RANCHO LA HABRA SPECIFIC PLAN

DRAFT ENVIRONMENTAL IMPACT REPORT

SCH NO. 2015111045

CITY OF LA HABRA

February 2018



Metis Environmental Group

Final EIR Volume 1

Rancho La Habra Specific Plan

Final Environmental Impact Report

Volume 1 – Draft Environmental Impact Report

July 2020

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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

In accordance with Section 15123 of the California Environmental Quality Act (CEQA) Guidelines, this chapter provides a summary of the proposed Rancho La Habra Specific Plan, its environmental effects, and the mitigation measures to be implemented to address the proposed project's significant effects. This chapter also summarizes the technical analyses completed for CEQA. The summary includes a brief description of proposed development, project objectives, City of La Habra (City), and other agency approvals needed to implement the project, areas of controversy/issues to be resolved, and a summary of alternatives to the proposed Specific Plan. In addition, this chapter summarizes (1) potential environmental impacts that would result from the proposed Specific Plan; (2) the level of significance of the environmental impacts prior to implementation of any applicable mitigation measures; (3) mitigation measures that would be implemented to avoid or reduce significant environmental impacts; and (4) the level of significance of impacts after mitigation measures are implemented.

The purpose of the analyses contained in this EIR is to provide information to decision makers and the public, and to define and quantify the physical environmental changes that would result from implementation of the proposed Specific Plan.

ES.2 PROJECT LOCATION

The Rancho La Habra Specific Plan (Specific Plan) is located in the southern portion of the City of La Habra, which is in the northern portion of Orange County (refer to **Figure 1-1**, Project Location in Chapter 1, *Introduction*). The City of Fullerton is located to the south and the City of Brea is to the east in Orange County. Within Los Angeles County, the City of La Mirada is located to the west of La Habra, with the cities of Whittier to the northwest and La Habra Heights to the north. Major regional roadways in the area include Beach Boulevard to the west and Imperial Highway to the north. Beach Boulevard provides regional access to the Interstate 5 freeway (I-5), approximately 4.5 miles to the south. Imperial Highway also provides regional access to the State Route 57 freeway (SR-57), approximately 5 miles to the east.

ES.3 PROJECT DESCRIPTION

The project site is the current site of the Westridge Golf Club, which is adjacent to Beach Boulevard and the existing Westridge Plaza shopping center. The Westridge Golf Club was developed along with the Westridge residential community to the south pursuant to the adopted La Habra Hills Specific Plan. The currently proposed Rancho La Habra Specific Plan

would remove the 151-acre project site from the La Habra Hills Specific Plan and develop the existing golf course with 402 residential dwelling units, including 277 single-family homes and 125 multi-family residences, along with either 20,000 square feet of commercial development (e.g., specialty grocery, restaurant, or general retail uses) or an additional 46 multi-family dwelling units. Also proposed are open space areas that would include public parks and private recreational areas, a community center, small amphitheater, habitat conservation areas, passive recreational uses including trails, wildlife viewing, picnic areas and tot lots on the approximately 151-acre site.

The applicant, ~~CalAtlantic~~ Lennar, is requesting that the City of La Habra approve the following:

- General Plan Amendment
- Change of Zone
- Rancho La Habra Specific Plan
- Amendment to the existing La Habra Hills Specific Plan
- Vesting Tentative Tract Map 17845
- Development Agreement with the City of La Habra
- Design Review for Planning Areas 1-4 and 6.
- ~~Conditional Use Permits for three Model Home Complexes~~
- Establishment of a Community Facilities District or another financing mechanism

In addition, the applicant is requesting the California Department of Fish and Wildlife to release and relocate existing deed restrictions that were previously established on the project site. These deed restrictions were established as mitigation for impacts related to previous construction of the existing golf course and adjacent residential areas to the south pursuant to the La Habra Hills Specific Plan. Release and relocation of these deed restrictions would be required in order for development of the proposed project to proceed.

ES.3.1 PROJECT OBJECTIVES

Objectives of the proposed project, including the underlying purpose of the project are presented below, pursuant to CEQA Guidelines Section 15124(b), which requires an EIR to include a "statement of objectives sought by the proposed project." As noted in CEQA Guidelines Section 15124(b), a "clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings."

The project objectives that have been identified by the Lead Agency (City of La Habra), as well as those identified by the Specific Plan applicant, ~~CalAtlantic~~ Lennar Homes of California are identified below.

a. Project Objectives of the City of La Habra

The City's overarching objectives for the proposed Rancho La Habra Specific Plan are to:

- Ensure that the long-term planned use of the project site is consistent with the goals, objectives, and other provisions of the City's General Plan, recognizing that state law grants the City the authority to amend the General Plan and approve a specific plan consistent with the *amended* General Plan; and
- Meet the requirements of state law and local ordinances to provide the public and decision-makers with a thorough and objective evaluation of the physical and environmental effects that would result from the proposed Rancho La Habra Specific Plan and related actions, implement all feasible mitigation measures and consider a reasonable range of alternatives to the proposed project that would avoid or reduce any significant environmental effects, and otherwise comply with the provisions of the CEQA and local practices to implement CEQA.

b. Applicant's Project Objectives

The applicant, ~~CalAtlantic~~ Lennar Homes of California, has established the following project objectives for its proposed Specific Plan development:

- Implement the City's Housing Element by providing a range of new development that provides a range of new housing types, sizes, and prices for existing and future residents of the city;
- Provide new housing opportunities for city residents that provide fiscal benefit to the City, whereby revenues from the new development exceed public expenditures needed to serve and maintain the development;
- Provide a range of public park and recreational facilities, such as a Community Center, open turf, playground areas, picnicking and quiet enjoyment space, trail systems with fitness facilities and view overlooks, and nature trails with educational signage, that exceed the City's local park code requirements for the proposed project;
- Create a network of trails throughout the residential neighborhoods that provide connections to existing City and regional trails east and west of the project site and to the Westridge Plaza Shopping Center located north of the project site;
- Improve the aesthetic character of the Beach Boulevard and Idaho Street frontages through landscape design consistent with the City's goals and objectives;
- Preserve, restore, and conserve natural habitat on the project site to the extent practicable considering the other competing project objectives;

- Reduce the demand for potable water compared to the existing golf course water demand; and
- Redevelop the golf course property for a "higher and better use."[1]

ES.3.2 PROPOSED FUTURE DEVELOPMENT

As shown in **Table ES-1** and **Table ES-2**, as well as **Figure 2-5~~ES-1~~**, the Rancho La Habra Specific Plan defines seven Planning Areas. Planning Area 1 is proposed for the multi-family residential development, while Planning Areas 2 through 4 are proposed for single-family residential neighborhoods. Planning Area 5 is an approximately 2.6-acre building pad located along Beach Boulevard designed to accommodate either 20,000 square feet of commercial development or an additional 46 multi-family dwelling units. Planning Area 6 consists of open space uses, including conversion of the existing golf course clubhouse to a City-owned Community Center, a small outdoor amphitheater, habitat conservation areas, passive recreation areas for hiking and wildlife viewing, picnic areas, tot lots. Planning Area 7 encompasses the landscaped slopes separating the Westridge neighborhood residences from the existing golf course. The Westridge neighborhood south of the Project site, which was developed as part of the La Habra Hills Specific Plan, retains an easement over the landscaped slopes, along with the obligation for slope maintenance. The Specific Plan includes proposed modifications to the landscaped as a fuel modification area for fire safety.

ES.4 ANTICIPATED DISCRETIONARY ACTIONS AND APPROVALS

Implementation of the proposed project will require the following discretionary actions and other approvals:

- City of La Habra
  - General Plan Amendment for the project site from: Open Space to Low Density Residential, Multi-Family 1, and Mixed Use Center 1.
  - Amend the La Habra Hills Specific Plan to remove the project site and golf course references from the Specific Plan.
  - Approval of the Rancho La Habra Specific Plan.
  - Vesting Tentative Tract Map to divide the property into single-family residential, multi-family residential, commercial retail, and open space lots.

[1] The Appraisal Institute defines "highest and best use" as the "reasonably probable and legal use of vacant land or an improved property that is physically possible, appropriately supported, financially feasible, and that results in the highest value."

Table ES-1[2]
Land Use Acreage by Planning Area

	Planning Area 1	Planning Area 2	Planning Area 3	Planning Area 4	Planning Area 5	Planning Area 6	Planning Area 7	Total
Residential/Commercial Development								
Multi-Family Homes	8.4	-	-	-	-	-	-	**8.4**
Single-Family Lots	-	14.2	8.1	12.4	-	-	-	**34.7**
Commercial or Multi-Family Homes	-	-	-	-	2.4	-	-	**2.4**
Open Space Uses								
Public Community Center and Park	-	-	-	-	-	4.1	-	**4.1**
Public Park and Picnic Area	-	-	-	-	-	10.4	-	**11.4**
Public Linear Park	-	-	-	-	-	10.6	-	**10.4**
Upland Habitat Conservation Area	-	-	-	-	-	12.2	-	**12.58**
Riparian Habitat Conservation Area	-	-	-	-	-	2.1	-	**1.23**
Private Open Space	1.7	14.6	5.8	6.2	0.2	-	-	**25.6**
Existing Slope	-	-	-	-	-	-	19.3	**19.3**
Roads	0.3	6.8	3.1	4.9	-	3.0	-	**18.1**
Total Acres	**10.4**	**35.6**	**17.0**	**23.5**	**2.6**	**42.4**	**19.3**	**150.8**

Table ES-2
Number and Size of Dwelling Units by Planning Area

Residential Planning Area	Minimum Lot Size	Number of Dwelling Units	Approximate Average Size of Dwelling Units	Number of Bedrooms
Planning Area 1	not applicable – multi-family	125	1,900 square feet	3/4
Planning Area 2	48'/54' x 80' (3,840 square feet)	115	2,700 square feet	4/5
Model Home Complex	47' x 70' (3,290 square feet)	3	2400 square feet	4
Planning Area 3	47' x 70' (3,290 square feet)	77	2,400 square feet	4
Planning Area 4	55' x 90' (4,950 square feet)	82	3,300 square feet	4/5
Planning Area 5	not applicable – multi-family (option)	46	1,900 square feet	3/4

Source: Rancho La Habra Specific Plan, 2017.

[2] Note that Table ES-1 was updated and superseded. See Table ES-1 in Final EIR – Volume 2, Partially Recirculated Draft EIR.

- Design Review, including proposed architectural design for each Planning Area;
- ~~Approval of a Conditional Use Permit: The Applicant seeks approval of a Conditional Use Permit (CUP) for the construction and operation of model home complexes, including signage and flags.~~
- Formation of a Community Facilities District, also known as a Mello Roos District, or another mechanism for financing of improvements.

- California Department of Fish and Wildlife
  - ~~Release and relocation of~~ Vacate an existing deed restriction within the Specific Plan area.
  - Section 1600 Streambed Alteration Agreement.
- U.S. Fish and Wildlife Service
  - Amended Biological Opinion.
- U.S. Army Corps of Engineers
  - Section 404 Nationwide Permit.
- Regional Water Quality Control Board
  - Section 401 Water Quality Certification.
- Department of Transportation (Caltrans) District 12
  - Encroachment permits.

a. Responsible and Trustee Agencies for the Rancho La Habra Specific Plan

The following identifies responsible agencies[3] and trustee agencies[4] for the proposed Rancho La Habra Specific Plan.

- Regional Agencies
  - Orange County Public Works Department (encroachment permit)
  - Orange County Sanitation District (Sewage Collection Permit)
  - Orange County Health Care Agency (Remedial Action Supervision)
- State Agencies
  - Santa Ana Regional Water Quality Control Board (National Pollution Discharge Elimination System (NPDES) Storm Water Permit NPDES Construction Permit; Section 401 Water Quality Certification)

[3] A "responsible agency" is a public agency, other than the lead agency, which has responsibility for carrying out or approving a project.

[4] A "trustee agency" is a state agency that has jurisdiction by law over natural resources affected by a project, that are held in trust for the people of the State of California.

  - Department of Transportation (Caltrans) District 12 (Encroachment Permit)
  - California Department of Fish and Wildlife (Section 1600 Streambed Alteration Agreement; Release of Deed Restriction)
- Federal Agencies
  - U.S. Fish and Wildlife Service (Amended Biological Opinion)

ES.5 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

ES.5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

This EIR identifies the following Significant Unavoidable impacts that would result from implementation of the proposed Specific Plan.

- **Land Use and Planning Impact LUP-1.1**: The proposed Specific Plan would be inconsistent with a goal and several policies of the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Since these inconsistencies are reflected in significant air quality, greenhouse gas (GHG), and traffic impacts, impacts related to inconsistencies with the 2016 RTP/SCS would be significant even with implementation of all feasible mitigation measures.
- **Population and Housing Impact POP-1:** Implementation of the proposed Rancho La Habra Specific Plan would generate population growth as the direct result of the housing proposed by the Specific Plan. While the proposed project would not necessarily increase the City's projected growth rate through 2040, it would substantially increase La Habra's inventory of land for the development of housing, and therefore result in substantial population growth. Such population growth would exceed the growth projections used for preparation of the current regional Air Quality Management Plan, would therefore be inconsistent with that plan, and a significant impact would result. This increased population growth would also result in significant and unavoidable physical environmental effects in relation to aesthetics and visual resources, traffic and circulation, and greenhouse gas emissions.
- **Aesthetics Impact AES-3:** Implementation of the proposed Rancho La Habra Specific Plan would result in the loss of a major open space resource. While the proposed project would be well planned and designed, the substantial loss of open space that would result from the proposed development would degrade the existing visual character of the site.
- **Traffic and Circulation** With respect to mitigation at intersections under the jurisdiction of the cities of Fullerton, Buena Park, and La Mirada, and Caltrans, under CEQA, a fair share monetary contribution is considered to be adequate mitigation if the fee is tied to a reasonable plan that the relevant agency is committed to implementing. However, these cities and Caltrans do not have mitigation fund programs in place for improvements to which the proposed project can contribute. Therefore, because the City has no authority

to implement the recommended traffic improvements, impacts remain *significant and unavoidable*. See **Table ES-3** for a summary of traffic impacts at specific intersections.

- **Air Quality Impact AQ-1:** Although the proposed project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, proposed housing and population growth would be inconsistent with the Air Quality Management Plan for the South Coast Air Basin.
- **Greenhouse Gas Emissions Impact GHG-1:** Implementation of the proposed Rancho La Habra Specific Plan would result in a net increase in GHG emissions of ~~6,037.55~~ 7,554.69 $MTCO_2e$ per year, which would exceed the SCAQMD's screening threshold of 3,000 $MTCO_2e$ per year.
- **Noise and Vibration Impact NOI-4:** Project-related demolition and crushing, site grading, and infrastructure and building construction would temporarily expose persons to noise levels substantially in excess of existing conditions. Even with implementation of Mitigation Measures NOI-4a through NOI-4j, construction noise levels would remain substantially above ambient conditions and would be clearly audible to area residents.

ES.5.2 IMPACTS FOUND NOT TO BE SIGNIFICANT

The analyses undertaken during preparation of this EIR determined that no impacts would result in relation to the following.

a. Agricultural and Forestry Resources

The project site, currently developed as the Westridge Golf Club, is within an urban setting, and does not provide any opportunity for agricultural or forestry use. The site does not contain any "prime" agricultural land, and no such land exists in the project vicinity. In addition, no forestry resources occur on the project site or within the project environs. The project site and adjacent properties are designated as "Urban and Built-up Land" according to the California Department of Conservation, California Important Farmland Finder map system (2016). The City's current land designation for the project site is "Open Space – Parks, Flood Channels" (2014). The site is not designated for agricultural or forestry use and is not bound by a Williamson Act contract. Thus, implementation of the proposed project would have no impact on agricultural or forestry resources.

b. Mineral Resources

Neither the City's General Plan nor the State of California identify the project site or its environs as a potential location for mineral resources of State-wide, regional, or local significance. While the project site was formerly part of the 950-acre West Coyote Hills Oil Field, within which extraction activities ceased in 1995 prior to the construction of the existing golf course. All of the

Table ES-3[5]
Summary of Traffic Impacts

		Jurisdiction	Significant Impact?	Included in Fee Program?	Can La Habra Implement Mitigation?	Included in Fair Share?	Level of Significance
1.	Beach Boulevard at Rosecrans Avenue	La Mirada/Caltrans	Yes	No	No	Yes	SU
2.	Gilbert Street at Rosecrans Avenue	Fullerton	No	--	--	--	LTS
3.	Euclid Street at Rosecrans Avenue	Fullerton	No	--	--	--	LTS
4.	Beach Boulevard at Hillsborough Drive	La Mirada/Caltrans	No	--	--	--	LTS
5.	Beach Boulevard at Hillsborough Park Apt.	La Habra/Caltrans	No	--	--	--	LTS
6.	Idaho Street at Sandlewood Avenue	La Habra	No	--	--	--	LTS
7.	Euclid Street at Sandlewood Avenue	La Habra	Yes	--	--	--	LTS
8.	Santa Gertrudes Ave at Imperial Highway	La Mirada	No	--	--	--	LTS
9.	1st Avenue at Imperial Highway	La Mirada	No	--	--	--	LTS
10.	Beach Boulevard at Imperial Highway	La Habra/Caltrans	Yes	No	No	Yes	SU
11.	La Habra Hills Drive at Imperial Highway	La Habra/Caltrans	Yes	No	No	Yes	SU
12.	Idaho Street at Imperial Highway	La Habra/Caltrans	No	--	--	--	LTS
13.	Euclid Street at Imperial Highway	La Habra/Caltrans	Yes	No	No	Yes	SU
14.	Harbor Boulevard at Imperial Highway	La Habra/ Fullerton/ Caltrans	Yes	No	No	Yes	SU
15.	Beach Boulevard at Lambert Road	La Habra/ Caltrans	Yes	No	No	Yes	SU
16.	Idaho Street at Lambert Road	La Habra	Yes	Yes	Yes	No	SM
17.	Euclid Street at Lambert Road	La Habra	Yes	Yes	Yes	No	SM
18.	Harbor Boulevard at Lambert Road	La Habra	Yes	Yes	Yes	No	SM

[5] Note that Table ES-3 was updated and superseded. See Table ES-3 in Final EIR – Volume 2, Partially Recirculated Draft EIR.

Table ES-3[5]
Summary of Traffic Impacts

		Jurisdiction	Significant Impact?	Included in Fee Program?	Can La Habra Implement Mitigation?	Included in Fair Share?	Level of Significance
19.	La Mirada Boulevard at Imperial Highway	La Mirada	Yes	Yes	Yes	No	SM
20.	Beach Blvd at La Mirada Blvd/Malvern Ave	Buena Park/ Caltrans	Yes	No	No	Yes	SU
21.	Beach Boulevard at La Habra Boulevard	La Habra/ Caltrans	No	--	--	--	LTS
22.	Valley View Avenue at Imperial Highway	La Mirada	Yes	No	No	Yes	SU
23.	Beach Boulevard at Artesia Boulevard	Buena Park/ Caltrans	Yes	No	No	Yes	SU
24.	Beach Boulevard at Commonwealth Avenue	Buena Park/ Caltrans	No	--	--	--	LTS
25.	I-5 NB Ramps at Auto Center Drive	Buena Park/ Caltrans	No	--	--	--	LTS
26.	Beach Boulevard at Auto Center Drive	Buena Park/ Caltrans	No	--	--	--	LTS
27.	Beach Boulevard at I-5 SB Ramps	Buena Park/ Caltrans	Yes	No	No	Yes	SU
28.	Beach Boulevard at Whittier Boulevard	La Habra/ Caltrans	No	--	--	--	LTS
29.	Hacienda Road at Whittier Boulevard	La Habra/ Caltrans	Yes	No	No	Yes	SU
30.	Walnut Street at Imperial Highway	La Habra/ Caltrans	Yes	No	No	Yes	SU
31.	Gilbert Street at Malvern Avenue	Fullerton	Yes	No	No	Yes	SU
32.	Euclid Street at Malvern Avenue	Fullerton	Yes	No	No	Yes	SU

Notes: LTS = Less than Significant; SM = Significant but Mitigable; SU = Significant and Unavoidable

wells have been abandoned in accordance with California Division of Oil, Gas, and Geothermal Resources (DOGGR) regulations.

No significant mineral deposits are known to remain within La Habra, and no areas are designated as Mineral Resource Zones (MRZ). The City's General Plan does not identify significant mineral resources within the project site. Therefore, no impacts related to the availability of mineral resources would occur as a result of proposed project.

c. Release and Relocation of Existing Deed Restriction[6]

Construction of the Westridge Golf Club pursuant to the 1992 La Habra Hills Specific Plan involved impacts on biological resources resulting in the need for regulatory permits and mitigation. Regulatory permits and mitigation requirements were embodied in a Streambed Alteration Agreement (February 23, 1995) and resulted in recordation of a deed restriction in favor of the California Department of Fish and Game (now California Department of Fish and Wildlife [CDFW]) on November 9, 2009 to protect resources "having wildlife and habitat values of great importance to the State of California."

As noted in the Declaration of Deed Restriction (Appendix F-7), the conservation area established by the deed restriction "provides mitigation in perpetuity for certain impacts associated with the development of a 300-acre abandoned oil field including pre-development activities and subsequent construction of 540 homes and an 18-hole golf course, and associated infrastructure that impacts 18 acres of highly disturbed coastal sage scrub." The recorded deed restriction established a total of 11.43 acres of area on site to be conserved in perpetuity as mitigation for loss of habitat areas identified in **Table ES-4**. **Figure 2-11** in Chapter 2, *Project Description*, shows the extent and distribution of the existing CDFW deed restriction within the project site.

Table ES-4
Habitat Areas Identified for Protection in Existing Deed Restriction

Habitat Type	Acreage
Coastal Sage Scrub	2.27
Southern Willow Scrub	3.52
Mulefat Scrub	1.40
Oak Woodland	2.00
Freshwater Marsh	0.52
Open Water	1.72
Total	**11.43**

Source: Declaration of Deed Restriction, October 28, 2009

The recorded deed restriction states that the conservation area defined in the deed restriction (see **Figure 2-11**) "shall not be utilized in any manner inconsistent with the conservation of regional wildlife using the conservation area (including sensitive species)." The deed restriction specifically prohibits the following activities within the conservation area:

[6] See Section 3.5 of Final EIR - Volume 2, Partially Recirculated Draft EIR for an updated discussion of impacts related to existing onsite deed restrictions and impacts of vacating those deed restrictions.

- ~~Development within the Conservation Area for residential, commercial, retail, industrial, institutional, or recreational purposes, and/or for any other land uses, other than habitat preservation-related uses (such as hiking, bird watching, etc.);~~
- ~~Use of motor vehicles, except on a temporary basis as may be necessary for activities directed at benefitting regional wildlife and habitat for those species which may utilize the Conservation Area;~~
- ~~Depositing of trash, garbage, refuse, ash, waste material, other offensive or toxic material not consistent with the purpose of this instrument;~~
- ~~Erecting of any building;~~
- ~~Excavating dredging or removing of loam, gravel, soil, rock, sand, or other material, and grading or any other land disturbing activity; and~~
- ~~Agricultural cultivation or plowing for cultivation.~~

~~Since the deed restriction was established to mitigate impacts of the previously approved and constructed La Habra Hills Specific Plan build out, the proposed Ranch La Habra Specific Plan project includes a request to the California Department of Fish and Wildlife to release portions of the existing deed restriction placed on the golf course property as mitigation for development of the golf course and adjacent Westridge residential community, with the intention to relocate some areas subject to the current deed restriction to an upland conservation area to be established in the western portion of the project site.~~

~~Because the existing deed restriction within the project site was established as mitigation in perpetuity for development of the La Habra Hills Specific Plan, including the Westridge Golf Club and the Westridge residential community, no portion of the deed restriction could be released without providing equivalent mitigation for the original impacts of the La Habra Hills Specific Plan. Thus, release of any portion of the existing deed restriction would be accompanied by the provision of equivalent mitigation for the original impacts of the La Habra Hills Specific Plan.~~

~~Release of any portion of the existing deed restriction would (1) remove state-imposed restrictions that stipulate conservation of sensitive natural habitat as the only permitted use of the deed-restricted area and (2) result in loss of mitigation previously required to address impacts from development of the La Habra Hills Specific Plan. However, provision of an equivalent replacement of wildlife and habitat values with "no net loss" that would be a requirement of any agreement between the project applicant and the California Department of Fish and Wildlife, should that agency agree to remove or relocate the existing deed restrictions in the Rancho La Habra Specific Plan area, would avoid significant impacts. Thus, the impact of removal or redistribution of wildlife and habitat values protected in the existing deed restricted areas within the Rancho La Habra Specific Plan, if approved by CDFW, would be less-than-significant.~~

ES.5.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

a. Land Use and Planning

Threshold LUP-1: Physically divide an existing community.

