfire risk would be reduced to less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

**Mitigation:** No additional mitigation required. The following mitigation measure from the 2022 Certified PEIR is applicable to the Revised Project:

MM 4.11-2 Prior to issuance of a grading permit for sites within or adjacent to a Very High FHSZ, the project applicant shall prepare a Fire Protection Plan (FPP). Prior to preparation of an FPP, the Project proponent shall coordinate with OCFA to ensure that modeling of the FPP and design of the project is appropriate to meet the requirements and standards of the OCFA. The FPP shall be subject to the review and approval from the City of Yorba Linda and OCFA. The FPP shall assess a project's compliance with current regulatory codes and ensure that impacts resulting from wildland fire hazards have been adequately mitigated. The FPP shall also specifically identify the need for fire systems, water availability, construction requirements, and fire-resistant landscaping i.e. fuel modification zones), and appropriate defensible space around structures.

*c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary ongoing impact to the environment?*

**2022 Certified PEIR Findings:** The 2022 Certified PEIR concluded that the Original Project does not require the installation of maintenance of infrastructure that may exacerbate fire risk or impact the environment. The need for installation and maintenance of new infrastructure (such as roads, fuel breaks, emergency water resources, power lines, or other utilities) for future development projects would be evaluated as part of the discretionary permit review process. Therefore, impacts would be less than significant.

**Analysis of Revised Project:** Consistent with the findings of the 2022 Certified PEIR, the Revised Project does not require the installation of maintenance of infrastructure that may exacerbate fire risk or impact the environment. Future housing development facilitated by the Revised Project would be subject to discretionary permits and would occur as market conditions allow or at the discretion of the individual property owners. The need for installation and maintenance of new infrastructure (such as roads, fuel breaks, emergency water resources, power lines, or other utilities) for future development projects would be evaluated as part of the discretionary permit review process. Future developments would also be required to go through the City's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations, as set forth by CBC and in the Chapter 15.08 (California Fire Code, as adopted and amended by the City of Yorba Linda) of the City's Municipal Code.

Additionally, to the extent feasible, the City requires the undergrounding of electric lines for new development. Therefore, impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

**2022 Certified PEIR Findings:** The 2022 Certified PEIR concluded that there is one housing opportunity site (S5-008) that is located within a landslide zone. Regardless of the landslide susceptibility, future development pursuant to the Original Project would be required to have a site-specific geotechnical investigation, which would ensure that each development is engineered and constructed to maximize stability and preclude safety hazards to on-site areas. Housing opportunities sites S6-015, S6-025, S7-001, and S4-503 are located within a flood hazard area. Future development would be required to comply with City's floodplain management regulations prepare a WQMP which would reduce runoff from construction and identify BMPs for runoff controls and treatments. Implementation of the Original Project is not anticipated to directly or indirectly cause potential substantial risks, including landslides, as a result of runoff, post-fire instability or drainage change. Impacts would be less than significant.

**Analysis of Revised Project:** Under the Revised Project, there is only one housing opportunity site (S5-008) that is located within a landslide zone. The new site proposed under the Revised Project, Site S6-025, is not located within a landslide zone according to Exhibit PS-3, Landslide Zones, of the City's General Plan Health and Safety Element (City of Yorba Linda, 2016c). Consistent with the Original Project, future development pursuant to the Revised Project would be required to have a site-specific geotechnical investigation, which would ensure that each development is engineered and constructed to maximize stability and preclude safety hazards to on-site and adjacent areas. Therefore, implementation of the Original Project is not anticipated to directly or indirectly cause potential substantial risks, including landslides, as a result of runoff, post-fire instability or drainage change. Impacts would be less than significant.

Under the Revised Project, Sites S7-001 [designated as 0.2% annual chance flood hazard, areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile (Zone X)] and S4-053 [designated as areas subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies (Zone A)] would be removed. One new site, Site S6-025, is proposed to be added under the Revised Project. The northern half of Site S6-025 is designated as Zone X. A small portion of the eastern edge of Site S6-025 is designated as Zone A. Consistent with the Original Project, the Revised Project would be required to comply with the local standards for construction in floodplain areas adopted by the City. The City would review and approve the plans prior to the issuance of grading permits. With compliance with Federal and local regulatory requirements, the potential to cause downstream flooding would be less than significant. Construction within SFHAs is governed by the City's Municipal Code Chapter 15.12, Flood Damage Protection. Compliance with the City's floodplain management regulations would ensure impacts are less than significant. To further reduce impacts related to runoff, the Orange County Municipal Separate Storm Sewer System (MS4) permit requires the capture and temporary

detention of a Stormwater Quality Design volume, based on the runoff produced from a 0.75-inch, 24-hour storm event or 85th percentile, 24-hour storm event, whichever is greater. Future development under the Revised Project would be required to prepare a WQMP at the project processing and permitting stages. Implementation of the WQMP would reduce runoff from project sites during storm events and identify BMPs for runoff controls and treatments. Based on the foregoing analysis, the Revised Project is not anticipated to expose people or structure to significant risks, including downslope or downstream flooding or landslides as a result of runoff, postfire instability, or drainage change. Impacts would be less than significant. Accordingly, the Revised Project would not result in any new, increased or substantially different impacts, other than those previously considered and addressed in the 2022 Certified PEIR. No changes or additions to the 2022 Certified PEIR analysis is necessary.

#### **4.21 Conclusion of the PEIR Addendum**

Based on the findings and information contained in the previous EIR, the analysis above, and the CEQA statute and State CEQA Guidelines, including sections 15162 through 15164, the Revised Project would not result in any additional effects on any environmental resources located on or near the Site and the potential environmental effects of the Revised Project have been adequately addressed in the previously certified EIR for the Original Project. No new or increased impacts not already analyzed in the EIR would result from the Revised Project, and there is no new information of substantial importance that was not available at the time the EIR was certified. Therefore, the approval of this Addendum to the EIR is appropriate under State CEQA Guidelines section 15164 and the Public Resources Code.

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## **5.0 REFERENCES**

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## 5.0 REFERENCES

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**APPENDIX A**

**2022 CERTIFIED PEIR MITIGATION MONITORING AND REPORTING PROGRAMS**

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**APPENDIX B**  
**NOISE IMPACT ANALYSIS**

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**APPENDIX C**  
**TRAFFIC IMPACT ANALYSIS**

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**APPENDIX D**

**VEHICLE MILES TRAVELED ANALYSIS**

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