Impact LUP-1: Implementation of the proposed Rancho La Habra Specific Plan would result in the temporary closure of the La Habra Hills Drive entrance to the Westridge residential community during site grading, temporarily restricting use of one of the three current entries to the community. Connectivity to and from the Westridge residential community during project site grading would be temporarily reduced due to the closure of La Habra Hills Drive, increasing travel time between housing and shopping. However, connectivity for the Westridge community would not be eliminated. Because the condition would be temporary, the community's access points to Idaho Street and Beach Boulevard would remain unaffected, and emergency access from the two closest fire stations serving the Westridge community would not be affected, the impact would *less than significant*.

Threshold LUP-2: Conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Impact LUP-2.1: The proposed Specific Plan would be inconsistent with a goal and several policies of the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Since these inconsistencies are reflected in significant air quality, greenhouse gas (GHG), and traffic impacts, impacts related to inconsistencies with the 2016 RTP/SCS would be significant even with implementation of all feasible mitigation measures. Impacts would therefore be *significant and unavoidable*.

Impact LUP-2.2 The proposed Rancho La Habra Specific Plan would be inconsistent with certain policies of the La Habra General Plan resulting from an increase in the allowable buildout of the General Plan. However, approval of the proposed General Plan Amendment would include the proposed project in the General Plan's buildout, thereby achieving consistency between the proposed project and the General Plan. Therefore, *no impact* would result.

Impact LUP-2.3 Although the proposed project would increase the citywide GHG emissions identified in the City's Climate Action Plan (CAP) by ~~5,746.61~~ 8,095.99 $MTCO_2e$ in 2026 and 7,554.69 $MTCO_2e$ in 2030 annually, the

proposed project would not impede achievement of the CAP's GHG emissions reduction goals, which are based on AB 32 targets. Because (1) the proposed project would implement all applicable GHG reduction measures set forth in the Climate Action Plan and (2) emissions per service population would be consistent with AB 32 goals as discussed in Section 3.9, *Greenhouse Gas Emissions*, the proposed project would be consistent with the adopted City's Climate Action Plan. Impacts would therefore be *less than significant*.

Threshold LUP-3: Conflict with any applicable habitat conservation plan or natural community conservation plan.

Impact LUP-3: The Specific Plan area is not located within a "sub-regional focus area" that would be protected by the Central and Coastal Orange County Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP). Therefore, *no impact* would result.

b. Population and Housing

Threshold POP-1: Induce substantial population growth.

Impact POP-1: Implementation of the proposed Rancho La Habra Specific Plan would generate population growth as the direct result of the housing proposed by the Specific Plan. While the proposed project would not necessarily increase the City's projected growth rate through 2040, it would substantially increase La Habra's inventory of land for the development of housing, and therefore result in substantial population growth. Such population growth would exceed the growth projections used for preparation of the current regional Air Quality Management Plan, would therefore be inconsistent with that plan, and a significant impact would result. This increased population growth would also result in significant and unavoidable physical environmental effects in relation to aesthetics and visual resources, traffic and circulation, and greenhouse gas emissions. The resulting population and housing impact would therefore be *significant and unavoidable*.

Threshold POP-2: Displace housing or people, necessitating the construction of replacement housing elsewhere.

Impact POP-2: Implementation of the proposed Rancho La Habra Specific Plan would not result in displacement of existing housing or people that would necessitate the construction of replacement housing. *No impact* would result.

c. Aesthetic Resources

Threshold AES-1: Adverse effect on a scenic vista.

Impact AES-1: While portions of proposed Rancho La Habra Specific Plan residential and commercial development would be visible from public locations, such development would not block scenic vistas. The impact would be *less than significant*.

Threshold AES-2: Damage scenic resources within a state scenic highway.

Impact AES-2: The project site is not within or visible from a designated or eligible state scenic highway. Implementation of the proposed Rancho La Habra Specific Plan would not, therefore, damage scenic resources within a state scenic highway, and there would be *no impact*.

Threshold AES-3: Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact AES-3: Implementation of the proposed Rancho La Habra Specific Plan would result in the loss of a major open space resource. While the proposed project would be well planned and designed, the substantial loss of open space that would result from project development would degrade the existing visual character of the site. Even with implementation of project design features and compliance with existing regulations, this impact would remain *significant and unavoidable*.

While no feasible mitigation measures are available to reduce Impact AES-3 to a less than significant level, as discussed in Chapter 7, *Alternatives*, the following Project Alternatives (in addition to No Project Alternatives) would eliminate or reduce the identified significant impact in relation to visual character:

Alternative 3: Golf Course and Hotel

Alternative 4: Reduced Density Residential/Nine-Hole Golf Course

Alternative 5: Reduced Density Single-Family Development

Threshold AES-4: New source of substantial light or glare, which would adversely affect day or nighttime views in the area.

Impact AES-4.1: Implementation of proposed Rancho La Habra Specific Plan would not create substantial new sources of nighttime lighting that would spillover onto sensitive uses (i.e., residences) for a substantial portion of the night

or would impair drivers' vision at night. Project lighting impacts would, therefore, be *less than significant*.

Impact AES-4.2: Implementation of the proposed Rancho La Habra Specific Plan would not create a substantial new source of glare. The impact would be *less than significant*.

d. Biological Resources

See Section ES.5.3 e of Final EIR – Volume 2 for a summary of Biological Resources impacts and mitigation measures.

e. Cultural Resources

Threshold CUL -1: Substantial adverse change in the significance of a historic resource.

Impact CUL-1: Because no significant historic resources are present within the project site, implementation of the proposed Rancho La Habra Specific Plan would not result in a substantial adverse change in the significance of a historic resource. *No impact* would result.

Threshold CUL-2: Substantial adverse change in the significance of an archaeological resource.

Impact CUL-2: Implementation of the proposed Rancho La Habra Plan could result in a substantial adverse change in the significance of a previously unknown subsurface archaeological resource during site grading activities within areas previously undisturbed by golf course construction. However, compliance with existing regulations and implementation of mitigation measures would reduce this potential impact to a less- than-significant level. The impact would therefore be *significant but mitigable*.

Mitigation Measure CUL-2a: A qualified archaeologist shall be retained to conduct spot-checking of site grading activities and to respond on an as-needed basis to address unanticipated archaeological discoveries. In addition, a qualified Native American Monitor shall be present onsite during construction-related ground disturbance activities, including but not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, trenching, and vegetation removal.

In the event that archaeological materials, including stone tools, shells, bones, glass shards, ceramics, or other materials older than 50 years in age, are encountered during ground-disturbing activities, work in the

immediate vicinity of the resource shall cease until a qualified archaeologist approved by the City and a qualified Native American Monitor have assessed the discovery and appropriate treatment pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5 is determined and implemented.

If archaeological resources are found to be significant, the archaeologist and Native American Monitor shall determine, in consultation with the City and any local Native American groups expressing interest following notification by the City, appropriate avoidance measures or other appropriate mitigation. Pursuant to CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts on archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as a historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

Mitigation Measure CUL-2b: Prior to removal of any native vegetation from the project site, Native American monitors or representatives of the Gabrieleño Band of Mission Indians-Kizh Nation shall be invited to the project site to document and distinguish native vegetation that is preferred by the Tribe. All plants preferred by the Tribe that are proposed to be removed as part of site development shall be made available to the Tribe prior to their removal.

Threshold CUL-3: Cause a substantial adverse change in the significance of a tribal cultural resource.

Impact CUL-3: No tribal cultural resources meeting the definition set forth 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 is known to exist within the project site. However, there is still a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities. With

implementation of **Mitigation Measure CUL-2a** and **Mitigation Measure CUL-2b** impacts will be *less than significant*

Threshold CUL-4: Destruction of a unique paleontological resource or unique geologic feature.

Impact CUL-4: Implementation of the proposed Rancho La Habra Specific Plan could destroy a unique paleontological resource or unique geologic feature as the result of future site grading within areas previously undisturbed by golf course construction. However, compliance with existing regulations and implementation of EIR mitigation measures would reduce this potential impact to a less- than-significant level. The impact would therefore be *significant but mitigable*.

Mitigation Measure CUL-4: The applicant/developer shall retain a County-certified paleontologist approved by the City to conduct full-time monitoring during all earth-moving activities involving previously undisturbed sediments of the La Habra and San Pedro Formations along with periodic paleontological spot checks within excavation areas mapped as Quaternary alluvium exceeding depths of 5 feet to determine if older, paleontologically sensitive sediments are present. If such older, paleontologically sensitive sediments are present, full-time monitoring shall be implemented.

If paleontological resources are encountered during ground-disturbing activities, work in the immediate vicinity of the resource shall cease until a County-certified paleontologist has assessed the discovery and appropriate treatment is determined and implemented.

Threshold CUL-5: Disturb any human remains, including those interred outside of formal cemeteries.

Impact CUL-5: Implementation of the proposed Rancho La Habra Specific Plan could disturb previously unknown human remains interred outside of formal cemeteries. However, compliance with existing regulations would ensure that this potential impact would be *less than significant*.

f. Traffic and Circulation

See Section ES.5.3 f of Final EIR – Volume 2 for a summary of Traffic and Circulation impacts and mitigation measures.

g. Air Quality

See Section ES.5.3 g of Final EIR – Volume 2 for a summary of Air Quality impacts and mitigation measures.

h. Greenhouse Gas Emissions

See Section ES.5.3 h of Final EIR – Volume 2 for a summary of Greenhouse Gas Emissions impacts and mitigation measures.

i. Energy Resources

See Section ES.5.3 i of Final EIR – Volume 2 for a summary of Energy Resources impacts.

j. Noise and Vibration

See Section ES.5.3 j of Final EIR – Volume 2 for a summary of Noise and Vibration impacts and mitigation measures.

k. Hazards and Hazardous Materials

Threshold HAZ-1: **Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.**

Impact HAZ-1: Because site demolition and construction activities, as well as operation of proposed new residential and commercial uses, would be required to comply with applicable regulations for the use of hazardous materials, the impact related due to routine transport, use, or disposal of hazardous materials would be *less than significant*.

Threshold HAZ-2: **Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.**

Impact HAZ-2.1: Demolition, grading, and construction activities related to the proposed Specific Plan would be required to comply with existing laws and regulations for the routine transport, use, and disposal of hazardous materials. As a result, the impact would be *less than significant*.

Impact HAZ-2.2: Soils containing petroleum hydrocarbons would be encountered during site grading. A Soils Management Plan approved by the Orange County Health Care Agency sets forth extensive controls that make a substantial

health risk unlikely; however, a health risk is nevertheless possible. The impact would be *significant but mitigable*.

Mitigation Measure HAZ-2.2: Excavation, handling, and placement of contaminated soils within the project site shall be undertaken so as to achieve a residential cleanup standard of an acceptable excess cancer risk (ECR) of 1×10^{-5} for construction workers, residents and workers within proposed uses on-site, and residents of adjacent neighborhoods.

Impact HAZ-2.3: Three dwelling units are proposed directly over previously abandoned wells, and site grading, including lowering of ground elevations over previously abandoned wells, could affect their integrity. Compliance with site review requirements of the Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR) would ensure public safety. The impact would be *less than significant*.

Impact HAZ-2.4: Proposed residential and commercial uses would routinely use and store result small quantities of common chemicals (e.g., paints, solvents, and cleaning products). Such hazardous materials would be used and stored in accordance with applicable regulations. As a result, reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be unlikely, and the impact would be *less than significant*.

Threshold HAZ-3: **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school.**

Impact HAZ-3: While project site development would not result in hazardous emissions or handling of acutely hazardous materials, site grading would result in the excavation, stockpiling, and placement of total petroleum hydrocarbon (TPH)-affected soils below the project site, which is within 0.25-mile of Las Positas Elementary School. TPH-affected soils would be handled pursuant to a Soils Management Plan approved by the Orange County Health Care Agency, and the project would be required to comply with applicable rules of the South Coast Air Quality Management District; however, a hazard is nevertheless possible. The impact would be *significant but mitigable*.

Threshold HAZ-4: **Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.**

Impact HAZ-4: Due to past oil extraction activities, the project site is included on a list of hazardous materials sites. TPH-affected soils would be handled pursuant to a Soils Management Plan approved by the Orange County Health Care Agency, and such handling would be required to comply with applicable rules of the South Coast Air Quality Management District; however, a hazard is nevertheless possible. The impact would be *significant but mitigable*.

See **Mitigation Measure HAZ-2.2**.

Threshold HAZ-5: **Result in a safety hazard for people residing or working in the project area for a project located within an airport land use plan or, where such plan has not been adopted, be within 2 miles of a public airport use airport or public use airport.**

Impact HAZ-5: Because the project site is not within an airport land use plan or within 2 miles of a public airport for which an airport land use plan has not been adopted, *no impact* would result.

Threshold HAZ-6: **Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area.**

Impact HAZ-6: Because the project site is not within an airport land use plan or within two miles of a private airstrip, there would be *no impact*.

Threshold HAZ-7: **Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.**

Impact HAZ-7: La Habra Hills Drive would be temporarily closed during site grading, temporarily eliminating emergency access to the Westridge community during project construction. The temporary closure of La Habra Hills Drive that would occur during project site grading would not affect emergency access from the two closest fire stations serving the project site and the Westridge community. In addition, as a standard condition for issuance of a building permit, the applicant would be required to prepare and implement a Construction Phase Emergency Fire Access Plan and a Construction Phase Emergency Access Plan, which would ensure adequate emergency response is available to the project site and the adjacent Westridge community in the event of an emergency. Therefore, the impact would be *less than significant*.

Threshold HAZ-8: **Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.**

Impact HAZ-8: Proposed project site development would place new residential uses within a Very High Fire Hazard Area and intensify development along a wildland-urban interface, increasing fire hazards. Compliance with existing codes, along with implementation of the proposed Fire Management Plan as approved by the Los Angeles County Fire Department, would ensure an adequate level of fire safety. As a result, the impact would be *less than significant*.

l. Hydrology and Water Quality

Threshold HWQ-1: Violate any water quality standards or waste discharge requirements.

Impact HWQ-1.1 Site grading and construction activities would result in short-term increases in the transport of silt and sediment, along with hydrocarbon-based pollutants, to receiving waters. Site construction activities would also allow for infiltration of hydrocarbon and other pollutant discharges into the groundwater. However, compliance with National Pollutant Discharge Elimination System (NPDES) requirements, as well as implementation of a Stormwater Pollution Prevention Plan (SWPPP), including Best Management Practices (BMPs), would avoid the potential to violate any water quality standards or waste discharge requirements. The impact would therefore be *less than significant*.

Impact HWQ-1.2: Following completion of grading and construction, urban runoff and waste discharges from project site streets, parking lots, and other paved areas, as well as runoff from landscaped areas, would carry a variety of pollutants to receiving waters. However, implementation of Best Management Practices (BMPs) as required to be set forth in the project's Stormwater Management Plan and Water Quality Management Plan would avoid the potential to violate any water quality standards or waste discharge requirements during ongoing operations. The impact would therefore be *less than significant*.

Threshold HWQ-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level

which would not support existing land uses or planned uses for which permits have been granted).

Impact HWQ-2: Implementation of the proposed Rancho La Habra Specific Plan would increase the impervious surface area within the project site, reducing groundwater infiltration. However, because the proposed project would also substantially reduce the amount of groundwater consumed within the project site, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. This impact would be *less than significant*.

Threshold HWQ-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site; or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Impact HWQ-3: The proposed Rancho La Habra Specific Plan would maintain existing drainage patterns within the project site but would substantially increase the site's impervious surface area, increasing runoff. Because drainage would be directed through a series of detention basins, runoff from the project site would not increase beyond the capacity of downstream drainage facilities, with one exception: the existing 48-inch drainage pipe crossing Beach Boulevard, which is deficient in the existing condition. The on-site flooding that could result would be addressed by construction of a second drainage pipeline under Beach Boulevard. The impact therefore would be *significant but mitigable*.

Mitigation Measure HWQ-3: The applicant shall construct a 48-inch storm drain underneath Beach Boulevard parallel to the existing storm drain pipe that connects the on-site detention basin with the existing storm drain pipe on the west side of Beach Boulevard. The applicant shall perform the work using a jack and bore method to avoid impacts on traffic on Beach Boulevard. The applicant shall also obtain (1) approval from Caltrans to jack and bore underneath Beach Boulevard and, (2) to the extent necessary, a temporary construction easement from the Hillsborough Apartment complex on the west side of Beach Boulevard. Furthermore, the applicant shall recalculate the size of the detention basin, and if additional storage is necessary, the Applicant shall show underground buried storm water storage adjacent to the detention basin

shown on the Vesting Tentative Tract Map. The final hydraulic calculations document that existing off-site storm flows and the additional on-site storm flows would not exceed the design capacity of the existing and new storm drain pipes under Beach Boulevard. All final calculations and design plans shall be approved by the City of La Habra.

Threshold HWQ-4: Otherwise substantially degrade water quality.

Impact HWQ-4: Implementation of the proposed project would introduce water quality pollutants during site grading and construction and ongoing operations. Implementation of BMPs and compliance with applicable requirements designed to protect water quality would ensure that water quality in receiving waters and groundwater would not be substantially degraded. The impact would therefore be *less than significant*.

Threshold HWQ-5: Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

Impact HWQ-5: Implementation of the proposed Specific Plan would not place housing within a 100-year flood hazard area. *No impacts* would occur.

Threshold HWQ-6: Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Impact HWQ-6: Implementation of the Rancho La Habra Specific Plan would not place structures within a 100-year flood area that could impede or redirect flood flows. *No impacts* would occur.

Threshold HWQ-7: Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact HWQ-7: Implementation of the proposed Rancho La Habra Specific Plan would not expose people or structures to risks related to flooding due to the failure of a levee or dam. *No impacts would not occur*.

Threshold HWQ-8: Cause inundation by seiche, tsunami, or mudflow.

Impact HWQ-8: Implementation of the proposed Rancho La Habra Specific Plan would not cause or be subject to inundation due to seiche, tsunami, or mudflow. *No impact* would result.

m. Geology, Soils, and Seismicity

Threshold GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and/or landslides.

Impact GEO-1.1: Proposed residential structures on Lots 12, 28 and 29 would be located within the Alquist-Priolo Earthquake Fault Zone, which could potentially expose those structures and people to a significant safety risk should active faults or active fault splays be located within 100 feet of the lots. The resulting impact would be *significant but mitigable*.

Mitigation Measure GEO-1.1: A minimum 100-foot setback for all residential structures shall be maintained from any active fault or fault splay.

Impact GEO-1.2: Implementation of the Rancho La Habra Specific Plan would expose people and structures to strong seismic groundshaking. However, compliance with existing California Building Code requirements as they would apply to site-specific conditions would ensure that impacts related to risk of loss, injury, or death involving strong seismic groundshaking would be *less than significant*.

Impact GEO-1.3: Implementation of the Rancho La Habra Plan would expose people and structures to seismic-related ground failure, including liquefaction. The project site contains relatively isolated sandy layers within alluvial soils that are susceptible to liquefaction and dynamic settlement within the upper 50 feet of the surface. Potential dynamic settlement is estimated to be on the order of 1 to 2 inches. Differential dynamic settlement is estimated at half of the total settlement over a horizontal span of 30 feet. Impacts would be *significant, but mitigable*.

Mitigation Measure GEO-1.3a: Stiffened and/or post-tensioned slab foundations shall be used to support all new proposed development within the project site. Pre-soaking of the subgrade soils shall be required to reduce the potential impact of expansive soils.

Impact GEO-1.4: The mechanically stabilized earth (MSE) wall below proposed Lots 241 through 245 would be at risk from landslide. <u>In addition, site grading activities would result in removal of a buttress keyway in the southern portion of the site, requiring slope stabilization and remedial grading of an existing landslide.</u> The impact related to risk of loss, injury, or death involving landslides would be *significant but mitigable*.

Mitigation Measure GEO-1.4a: Additional geogrid reinforcement length beyond local stability requirements to be determined by the MSE wall designer and approved by the City shall be required to provide adequate global stability factors of safety (greater than 1.5 and 1.1 for static and pseudo-static [seismic] loading conditions, respectively, for the MSE wall located below Lots 241 through 245 of Vesting Tentative Tract Map 17845.[7]

Mitigation Measure GEO-1.4b: The planned landslide removal at Cross-Section 2-2′-2″shall be undertaken prior to excavation of the keyway back-cut slope north of the proposed landslide removal area as depicted in **Figure 3.14-3**, *Revised Portion of Cross-Section 2-2′-2″*. Additionally, the landslide removal shall be excavated in slots, or sections, where an area of landslide approximately 80 feet long (measured parallel to the slope face) is removed and replaced as compacted fill, prior to excavation of the adjacent 80-foot-wide section. A minimum of approximately 15 vertical feet of compacted fill shall be placed above the landslide rupture surface within each completed slot, prior to the next section of landslide removal. The landslide removal operation shall be performed so that no sections are left open (defined as lacking a minimum of 15 vertical feet in front of the landslide) over a weekend/holiday or when a significant rain event is predicted over the next three days. Full-time observation and testing shall be monitored by a qualified geotechnical expert during the landslide removal operation, and the expert shall provide supplemental recommendations based on observed field conditions.

Threshold GEO-2: **Result in substantial soil erosion or the loss of topsoil.**

Impact GEO-2: Site grading and construction activities would result in short-term increases in the transport of silt and sediment to receiving waters. However, compliance with National Pollutant Discharge Elimination System (NPDES) requirements, as well as implementation of a Stormwater Pollution Prevention Plan (SWPPP), including best management practices (BMPs), would avoid substantial erosion or loss of topsoil. The resulting impact would therefore be *less than significant*.

[7] Preliminary slope stability analysis set forth in the project geotechnical report indicates at least 6 layers of geogrid reinforcement lengths of 60 feet, with an allowable strength (after appropriate reduction factors are applied by the manufacturer) of approximately 3.5 kips per foot, spaced at a maximum vertical spacing of 2 feet, are required for adequate global factors of safety. Further refinement of the design for required global stability geogrid will occur during preparation of the 40-scale grading plan and with input from the MSE wall designer subject to approval of the City of La Habra.

Threshold GEO-3: **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.**

Impact GEO-3: Slopes within the project site will have an appropriate factor of safety with one exception -- the mid slope MSE walls located below Lots 241 through 245, which will require reinforcement will be necessary to provide an adequate factor of safety. In addition, the project site contains relatively isolated sandy layers within alluvial soils that are susceptible to liquefaction and dynamic settlement within the upper 50 feet of the surface, resulting in the potential for liquefaction and dynamic settlement. The project site contains previously placed non-structural fill and near-surface alluvium soils that lack sufficient compaction for the proposed development. The proposed increase of grades over existing alluvium in portions of the site will induce up to 2½ inches of settlement which is estimated to occur over approximately 6 to 12 months after completion of rough grading. Finally, the presence of corrosive soil could affect the long-term integrity of proposed structures' foundation systems. However, implementation of mitigation measures based on the recommendations of the Rancho La Habra Geotechnical Report and compliance with the California Building Code will would resolve soil stability issues. Impacts will therefore be *significant but mitigable*.

Mitigation Measure GEO-3a: Removals of unsuitable fill material up to approximately 50 feet deep below existing grades shall be performed for the western portion of the project site and within several isolated small canyon areas at the eastern portion of the site, in accordance with recommendations of the Geotechnical Report. Precise locations and depths of removals shall be made by the project's geotechnical consultant, as approved by the City, and noted on the final approved grading plans.

Mitigation Measure GEO-3b: As part of remedial grading, unsuitable soils shall be removed to competent soils, temporarily stockpiled (where necessary) and replaced as properly compacted fill. Prior to placement as compacted fill, significant organic materials or other unsuitable materials shall be removed and properly exported off-site.

Mitigation Measure GEO-3c: Any concrete material from site demolition used in general fill shall be environmentally suitable and crushed such that it is no larger than 8 inches in maximum dimension and well blended (i.e., no nesting and voids) into site fills. Any concrete material placed in

MSE wall backfill areas (refer to **Mitigation Measure GEO-3i**) shall be crushed to meet gradation requirements of aggregate base in accordance with the last edition of the Greenbook: Standard Specifications for Public Works Construction. The actual depths and lateral extents of grading shall be determined by the geotechnical consultant, based on subsurface conditions encountered during grading.

Mitigation Measure GEO-3d: Stabilization fill keyways shall be constructed for design cut slopes that are not undercut by remedial grading. Locations of the stabilization fill keyways shall be constructed in accordance with recommendations made in the Geotechnical Report, with final locations and design specifications made by the project's geotechnical consultant subject to review and approval by the City xxx. Keyways shall be shown on the final grading plans. Design cut lots, or lots with less than 5 feet of design fill, shall be overexcavated a minimum of 5 feet below respective pad grades.

Mitigation Measure GEO-3e: Proposed fill slopes shall be constructed at a slope ratio of 2:1 (horizontal to vertical) or flatter so as to achieve the factors of safety recommended in the Geotechnical Report.

Mitigation Measure GEO-3f: Fills placed deeper than 40 feet below proposed grade shall be compacted to an increased minimum relative compaction of 93 percent relative compaction. Fill shall be moisture-conditioned to be between optimum moisture content and 2 percent over optimum moisture content, pursuant to ASTM D1557.

Mitigation Measure GEO-3g: Settlement monuments shall be installed within four weeks after completion of grading within fill areas greater than approximately 40 feet below finish grade and where significant amounts of fill are placed over left-in-place alluvium. Settlement monuments shall be read by a licensed surveyor with an off-site benchmark. The survey readings shall be obtained four times in the first two months, twice in the third month, and then once a month unless otherwise requested by the geotechnical consultant. Shallow footings and slab-on-grade foundations shall be constructed after settlement monitoring data indicate future total settlements are within tolerable limits. Tolerable limits shall include a determination by the project's geotechnical engineer, subject to review and approval by the City, that the surveyed areas would maintain a predicted 3 inches or less of settlement for the next 50 years. If a determination is made that tolerable limits are not met, either impacted areas shall be surcharged with

additional fill material and surveyed for an additional three months to determine that tolerable limits are met, or construction shall be delayed until additional settlement monitoring determines that tolerable limits are met.

Mitigation Measure GEO-3h: Additional geogrid reinforcement length (beyond local stability requirements) shall be required for adequate global stability factors of safety of the MSE retaining wall located at various areas throughout the site, as determined during final design and as approved by the City. Final design requirements including geogrid reinforcement length shall be determined by the MSE wall designer during preparation of the 40-scale grading plan and approved by the City based on the recommendation made in the Geotechnical Report. Geogrid reinforcement length requirements shall be noted on the final approved construction plans.

Mitigation Measure GEO-3i: MSE walls and conventional retaining walls shall be backfilled with relatively sandy soils obtained from either on-site or off-site locations. Sandy soils shall comprise the geogrid zone required for local stability as determined by the MSE wall designer and approved by the City. For conventional retaining walls, the sandy import zone shall be a minimum of one-half the height of the retaining wall. These requirements shall be noted on the final approved construction plans.

Mitigation Measure GEO-3j: Soil samples shall be collected and tested for presence of corrosive soils at the completion of rough grading. If corrosive soils are detected with (1) pH levels of 5.5 or less, (2) chloride concentration of 500 parts per million (ppm) or greater, or (3) sulfate concentration of 2,000 ppm or greater, specific remediation methods—such as increased compressive strength for structural concrete, decreased water-to-cement ratio for structural concrete and/or encapsulation of post-tensioned cables—shall be implemented as approved by the City. Specific remediation methods shall include one or more of the above-listed options as determined by the foundation design engineer and as approved by the City. If corrosive soils are not detected at levels described above, no mitigation shall be required.

Threshold GEO-4: **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.**

Impact GEO-4: Soils within portions of the project site tested as having very high potential for expansion. However, implementation of mitigation

measures based on the recommendations of the project's Geotechnical Report and compliance with the California Building Code would resolve expansive soil issues. Impacts will therefore be *significant but mitigable*.

Mitigation Measure GEO-4: Soil samples shall be collected and tested at the completion of rough grading to assess expansive soil conditions. Based on the test results, the project shall incorporate specific recommendations set forth by the foundation design engineer, subject to review and approval by the City, such as the use of stiffened and/or post-tensioned slab foundations, pre-soaking of the subgrade soils, and establishment of minimum setbacks for structures located near slopes.

Threshold GEO-5: **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.**

Impact GEO-5: Implementation of the Rancho La Habra Plan would require all development to connect to municipal sewage systems, and no septic tanks or alternative wastewater disposal systems would be used. As a result, there would be *no impact*.

n. Public Services

Threshold PSF-1 **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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.**

Impact PSF-1.1: Implementation of the proposed Rancho La Habra Specific Plan would increase demand for police services during construction and ongoing operations, but would not necessitate provision of new facilities or physical expansion of existing police facilities. Thus, *no impact* would result.

Impact PSF-1.2: Implementation of the proposed Rancho La Habra Specific Plan would increase demand for fire protection services, but would not necessitate provision of new facilities or physical expansion of existing fire protection facilities. Thus, *no impact* would result.

Impact PSF-1.3: Implementation of the proposed Rancho La Habra Specific Plan would generate additional students within the Lowell Joint School District and

the La Habra City School District for grades Kindergarten (K)-8, and within the Fullerton Joint Union High School District for grades 9-12. Payment of required school impact fees to these districts would constitute mitigation in full for the increased number of students. Thus, *no impact* would result.

Impact PSF-1.4: Implementation of the proposed Rancho La Habra Specific Plan would increase demand for library services but would not necessitate provision of new facilities or physical expansion of existing facilities. Thus, *no impact* would result.

o. Recreational Resources

Threshold REC-1: 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.

Impact REC-1: The proposed Rancho La Habra Specific Plan provides for parks and recreational land in excess of La Habra Municipal Code requirements. Thus, the proposed project would not 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. The project would include closure of the Westridge Golf Club, resulting in the loss of a major recreational resource; however, this closure would not cause or accelerate physical deterioration of other golf courses, which are available within a 5-mile radius of the project site. The impact would therefore be *less than significant*.

Threshold REC-2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact REC-2: Construction and operation of proposed parks and recreation facilities would contribute to impacts addressed throughout this EIR, except for those impacts specifically related to population growth or to the project's proposed residential and commercial areas and their operations. The significance of these impacts would be as identified in other EIR sections.

p. Utilities, Service Systems, and Water Supply

Threshold UTI-1: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Impact UTI-1: Because proposed land uses would not discharge wastewater that contains harmful levels of chemicals and would not exceed the capacity of Orange County Sanitation District (OCSD) Reclamation Plant No. 2, implementation of the proposed Specific Plan would not exceed applicable wastewater treatment requirements, and the impact would be *less than significant*.

Threshold UTI-2: Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact UTI-2.1: Construction of needed water infrastructure would not result in any on-site physical effects on the environment other than those that are analyzed as part of development of proposed residential and commercial uses (e.g., site grading). In addition, off-site improvements, other than connections to existing water lines adjacent to the project site, would not be needed. The off-site connections to existing water lines would occur exclusively within existing road rights-of-way. While such connections would require roadway lane closures during construction, such closures would be temporary and subject to standard City and Caltrans requirements to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of water facilities would be *less than significant*.

Impact UTI-2.2: Construction of needed sewer infrastructure would not result in any on-site physical effects on the environment other than those analyzed as part of development of proposed residential and commercial uses (e.g., site grading). In addition, the necessary off-site sewer improvements would occur exclusively within existing road rights-of-way. While such connections would require roadway lane closures during construction, the closures would be temporary and subject to standard City and Caltrans requirements to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of sewer facilities would be *less than significant*.

Threshold UTI-3: Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact UTI-3: Construction of needed drainage infrastructure would not result in any on-site physical effects on the environment other than those that would occur as the result of development of proposed residential and

commercial uses (e.g., site grading). In addition, the off-site construction of a 48-inch storm drain connection under Beach Boulevard would occur exclusively within existing rights-of-way. By using jack and bore, this construction would not cause lane closures or traffic interruptions. Boring for the storm drain would occur within an existing right-of-way in ground that was largely previously disturbed for construction of an adjacent storm drain. The equipment used in the jack and bore operation would generate less noise than the on-site grading operations analyzed in Section 3.11, *Noise and Vibration*. As a result, impacts related to construction of drainage facilities would be *less than significant*.

Threshold UTI-4: Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.

Impact UTI-4: Development under the proposed Specific Plan would require approximately 101 acre-feet less water annually than the existing golf course use. In addition, because La Habra's water supplies are adequate to meet projected demands in normal, dry, and multiple dry years through 2040 even without the proposed project, new or expanded entitlements would not be needed. Therefore, *no impact* would result.

Threshold UTI-5: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Impact: UTI-5: Adequate treatment capacity is available at Orange County Sanitation District (OCSD) Reclamation Plant No. 2 to treat wastewater generated by the proposed project in addition to OCSD's existing commitments. The project's impact would therefore be *less than significant*.

Threshold UTI-6: Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.

Impact UTI-6: Because the Olinda Alpha Landfill and the Orange County landfill system have adequate daily capacity, the addition of 1.42 tons of solid waste per day from project operations would not exceed the permitted daily capacity of area landfills. Adequate daily landfill capacity also exists at area landfills to accept waste from project construction activities, which will be required to implement waste reduction programs. In addition, OC Waste & Recycling projects that, by 2066, Orange County's disposal system would have 71 million tons of remaining capacity, which is more

than sufficient to accommodate the 51,900 tons of solid waste that would be generated by the project operations over this 50-year period. Thus, the proposed project would not exceed the total capacity of area landfills, and impacts would be *less than significant*.

Threshold UTI-7 **Fail to comply with federal, state, and local statutes and regulations related to solid waste.**

Impact UTI-7: Implementation of the proposed Specific Plan would comply with federal, state, and local statutes and regulations related to solid waste. *No impact* would occur.

ES.6 ALTERNATIVES

CEQA requires that an EIR describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, while avoiding or reducing the significant environmental effects of the proposed Project and to evaluate the comparative merits of the alternatives. Chapter 7 also evaluates alternatives to the proposed Project as required by CEQA. These alternatives include:

- Alternative 1: No Project – No Development
- Alternative 2: No Project - General Plan Buildout
- Alternative 3: Golf Course and Hotel
- Alternative 4: Residential with Nine-Hole Golf Course (314 dwelling units)
- Alternative 5: Reduced Residential Density with Nine-hole Golf Course (144 dwelling units)
- Alternative 6: Reduced Residential Density

ES.6.1 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an EIR identify an environmentally superior alternative. If the No Project Alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)).

The No Project – No Development Alternative would avoid all of the significant impacts of the proposed project, including inconsistency with the La Habra General Plan, providing for the continued use of the existing Westridge Golf Club. This alternative would also reduce all other environmental effects of the proposed Specific Plan with the exception of water use.

Of the other alternatives evaluated in this EIR, Alternative 4, the Reduced Density Residential/Nine-Hole Golf Course Alternative with 144 dwelling units, would be the

environmentally superior alternative since it would avoid the significant impacts of the proposed project, reduce other impacts compared to the proposed project, meet City project objectives, and partially meet most applicant objectives (although to a lesser degree than the proposed project).

Table ES-4~~3~~ compares the effects each of the six alternatives would have in relation to the seven significant unavoidable impacts that would result from the proposed project.

Table ES-4~~5~~
Comparison of Alternatives in Relation to Significant Unavoidable Impacts on Proposed Project

Significant Unavoidable Impact of Proposed Project	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6
Land Use and Planning (inconsistency with the Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS] and the La Habra General Plan)	Avoid	Avoid	Avoid	Reduce	Reduce	Reduce
Population and Housing (generation of population growth above existing General Plan build-out, reflected in significant traffic, air quality, and greenhouse gas impacts)	Avoid	Avoid	Avoid	Reduce	Reduce	Reduce
Aesthetic Resources (loss of a major open space resource resulting in a change in the character of the site)	Avoid	Avoid	Avoid	Reduce	Reduce	Reduce
Traffic and Circulation (increased traffic exceeding established significance thresholds)	Avoid	Avoid	Reduce	Reduce	Reduce	Reduce
Air Quality (housing and population growth inconsistent with the current regional Air Quality Management Plan)	Avoid	Avoid	Reduce	Avoid	Reduce	Avoid
Greenhouse Gas Emissions (annual emissions exceeding established significance thresholds)	Avoid	Avoid	Reduce	Avoid	Reduce	Avoid
Noise (construction noise)	Avoid	Reduce	Reduce	Reduce	Reduce	Reduce

ES.7 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123 specifies that the EIR summary shall identify "areas of controversy" known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects. To date, the following areas of controversy and issues to be resolved have been identified.

- Loss of open space and opportunities to golf, as well as changes in views and the character of the project site resulting from the proposed change in land use from golf course to a residential community.
- Noise, dust and air pollutant emissions during site grading and construction.
- Impacts to local schools.

- Safety of existing and future residents.
- Traffic congestion on area roadways.

CHAPTER 1 INTRODUCTION

This environmental impact report (EIR) has been prepared by the City of La Habra (City) as the Lead Agency in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 *et seq.*) and CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 *et seq.*). This EIR has been prepared to identify, analyze, and mitigate the significant environmental effects of the proposed Rancho La Habra Specific Plan and related actions (the project).

CEQA requires each EIR to reflect the independent judgment of the Lead Agency, including but not limited to the thresholds of significance used to analyze project impacts, analyses, and conclusions regarding the level of significance of impacts both before and after mitigation, and the mitigation measures to be implemented to avoid or reduce project-related impacts (CEQA Sections 21082.1, 15084, and 15090). In preparing this EIR, the City has retained and directed a team of CEQA and environmental technical specialists as consultants. However, the analyses and conclusions set forth in this EIR reflect the independent judgment of the City as Lead Agency.

1.1 OVERVIEW OF THE RANCHO LA HABRA SPECIFIC PLAN

1.1.1 PROJECT LOCATION

The Rancho La Habra Specific Plan (Specific Plan) proposes development of the existing Westridge Golf Course in the city, which is in the northern portion of Orange County (refer to **Figure 1-1**). The City of Fullerton is located to the south and the City of Brea is to the east in Orange County. The City of La Mirada is located to the west of La Habra, in Los Angeles County, with the cities of Whittier to the northwest and La Habra Heights to the north, all in Los Angeles County. Major regional roadways in the area include Beach Boulevard to the west and Imperial Highway to the north. Beach Boulevard provides regional access to the Interstate 5 freeway (I-5), approximately 4.5 miles to the south. Imperial Highway also provides regional access to the State Route 57 freeway (SR-57), approximately 5 miles to the east.

The approximately 151-acre Specific Plan area (project site) is located at 1400 South La Habra Hills Drive, which is east of Beach Boulevard, west of Idaho Street, and south of Imperial Highway, in the city. Direct access to the Specific Plan area (existing Westridge Golf Course property) is currently from La Habra Hills Drive.

1.1.2 PROJECT CHARACTERISTICS

The Rancho La Habra Specific Plan proposes development of 402 dwelling units, consisting of 277 single-family homes and 125 multi-family residences, along with either 20,000 square feet of commercial development (e.g., specialty grocery, restaurant, or general retail uses) or an additional 46 multi-family dwelling units adjacent to Beach Boulevard (to the west) and the existing Westridge Plaza shopping center (to the north). The Specific Plan also proposes open space, trails, and parks on the approximately 151-acre project site. Included as part of the project's proposed parkland is conversion of the existing golf clubhouse facility to a City-owned Community Center.

Development of the proposed project requires several approvals that are being requested by the applicant, CalAtlantic Homes, including:

- General Plan Amendment
- Change of Zone
- Rancho La Habra Specific Plan
- Amendment to the La Habra Hills Specific Plan
- Vesting Tentative Tract Map 17845
- Development Agreement
- Design Review
- ~~Conditional Use Permit for model home complexes~~
- Proposed Community Facilities District
- Release of an existing deed restriction

See Chapter 2, *Project Description*, for descriptions of each of these proposed actions.

1.2 ENVIRONMENTAL REVIEW

Because proposed development of the Rancho La Habra Specific Plan and the other approvals listed above require discretionary actions by a public agency, including the City, the Specific Plan and related actions constitute a "project" under CEQA, and must be evaluated for their potential to create adverse environmental effects.

Consistent with CEQA requirements, this EIR assesses the direct and indirect environmental impacts associated with the physical changes that would result from implementation of the proposed Rancho La Habra Specific Plan and related actions. Additionally, this EIR sets forth all feasible mitigation measures and evaluates a reasonable range of alternatives to address identified significant impacts. The City is required to consider the information provided in this EIR, along with any other relevant information, in making its decisions regarding the proposed project.

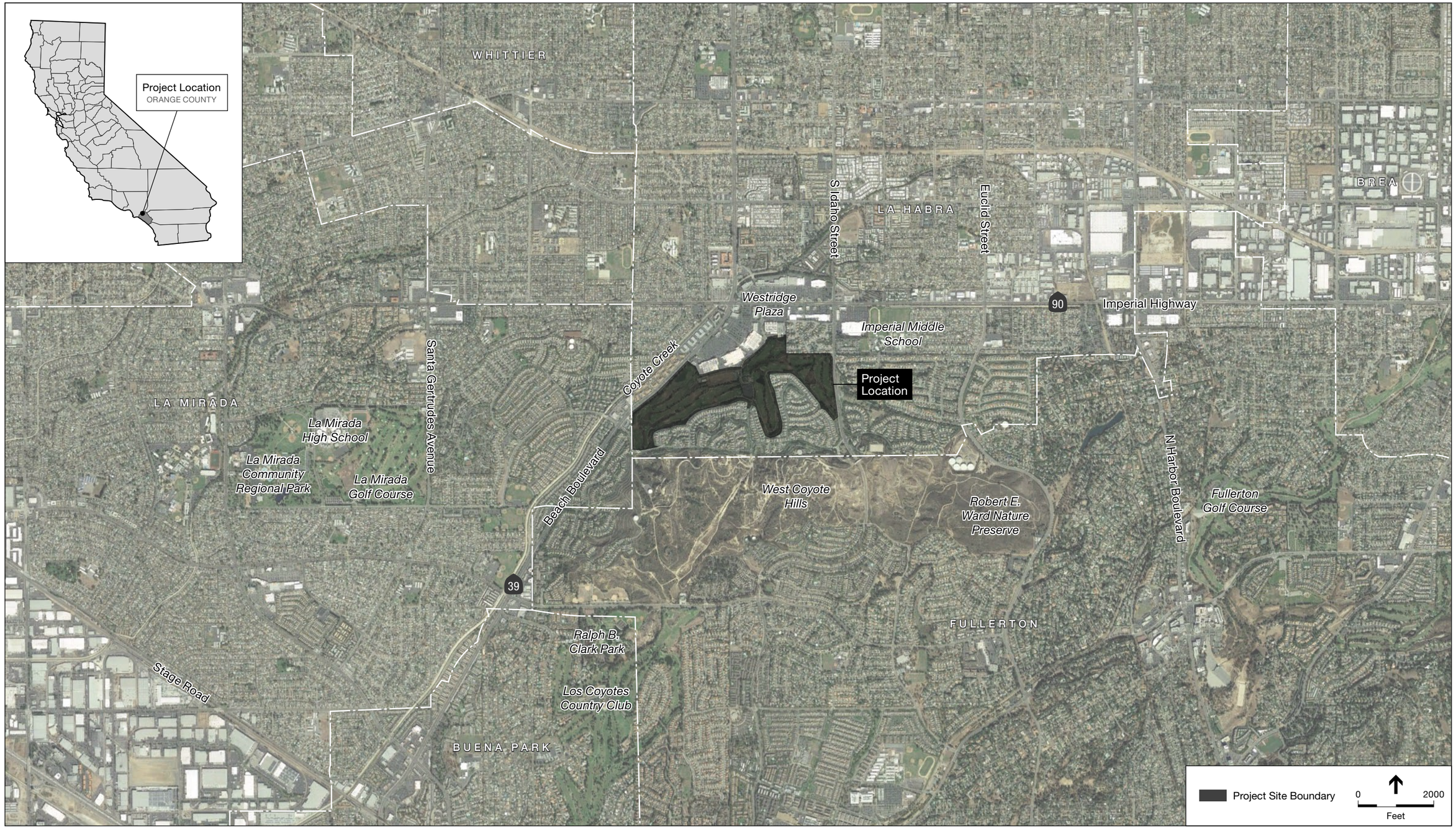


Figure 1-1: Project Location

Source: Google Earth Pro

1.2.1 PURPOSE AND INTENDED USE OF THIS EIR

Pursuant to the provisions of CEQA Guidelines Section 15121 (a), this EIR is intended as an informational document to inform public agency decision-makers and the general public of the significant environmental effects of the proposed Rancho La Habra Specific Plan and related actions, identify possible ways to avoid or minimize those significant effects, and describe reasonable alternatives to the project that might avoid or lessen significant environmental effects. As a public disclosure document, an EIR does not recommend approval or denial of a project or determine whether the project is "good" or "bad." The EIR's purpose is to provide information regarding the physical environmental changes that would result from the actions being considered by the City to aid in the agency's decision-making process.

California CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision-makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision-makers to make an intelligent decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

1.2.2 RANCHO LA HABRA ENVIRONMENTAL REVIEW PROCESS

a. Notice of Preparation

Pursuant to the requirements of CEQA, the City, as Lead Agency, prepared and distributed a Notice of Preparation (NOP). The NOP, which is included in Appendix D, indicated that an EIR was being prepared and asked members of the public and public agencies to provide input on the types of environmental analyses that should be included in the EIR being prepared by the City.

The City distributed the NOP on November 13, 2015, for a 30-day review period. The NOP was distributed to public agencies, utility and service providers, adjacent jurisdictions, and interested

parties in the project area. Comments received on the NOP are included in Appendix E and summarized in **Table 1-1**.

Table 1-1
Summary of NOP Comment Letters

Comment Letters and Issues	Relevant EIR Sections
1. Gabrieleño Band of Mission Indians – Kizh Nation: November 16, 2015	
The Gabrieleño Band of Mission Indians – Kizh Nation commented that, while the project site may have previously been developed, the possibility exists that unknown, yet significant cultural resources may be encountered during ground-disturbing activities. AB 52 requires that Lead Agencies consult with Native American Tribes who can prove and document traditional and cultural affiliation with the area of the proposed project. The following mitigation measures are therefore requested to be incorporated into the EIR: • Obtain the service of a qualified Native American monitor or monitors during construction-related ground-disturbing activities. • If native vegetation is to be removed, Native American monitors or an authorized representative of the Tribe shall be permitted to visit the area to distinguish native vegetation. All plants preferred by the Tribe shall be made available to the Tribe prior to removal.	3.6 Cultural Resources
2. Fullerton Joint Union High School District: December 1, 2015	
The District asked to be included in "all mailings, communications, meetings, and conversations" that affect schools for this project. The District noted that statutory development fees will be required at the time of building permits. Discussion of this project should also include the La Habra School District and Lowell Joint School District.	3.15.4 Public Schools
3. South Coast Air Quality Management District (SCAQMD): December 7, 2015	
The SCAQMD commented that, when the Draft EIR is available for public review, a copy should be provided directly to the SCAQMD, along with all appendices related to air quality and greenhouse gas emissions. The SCAQMD's 1993 Air Quality Handbook should be used in the preparation of the air quality analysis for the proposed project. The most recent update of CalEEMod land use emissions software should be used to quantify project impacts. The EIR should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project, including demolition (if any), construction, and operations. In addition to recommending analysis of regional air quality impacts, the SCAQMD recommended that localized air quality impacts be analyzed based on localized significance thresholds (LSTs). The SCQAMD noted that, in the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures be implemented to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures should also be discussed.	3.8 Air Quality 3.9 Greenhouse Gas Emissions

Table 1-1
Summary of NOP Comment Letters

Comment Letters and Issues	Relevant EIR Sections
4. La Habra City School District: December 11, 2015	
The District noted that the proposed project would increase student enrollment and could create the need for additional classroom space. The letter noted that the District's position is for development to "mitigate 100% of the cost of facilities needed to house the students that are generated by the development." The letter cited the need for alternative funding sources to supplement state bonds and development impact fees. The District's letter encouraged the developer of the project to work with the District to achieve appropriate mitigation solutions for the students. Areas of concern include direct, indirect, and cumulative impacts related to: • Need for additional school facilities and support services; • Traffic and parking relative to existing and future schools; • Safe routes for students to school; • Operation of new and existing facilities, including programs offered, to accommodate students from the proposed project; • Infrastructure, utilities, and/or storm water treatment arising from the construction of new facilities or the alteration of existing facilities; and • Deficiencies of fees paid as compared to revenue required to construct new school facilities to accommodate students from the proposed project.	3.15.4 Public Schools
5. City of Fullerton: December 14, 2015	
The following areas of concern were noted in the City of Fullerton's letter: • Biological Resources – Potential impacts on habitat for specified bird species including the gnatcatcher, cactus wren, Cooper's hawk, red-shouldered hawk, and great horned owl should be studied. • Land Use and Planning – Cumulative impacts of the nearby West Coyote Hills development should be considered. • Traffic - The traffic study and intersections proposed have been reviewed by the City's Traffic Engineer and no additional intersections or traffic studies are recommended. • Air Quality - Potential impacts during the project grading and construction should be studied for their effects on air quality in the City of Fullerton.	3.5 Biological Resources 3.2 Land Use and Planning 3.7 Traffic and Circulation 3.8 Air Quality
6. Caltrans District 12: December 14, 2015	
Caltrans noted the following comments: • A traffic impact study is necessary to determine this proposed project's near-term and long-term impacts on the State facilities – existing and proposed – and to propose appropriate mitigation measures. • Any facilities within Caltrans' right-of-way that will be affected due to the proposed project need to be analyzed. • Analyses within Caltrans' right-of-way need to reference the latest Highway Capacity Manual (HCM 2010 Edition). For the interrupted flow, 95th percentile queue lengths need to be considered. For uninterrupted flow, basic freeway, diverge, merge, and weaving need to be considered. • The proposed project will significantly affect SR-39, Beach Boulevard, and SR-90, Imperial Highway. • The analysis shall include an intersection capacity analysis (by the HCM	3.7 Traffic and Circulation

Table 1-1
Summary of NOP Comment Letters

Comment Letters and Issues	Relevant EIR Sections
methodology) pertaining to the street intersections along SR-39 and SR- 90. • Any and all mitigation measures in case of significant impacts on the state highway system need to be addressed. • Any work within Caltrans right-of-way will require an encroachment permit.	
7. Southern California Association of Governments (SCAG): December 14, 2015	
SCAG undertook an evaluation of the consistency of the proposed project with the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and noted the following: • SCAG's adopted growth forecasts indicate only a 100-household increase for the City between 2020 and 2035, with a 500-person decrease in total population due to decreasing household size. • SCAG recommended that the City review 2012 RTP/SCS Program EIR Mitigation Measures "for guidance, as appropriate."	3.2 Land Use and Planning 3.3 Population and Housing
8. Shute Mihaly & Weinberger: December 14, 2015	
This letter was submitted by Shute Mihaly & Weinberger on behalf of its client, the Westridge Community Association (Westridge), which is a nonprofit mutual benefit corporation made up of owners of homes located in the city, between the southern boundary of the proposed project and the City's southern boundary. The letter identified the following issues that need to be addressed in the EIR: • **Cumulative Impacts**. The letter noted that cumulative impacts are "exceptionally important" since the City of Fullerton approved the 757-unit West Coyote Hills project immediately to the south of the Westridge neighborhood. The letter noted that Westridge residents will be almost completely surrounded by the two projects, which will create many of the same types of impacts (e.g., grading, air quality, noise, traffic, visual resources, and biological resources). • **Noise**. The letter stated that compliance with zoning and plan designations is a minimum, and does not mean that a project has no significant impact or requires no mitigation since the local noise ordinance exempts all construction activities conducted between 7:00 a.m. and 8:00p.m., Monday through Saturday. The letter additionally stated that the EIR must use a metric that accurately reflects noise created by the project as compared to baseline conditions, noting that a noise metric that averages noise levels might not be appropriate. The letter stated that the EIR for this project needs to consider the full range of sound levels that will cause impacts, both from short-term peaks during construction work on this and other nearby sites and from long term occupancy of the Project, stating that daily or even hourly averages might not be sufficient to analyze the impacts on neighboring communities such as Westridge. The letter further noted that noise impacts translate into additional health impacts, and that if substantial increases in noise would occur as the result of the proposed project, the EIR would need to discuss the health effects of those noise impacts. The comment letter stated that CEQA requires implementation of all feasible measures that will reduce the project's impacts, even if they do not completely avoid significant impacts, and that the EIR needs to address all aspects of noise impacts created by the project, and mitigate significant	6. Cumulative Impacts 3.11 Noise and Vibration 3.4 Aesthetic Resources 3.7 Traffic and Circulation 3.8 Air Quality 3.5 Biological Resources 3.14 Geology, Soils, and Seismicity 7. Alternatives

Table 1-1
Summary of NOP Comment Letters

Comment Letters and Issues	Relevant EIR Sections
effects, even if such measures go beyond the City's existing noise ordinance. • **Visual Resources**. The letter stated that the EIR needs to analyze the impacts of the proposed project on aesthetics, including scenic vistas, scenic resources, and the "juxtaposition of the proposed development with the existing community," including clear graphics showing pre- and post-project visual conditions. The letter cited the court in *Quail Botanical Gardens Foundation, Inc. v. City of Encinitas,*29 Cal. App. 4th 1597, 1606 (1994), which stated that it is "self-evident" that replacing open space with a subdivision will have an adverse effect upon "views and the beauty of the setting." The letter noted that the EIR needs to also consider how to mitigate such impacts in an urban environment "that is already short on open space." Included in the analysis should be the impact of new lighting on the project site's surroundings, including quantifying both baseline and post-development levels of light reaching surrounding homes. The letter noted that, the EIR needs to analyze whether the installation of street lights, house-mounted lights, or other project-related lighting next door to existing homes will have a substantial adverse effect on human beings, including human health. In addition, the EIR needs to identify mitigation for these effects, and also evaluate the effectiveness of shields and other measures to minimize spillover of lighting onto adjacent properties. • **Traffic and Transportation**. The letter stated that the EIR needs to provide a comprehensive analysis of the project's traffic impacts, noting that traffic in the area is already frequently congested. The letter requested that the EIR not only address delay at intersections, but also "assess the change in quality of life that residents will experience" to determine whether neighborhood streets will be "seriously impacted" as the result of the proposed project and cumulative projects. The letter also stated that the EIR needs to clearly identify the amount of parking that will be provided for residents, visitors, and users of the proposed commercial site, and identify and describe the proposed project's connection to public transit. The letter noted that it did not appear that the proposed project included a robust transit program, and that one should be developed to mitigate the project's significant impacts. • **Air Quality**. The letter requested that the EIR contain a thorough analysis of project-related and cumulative impacts to air quality with particular attention to identifying each source of emissions that would be generated by the project, including regular use of maintenance equipment. Analysis of construction-related increases in toxic air contaminants and criteria air pollutant emissions associated with heavy off-road equipment, as well as the mobilization of dust and other particulate matter, was identified as being needed for the EIR. The letter stated that construction-related impacts are a particular concern in light of the site's historical use for oil production and the known existence of contaminated soils on-site. As a result, the letter noted that the EIR needs to consider both alternatives and mitigation measures that will avoid mobilizing contaminated soils and protect construction workers and nearby residents. • **Biological Resources**. The letter noted that the La Habra General Plan, which was adopted in 2015, identifies the Westridge Golf Course as one of the "[f]ew areas of the City [that] support sensitive biological resources," and	

Table 1-1
Summary of NOP Comment Letters

Comment Letters and Issues	Relevant EIR Sections
that these resources were created and protected as mandatory mitigation for the La Habra Hills Specific Plan development. The letter asserted that any impact on these resources is not only attributable to the proposed project, but would also represent a potential violation of the Mitigation and Monitoring Plan adopted for the La Habra Hills Specific Plan. The letter stated that the EIR needs to consider alternatives that avoid, or at least minimize, biological impacts because on-site resources "may be impossible to mitigate locally." A full analysis of the project-specific and cumulative effects on biological resources impacts was requested. The letter stated that the biological resources study needs to be based on detailed field studies completed at appropriate times of the year for each species potentially found in the area. The letter further stated that consultation with the U.S. Fish and Wildlife Service and state Department of Fish and Wildlife is needed, and that deferral of mitigation measures until subsequent regulatory permitting processes would not be appropriate. • **Geologic Impacts and Slope Stability**. The letter noted that portions of the project site are very steep, and that altering the terrain below the Westridge community could destabilize the hillside separating the project site from Westridge. Thus, the letter stated that the EIR need to disclose whether the applicant will be required to undertake hill-stabilizing measures and what those measures will be. The letter further stated that the EIR should analyze whether landslides or liquefaction at the project site following construction could pose any hazards to residents, both on-site and on adjacent properties. • **Alternatives**. The letter stated that the EIR must clearly articulate the proposed project's objectives, recognizing that the existing Westridge Golf Course is one of the only remaining large areas of open space in La Habra. The letter stated that the EIR needs to include a discussion of alternatives that would lessen the significant impacts of the project, including (1) alternative locations, (2) considerably less intensive levels of project site development, and (3) other options for meeting housing demands.	
9. California Department of Fish and Wildlife (CDFW): December 15, 2015	
CDFW stated that it submitted its comments pursuant to its authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines Section 15386), as well as its authority as a Responsible Agency (CEQA Guidelines Section 15381) in relation to aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 *et seq.*) and Fish and Game Code Section 1600 *et seq*. CDFW's letter offered the following specific comments: • Waters of the state have been identified on the eastern portions of Westridge Golf Course. Despite landscaping and street paving, these streams may be periodically subject to inundation and, as such, are a component of the stream bed and channel. Any project activity that will divert or obstruct the natural flow of, or change or use material from the bed, channel, or bank (which may include associated riparian resources) of a river or stream, including an activity that seeks to exclude the stream from its floodplain, such as installation of fill to bring portions of the site out of the 100-year flood zone, could trigger the need for notification to CDFW pursuant to Fish and Game Code Section 1600 *et seq.* as well as the need for a Lake and	3.5 Biological Resources 3.13 Hydrology and Water Quality 6.0 Cumulative Impacts

Table 1-1
Summary of NOP Comment Letters

Comment Letters and Issues	Relevant EIR Sections
Streambed Alteration Agreement. Such an agreement would be subject to CEQA. CDFW as a Responsible Agency under CEQA may consider the City's EIR for the project. To minimize additional requirements by CDFW for a streambed alteration agreement, the EIR prepared by the City should "fully identify the potential impacts to the stream or riparian resources, including flood plain exclusion, and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of a Lake and Streambed Alteration Agreement." Because the proposed project would "create a significant amount of ground disturbance," the CDFW letter expressed concern over potential project impacts in relation to storm water quality and hydrology. CDFW stated that the EIR should analyze the efficacy of Low Impact Development options to minimize storm water impacts, including: o Site layout with regard to sensitive resources, including off-site native habitat; o The use of pervious surfaces (crushed aggregate, turf block, unit pavers, pervious concrete and asphalt) as alternatives to impervious surfaces; and o Structure roof spouts emptying over pervious surfaces. • The letter stated that if runoff cannot be dispersed through these measures, the EIR should consider directing runoff to facilities designed to detain and treat runoff, such as detention or bio-retention basins. • An additional CDFW concern regarding the project involves direct and cumulative impacts on birds, particularly migratory species, through inadvertent bird strike. The CDFW letter also set forth the following general comments: • CDFW considers adverse impacts on a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, Sections 2080, 2085). • To enable CDFW to adequately review and comment on the proposed project, it recommends the EIR include: o A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes. o A range of feasible alternatives to avoid or otherwise minimize impacts on sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate. • To provide a complete assessment of the flora and fauna, the EIR should include: o Information on the regional setting, with emphasis on resources that are rare or unique to the region. o A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Adjoining habitat areas should be included in this assessment where site activities could lead to direct	

Table 1-1
Summary of NOP Comment Letters

Comment Letters and Issues	Relevant EIR Sections
or indirect impacts off-site. o A current inventory of the biological resources associated with each habitat type on-site and within the area of potential effect. o An inventory of rare, threatened, endangered, and other sensitive species on-site and within the area of potential effect. CDFW requires focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. • To provide a thorough discussion of direct, indirect, and cumulative impacts expected, the following should be addressed in the EIR: o A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The drainage discussion should address: ▪ project-related changes on drainage patterns on-site and downstream; ▪ volume, velocity, and frequency of existing and post-project surface flows; ▪ polluted runoff; ▪ soil erosion and/or sedimentation in streams and water bodies; and ▪ post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. o Discussions regarding indirect project impacts on biological resources. o Impacts on, and maintenance of, wildlife corridor/movement areas. o The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas and may inadvertently contribute to wildlife-human interactions. o Cumulative effects of the proposed project in combination with past, present, and anticipated future projects. • The EIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. • The EIR should include mitigation measures for adverse project-related impacts on sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. • For proposed preservation and/or restoration, the EIR should include measures to protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. • CDFW recommends that measures be taken to avoid project impacts to	

Table 1-1
Summary of NOP Comment Letters

Comment Letters and Issues	Relevant EIR Sections
nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act. Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds. • CDFW noted that it generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. • Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: o the location of the mitigation site; o the plant species to be used, container sizes, and seeding rates; o a schematic depicting the mitigation area; o planting schedule; o a description of the irrigation methodology; o measures to control exotic vegetation on-site; o specific success criteria; o a detailed monitoring program; o contingency measures should the success criteria not be met; and o identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.	
10. Lowell Joint School District: December 15, 2015	
The District requested that it be included in in both written and verbal dialogue with the City regarding the proposed project.	3.15.4 Public Schools
11. Soboba Band of Luiseno Indians: December 24, 2015	
The Soboba Band of Luiseno Indians stated that it did not have any specific concerns regarding known cultural resources within the project site, and requested that the appropriate consultation continue to take place between concerned tribes, project proponents, and local agencies. The Soboba Band of Luiseno Indians also requested that approved Native American Monitor(s) be present during any future ground-disturbing proceedings, including surveys and archaeological testing, associated with this project, and will defer to Gabrieleno Tribal Consultants who are in closer proximity to the project.	3.6 Cultural Resources
12. California Public Utilities Commission (CPUC): December 28, 2015	
The CPUC noted that it has jurisdiction over the safety of highway-rail crossings in California, and that the California Public Utilities Code requires CPUC approval for the construction or alteration of crossings. The CPUC letter recommended that language be added to the Specific Plan so that any future development adjacent to or near a rail right-of-way is planned with the safety of the rail corridor in mind.	3.7 Traffic and Circulation

b. Scoping Meetings

Pursuant to Section 15082 (c) (1) of the CEQA Guidelines, the City hosted public scoping meetings on November 17, 2015 and December 8, 2015 to provide an opportunity for members of

the public and public agencies to provide input on the scope and content of the environmental information and analysis to be included in the EIR for the proposed Rancho La Habra Specific Plan. Issues that members of the public raised at the November 17, 2015 and December 8, 2015 scoping meetings[1] include the following:

- Traffic on surrounding roadways
- Loss of the golf course; loss of open space
- Loss of views
- Light pollution
- Air pollutant and greenhouse gas emissions
- Potential for methane and sulfur to create odors
- Noise effects on adjacent residents
- Noise, trash, and safety issues related to future use of the clubhouse and a community facility
- Increased crime
- Loss of biological habitat
- Effects on property values; costs to Westridge residents
- Poor walkability of proposed housing to adjacent commercial uses
- Need for more townhomes to address housing affordability
- Water use and availability
- Impacts on already-overcrowded schools
- Potential contamination of groundwater due to existing contaminants under the golf course
- Maintenance responsibilities (who will be responsible for maintenance?)
- Dust during construction and grading
- Impacts on City services
- Potential costs to the people of La Habra
- Seismic safety and slope stability
- Overdevelopment of commercial space

c. Availability and Review of the Draft EIR

The City filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse, indicating that this Draft EIR has been completed and is available for review. A Notice of Availability of the EIR was published concurrently with distribution of this

[1] Written comments from both meetings and a full transcript of the December 2, 2015 scoping meeting is provided in Appendix B.

document. The Draft EIR for the proposed Rancho La Habra Specific Plan is being distributed directly to agencies, organizations, and interested groups and persons for comment during the formal public review period in accordance with Sections 15085, 15086, and 15087 of the CEQA Guidelines.

The Draft EIR is also available for review at the following locations:

- La Habra City Hall, City Clerk and Community Development counters, 110 East La Habra Boulevard, La Habra, CA 90631;
- La Habra Public Library, 221 East La Habra Boulevard, La Habra, CA 90631;
- City website (lahabracity.gov)

Materials included in the reference sections in this Draft EIR are available for review at La Habra City Hall, 110 East La Habra Boulevard, La Habra, CA 90633.

The 45-day public review period begins on January 3, 2018 and ends at 5:00 p.m. on February 16, 2018 (by which time comments on the Draft EIR need to be received by the City). During this review period, written comments regarding the content, analyses, and conclusions of the Draft EIR may be submitted to the City. These comments should focus upon the sufficiency of this Draft EIR in identifying and analyzing the possible impacts of the proposed Rancho La Habra Specific Plan and ways in which significant effects on the environment might be avoided or mitigated (CEQA Guidelines Section 15204(a)).

Comments on the Draft EIR should be sent to:

Mr. Andrew Ho, Community Development Director
City of La Habra
110 East La Habra Boulevard
La Habra, CA 90631
andrewh@lahabraca.gov

d. Preparation and Review of the Final EIR

Following the close of the public review period for the Draft EIR, the City will prepare a Final EIR in conformance with CEQA and the CEQA Guidelines. According to CEQA Guidelines Section 15132, the Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft EIR;

(b) Comments and recommendations received on the Draft EIR during the public review period;

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR;

(d) The responses of the lead agency to significant environmental points raised in the review and consultation process; and

(e) Other information necessary as determined by the Lead Agency.

1.3 DEFINITIONS OF KEY CEQA TERMINOLOGY

Less than Significant Impact: A physical environmental effect that would result directly or indirectly from the proposed project and not exceed any identified significance threshold.

Mitigation: Actions that address an adverse environmental impact by either (1) avoiding the impact; (2) reducing or minimizing the magnitude, scope, or intensity of the impact; or (3) compensating for the impact by replacing or substituting for the [natural] resource, or ecological functions, that would be impaired, suspended, or eliminated.

Significance Criteria, Significance Thresholds: The criteria used in this EIR to determine whether an impact is or is not "significant." These criteria are based on (a) CEQA-stipulated "mandatory findings of significance," which are specific conditions that the State Legislature and the Secretary of Resources have determined constitute a significant effect on the environment, and are listed in CEQA Guidelines Section 15065; (b) the criteria outlined in CEQA Guidelines Appendix G; and/or (c) commonly accepted practice and the independent judgment of the Lead Agency in instances where the CEQA Guidelines do not set forth a relevant criterion.

Significant Impact: Includes any substantial adverse change in physical environmental conditions, such as land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance, that would result either directly or indirectly due to implementation of the proposed project (CEQA Guidelines Section 15382). An economic or social change by itself is not typically considered to be a significant impact, even if the change would be substantial. However, social or economic changes related to a physical environmental change may be considered in determining whether the physical change is significant (CEQA Guidelines Section 15382). A significant impact represents a physical environmental effect that would result directly or indirectly from the proposed project and would exceed an identified significance threshold.

Significant Unavoidable Impact: Includes those significant adverse environmental impacts for which either no mitigation is feasible or implementation of all feasible mitigation would not reduce the impact to a less than significant level.

1.4 FORMAT OF THE DRAFT EIR

Following this Chapter 1, *Introduction*, the Draft EIR is organized as follows:

- **Chapter 2, *Project Description*,** describes in detail the project's background and setting, project objectives, and proposed site development. Chapter 2 also identifies the specific public agency approvals and actions required to implement the project.
- **Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*,** discusses, for each environmental topic addressed in detail, the regulatory setting, existing conditions, applicable plans and policies, significance criteria, environmental impacts of the project, and mitigation measures recommended for the project. This chapter also identifies environmental issues, such as agricultural resources, for which impacts would not occur and that therefore are not examined in detail in this EIR, along with the rationale for such determinations. Finally, this chapter summarizes the project's significant unavoidable environmental impacts (i.e., those for which implementation of all feasible mitigation measures would not reduce the impact to a less than significant level).
- **Chapter 4, *Significant Irreversible Environmental Changes*,** addresses environmental effects associated with the project that have the potential for irretrievable and irreversible commitment of resources.
- **Chapter 5, *Growth Inducement*,** describes project's potential to induce growth beyond development of the project site itself.
- **Chapter 6, *Cumulative Impacts*,** provides an analysis of the combined (cumulative) impacts of the proposed project in combination with other past, present, and reasonably foreseeable projects.
- **Chapter 7, A*lternatives*,** provides a qualitative analysis of the ability of alternatives to the proposed project to avoid or reduce the extent of the impacts, particularly significant impacts, that would result from the proposed project. As required by CEQA, included in the discussion of alternatives is discussion of the No Project Alternative (environmental effects that would result should the proposed project not be approved) and a discussion of the environmentally superior alternative.
- **Chapter 8, *Mitigation Monitoring and Reporting Program (MMRP)*,** sets forth an implementation strategy for each mitigation measure to ensure that adopted mitigation measures are successfully implemented. For each mitigation measure, this chapter identifies the timing of when the mitigation measure is to be implemented, the party responsible for implementing the mitigation measure, the agency with the power to monitor and enforce implementation of the mitigation measure, and agency responsible for determining compliance with specified mitigation measures.
- **Chapter 9, *Report Preparers*,** identifies the authors of the EIR, including City staff and the EIR consultant team, as well as the organizations and other persons that were consulted during preparation of this EIR.

Appendices to this EIR are as follows:

- Appendix A. La Habra General Plan Amendment
- Appendix B. La Habra Hills Specific Plan Amendment
- Appendix C. Rancho La Habra Specific Plan
- Appendix D. NOP and the Distribution List
- Appendix E. NOP Comments
- Appendix F. Biological Resources (Superseded by Appendix F of the Partially Recirculated Draft EIR)
  - Appendix F-1. Plant Species Recorded During Field Surveys
  - Appendix F-2. Avian Species Recorded During Field Surveys
  - Appendix F.3. CNDDB Search Results 2017
  - Appendix F-4. Representative Photographs
  - Appendix F-5. 2014 and 2016 USFWS Protocol CAGN Surveys
  - Appendix F-6. Air Photos 2003-2016 for Habitat Comparison of Riparian Vegetation
  - Appendix F-7. Streambed Alteration Agreement
  - Appendix F-8. Recorded Deed Restriction
- Appendix G. Cultural and Paleontological Resources Survey
- Appendix H. Traffic Impact Analysis (Superseded by Appendix F of the Partially Recirculated Draft EIR)
- Appendix I. Air Quality Analysis (Superseded by Appendix F of the Partially Recirculated Draft EIR)
- Appendix J. Greenhouse Gas Analysis (Superseded by Appendix F of the Partially Recirculated Draft EIR)
- Appendix K. Energy Analysis Report (Superseded by Appendix F of the Partially Recirculated Draft EIR)
- Appendix L. Acoustical Analysis and Vibration Study (Superseded by Appendix F of the Partially Recirculated Draft EIR)
- Appendix M. Phase I Environmental Site Assessment and Soil Management Plan
- Appendix N. Hydrology and Hydraulics Report
- Appendix O. Water Quality Management Plan
- Appendix P. Geotechnical Report
- Appendix Q. Public Service Letters
- Appendix R. Sewer System Hydraulic Analysis
- Appendix S. Water System Hydraulic Analysis
- Appendix T. Water Supply Assessment

1.5 REFERENCES

California Environmental Quality Act (CEQA) Sections 21082.1 (c)(2) and (3); CEQA Guidelines Sections 15084 (e) and 15090 (a)(3).

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CHAPTER 2 PROJECT DESCRIPTION

See Chapter 2 of Final EIR Volume 2 for the Project Description as revised and updated by the Partially Recirculated Draft EIR.

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CHAPTER 3 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

3.1 INTRODUCTION

This chapter focuses upon evaluating the significant environmental effects of the proposed Rancho La Habra Specific Plan and related requested actions (collectively referred to as the "proposed Project"), which are described in Chapter 2, *Project Description*. This chapter describes the existing physical environmental setting (also referred to as "baseline") for each environmental topic, and the impacts that would result from implementation of the proposed Project. Because existing federal, state, and local regulations would also shape how the Specific Plan is implemented and provide requirements for avoiding and reducing environmental impacts, a discussion of relevant plans, programs, and policies pertinent to each environmental issue addressed in this chapter is provided. Finally, this chapter identifies feasible mitigation measures to reduce the significant impacts of the proposed Project.

3.1.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

The following discussion describes the analysis leading to the conclusions that environmental effects of the proposed Project would not be significant in relation to agriculture/forestry resources or mineral resources and therefore did not require detailed analysis.

a. Agriculture and Forestry Resources

The Project site is currently developed as the Westridge Golf Club. The site does not contain any prime agricultural land, nor does such land exist in the vicinity of the Project site. In addition, no forestry resources occur on or in the vicinity of the Project site. The Project site and adjacent lands are designated as "Urban and Built-up Land" according to the California Department of Conservation, California Important Farmland Finder map system (2016). Urban and Built-up Land is characterized as being occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures. The Project site is not designated or zoned for agricultural or forestry use by the City of La Habra (City), and the site is not subject to a Williamson Act contract. Thus, implementation of the proposed Project would have no impact on agricultural or forestry resources.

b. Mineral Resources

Neither the City's General Plan nor the State of California have identified the Project site or its environs as a potential location for extraction or management of mineral resources of state-wide, regional, or local significance. According to the General Plan, La Habra's mineral resource extraction and oil production is inactive. Historically, the Project site was part of the 915-acre West Coyote Hills oil field and was formerly used for oil production. Oil extraction activities in the West Coyote Hills oil field ceased in 1995, and all wells (23 of which are within the Project site) have been abandoned in accordance with Division of Oil, Gas, and Geothermal Resources (DOGGR) regulations.

Following remediation, the Project site was developed with an 18-hole golf course and it is not currently recognized as a potential mineral resource site. No portions of the Project site are designated as a Mineral Resource Zone (MRZ). Therefore, no impacts on mineral resources would result from Project implementation.

3.1.2 FORMAT OF DETAILED ENVIRONMENTAL ANALYSES

The following sections address environmental impacts for issues determined to have the potential for significant effects:

- 3.2 Land Use and Planning Policy
- 3.3 Population and Housing
- 3.4 Aesthetic Resources
- 3.5 Biological Resources[1]
- 3.6 Cultural Resources
- 3.7 Traffic and Circulation[1]
- 3.8 Air Quality[1]
- 3.9 Greenhouse Gas Emissions[1]
- 3.10 Energy Resources[1]
- 3.11 Noise and Vibration[1]
- 3.12 Hazards and Hazardous Materials
- 3.13 Hydrology and Water Quality
- 3.14 Geology, Soils, and Seismicity
- 3.15 Public Services
- 3.16 Recreational Resources
- 3.17 Utilities, Service Systems, and Water Supply

This environmental impact report (EIR) evaluates the direct and indirect impacts resulting from construction and ongoing operations of the proposed Project. Under the California Environmental Quality Act (CEQA), EIRs are intended to focus their discussion on significant impacts, and may limit discussion of other impacts to a brief explanation of why the impacts are

[1] This section of the Draft EIR was updated as part of the Partially Recirculated Draft EIR and can be found in the corresponding Section number in Final EIR Volume 2.

not significant, such as in Section 3.1.1 above in relation to agricultural/forestry resources and mineral resources.

Each environmental topic section addressed in detail in this chapter generally includes the following main subsections:

- *Introduction*, outlining what the section will address and providing definitions of technical terms used in the section.
- *Applicable Plans, Policies, and Regulations*, describing federal, state, and local plans, policies, and regulations that implementation of the proposed Rancho La Habra Specific Plan must address and would thus shape its implementation.
- *Environmental Setting*, describing the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- *Significance Criteria*, setting forth the thresholds of significance (significance criteria) used to determine whether impacts are "significant."
- *Project Impacts and Mitigation Measures*, setting forth and analyzing one or more impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
    - A statement of the impact being analyzed, along with the EIR's conclusion about the significance of the impact.
    - A description of the methodology used to analyze the impact and determine whether it would be significant or less than significant.
    - An impact assessment that evaluates the changes to the physical environment that would result from the proposed Project.
    - A significance conclusion comparing identified impacts of the proposed Project to the relevant significance threshold and presenting a determination on the significance of each impact prior to the implementation of any required mitigation.
    - All feasible mitigation measure(s) for each impact determined to be significant. Mitigation measures include enforceable actions to:
        - avoid a significant impact;
        - minimize the severity of a significant impact;
        - rectify an impact by repairing, rehabilitating, or restoring the affected physical environment;
        - reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the Project; and/or
        - compensate for the impact by replacing or providing substitute resources or environmental conditions.

  - Actions to be taken to ensure effective implementation of required mitigation measures.
  - Analysis of the effectiveness of identified mitigation measure(s) to avoid or reduce significant impacts to a less-than-significant level.
- *References*, listing the background information used to prepare the analysis in the section.

This EIR identifies all thresholds, impacts, and mitigation measures with an alpha-numeric designation that corresponds to the environmental topic addressed in each section (e.g., "3.5" for Section 3.5, *Biological Resources*). The numbering of thresholds, impacts, and mitigation measures is accomplished as follows:

- The significance thresholds are provided with numbers related to the section in which they are found. For example, biological resources significance thresholds in Section 3.5, *Biological Resources*, are numbered **Threshold BIO-1** through **Threshold BIO-6**.
- Impacts are numbered based on the environmental threshold they address. For example, **Impact BIO-5** provides analysis in relation to **Threshold BIO-5**.
- Where more than one impact is analyzed in relation to a specific threshold, each impact is provided with a unique number. For example, the two impacts analyzed in relation to **Threshold BIO-1** (candidate, sensitive, or special-status species) are numbered **Impact BIO-1.1** and **Impact BIO-1.2**.
- Similarly, each mitigation measure is numbered to correspond to the impact and threshold that it addresses. For example:
  - Mitigation Measures BIO-1.1a, BIO-1.1b, and BIO-1.1c address Impact BIO-1.1, which analyzes Threshold BIO-1.1;
  - **Mitigation Measure BIO-5** (bird nesting and roosting) addresses **Impact BIO-5**, which analyzes **Threshold BIO-5**.

a. Environmental Setting/Baseline

"Environmental Setting" subsections describe current conditions with regard to the environmental resource area reviewed. CEQA Guidelines Section 15125 states that "An EIR must include a description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. The environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to gain an understanding of the significant effects of the proposed Project and its alternatives."

The CEQA Guidelines and case law recognize that the date for establishing an environmental baseline cannot be rigid (see CEQA Guidelines Sections 15146, 15151, and 15204). In some

instances, information is presented in the environmental setting that differs from the precise time of the Notice of Preparation (NOP). This information is considered representative of baseline conditions. Furthermore, environmental conditions may vary from year to year, and in some cases, it is necessary to consider conditions over a range of time periods.

The NOP for this EIR was published in November 2015. Except as specified otherwise within the document, any reference to "existing" conditions throughout this EIR refers to the baseline condition as of 2015. Where technical studies or other baseline information refer to a date other than 2015, an explanation of the validity of the baseline information in relation to 2015 baseline conditions is provided.

b. Thresholds of Significance/Significance Criteria

CEQA Guidelines Section 15382 defines a significant effect on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

The "Significance Criteria" subsections provide the specific thresholds of significance by which impacts are judged to be significant or less than significant in this EIR. These include identifiable quantitative or qualitative standards or sets of criteria pursuant to which the significance of each given environmental effect can be determined. Exceedance of a threshold of significance normally means the effect will be determined to be "significant" (CEQA Guidelines Section 15064.7(a)). However, an iron-clad definition of a "significant" effect is not always possible because the significance of an activity may vary with the setting (CEQA Guidelines Section 15064(b)). Therefore, a Lead Agency has the discretion to determine whether to classify an impact described in an EIR as "significant," depending on the nature of the area affected. The thresholds of significance used to assess the significance of impacts are based on those provided in Appendix G of CEQA Guidelines.

c. Impact Significance Classifications

The following classifications are used throughout the impact analysis in this EIR to describe the level of significance of environmental impacts:

- **Significant Impact –** A significant impact is defined by Section 15382 of the CEQA Guidelines as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the Project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself "shall not be considered a significant effect on the environment … [but] may

be considered in determining whether the physical change is significant." As defined in this EIR, a significant impact exceeds the defined significance criteria and therefore requires mitigation.

- **No Impact –** No adverse effect on the environment would occur, and mitigation measures are not required.
- **Less-than-Significant Impact –** The impact does not reach or exceed the defined threshold (criterion) of significance. Therefore, no mitigation is required.
- **Significant but Mitigable Impact –** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. Feasible mitigation measures, including standard conditions of approval, when implemented, will reduce the significant impact to a less-than-significant level.
- **Significant and Unavoidable Impact –** The impact reaches or exceeds the defined threshold (criterion) of significance, and mitigation is therefore required. However, application of all feasible mitigation measures and standard conditions of approval would not reduce the impact to a less-than-significant level.

While CEQA requires that an EIR identify all feasible mitigation to avoid or reduce the significant impacts of a project, it also permits public agencies to approve a project even though it would result in one or more significant unavoidable environmental effects. For a Lead Agency to approve the Project with one or more significant unavoidable impacts, it must first prepare a statement of overriding considerations, which identifies the specific economic, legal, social, technological, or other benefits of the Project, including region-wide or state-wide environmental benefits, that outweigh its significant unavoidable effects and thereby warrant its approval (Public Resources Code Section 21083; CEQA Guidelines Section 15093). The statement of overriding considerations must be supported by substantial evidence in the record (CEQA Guidelines Section 15093(a)).

3.1.3 REFERENCES – ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

City of La Habra, *City of La Habra General Plan 2035,* adopted January 21, 2014. Accessed June 2, 2017: http://www.lahabracity.com/320/General-Plan-2035.

Declaration of Deed Restriction, October 28, 2009.

Streambed Alteration Agreement, February 23, 1995.

3.2 LAND USE AND PLANNING

3.2.1 INTRODUCTION

a. Overview

This section examines the potential for the Rancho La Habra Specific Plan (Project) to (1) physically divide an established community; (2) conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to plans and land use restrictions adopted for the purpose of avoiding or mitigating an environmental effect); or (3) conflict with a habitat conservation plan or natural community conservation plan.

In accordance with CEQA Guidelines Section 15125(d), this section provides a summary of the plans, policies, and regulations of the City of La Habra and regional and state agencies that have policy and regulatory authority over the proposed development of the Rancho La Habra Specific Plan area.

b. Definitions

- **Buffer** refers to land and/or improvements designated to protect one type of land use from another in order to eliminate or minimize land use compatibility issues.
- **Density/Intensity** of use refers to the number of dwelling units per acre of land for residential uses, or floor area ratio (FAR), which expresses the ratio of building area per acre of land for non-residential uses.
- **Existing Land Use** consists of the current use of land at the time of EIR baseline (November 2015).
- **General Plan** refers to the officially adopted plans of the City of La Habra, which represents the comprehensive, long-term general plan for the physical development of the City adopted pursuant to the requirements of California Government Code Sections 65300-65303.4. The La Habra General Plan is the core policy and land use planning document for the City.
- **Land Use Compatibility** refers to the characteristics of different uses or activities that permit them to be located near each other in harmony and without conflict. Some elements affecting compatibility include intensity of occupancy as measured by dwelling units per acre, pedestrian or vehicular traffic generated, volume of goods handled, and such environmental effects as noise, vibration, glare, air pollution, or the presence of hazardous materials.
- **Permitted Land Uses** refer to the specific uses consistent with the General Plan designations and zoning for a particular site.

- **Planned Land Use** refers to the General Plan designations and zoning for a particular site.
- **Zoning** refers to the written regulations and laws that implement the City's General Plan and define how property in specific geographic zones can be used pursuant to the planning and zoning law of the State of California, as contained in Government Code Title 7, Division 1, Chapter 4 (commencing with Section 65800). Zoning specifies the permitted uses within zones and also regulates lot size and placement, bulk, and height of structures. Within the City of La Habra, zoning regulations are set forth in Title 18 of the Municipal Code.

3.2.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Rancho La Habra Specific Plan and related actions is subject to a range of state, regional, and local plans, policies, and regulations, which are described below.

a. Regional Plans, Policies, and Regulations

On April 7, 2016, the Southern California Association of Governments (SCAG) Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS integrates transportation planning with economic development and sustainability planning, and aims to comply with state greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375. With respect to transportation infrastructure, SCAG anticipates, in the RTP/SCS, that the six-county Southern California region will have to accommodate 22 million new residents, an increase of nearly four million people by 2040 while also meeting the GHG emissions-reduction targets set by the California Air Resources Board.

SCAG is empowered by state law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. The determination of each city's and county's share of regional housing needs that is required by law to be reflected in municipal General Plan housing elements is based on the growth projections of the RTP/SCS.

As discussed in Section 3.3, *Population and Housing*, the RTP/SCS projects that La Habra will grow from a population of 61,100 in 2012 to 68,500 people in 2040. Between 2012 and 2040, the RTP/SCS projects that the number of households in La Habra will grow from 19,000 to 21,700, while local employment opportunities will increase from 17,300 to 19,900.

RTP/SCS goals and policies relevant to the proposed Specific Plan include the following:

Goals

1. Align the plan investments and policies with improving regional economic development and competitiveness.
2. Maximize mobility and accessibility for all people and goods in the region.

3. Ensure travel safety and reliability for all people and goods in the region.
4. Preserve and ensure a sustainable regional transportation system.
5. Maximize the productivity of our transportation system.
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
7. Actively encourage and create incentives for energy efficiency, where possible.
8. Encourage land use and growth patterns that facilitate transit and active transportation.

Policies

- **Identify regional strategic areas for infill and investment**: Identify strategic opportunity areas for infill development of aging and underutilized areas and increased investment in order to accommodate future growth. This strategy makes efficient use of existing and planned infrastructure, revitalizes communities, and maintains or improves quality of life. Strategic areas are primarily identified as those with potential for transit-oriented development, existing and emerging centers, and small mixed-use areas.
- **Develop "Complete Communities":** Create mixed-use districts or "complete communities" in strategic growth areas through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other. Focusing a mix of land uses in strategic growth areas creates complete communities wherein most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.
- **Plan for additional housing and jobs near transit:** Pedestrian-friendly environments and more compact development patterns in close proximity to transit serve to support and improve transit use and ridership. Focusing housing and employment growth in transit-accessible locations through this transit-oriented development approach will serve to reduce auto use and support more multi-modal travel behavior.

  Plan for changing demand in types of housing: Shifts in the labor force, as the large cohort of aging "baby boomers" retires over the next 15 years and is replaced by new immigrants and "echo boomers," will likely induce a demand shift in the housing market for additional development types such as multi-family and infill housing in central locations, appealing to the needs and lifestyles of these large populations.
- **Continue to protect stable, existing single-family areas:** Continue to protect stable existing single-family neighborhoods as future growth and a more diverse housing stock are accommodated in infill locations near transit stations, in nodes along corridors and in existing centers. Concurrently, focusing growth in central areas and maintaining less development in outlying areas preserves the housing option for large-lot single-family homes, while reducing the number of long trips and vehicle miles traveled to employment centers.

b. Local Plans, Policies, and Regulations

La Habra General Plan

La Habra General Plan goals relevant to land use and planning include the following.

Chapter 2, Community Development

Land Use Goal LU 1, Growth and Change. Sustainable growth and change through orderly and well-planned development that provides for the needs of existing and future residents and businesses, ensures the effective provision of public services, makes efficient use of land and infrastructure, and promotes the health of the community.

Land Use Goal LU 2, Land Use Diversity and Choices for Residents. A mix of land uses that meets the diverse needs of La Habra's residents, offers a variety of employment opportunities, and allows for the capture of regional population.

Land Use Goal LU 3, Neighborhoods, Centers, and Corridors. A city of distinct, compact, and walkable mixed-use centers and corridors, surrounded by diverse and complete residential neighborhoods, and connected to a unifying network of greenways and open spaces.

Land Use Goal LU 4, A Quality Community. New development is located and designed to maintain the qualities that distinguish La Habra as a special and safe place to live, work, and play, with well-designed buildings, public places, signage, and open spaces and effective transitions among neighborhoods and districts.

Land Use Goal LU 5, City Sustained and Renewed. Land development practices that sustain natural environmental resources, the economy, and societal well-being for use by future generations, while reducing greenhouse gas emissions and impacts on climate change, are maintained.

Land Use Goal LU 7, Livable Neighborhoods. A City composed of neighborhoods with a variety of housing types that are desirable places to live, contribute to the quality of life, and well maintained.

Land Use Goal LU 8, Single-Family Neighborhoods. Distinct and quality single-family residential neighborhoods distinguished by their identity, scale, and character.

Land Use Goal LU 9, Multi-Family Neighborhoods. Multi-family residential neighborhoods that provide ownership and rental opportunities are well designed, exhibit a high quality of architecture, and incorporate amenities for their residents.

Land Use Goal 11, Diverse Districts and Corridors. Vital, active, prosperous, and well-designed commercial districts that provide a diversity of goods, services, and entertainment and contribute to a positive experience for visitors and community residents.

For discussion of relevant General Plan policies, see Section 3.2.5 below.

3.2.3 ENVIRONMENTAL SETTING

a. Project Site Background

The Project site was originally part of the 915-acre West Coyote Hills oil field operated by Chevron Corporation, portions of which were located in the cities of La Habra and Fullerton. In 1992, the City of La Habra adopted the La Habra Hills Specific Plan to create a master planned community on the 380 acres of the former oil field located within the La Habra city limits.

The La Habra Hills Specific Plan created a development plan consisting of four residential neighborhoods totaling 700 dwelling units, an 18-hole golf course, a 29.5-acre community park, and 2.6 acres of open space. The residential component of the La Habra Hills Specific Plan was ultimately built out with a total of 556 single-family dwelling units.

The northern portion of the La Habra Hills Specific Plan area was developed as the Westridge Golf Club. The privately-owned golf course, club house, and driving range are open to the public. The golf course includes a clubhouse with a restaurant and pro shop. While located adjacent to the Westridge community, the golf course is not part of the Westridge community or its homeowners' association.

b. Existing Land Use on Project Site

The Project site consists of the existing 151-acre Westridge Golf Club, located at 1400 South La Habra Hills Drive. The golf course clubhouse is located along La Habra Hills Drive, toward the center of the golf course. The clubhouse entry and 10 parking stalls, including five handicap parking stalls, are located on the clubhouse side of La Habra Hills Drive. The main parking lot providing 240 parking spaces is located across La Habra Hills Drive at a higher elevation.

The clubhouse consists of a 22,500-square-foot building that houses a golf pro shop, banquet rooms, restaurant/bar, and offices. A golf cart storage and maintenance area is located below the clubhouse building.

Golf play generally occurs from dawn to dusk, with summer tee times starting at 6:15 a.m. and ending at 5:15 p.m. The golf course also provides a practice facility open from 7:00 a.m. to 10:00 p.m. with a "double decker" driving range consisting of 35 tees/driving positions. The practice facility also provides putting greens, mini-pro shop, and patio where drinks and snacks are served. The driving range is lighted for night use.

Located just west of the practice facility is a maintenance yard consisting of a maintenance building and paved area for material and vehicle storage. All golf course maintenance activities and equipment are stored in and operate from this location.

c. Surrounding Land Uses

The existing Westridge community, consisting of single-family detached homes, borders the Project site on the south. The existing Westridge Plaza Shopping Center, a 695,000-square-foot retail/commercial center, is located to the north of the project site at the corner of Imperial Highway and Beach Boulevard. Also to the north are single-family residential subdivisions that take access from Idaho Street from Olive Tree Drive and Rain Tree Drive. Idaho Street, Vista Del Valle Park, and homes are located to the east; and Beach Boulevard, commercial and multi-family residential development, and Coyote Creek are located to the west.

3.2.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of land use and planning impacts. Based on Appendix G of the CEQA Guidelines, the proposed project would have a significant effect if it were to:

Threshold LUP-1 Physically divide an established community;

Threshold LUP-2 Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or

Threshold LUP-3 Conflict with any applicable habitat conservation plan or natural community conservation plan.

3.2.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold LUP-1: Physically divide an existing community.

Impact LUP-1: Implementation of the proposed Rancho La Habra Specific Plan would result in the temporary closure of the La Habra Hills Drive entrance to the Westridge residential community during site grading, temporarily restricting use of one of the three current entries to the community. Connectivity to and from the Westridge residential community during Project site grading would be temporarily reduced due to the closure of La Habra Hills Drive, increasing travel time between housing and

shopping. However, connectivity for the Westridge community would not be eliminated. Because the condition would be temporary, the community's access points to Idaho Street and Beach Boulevard would remain unaffected, and emergency access from the two closest fire stations serving the Westridge community would not be affected, the impact would *less than significant*.

Methodology

The analysis related to this threshold considers whether the proposed Rancho La Habra Specific Plan would create new physical barriers that would eliminate or reduce existing levels of connectivity between areas of an existing community or neighborhood to the extent that one portion of the community or neighborhood would be physically separated from other areas of the community or neighborhood.

Impact Assessment

In the existing condition, La Habra Hills Drive extends from Imperial Highway to the golf course clubhouse and then south to a gated access to the Westridge community. For approximately 15 months during Project site grading and infrastructure installation, La Habra Hills Drive across the Project site would be closed to Westridge residents. The remaining two access points to the Westridge community – Hillsborough Drive west to Beach Boulevard and Nicklaus Avenue east to Idaho Street – would remain available for daily traffic and emergency access. However, access to the north, for example between the Westridge residential community and the Westridge Plaza Shopping Center, would not be available through the Project site; traffic would be diverted to Beach Boulevard, creating a longer route between the residential community and shopping. In addition, as discussed in Section 3.11, *Hazards and Hazardous Materials*, the temporary closure of La Habra Hills Drive would not affect response time to the Westridge community from the two closest Los Angeles County fire stations, both of which are within 0.5-mile of the Westridge community.

Following grading and infrastructure improvements, La Habra Hills Drive would be re-opened to the Westridge residential community. The public road would be re-routed around the parking lot to the future Community Center, minimizing potential pedestrian/automobile conflicts for park users. The roadway would provide continued access to the Westridge community for both daily and emergency use.

Significance Conclusion for Impact LUP-1

Implementation of the proposed Rancho La Habra Specific Plan would result in the temporary closure of the La Habra Hills Drive entrance to the Westridge residential community during site grading, temporarily restricting use of one of the three current entries to the community.

Connectivity to and from the Westridge residential community during Project site grading would be temporarily reduced due to the closure of La Habra Hills Drive, increasing travel time between housing and shopping. However, connectivity for the Westridge community would not be eliminated. Because the condition would be temporary, the community's access points to Idaho Street and Beach Boulevard would remain unaffected, and emergency access from the two closest fire stations serving the Westridge community would not be affected, the impact would be less than significant, and no mitigation would be required.

Threshold LUP-2: Conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Impact LUP-2.1: The proposed Specific Plan would be inconsistent with a goal and several policies of the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Since these inconsistencies are reflected in significant air quality, GHG (total annual emissions[1]), and traffic impacts, impacts related to inconsistencies with the 2016 RTP/SCS would be significant even with implementation of all feasible mitigation measures. Impacts would therefore be *significant and unavoidable*.

Methodology

An inconsistency with a land use or planning policy is not necessarily an impact under CEQA; only those inconsistencies that would result in physical effects on the environment are considered "impacts" under CEQA and identified as such in this EIR. An evaluation was first undertaken to determine the proposed Project's consistency with applicable policies of the SCAG RTP/SCS. A significant impact in relation to the RTP/SCS would occur if an inconsistency would result in a significant adverse physical effect as identified in the significance conclusions following mitigation in Sections 3.2 through 3.17 and summarized in Section 3.18, *Significant Unavoidable Impacts*, of this EIR.

[1] As set forth in Section 3.9, Greenhouse Gas Emissions of the Partially Recirculated Draft EIR, the proposed project would generate an annual net increase of ~~6,037.55~~ 8,095.99 $MTCO_2e$ in 2026 and 7,554.69 $MTCO_2e$ in 2030, exceeding the ~~applicable~~ SCAQMD screening threshold of 3,000 $MTCO_2e$ as discussed in relation to Impact GHG-1. As discussed in relation to Impact GHG-2, the proposed project would implement all applicable provisions of the State of California's 2017 Scoping Plan and the City's Climate Action Plan~~, and would generate emissions of 4.6 $MTCO_2e$ per service population, which is below the per service population efficiency threshold recommended by the SCAQMD, and consistent with the service population efficiency standards needed to implement AB 32~~. ~~See~~ As discussed in relation to Impact LUP-2.3 and Impact GHG-2, even with implementation of all applicable Greenhouse Emissions Mitigation Measures, the Project would remain inconsistent with three goals and one policy of the regional RTP/SCS ~~for additional discussion~~.

Impact Assessment

Table 3.2-1 lists the policies from SCAG's 2016 RTP/SCS that are relevant to the proposed Specific Plan. SCAG policies focus largely on implementing transit-oriented development and increasing the use of regional transit, encouraging development patterns and densities that reduce infrastructure costs and providing affordable and a variety of housing types.

Significance Conclusion for Impact LUP-2.1

As noted in **Table 3.2-2**, the proposed Specific Plan would be inconsistent with ~~several~~ three goals and one policy of the 2016 RTP/SCS. Since these inconsistencies are reflected in significant air quality, GHG, and traffic impacts, impacts related to inconsistencies with the 2016 RTP/SCS would therefore be significant.

Mitigation Measures

All mitigation measures set forth in EIR Section 3.7, *Traffic and Circulation*, Section 3.8, *Air Quality*, and Section 3.9, *Greenhouse Gas Emissions* would apply to related inconsistencies with the 2016 RTP/SCS.

Significant Conclusion for Impact LUP-2.1 with Implementation of Mitigation Measures

Because significant unavoidable air quality, GHG, and traffic impacts related to inconsistencies with the 2016 RTP/SCS would result following implementation of all feasible mitigation measures, the impact would be significant and unavoidable.

Threshold LUP-2: Conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Impact LUP-2.2: The proposed Rancho La Habra Specific Plan would be inconsistent with certain policies of the La Habra General Plan resulting from an increase in the allowable buildout of the General Plan. However, approval of the proposed General Plan Amendment would include the proposed Project in the General Plan's buildout, thereby achieving consistency between the proposed Project and the General Plan. Therefore, *no impact* would result.

Table 3.2-1
Project Consistency with Regional Land Use Goals and Policies

Existing 2016 RTP/SCS Goals and Policies	Project Consistency
Goals	
Align the plan investments and policies with improving regional economic development and competitiveness.	**Consistent**. The proposed Specific Plan would place substantial new housing adjacent to major commercial development, which would increase the competitiveness of those commercial uses.
Maximize mobility and accessibility for all people and goods in the region.	**Inconsistent**. The proposed Specific Plan would place additional low-density housing dependent on vehicular access in an area already experiencing substantial congestion. The proposed Specific Plan would provide improvements to area pedestrian and bicycle facilities, but the area is without access to convenient transit service to major jobs centers other than bus service along Beach Boulevard.
Ensure travel safety and reliability for all people and goods in the region.	**Consistent**. The proposed Specific Plan would involve improvements to the circulation system in order to increase the safety and efficiency for a variety of users, including pedestrians and cyclists.
Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Inconsistent**. The proposed Specific Plan would be inconsistent with the adopted Air Quality Management Plan, and would result in significant unavoidable air quality and greenhouse gas emissions impacts.[a] While the proposed Project would provide substantial bicycle and pedestrian facilities on-site, it would also introduce housing in an area without major transit. The result would be reliance on the use of automobile travel.
Actively encourage and create incentives for energy efficiency, where possible.	**Consistent**. The Specific Plan includes energy-efficient design standards and guidelines along with incorporation of features that would decrease water use.
Encourage land use and growth patterns that facilitate transit and active transportation.	**Inconsistent**. The proposed Specific Plan would introduce increased housing in an area without major transit, and increase reliance on the use of automobile travel.
Policies	
Identify regional strategic areas for infill and investment.	**Not Applicable**. The policy aims to identify priority areas for infill and investment, which needs to occur before consistency of the proposed Project with identification of any such areas.
Plan for additional housing and jobs near transit.	**Inconsistent**. The Specific Plan would substantially increase the number of dwelling units in an area without major transit.
Plan for changing demand in types of housing.	**Not Applicable**. The regional policy addresses long-term planning and recognizing that changes in the types of housing that is needed will occur over time. The proposed Specific Plan primarily provides single-family detached housing (277 of 402 dwelling units) along with moderate-density attached housing (125 dwelling units). Single-family housing is proposed on small lots, providing for a higher density than traditional single-family detached development, while the proposed courtyard-style multi-family dwellings represent an alternative to traditional high-density multi-family development. These types of housing are consistent with current market conditions.
Ensure adequate access to open space.	**Consistent**. While the Specific Plan proposes to convert the Westridge Golf Club to residential use, the proposed Project would exceed established park requirements. The Specific Plan would also provide access to open space by improving bicycle and pedestrian access throughout the Specific Plan area.

[a] As discussed in relation to Impacts LUP-2.3, GHG-1, and GHG-2, the proposed Project would have a significant and unavoidable impact in relation to total GHG emissions, but would nevertheless be consistent with plans and programs to reduce GHG emissions, including the City's Climate Action Plan and AB 32 GHG emissions reduction targets.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
Chapter 2, Community Development	
LU 1.1 Redirect Growth. Redirect growth away from residential neighborhoods onto underutilized parcels along La Habra's arterial corridors, industrial districts, and in the historic civic center/downtown core.	**Consistent**. The proposed Project would direct growth away from existing residential neighborhoods to the existing Westridge Golf Club. Access to the Project site would be from three arterial corridors: Beach Boulevard, Imperial Highway (via La Habra Hills Drive), and Idaho Street. The proposed Project would be supportive of the General Plan Use Goal LU-1 through the inclusion of a variety of sustainability features (reduced water consumption, energy conservation measures, habitat conservation, and provision of extensive bicycle and pedestrian trails within the Project site. Analyses conducted for the proposed Project demonstrate that public services can be effectively provided. Preparation and City review of the proposed Specific Plan and Design Review for each of the Project's planning areas will ensure that site development is orderly and well-planned development.
LU 1.2 Development Capacity. Accommodate the type and density of land uses depicted on the Land Use Diagram to a cumulative (existing and new) maximum of 24,850 housing units and 12,525,000 square feet of commercial and industrial development citywide. These represent increases of 4,213 units and 4.1 million square feet respectively above January 2011 existing development.	**Consistent**. Because the General Plan recognized that the La Habra Hills Specific Plan had been built out and the General Plan did not contemplate any residential or commercial would occur within the Westridge Golf Club, the proposed Project would increase General Plan build-out over that stated in the currently adopted Policy LU 1.2, which sets forth a factual statement as to amount of development that the adopted General Plan land use map and applicable allowable development intensities would permit based on the development capacity of specific properties within the City, rather than a providing a projection of the amount of development that might exist with the City during an estimated "buildout" year. Consistency between the proposed Project and this General Plan policy is proposed by the applicant to be achieved through amending Land Use Policy LU 1.2 to include the proposed Project.
LU 1.3 Growth Exceeding Development Capacities. Allow for increments of development exceeding these limits provided their cumulative environmental impacts do not result in impacts greater than the levels of significance or change the findings described by the certified General Plan Program Environmental Impact Report (EIR).[1] [1] It is anticipated that the development limits specified by Policy 1 and addressed in the General Plan 2035 Program EIR would not be exceeded prior to the next normal updating of the General Plan, for which a new EIR would be prepared in accordance with CEQA.	**Consistent**. Among the purposes of this EIR is to provide the evaluation of environmental impacts called for in Policy LU-1.3. Although cumulative environmental impacts would increase in relation to air quality, GHG emissions, traffic, public services, and utilities and service systems. Consistency between the proposed Project and this policy is proposed by the applicant to be achieved by amending Land Use Policy LU 1.2 to which this policy is directed to include the proposed Project.
LU 1.4 Subsequent Environmental Review. Require that a Program EIR addressing cumulative citywide impacts be prepared when increments of development exceeding these capacities result in impacts greater than the levels of significance or change the findings described by the certified General Plan Program Environmental Impact Report (EIR).	**Consistent.** This EIR analyzes city-wide cumulative impacts as well as Project-specific impacts on the environment. Cumulative impacts associated with the proposed Project are analyzed in Chapter 6 of this EIR. As discussed in Chapter 6, the proposed Project would increase the severity of significant unavoidable Air Quality and Greenhouse Gas Emissions impacts identified in the General Plan EIR.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
LU 1.5 Development Concurrency with Public Facilities. Phase development and public facilities working with other public entities to assure that adequate public facilities are available at the time of occupancy.	**Consistent.** Provision of needed infrastructure would precede development of residential and commercial uses such that needed public facilities would be available at the time of occupancy.
LU 2.1 Places to Live. Provide opportunities for a full range of housing types, locations, and densities to address the community's fair share of regional housing needs and to provide market support to economically sustain commercial land uses in La Habra. The mix, density, size, and location of housing shall be determined based on the projected needs specified in the Housing Element, as amended periodically.	**Consistent.** The proposed Project would provide funding for lower income housing, additional opportunities for small lot single-family detached and courtyard-style multi-family attached housing in a planned community setting, and additional market support for existing nearby and adjacent commercial uses in the City.
LU 2.6 Places that Support Healthy Lifestyles. Provide opportunities for the development of new parks of varying types and scales (including small urban infill parks and parklets), community gardens, and open spaces, prioritizing their development in locations subject to infill and intensification.	**Consistent.** The proposed Project would provide new park and open spaces, include a Community Center facility, traditional neighborhood parks, trails, and wildlife viewing areas.
LU 3.1 Sustainable Development Pattern. Provide for an overall pattern of land uses that promotes efficient development; reduces pollution, automobile dependence, and greenhouse gas emissions and the expenditure of energy and other resources; ensures compatibility between uses; enhances community livability and public health; and sustains economic vitality.	**Consistent.** The sustainable development pattern sought by Policy LU 3.1 is reflected in the location of the Project site adjacent to the existing residential neighborhoods to the south and west, along with the Project's location adjacent to major commercial development to the north. The Project site is also adjacent to an existing bus line along Beach Boulevard.
LU 3.2 Uses to Meet Daily Needs. Encourage uses that meet daily needs such as grocery stores, local-serving restaurants, and other businesses and activities within walking distance of residences to reduce the frequency and length of vehicle trips.	**Consistent.** The proposed Project includes a 20,000-square-foot commercial center within Planning Area 5 that would provide for daily needs. Although commercial development within Planning Area is the preferred land use for the site, the Specific Plan proposes an option that would permit development of 46 multi-family dwelling units within Planning Area 5 in addition to the 125 multi-family dwelling units proposed for Planning Area 5.
LU 3.5 Complete and Livable Neighborhoods. Maintain a development pattern of distinct residential neighborhoods oriented around parks, schools, and community meeting facilities that are connected with neighborhood-serving businesses and public transit.	**Consistent.** The Rancho La Habra Specific Plan would provide for internal parks, public and private recreational facilities, and community meeting facilities. The Project site is located adjacent to the Westridge Plaza Shopping Center, and proposes an option for 20,000 square feet of new commercial space.
LU 4.1 Development Compatibility. Require that development is located and designed to assure compatibility among land uses, addressing such elements as building orientation and setbacks, buffering, visibility and privacy, automobile and truck access, impacts of noise and lighting, landscape quality, and aesthetics.	**Consistent**. The Rancho La Habra Specific Plan area is a transition zone between existing commercial uses to the north and residential uses to the south. The proposed Project would replace the existing golf course buffer between these two uses with a combination of residential development and open space. Differences in elevation between the existing Westridge community and the Project site provide for separation between existing and proposed future development. In addition, siting of the residential development within the Specific Plan area below the existing Westridge community would preserve views of the San Gabriel Mountains and La Habra basin from existing homes. However, proposed development within the Project site would be visible from several locations, changing the visual character of the

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
	Project site. Vehicular access to and from the Westridge community through the Project site would be maintained except during site grading when La Habra Hills Drive would be temporarily closed.
LU 4.3 Public Safety and Community Design. Require that neighborhoods, centers, streets, and public spaces be designed to enhance public safety and discourage crime by providing street-fronting uses ("eyes on the street"), adequate lighting and sight lines, and features that cultivate a sense of community ownership.	**Consistent**. The proposed Project includes the following elements implementing this General Plan policy: • Promotion of neighbor interaction and community safety through forward-facing architecture and appropriate front yard setbacks; • A front yard setback of 10 feet for porches and living area to encourage "eyes on the street" by bringing the living area forward and moving the garage farther back (18-foot setback); • A street tree program that mandates the installation and on-going maintenance of street trees placed behind the sidewalk to provide substantially shaded sidewalks to encourage walking, thereby increasing casual surveillance within residential neighborhoods; and • A landscape plan attuned to minimizing hiding areas in landscaped areas near sidewalks and buildings. The proposed Specific Plan has been reviewed by the La Habra Police Department, and would meet safety requirements established by the Police Department to enhance public safety and discourage crime.
LU 4.4 Design Review. Require design review that focuses on achieving appropriate form and function for new and redeveloped projects to assure compatibility with community character, while promoting creativity, innovation, and design quality.	**Consistent**. Design Review plans for Planning Areas 1, 2, 3, 4 and 6 have been submitted, and are included as part of the review and approval of the Project described in this EIR. Planning Area 5 will also be subject to Design Review at such time as site-specific development is proposed within the portion of the Project site.
LU 5.1 Regulating Sustainable Development. Require that new development and reconstruction comply with the California Green Building Standards Code with amendments and update periodically to reflect future amendments.	**Consistent**. Development within the Project site would be subject to the California Green Building Standards Code and a further 20% reduction in energy use as established in the City's adopted Climate Action Plan.
LU 5.2 Sustainable Building Practices. Promote sustainable building practices that utilize architectural design features, materials, interior fixtures and finishes, and construction techniques to reduce energy and water consumption, human exposure to toxic and chemical pollution, and disposal of waste materials.	**Consistent**. All buildings within the Project site would be constructed pursuant to CalGreen building standards and a further 20% reduction in energy use as established in the City's adopted Climate Action Plan.
LU 5.3 Existing Structure Reuse. Encourage the retention, adaptive reuse, and renovation of existing buildings with "green" building technologies and standards.	**Consistent**. The existing clubhouse within the golf course would be brought up to current building code standards and converted to use as a public Community Center.
LU 5.4 Sustainable Sites and Land Development. Promote land development practices that reduce energy and water consumption, pollution, greenhouse gas emissions, and disposal of waste materials incorporating such techniques as: a. Concentration of uses and design of development to promote walking, bicycling, and use of public transit in lieu of the automobile;	**Consistent**. Implementation of the proposed Rancho La Habra Specific Plan would result in a substantial reduction of potable water use compared to the existing golf course use. While the proposed Project would increase total energy consumption in relation to the existing golf course, as discussed in Section 3.10, *Energy Resources*, the Project would be 20 percent more efficient than current (2017) Title 24 standards, and energy would not be consumed in a wasteful manner. Other sustainability features of

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
b. Capture and reuse of stormwater on-site for irrigation; c. Management of wastewater and use of recycled water, including encouraging the use of grey water; d. Orientation of buildings to maximize opportunities for solar energy use, daylighting, and ventilation; e. Use of landscapes that conserve water and reduce green waste; f. Use of permeable paving materials or reduction of paved surfaces; g. Shading of surface parking, walkways, and plazas and incorporation of solar technology; and/or h. Recycling and/or salvaging for reuse of construction and demolition debris.	the proposed Project include: • The proposed Project is located adjacent to existing transit service along Beach Boulevard, and would provide a series of pedestrian and bicycle routes and paths through the Project site. • Construction debris is proposed to be crushed and used for road base. Additional, design-oriented, sustainability features identified in Policy LU 5.4 will be reviewed and feasible measures included as conditions of approval during the Project's Design Review process.
LU 7.2 New Residential Development. Attract new residential development that is well-conceived, constructed, and maintained in a variety of types and densities, housing types at scales, and locations and costs.	**Consistent**. The Rancho La Habra Specific Plan includes architectural design guidelines as well as development standards that reflect the intended consistency and compatibility with the existing development. The Project would provide both single-family and multi-family housing types, with different size units and price points to attract a variety of homebuyers.
LU 7.5 Walkable Neighborhoods. Maintain sidewalks, parkways, street tree canopies, and landscaping throughout the residential neighborhoods to promote walking as an enjoyable and healthy activity and alternative to automobile use.	**Consistent**. A comprehensive system of sidewalks and trails would be provided to facilitate pedestrian mobility throughout the Project site. As part of the required design review process, the landscaping plan would be reviewed to ensure that street trees and other landscape materials and design promote walking as an enjoyable and healthy activity and alternative to automobile use.
LU 7.6 Neighborhood Connectivity. Maintain sidewalks or other means of pedestrian and bicycle connections to neighborhood commercial centers, parks, schools, work places, and other community activity centers.	**Consistent**. A comprehensive system of sidewalks and trails would be provided to facilitate pedestrian mobility throughout the Project site. This pedestrian system, in combination with existing off-site pedestrian facilities, would provide connections to commercial centers, parks, schools, work places, and other community activity centers.
LU 7.7 Incompatible Uses. Prohibit the development of uses that are incompatible with and physically divide residential neighborhoods.	**Consistent**. The proposed Project would provide for a compatible mix of residential and small-scale commercial uses. As discussed in relation to Impact LUP-1, the proposed Project, when completed, would not physically divide any residential neighborhoods.
LU 7.8 Safety. Require that residential developments be designed to facilitate and enhance neighborhood surveillance for safety.	**Consistent**. The proposed Specific Plan includes the following elements implementing this General Plan policy: • Promotion of neighbor interaction and community safety through forward-facing architecture and appropriate front yard setbacks; • A front yard setback of 10 feet for porches and living area to encourage "eyes on the street" by bringing the living area forward and moving the garage farther back (18-foot setback); • A street tree program that mandates the installation and on-going maintenance of street trees placed behind the sidewalk to provide substantially shaded sidewalks to encourage walking, thereby increasing casual surveillance within residential neighborhoods; and

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
	• A landscape plan attuned to minimizing hiding areas in landscaped areas near sidewalks and buildings.
LU 8.1 Neighborhood Identity. Maintain distinguishing characteristics, such as topography, parcel size, housing scale and form, and public streetscapes that differentiate La Habra's single-family neighborhoods.	**Consistent**. The proposed Project would be reviewed through the City's design review process to ensure that site grading, proposed parcel sizes, architectural design, and streetscape design would distinguish the Project's single-family neighborhoods from other single-family neighborhoods in the City.
LU 9.1 Character and Design. Design new and renovated multi-family residential to achieve a high level of architectural design and quality of life for residents, in consideration of the following principles: a. Consistent architectural design treatment b. Design elevations of multi-family buildings facing public streets and pedestrian ways to exhibit a high level of visual interest and distinguish entries for separate residences as feasible for security and privacy c. Incorporate setbacks, modulate building mass, and design multifamily buildings and projects in consideration of the development patterns of the surrounding neighborhood.	**Consistent**. The proposed Specific Plan sets forth architectural and design guidelines for multi-family residential development to ensure a high level of design quality. Design Review plans for Planning Areas 1, 2, 3, 4 and 6 have been submitted and are included as part of the review and approval of the Project described in this EIR. Planning Area 5 will also be subject to Design Review at such time as site-specific development is proposed within the portion of the Project site.
LU 9.3 Development Transitions. Ensure sensitive transitions in building scale between buildings in multi-family residential areas and lower-scale buildings in adjoining residential neighborhoods and commercial districts.	**Consistent**. Generally, development transitions from proposed single-family residential neighborhoods to proposed multi-family and commercial development are proposed to be accomplished through grade changes, building orientation, and landscaping. Final architectural, landscape, and development plans for proposed multi-family residential and commercial development would be subject to the City's design review process, which would ensure compliance with Specific Plan design guidelines and Policy LU 9.3.
LU 9.4 Streetscapes. Provide ample public spaces and tree-lined sidewalks or pathways furnished with appropriate pedestrian amenities that contribute to comfortable and attractive settings for pedestrian activity in multi-family neighborhoods.	**Consistent**. The proposed Specific Plan includes a trails system furnished with appropriate pedestrian amenities, including passive park areas and wildlife viewing areas.
LU 11.7 Architecture and Site Design. Require that new development and renovated or remodeled existing buildings in multi-tenant centers and corridors be located and designed to complement existing uses, as appropriate, and exhibit a high quality of architecture and site planning in consideration of the following principles: a. Seamless connections and transitions with existing buildings, in terms of building scale, elevations, and materials; b. Integration of signage with the buildings' architectural character; c. Landscaping contributing to the appearance and quality of development; d. Clearly delineated pedestrian connections between business areas, parking areas, and to adjoining neighborhoods and districts;	**Consistent**. Development plans for Planning Areas 1, 2, 3, 4 and 6 have been submitted and are included as part of the review and approval of the Project described in this EIR. The plans will be reviewed against these standards. Planning Area 5 will also be subject to Design Review at such time as site-specific development is proposed within the portion of the Project site.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
e. Incorporation of plazas and expanded sidewalks to accommodate pedestrian, outdoor dining, and other activities.	
LU 17.6 Parks and Open Spaces. Seek to expand the City's parklands, greenways, and open spaces as land becomes available and funding is available and coordinate with other appropriate agencies, as provided for in the Open Space, Parks, Trails, and Recreation (OS) Element.	**Consistent**. The proposed Specific Plan provides ~~25.1~~ 28.86 acres of public parkland, which would increase existing citywide public park acreage per 1,000 from 2.29 acres of park per 1,000 population to ~~2.64~~ 2.71 acres per 1,000 population, thereby meeting La Habra's citywide goal of 2.5 acres per 1,000 population of city-owned parkland. This occurs since the ~~25.1~~ 28.86 acres of public park land to be provided by the proposed Project exceeds the ~~3.78~~ 4.13 acres of park land required to be dedicated per the City's Municipal Code. In addition to active and passive public parks and trails, the Project would provide a public Community Center, habitat conservation areas, and wildlife viewing areas.
LU 11.8 Buffering Adjoining Residential Areas. Ensure commercial uses adjoining residential neighborhoods or in mixed residential and commercial developments be designed to be compatible with each other.	**Consistent**. Site and architectural design of the proposed commercial center would be reviewed in light of the proposed site and architectural design for adjacent single-family and multi-family residential areas.
LU 17.9 Stormwater Facilities. Work with the Orange County Flood Control District to ensure that structures channeling or retaining water be designed and constructed of materials and colors so as to blend with the natural environment.	**Consistent**. As part of the City's review of engineering design for stormwater detention facility within the Project site, basin design, including materials and colors, would be reviewed to ensure that basins would blend with the adjacent environment.
LU 17.10 Integration of Utilities. Require utilities that cannot be feasibly placed underground be located and designed to produce the least visual and environmental impact on the community.	**Consistent**. All utilities would be undergrounded.
H 1.4 Variety of Housing. Promote a variety of housing types at scales, values, and locations carefully selected to provide housing opportunities for all economic segments of the population, while emphasizing the protection and conservation of existing single-family neighborhoods.	**Consistent**. The proposed Project would expand housing opportunities within the City by providing detached single-family dwelling on small lots, as well as attached multi-family dwelling in a courtyard-style setting. In addition, the proposed Project will provide funding for lower income housing.
H 2.13 Energy Conservation. Encourage the design and construction of new homes and rehabilitation of existing homes in accordance with both voluntary and mandatory green building standards and energy saving criteria adopted by the City.	**Consistent**. All housing within the Project site would be constructed to CalGreen building standards. In addition, conversion of the existing golf clubhouse to a Community Center would bring the building up to current energy conservation standards.
CR 1.2 Applicable Laws and Regulations. Ensure that City, State, and Federal historic preservation laws, regulations, and codes are implemented including the California Historical Building Code and State laws pertaining to archaeological resources, to assure the adequate protection of these resources.	**Consistent**. Through the City's CEQA and development review processes, compliance with city, state, and federal historic preservation laws, regulations, and codes would be ensured, thereby providing adequate protection of resources.
CR 1.3 Consultation. Consult with the appropriate organizations and individuals to minimize potential impacts to historic and cultural resources, such as the Information Centers of the California Historical Resources Information System (CHRIS), the Native American Heritage Commission (NAHC), the Native American groups and organizations.	**Consistent**. Consultation with tribal authorities and the Native American Heritage Commission has been undertaken as part of the proposed Project's CEQA review to address historic, cultural, and tribal resources pursuant to Assembly Bill 52 and Senate Bill 18.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
CR 1.5 Planning. Take historical and cultural resources into consideration in the development of planning studies and documents.	**Consistent**. Appropriate mitigation measures have been prescribed and would be implemented to ensure that site development would provide appropriate consideration to historical, cultural, and paleontological resources, and that impacts on these resources would be minimized.
CR 1.8 Early Consultation. Minimize potential impacts to historic and cultural resources by consulting with property owners, land developers, and the building industry early in the development review process.	**Consistent**. Consultation with tribal authorities and the Native American Heritage Commission has been undertaken as part of the proposed Project's CEQA review to address historic, cultural, and tribal resources pursuant to Assembly Bill 52 and Senate Bill 18.
CR 1.9 Compatibility with Historic Context. Review proposed new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context. Pay special attention to the scale, massing, and relationship of proposed new development to surrounding historic resources.	**Consistent**. The Specific Plan contains architectural and landscape guidelines, which would promote harmonious Project design while providing a guide to architectural exterior form and style that would complement the surrounding residential and historical context of La Habra. Drawing on the architectural history of La Habra, the guidelines and the selected architectural styles allow for individual expression while maintaining the integrity of the design aesthetic expected in the environment.
CR 1.13 Archaeological Resources. Develop or ensure compliance with protocols that protect or mitigate impacts to archaeological, historic, and cultural resources including prehistoric resources.	**Consistent**. The Project site has been found to have a moderate potential for discovery of archaeological resources and a high potential for discovery of paleontological resources during earthwork within previously undisturbed soils. Mitigation Measures CUL-2 and CUL-3 described in Section 3.6, *Cultural Resources*, would ensure compliance with protocols that protect and mitigate impacts on archaeological and paleontological resources.
CI 1.1 A Community of Places. Provide for the distribution and concentration of new development to establish clusters of distinct, identifiable, and walkable mixed-use centers and corridors, differentiated from the City's automobile-oriented "strip corridors," as guided by the Land Use Plan Diagram.	**Consistent**. The Rancho La Habra Specific Plan would achieve consistency with this policy by proposing a planned community with a distinct identity, including parks and trails for both Project site residents and the community at large.
CI 1.3 Identification of Place. Develop a program of well-designed signage that identifies and distinguishes La Habra's neighborhoods, districts, and streets.	**Consistent**. The Specific Plan includes a signage program to identify and distinguish the proposed residential community.
CI 1.4 Natural Setting. Maintain the City's hillsides and open spaces as elements that separate and distinguish La Habra from surrounding communities.	**Consistent**. The proposed Project would maintain the hillside that currently separate the Project site from the existing Westridge residential neighborhood. Although the proposed Project would result in a substantial loss of open space (existing Westridge Golf Club), 58 percent of the site will be retained in open space.
CI 2.1 Unique Sense of Place. Promote quality site, architectural, and landscape design that incorporates qualities and characteristics that make La Habra desirable and memorable including varied architectural styles, tree-lined streets, distinctive parks and open spaces, and walkable blocks.	**Consistent**. As part of the City's design review process, the proposed Specific Plan's architectural and landscape guidelines, as well as the Project's site, architectural, and landscape design plans, have been reviewed to ensure consistency with Policy CI 2.1.
CI 2.2 Building Scale and Design. Require that buildings and sites are designed to exhibit a high level of visual quality and are sensitive to the human scale.	**Consistent**. As part of the City's design review process, the proposed Specific Plan's architectural guidelines, as well as the Project's site, architectural, and landscape design plans, has been reviewed to ensure consistency with Policy CI 2.2.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
CI 2.3 Responsiveness to Context. Require building design that respects the local context in scale, massing, and materials; is responsive to La Habra's climate; and considers the historic and cultural context of its neighborhoods.	**Consistent**. As part of the City's design review process, the proposed Specific Plan's architectural guidelines, as well as the Project's site, architectural, and landscape design plans, have been reviewed to ensure compatibility of proposed Project development with the site's local land use, environmental, and cultural resources context.
CI 2.5 Attractive and Walkable Streets. Enhance the City's identity and image by tree planting and landscaping for the public rights-of-way and front setback areas of all major commercial and mixed-use districts and corridors.	**Consistent**. As part of the City's design review process, the proposed Specific Plan's landscape plan and architectural designs would be reviewed to ensure consistency with Policy CI 2.5. The proposed Project includes the following design elements to achieve attractive and walkable streets: • A street tree program that mandates the installation and on-going maintenance of street trees placed behind the sidewalk in order to provide substantially shaded sidewalks to encourage walking; • Forward-facing architecture and appropriate front yard setbacks to provide a pleasant street scene; and • A landscape plan attuned to minimizing hiding areas in landscaped areas near sidewalks and buildings, thereby enhancing the safety of walking through the community.
CI 2.6 Sustainable Streetscapes. Develop a consistent palette of drought-tolerant and native street plantings, permeable hardscapes, and low energy lighting fixtures that contribute to a high quality visual environment, while distinguishing La Habra as a model of sustainability.	**Consistent**. The proposed Project's plant palette would use drought-tolerant plantings to reduce the demand for potable water, while still achieving the desired character and atmosphere of the various neighborhoods. The visual quality of the proposed landscape palette will be review by the City as part of the required Design Review process to ensure consistency with this policy.
CI 3.1 Sense of Community. Establish a common logo and design template that will be consistently used for signage of public rights-of-way, places, and buildings.	**Consistent**. The proposed Specific Plan sets forth a design template for the Project site, including streetscapes, community gathering places and signage, and architectural design. As part of the City's design review process, the proposed Project's template would be reviewed in relation to the Project site's setting and city-wide design goals.
CI 3.3 Private Signage. Require that signage on private buildings be designed to exhibit a high quality of interest and visual appeal; be integrated into and reflect the building's architectural design character; and sized to not overwhelm its scale and mass.	**Consistent**. Project signage used for residential neighborhoods and linking trails and open space areas is proposed to be designed to reflect the character of each neighborhood while still maintaining consistency between neighborhoods. Likewise, commercial signage is proposed to complement the neighborhood and trail signage, as well as the existing Westridge Plaza Shopping Center. All proposed signage would be reviewed as part of the City's design review process to ensure a high quality of interest and visual appeal, as well as compatibility with adjacent development.
Chapter 3, Mobility/Circulation	
RN 1.1 Regional Transportation Plan. Support the regional transportation and growth management plan to conserve energy, improve air quality, and reduce greenhouse gas emissions (GHG) as appropriate and beneficial to the public welfare of the City and adjacent	See Table 3.2-1 for discussion of the proposed Project's consistency with 2016 Regional Transportation Plan/ Sustainable Communities Strategy goals and policies.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
communities.	
RN 1.7 Street System Improvements. Maintain and improve, where needed, the City's street system to maintain acceptable levels of service and provide a reliable and uncongested transportation system for the citizens of La Habra.	**Consistent**. The proposed Project would provide roadway improvements to La Habra Hills Drive to accommodate increased traffic. Access onto all three arterial roadways is provided by a fully signalized intersection to allow for convenient vehicular and pedestrian access.
RN 1.8 Safe Street Design. Ensure that street system improvements incorporate design that considers safe movement for all street users (motorists, bicyclists, transit users, pedestrians, the disabled, and commercial users).	**Consistent**. Roadway design within the Specific Plan area would comply with all City design standards to ensure the safe movement for all users (motorists, bicyclists, transit users, pedestrians, the disabled, and commercial users). In addition, off-street trails would be provided. Street trees along all streets would be designed to provide shade for sidewalks as the trees mature.
RN 1.10 Maintain Acceptable Levels of Service. Strive to achieve or maintain an acceptable level of service of LOS D or better at City jurisdiction intersections and LOS E or better at State Highway and CMP intersections.	**Consistent**. Traffic from the Project site would affect intersections both within and outside of the City of La Habra. The Traffic Impact Analysis for the proposed Project analyzes those intersections and provides recommendations to improve LOS. The applicant would be responsible for implementing all feasible mitigation measures in order to reach target LOS standards.
RN 1.15 Traffic Mitigation Fee. Require a locally collected and administered traffic mitigation fee to guarantee that new development pays for its fair share toward improvements resulting in reductions in air quality, GHG emission, and traffic impacts generated by the development.	**Consistent**. The applicant would be required to pay all required traffic mitigation fees as determined in the Traffic Impact Assessment and this EIR, and by the City.
AT 2.3 Bikeway Network. Maintain and extend where and when feasible the City's bikeway network to make bicycling an attractive option.	**Consistent**. The proposed Specific Plan would provide bicyclists with multiple connection points to surrounding streets, parks, and retail uses. An extensive system of on-street and off-street trails is proposed within the Project site to encourage bicycle use.
AT 2.4 Bike Trail Linkages. Provide additional Class-I, Class-II, or innovative bicycle trail linkages between residential areas, employment areas, schools, parks, commercial areas, and transit stations.	**Consistent**. See analysis of consistency with Policy AT 2.3.
AT 2.6 Pathway Easements. Require new development to dedicate easements for bicycle trail/pedestrian pathway connections.	**Consistent**. See analysis of consistency with Policy AT 2.3.
AT 2.8 Bicycle Parking. Require that a percentage of parking spaces in new non-residential developments and additions to existing facilities be set aside for secure bicycle parking, to encourage use of bicycles for commuting, shopping, and recreational purposes.	**Consistent**. Provision of bicycle parking would be required at the Community Center and other park areas, as well as at the proposed commercial center, to encourage bicycle use.
AT 3.1 Pedestrian Network. Develop facilities to create a comfortable pedestrian walking environment throughout the City, such as pedestrian pathways, textured paving crosswalks, street furnishings, and landscaping to link residential areas, commercial centers, schools, and parks making walking an attractive option.	**Consistent**. In addition to traditional sidewalks, the proposed Specific Plan provides for development of a 2.6-mile linear park trail corridor that would connect the residential neighborhoods to regional trails both to the west (Coyote Creek trail) and to the east (Idaho Street). Both the sidewalks and trail system would be thoroughly landscaped with an emphasis on shade trees. The trail system would also include fitness, educational, and view amenities to further encourage pedestrian use.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
AT 3.2 Pedestrian Linkages. Require that new developments provide dedicated easements or pedestrian linkages to adjacent developments, establishing an interconnected network of pedestrian sidewalks and paths.	**Consistent**. The proposed Specific Plan provides for development of a network of trails that would provide connections from the Project's residential neighborhoods to existing City and regional trails east and west of the Project site, and to the Westridge Plaza Shopping Center located north of the site.
AT 3.3 Accessible Facilities. Provide for the adaptation and use of all pedestrian circulation systems by persons with disabilities through the design standards and implementation of projects that recognize their need and increase their access to facilities and services, consistent with Americans with Disabilities Act (ADA) and State requirements.	**Consistent**. The proposed Project will be required to comply with all applicable Americans with Disabilities Act standards.
AT 3.5 Street Walkability. Provide for the complete street needs of pedestrians to ensure the "walkability" of all streets in residential, retail commercial, and mixed-use areas, including sidewalks, pedestrian crossing opportunities, median islands, pedestrian signals, street furniture, lighting, and signage.	**Consistent**. In addition to traditional sidewalks, the proposed Specific Plan provides for development of a 2.6-mile linear park trail corridor that would connect the residential neighborhoods to regional trails both to the west (Coyote Creek trail) and to the east (Idaho Street). Both the sidewalks and trail system would be thoroughly landscaped with an emphasis on shade trees. The trail system would also include benches and fitness, educational, and view amenities to further encourage pedestrian use. All pedestrian crossing opportunities, median islands, pedestrian signals, lighting, and signage would be required to comply with applicable City standards.
AT 3.6 Pedestrian Connectivity. Enhance pedestrian connectivity between pedestrian attractors such as neighborhoods, mixed-use centers, commercial areas, schools, parks, and entertainment and cultural areas to make the pedestrian option safer and more convenient.	**Consistent**. The proposed Specific Plan provides for development of a network of trails that would provide connectivity throughout the Project site, as well as connections from the Project's residential neighborhoods to existing City and regional trails east and west of the Project site, and to the Westridge Plaza Shopping Center located north of the site.
AT 3.8 Street Modifications/Improvements. Enhance pedestrian facilities (e.g., pedestrian pathways, textured paving crosswalks, street furnishings, and landscaping) where feasible when incorporating modifications/ improvements into an existing street.	**Consistent**. The design of pedestrian facilities will be reviewed by the City as part of the Design Review process to ensure consistency with this policy. All pedestrian crossing opportunities, median islands, pedestrian signals, lighting, and signage would be required to comply with City requirements of the La Habra Public Works Department.
TDM 1.3 GHG Emission Targets. Achieve greenhouse gas emission (GHG) targets through two principal strategies: reducing motor vehicle use and changing land use development patterns.	**Consistent.** Consistency between the proposed Project and this policy is proposed by the applicant to be achieved by amending Land Use Policy LU 1.2 to include the proposed Project, along with the certification of this EIR, which has analyzed the impacts of the increased residential capacity for the city. The EIR includes mitigation measures to ensure that Project-related GHG emissions per service population would be less than the proposed South Coast Air Quality Management District (SCAQMD) efficiency threshold of 4.8 metric tons of carbon dioxide equivalents ($MTCO_2e$) per capita per year, and would thereby not impede the City of achieving the GHG reduction targets set forth in the City's Climate Action Plan. Additionally, the Project will be required to implement all applicable measures from the La Habra Climate Action Plan, so that the proposed Project would be consistent with city-wide efforts to achieve GHG reduction targets.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
TDM 2.5 Alternative Fuel Facilities. Promote alternative fuel support facilities such as hydrogen and CNG fueling stations and electric vehicle charging stations for these emerging technologies.	**Consistent**. Electric vehicle charging stations would be provided within commercial and multi-family residential planning areas. In addition, all single-family dwelling units will be required to pre-wired for installation of home charging stations for electric vehicles.
NTMP 1.2 Engineering. Promote engineering improvements such as physical measures constructed to lower speeds, improve safety, or otherwise reduce the impacts of motor vehicles.	**Consistent**. An emergency access gate between the eastern and central portions of the Project site would prevent high speed "cut through" traffic from Beach Boulevard to Idaho Street.
P 1.2 Off-Street Parking. Require new developments to provide sufficient off-street parking to reduce on-street parking congestion and increase both auto and pedestrian safety.	**Consistent**. Proposed development within the Specific Plan area would be required to meet applicable standards for off-street parking.
Chapter 4, Infrastructure	
WS 1.1 Urban Water Management Plan. Implement the City's Urban Water Management Plan to ensure adequate water supply.	**Consistent**. A Water Supply Assessment prepared for the proposed Specific Plan found that the proposed Project would use approximately 96 acre-feet per year less water than the existing golf course and thus concluded that adequate water is available for the proposed development.
WS 1.3 Adequate Water Infrastructure. Ensure that the City's potable water infrastructure is sized adequately for storage capacity and treatment to serve existing and future projected demands.	**Consistent**. An analysis of the City's water system concluded that existing off-site water infrastructure is adequate to serve the proposed Specific Plan. The analysis also addressed on-site water infrastructure and concluded that adequate water infrastructure was proposed by the applicant to serve projected water demands from the Project site.
WS 1.7 New Water Facility Design. Ensure that water utility facilities are designed to be safe, aesthetically pleasing, and compatible with adjacent uses.	**Consistent**. Water facilities for the proposed Project would be underground and not visible to the public. All facilities would be constructed to City standards.
WS 2.1 Water Conservation Standards and Programs. Implement water conservation standards and programs during non-shortage conditions that reduce water consumption through conservation, reasonable and beneficial use of water, and prevention of water waste and implement water supply shortage actions during declared water shortage, including reducing water use during times of emergency.	**Consistent**. As analyzed in the Project Water Supply Assessment, the proposed Project's water demand would be approximately 35 percent less than current golf course water use. Proposed landscaping would meet the state's Model Water Efficiency Ordinance with plant selection and irrigation systems. Dwelling interiors would include water-saving features such as low-flow toilets, low-flow shower heads, and on-demand hot water, as detailed in the Water Supply Assessment.
WS 2.3 Water Efficient Landscaping. Encourage the use of water efficient landscaping (e.g., drought and fire-resistant landscaping and native vegetation) in new construction and rehabilitation projects.	**Consistent**. Proposed landscaping would meet the state's Model Water Efficiency Ordinance with plant selection and irrigation systems.
WS 2.4 Water Conservation Irrigation. Require water conservation irrigation methods such as drip irrigation, soil moisture sensors, and automatic irrigation systems in new construction and rehabilitation projects.	**Consistent**. Proposed landscaping would meet the state's Model Water Efficiency Ordinance with plant selection and irrigation systems, including use of drip irrigation, soil moisture sensors, and automatic irrigation systems, where appropriate.
WS 2.5 Water Conservation Devices. Require compliance with state laws for water conservation devices such as low flush toilets, self-closing faucets, and pressure reducing valves in all new and major renovated structures.	**Consistent**. Dwelling units would be provided with water-saving features such as low-flow toilets, low-flow shower heads, and on-demand hot water, as detailed in the Water Supply Assessment.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
SS 1.2 Peak Flow Service. Provide sufficient wastewater conveyance, pumping, and treatment capacity for peak sewer flows and infiltration.	**Consistent**. Analysis of sewer system design prepared for the proposed Project confirmed that the Project's proposed sewer system, including Orange County Sanitation District (OCSD) trunk lines and treatment facilities, would provide sufficient capacity to serve Project development.
SS 1.4 Adequate Wastewater Facilities. Coordinate with the Orange County Sanitation District (OCSD) to provide adequate collection, supply, treatment, and disposal of wastewater to meet the demands of existing and future development.	**Consistent**. OCSD trunk lines and treatment facilities have sufficient capacity to accommodate the proposed Project.
SS 1.6 Wastewater Best Practices. Work with OCSD to identify and implement, as feasible, best practices and technologies for wastewater collection and treatment including those that reduce the amount of wastewater requiring treatment, avoid sewage spills affecting stream courses and reservoirs, maintain the highest possible energy efficiency, and reduce costs and greenhouse gas emissions.	**Consistent**. Sewer facilities constructed for the proposed Project would meet all applicable standards of the City of La Habra and OCSD.
SS 1.7 New Development. Ensure that new development constructs, dedicates, and/or pays its fair share contribution to the wastewater treatment and collection system necessary to serve the demands created by the development.	**Consistent**. All new sewer facilities constructed for the proposed Project would be paid for by the applicant.
SD 1.1 Storm Drain Master Plan. Implement the City's Storm Drain Master Plan to ensure an adequate storm drainage system.	**Consistent**. A hydrology study (see Appendix I of this EIR) was prepared to analyze storm flows and evaluate needed storm drainage facilities to support proposed site development. As demonstrated in that study and discussed in Section 3.13, *Hydrology and Water Quality*, of this EIR, adequate drainage facilities would be constructed to accommodate post-development runoff generated by the proposed Project.
SD 1.2 NPDES Permit. Require new development and rehabilitated structures to minimize stormwater runoff and pollutants consistent with the City's National Pollutant Discharge Elimination System (NPDES) permit.	**Consistent**. The proposed Project would comply with current NPDES requirements to ensure that pollutants in stormwater runoff are sufficiently reduced in order to meet discharge requirements. The proposed Project includes three detention and water quality basins as Best Management Practices (BMPs) designed to meet water quality objectives and reduce peak storm flows to existing levels.
SD 1.3 Adequate Storm Drainage Infrastructure. Ensure that the City's storm drainage culverts, channels, and facilities are adequately sized, maintained, and upgraded to adequately convey stormwater runoff and prevent flooding for existing and new development.	**Consistent**. Proposed drainage facilities for the proposed Project would be required to be sized so as to adequately convey stormwater runoff and prevent flooding of existing and new development, including stormwater that currently drainage from the Westridge neighborhood through the Project site.
SD 1.4 Facility Design. Design stormwater drainage systems to be environmentally sustainable, appear natural in character, and to be compatible with surrounding uses.	**Consistent**. The proposed Project's drainage system has been designed to include drainage and water quality features that would accept and treat the post-development runoff. This drainage system includes catch basins and storm drains that would connect to the existing storm drain/flood control system. In addition, water quality features would be incorporated into the Project design to ensure that pollutant loads would be reduced in accordance with current discharge requirements.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
	Project-related storm drains would be underground and not visible to the public. Proposed water quality/detention basins would be designed so as to appear as small lakes with adjacent landscaping. All facilities would be constructed to City standards.
SD 1.5 Best Practices. Use and update best practices for stormwater management.	**Consistent**. BMPs would be implemented during site construction as prescribed in the required Storm Water Pollution Prevention Plan (SWPPP), along with the BMPs specified in the Final Water Quality Management Plan to ensure that long-term, post-development runoff meets current discharge requirements.
SD 1.7 Drainage Channels. Maintain storm drainage channels to adequately convey stormwater.	**Consistent**. The existing storm drain channel (Coyote Creek) has adequate capacity to accommodate stormwater runoff generated by the proposed Project. A parallel drainage line would be constructed under Beach Boulevard to address a current deficiency that would cause stormwater water to be generated within the adjacent Westridge community and the Project site to back up prior to conveyance across Beach Boulevard to Coyote Creek.
SD 1.9 No Net Increase. Require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.	**Consistent**. The proposed Project includes three detention basins designed to reduce peak storm flow discharge. As a result, the proposed Project would not increase stormwater runoff peak flows over existing conditions associated with a 100-year storm event.
WQ 1.1 National Pollutant Discharge Elimination System and Regional Water Quality Control Board. Implement the requirements of the Regional Water Quality Control Board (RWQCB) for compliance with the National Pollutant Discharge Elimination System permit and apply best management practices for point source discharges.	**Consistent**. The Project would comply with the City's NPDES requirements. A SWPPP would be prepared pursuant to current regulatory requirements, and would include BMPs necessary to minimize potential erosion during the construction phase. In addition, a Water Quality Management Plan has been prepared that identifies long-term water quality features in order to minimize post-development water quality impacts.
WQ 1.2 Orange County Drainage Area Management Plan and Water Quality Management Plan. Continue to enforce that all new developments and redevelopments comply with the Orange County Drainage Area Management Plan (DAMP) and that all applicable new developments and redevelopments prepare a Water Quality Management Plan (WQMP).	**Consistent**. The proposed Project would comply with the Orange County Drainage Area Management Plan (DAMP) and would implement a Water Quality Management Plan (WQMP).
WQ 1.3 Low Impact Development. Encourage the incorporation of Low Impact Development (LID) techniques (e.g., permeable paving, cells, bioswales, tree box filters, rain barrels, rooftop runoff for irrigating lawns) to manage stormwater and urban runoff, reduce runoff and pollution, and assist in maintaining or restoring the natural hydrology.	**Consistent**. Although soils on the Project site are not conductive to infiltration, the proposed Project incorporates biotreatment BMPs to address LID requirements for reducing runoff and pollution. Runoff from the site's development areas would be conveyed as surface flow toward and onto the public right-of-way. Runoff would then be concentrated in the gutter and directed into one of the proposed water quality basins via a network of underground storm drain pipes. The basins would outlet through a series of modular wetland systems by BioClean for treatment prior to discharging into the municipal storm drain system.
WQ 1.4 Protection of Water Bodies. Require new development to protect the quality of water bodies and natural drainage systems consistent with the City's NPDES	**Consistent**. The proposed Project would comply with current NPDES requirements to treat stormwater runoff prior to discharge into the natural drainage systems.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
permit.	
WQ 1.5 New Development. Require new development to protect the quality of water resources and natural drainage systems through site design, and use of source controls, stormwater treatment, runoff reduction measures, best management practices, and LID techniques.	**Consistent**. As indicated in in discussion of Policy WQ 1.3, biotreatment BMPs would be incorporated into the Project design to meet water quality and runoff requirements. As discussed in Section 3.13, *Hydrology and Water Quality*, water quality would be protected through source controls, stormwater treatment, runoff reduction measures, BMPs, and LID techniques.
WQ 1.6 Site Development. Encourage site design and development to minimize lot coverage and impervious surfaces.	**Consistent**. Although the Specific Plan would increase the total amount of impervious surfaces within the Project site in comparison to the existing golf course use (see Section 3.13, *Hydrology and Water Quality*), the proposed Project would be consistent with this policy in that it proposes approximately 87 acres of parks and natural areas, encompassing more than half of the Project site, in addition to pervious surfaces on private lands (e.g., private parks, landscape areas such as yard areas and landscaping within multi-family and commercial uses.
E 1.1 Adequate Service and Facilities. Coordinate with energy service providers to supply adequate electricity and natural gas service and facilities are available to meet the demands of existing and future development.	**Consistent**. Southern California Edison and the Southern California Gas Company were provided with the proposed Project's Notice of Preparation and copies of this EIR for review and comment. Adequate electricity and natural gas service and facilities are available to meet the demands of the proposed Project.
E 1.3 New Utility Infrastructure. Require that new utility lines be constructed underground and along existing utility corridors.	**Consistent**. All new utility lines would be constructed underground.
E 2.2 Title 24 Energy Efficiency. Continue to enforce energy conservation measures and efficient design standards related to residential and nonresidential buildings as required by Title 24.	**Consistent**. Development within the Project site would be required to comply with Title 24 CalGreen energy conservation standards.
E 2.3 California Green Building Standards Code. Continue to enforce California Green Building Standards Code sustainable construction building practices in the planning, design, and energy efficiency of new construction in La Habra.	**Consistent**. Development within the Project site would be required to comply with Title 24 CalGreen energy conservation standards.
E 2.4 California Energy Code. Continue to enforce California Energy Code practices regulating and controlling the energy efficiency of buildings in La Habra.	**Consistent**. Development within the Project site would be required to comply with all applicable code requirements.
E 2.7 Energy Efficient Design. Encourage site, building, and landscape design that reduces exterior heat gain and heat island effects (e.g., building orientation and exposure, tree plantings, reflective paving materials, covered parking, cool roofs) to reduce energy demands.	**Consistent**. Included in the proposed Project's landscape plan is a street tree program that mandates the installation and on-going maintenance of street trees placed behind the sidewalk to provide substantially shaded sidewalks that would encourage walking.
E 2.8 Renewable Energy. Encourage the installation and construction of solar (photovoltaic) panel systems in private and public projects as a viable renewable energy source.	**Consistent**. Pursuant to the La Habra Climate Action Plan, the following measures would be required: • Electrical vehicle charging stations would be provided within the proposed the commercial and multi-family residential development; • Single-family residences would be designed to accommodate the installation of solar panel systems, and such solar panel

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
	systems would be offered to initial buyers as an option; • Solar panels would be installed on multi-family residential structures; and • Commercial structures would be designed with the ability to install solar panels.
E 2.9 Solar Access. Ensure, to the extent feasible, that sites, subdivisions, landscaping, and buildings are configured and designed to maximize solar access.	**Consistent**. As part of the City's design review process, the siting of individual structures would be reviewed for consistency with this policy.
E 2.10 Land Use Practices. Implement energy conserving land use practices (e.g., compact and mixed use development, bikeway and pedestrian paths, and transit routes and facilities).	**Consistent**. The proposed Project includes an extensive system of internal bicycle and pedestrian paths.
WR 1.2 AB 939 and 50 Percent Diversion. Continue to partner, plan for, and document compliance with AB 939 source reduction and recycling requirements of 50 percent diversion of solid waste from landfills.	**Consistent**. Approximately 170,000 cubic yards of buried concrete debris would be crushed on site and reused as backfill and road base instead of being hauled off-site to a landfill. Additional construction waste recycling practices would be implemented as part of Project development to recycle construction debris. Residents would participate in the City's AB 939 waste reduction program through curbside recycling and normal operations of the City waste hauler.
WR 1.4 Waste Diversion. Require recycling, composting, and waste separation to reduce the volume and toxicity of solid wastes sent to landfill facilities, with the objective of diverting non-hazardous waste through source reduction, reuse, and recycling.	**Consistent**. Waste diversion would be accomplished through the normal operations of the City's waste hauler, as well as through the implementation of the Waste Management Plan described in Section 3.17, *Utilities, Service Systems, and Water Supply*.
WR 1.6 New Construction and Recycled Materials Use. Encourage the use of recycled materials in new construction through the continued enforcement of the California Green Building Standards Code.	**Consistent**. Site demolition is anticipated to generate approximately 170,000 cubic yards of concrete, asphalt, and masonry that would be crushed on-site for use as road base or in deep fills. The remaining construction materials that cannot be crushed would be recycled to the extent feasible as part of existing waste diversion programs.
WR 1.7 Adaptive Reuse of Existing Buildings. Promote the adaptive re-use and integration of existing buildings in new development projects in lieu of demolition unless they are structurally deficient, inconsistent with the spatial needs and functions of the new use, consume excessive energy and water, and/or financially infeasible.	**Consistent**. The existing golf course clubhouse would be brought up to current code and reused for a Community Center.
WR 4.1 Recycling and Reuse of Construction Waste. Continue to enforce the waste management plan for certain construction and demolition projects to reduce landfill waste by diverting a minimum of 50 percent of the construction and demolition debris (e.g., concrete, asphalt paving, asphalt roofing, lumber, gypsum board, rock, and soil).	**Consistent**. Site demolition is anticipated to generate approximately 170,000 cubic yards of concrete, asphalt, and masonry that would be crushed onsite for use as road base or in deep fills. The remaining construction materials that cannot be crushed would be recycled to the extent feasible as part of existing waste diversion programs.
Chapter 5, Community Services	
OS 1.1 Natural Resource Preservation. Preserve open spaces for the protection and maintenance of La Habra's natural resources including watersheds, hillsides, and drainage corridors.	**Consistent**. The proposed Project preserves the hillsides that separate the existing Westridge neighborhood from the Project site. In addition, approximately 87 acres (58 percent) of the Project site would remain in open space, including preservation of

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
	the existing drainage course through the middle of the site.
OS 1.4 Aesthetic Buffer. Utilize open space to serve as an aesthetic buffer between different land uses, where feasible, including the preservation of slope embankments in hillside areas.	**Consistent**. The existing Westridge Golf Club currently serves as an open space, aesthetic buffer between the Westridge residential community to the south and the Westridge commercial center to the north. Although the proposed Project would convert the existing golf course to residential use, existing and new landscaped slope embankments, would remain in open space to buffer the Westridge residential community from nearby commercial uses.
OS 1.5 Open Space Provisions. Require that significant residential development projects and Specific Plans address and make provisions for adequate amounts of private and/or public passive open space and landscaping that is sensitive to retaining the character of the natural environment where applicable.	**Consistent**. Approximately 87 acres (58 percent) of the Project site would remain in open space. This area would consist of traditional parks, a Community Center, a linear park, and habitat preservation and wildlife viewing areas.
OS 1.6 Open Space Linkages. Link open space areas preserved for natural resources, other open spaces, and activity centers to help define urban form and beautify the City.	**Consistent**. The Specific Plan proposes an extensive system of bicycle and pedestrian paths to connect residential neighborhoods to parks and open space areas, including wildlife viewing areas adjacent to preserved sensitive habitats.
OS 2.1 Parkland Standard. Provide, maintain, and support open space resources including parks, recreational facilities, and open space at a ratio of 2.5 acres per 1,000 residents for active and passive recreational purposes to allow residents opportunities to enjoy physical and mental health.	**Consistent**. The proposed Specific Plan provides ~~25.1~~ 28.86 acres of public parkland, which would increase existing citywide public park acreage per 1,000 from 2.29 acres of park per 1,000 population to ~~2.64~~ 2.71 acres per 1,000 population, thereby achieving La Habra's citywide goal of 2.5 acres per 1,000 population of city-owned park land.
OS 2.2 Incentives for Additional Parklands. Encourage developers to provide land dedications for parks and improvements exceeding minimum City requirements in exchange for incentives established by the City.	**Consistent**. The proposed Project would dedicate and improve ~~25.1~~ 28.86 acres of public park land, which is substantially in excess of the ~~3.78~~ 4.13 acres of park land that would be required to be dedicated per the City's Municipal Code. In addition to active and passive public parks and trails, the Project would provide a public Community Center, habitat conservation areas, and wildlife viewing areas.
OS 2.4 Park Types. Maintain a diverse and accessible system of parks and recreation facilities throughout La Habra, which include mini parks designed to provide passive open space, neighborhood parks generally planned for younger children and family groups, and community parks offering a wide range of indoor and outdoor recreation opportunities.	**Consistent**. The proposed Project would provide a variety of park and recreation types, including a Community Center, open turf multi-use parks, linear parks, and natural resource conservation areas. In addition, the Project would provide private recreation amenities, including three pool complexes and trail connections.
OS 2.8 Privately Owned Open Space Areas. Enforce compliance with conditions placed on development projects where open space has been set aside for use as a recreational amenity for La Habra's residents and visitors.	**Consistent**. The proposed Project would result in the conversion of the existing Westridge Golf Club to the Rancho La Habra residential planned community. The existing golf club was approved as part of the La Habra Hills Specific Plan and included as a condition of approval. Consistency with this General Plan policy is proposed by the applicant to be achieved by amending the La Habra Hills Specific Plan to remove the golf course from that Specific Plan and its conditions of approval.
OS 2.10 Quimby Act Park Fees and/or In Lieu Dedication. Continue to enforce local ordinances that require subdivision developments with residential land uses including large high-density residential and mixed-use	**Consistent**. The proposed Project would dedicate and improve ~~25.1~~ 28.86 acres of public parkland, which exceeds Municipal Code requirements (~~78~~ 4.13 acres at a ratio of 3.0 acres

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
projects to contribute fees or dedicate land, or combination thereof, for development or rehabilitation of parklands or recreational facilities accurately reflecting the burden of the new development on the City's recreational facilities and programs.	per 1,000 residents).
OS 2.12 Compatibility. Ensure that parks, recreation, and community centers are located and designed for compatibility with adjacent uses addressing such issues as noise, lighting, and parking.	**Consistent**. The proposed Project would provide a trails system connecting residential neighborhoods to recreational facilities to reduce the need for vehicular travel, and would also provide for needed parking at recreational facilities. Development standards for noise generation and night lighting would reduce impacts to less-than-significant levels and ensure compatibility of the proposed Project's parks, recreational facilities, and Community Center with its residential neighborhoods.
OS 2.13. Sustainable Parks. Require that new parks are designed and existing parks are retrofitted over time to incorporate sustainable development and landscape practices that reduce water and energy consumption.	**Consistent**. The City will review the proposed design of all proposed public parks, including the design of landscaping and irrigation systems, as well as pedestrian and trail connections to ensure consistency with this policy. As documented in Section 3.10, *Energy Resources*, the Project's energy consumption impacts would be less than significant. As documented in Section 3.17, the proposed Project will result in a net reduction from existing water consumption.
OS 2.14 Healthy Parks. Require that new parks are designed and existing parks retrofitted over time to incorporate elements that enhance opportunities for residents to engage in vigorous recreational activities and improve their health.	**Consistent**. In addition to traditional sidewalks for pedestrians and use of streets for bicycle travel, the proposed Specific Plan provides for development of a 2.6-mile linear park trail corridor that would connect the residential neighborhoods to regional trails both to the west (Coyote Creek trail) and to the east (Idaho Street). Both the sidewalks and trail system would be thoroughly landscaped with an emphasis on shade trees to encourage walking. In addition, the trail system would include fitness, educational, and view amenities to further encourage pedestrian use.
OS 2.15 Accessible Facilities. When renovating and creating new recreational facilities, ensure accessibility standards are met as specified in state and federal laws such as the Americans with Disabilities Act (ADA).	**Consistent**. The proposed Project would comply with all applicable ADA standards.
OS 3.1 Recreational Programs and Services. Continue to provide a wide range of recreational programs and services for La Habra residents of all ages and abilities including passive, active, individual, team, and other organized opportunities.	**Consistent**. The proposed Project would remodel and refurbish the existing golf course clubhouse to a function as a public Community Center to accommodate meetings, regular gatherings, and special events. The facility would provide both indoor and outdoor meeting and gathering areas, as well as special amenities such as a boardwalk along the existing lake. This facility would allow the City to program a wide range of events for the public.
OS 3.2 Youth, Adults, and Seniors. Continue to provide community services and programs that meet the social, recreational, and health needs of individuals and groups including youth, adults, and seniors.	**Consistent**. The proposed conversion of the existing golf clubhouse to a public Community Center would expand opportunities for the City to provide community services and programs that meet the social, recreational, and health needs of its residents.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
OS 4.1 Connections. Connect recreational facilities, residential neighborhoods, and key commercial and activity centers, to the extent feasible, with walking paths, trails, and bikeways.	**Consistent**. In addition to traditional sidewalks along residential streets, the proposed Specific Plan provides for a 2.6-mile linear park trail corridor that would connect the proposed residential community to regional trails to the west (Coyote Creek trail) and to the east (Idaho Street). Both the sidewalks and trail system would be thoroughly landscaped with an emphasis on shade trees. The trail system would also include fitness, educational, and view amenities to further encourage pedestrian use.
S 1.1 School Capacity. Cooperate with school districts to ensure that school facilities with sufficient capacity are reserved, constructed, and phased to meet the needs of current and projected enrollment, as permitted by State law.	**Consistent**. The proposed 402 dwelling units would generate school-age children and would result in an increased demand for school services and facilities. Payment of mandatory developer fees has been deemed by the state legislature as adequate mitigation for impacts on school facilities.
S 1.2 Review of Development Proposals. Include school districts in the review of residential development proposals to ensure that projects adequately address school impacts and issues.	**Consistent**. As part of the initial Project planning, the Project applicant met with the school districts serving the site to discuss the proposed development. In addition, the school districts were previously provided with the Notice of Preparation and are also being provided with this EIR for their review and comment.
S 1.9 Developer Fees. Ensure that residential development fully mitigates its impact on school facilities through the payment of fees or other negotiated methods, as permitted by State law.	**Consistent**. The proposed Project would be required to pay all mandatory school impact fees prior to issuance of building permits.
PS 1.7 Security and Design Features. Require that security measures are integrated into the design of new development projects, and support the incorporation of Crime Prevention through Environmental Design (CPTED) principles, or other comparable concepts.	**Consistent**. The proposed Project includes the following elements implementing this General Plan policy: • Promotion of neighbor interaction and community safety through forward-facing architecture and appropriate front yard setbacks; • A front yard setback of 10 feet for porches and living area to encourage "eyes on the street" by bringing the living area forward and moving the garage farther back (18-foot setback); • A street tree program that mandates the installation and on-going maintenance of street trees placed behind the sidewalk to provide substantially shaded sidewalks to encourage walking, thereby increasing casual surveillance within residential neighborhoods; and • A landscape plan attuned to minimizing hiding areas in landscaped areas near sidewalks and buildings.
PS 1.8 Review of Development Proposals. Include the LHPD in the review of development proposals to ensure that projects adequately address crime and safety.	**Consistent**. The proposed Specific Plan and Design Review applications have been reviewed by the La Habra Police Department.
FS 1.2 Adequate Water Supply. Maintain adequate water supply and fire flow pressure for fire suppression in La Habra.	**Consistent**. The domestic water analysis included in Section 3.17, *Utilities, Service Systems, and Water Supply*, evaluates water supply and pressure requirements for fire suppression. Adequate water supply and fire flow pressure are available to serve the proposed Project.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
FS 1.5 Review of Development Proposals. Include the City's fire service provider in the review of development proposals to ensure that projects adequately address safe design and on-site fire protection.	**Consistent**. The proposed Project has been preliminarily reviewed by the Los Angeles County Fire Department, which provided an initial set of conditions of approval with which the proposed Project would comply. Further review will occur as part of the Design Review and building permitting process.
Chapter 6, Conservation/Natural Resources	
BR 1.1 Biological Resource Protection. Conserve and protect wildlife ecosystems, riverine corridors, and sensitive habitat areas including the sensitive plant species areas within the Westridge Golf Course.	**Consistent**. With the removal of the golf course, the proposed Project provides for natural resource conservation by retaining some of the existing habitat areas in place, relocating and enhancing others and providing additional habitat off-site. .
BR 1.2 Natural Community Conservation Plan and Habitat Conservation Plan. Continue to participate in and support the policies of the Central and Coastal Orange County Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP) as a multispecies/multi-habitat reserve system and long-term management program that primarily protects coastal sage scrub and the species that utilize coastal sage scrub habitat.	**Consistent**. While the proposed Project is within the overall Orange County Central and Coastal NCCP/HCP, the Specific Plan area is not located within a "sub-regional focus area" that would be protected by the Orange County Central and Coastal NCCP/HCP.
BR 1.5 Riparian Restoration. Work with federal, state, and/or local agencies to restore riparian communities along and within the established creek corridors and flood control channels where appropriate and feasible.	**Consistent**. The proposed Specific Plan provides for conservation of riparian habitats within the Project site. Furthermore, a water quality basin would be planted with native riparian and wetland vegetation designed to treat urban flows and attract wildlife.
BR 1.6 Urban Forest. Build upon existing streetscapes and develop an urban forest along the City's commercial and mixed-use streets and in neighborhoods that provides avian habitat, sequesters carbon monoxide emissions, is conducive to pedestrian activity, and provides shade.	**Consistent**. The proposed Specific Plan provides for enhanced landscape plantings along Beach Boulevard and Idaho Street.
BR 1.8 Tree Preservation. Encourage the preservation of trees in existing and new development projects that are suitable nesting and roosting habitat for resident and migratory bird species.	**Consistent**. EIR mitigation measures set forth in Section 3.5, *Biological Resources*, provide for protection of nesting and roosting habitat for resident and migratory bird species.
BR 1.10 Landscaping. Encourage landscaping that minimizes the need for herbicides and pesticides and that provides food, water, habitat, and nesting sites for birds and other beneficial insects that help maintain the environmental resources and restore the larger ecosystem.	**Consistent**. The Specific Plan includes details on landscape design that promote the use of drought-tolerant plant material. An arborist study of all trees within the property boundaries was conducted for the EIR, and trees that qualify for boxing and relocation have been identified. Irrigation would be subject to the new standards set forth by the State of California in response to the drought and would be designed with Smart Controllers and the use of trip or micro-spray. Turf areas within the Project site would be limited.
BR 1.11 Native Plant Use. Encourage the use of native and drought tolerant plant materials, including native tree species, in public and private landscaping and revegetation projects.	**Consistent**. The Specific Plan includes details on landscape design that promote the use of drought-tolerant plant material.
BR 1.12 Environmental Review. Ensure that the development and environmental review process is responsive to the preservation and protection of sensitive wildlife and plant species and other sensitive habitat communities.	**Consistent**. The proposed Project's effects on biological resources in relation to both direct and indirect loss of sensitive habitat areas during grading, as well as the effects of the proposed residential community and its activities on protected sensitive habitat areas, were evaluated as part of EIR preparation (see

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
	Section 3.5, *Biological Resources*). The analysis contained in Section 3.5, *Biological Resources*, focuses on ensuring that sensitive habitats would be protected and that no net loss of wetlands would occur.
BR 1.13 Site Assessments. Require site assessments for developments that may adversely affect sensitive biological resources and ensure that individual projects incorporate mitigation measures, as necessary, to reduce impacts.	**Consistent**. The proposed Project's effects on biological resources in relation to both direct and indirect loss of sensitive habitat areas during grading, as well as the effects of the proposed residential community and its activities on protected sensitive habitat areas, were evaluated as part of EIR preparation (see Section 3.5, *Biological Resources*). The analysis contained in Section 3.5, *Biological Resources*, focuses on ensuring that sensitive habitats would be protected and that no net loss of wetlands would occur.
W 1.1 Protection of Water Resources. Work with Orange County Public Works, private property owners, neighboring jurisdictions, and others as necessary to conserve undeveloped open space areas and natural drainage channels for the purpose of protecting water quality, groundwater recharges, and stormwater management in the City's watershed and waterbodies including Coyote Creek and La Mirada Creek.	**Consistent**. Storm runoff from the surrounding hillsides and from a portion of the Westridge community flows through the riparian corridor within the Project site and collects in the lake adjacent to the existing golf course clubhouse. This riparian corridor, which supports a variety of riparian plant species, would be protected. In addition, the detention/water quality basin would be planted with native riparian and wetland vegetation designed to treat urban flows and attract wildlife.
W 1.5 New Development and Post-Development Stormwater Runoff. Require new development and post-development stormwater runoff to control sources of pollutants and improve and maintain urban runoff water quality through site design, stormwater treatment and protection measures, and best management practices (BMPs) consistent with the City's National Pollutant Discharge Elimination System (NPDES) Permit.	**Consistent**. The proposed Project would comply with the City's NPDES requirements, which include the preparation of a SWPPP and a WQMP to address construction impacts (e.g., erosion), and delineate specific structural and non-structural BMPs to be undertaken as part of site development. Three detention and water quality treatment basins are included in the Project design to treat surface runoff and reduce peak flows.
W 1.7 Landscaping. Encourage public and private landscaping in new and rehabilitated development projects to be designed to reduce water demand, detain runoff, decrease flooding, and recharge groundwater through activities such as the selection of plant material, soil preparation, and the installation of irrigation systems.	**Consistent**. As previously indicated, the proposed landscape plan incorporates drought-tolerant plantings designed to reduce water demand. In addition, the proposed Project's drainage plan has been designed to minimize post-development runoff and detain runoff.
W 1.8 Pervious Surfaces. Encourage maximizing pervious surfaces within new or substantially renovated public, institutional, residential, commercial, and industrial development projects.	**Consistent**. Although the Specific Plan would increase the total amount of impervious surfaces within the Project site in comparison to the existing golf course use (see Section 3.13, *Hydrology and Water Quality*), the proposed Project would be consistent with this policy in that it proposes approximately 87 acres of parks and natural areas, encompassing more than half of the Project site, in addition to pervious surfaces on private lands (e.g., private parks, landscape areas such as yard areas and landscaping within multi-family and commercial uses
W 1.9 Percolation. Design landscaping and other open space areas in development projects to capture stormwater runoff and percolate into the groundwater basin, to the extent feasible.	**Consistent**. The Specific Plan proposes approximately 87 acres of parks and natural areas. Project geotechnical studies have determined that the Project site is not conducive to percolation and groundwater recharge due to low infiltration rates and the presence of buried contaminated soils.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
AQ 1.4 Air Quality Assessment and Monitoring. Cooperate with the California ARB and SCAQMD to measure air quality at emission sources and enforce the standards of the Clean Air Act for air quality and GHG emissions.	**Consistent**. The proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and project-related air emissions would be mitigated to less-than-significant levels.
AQ 2.1 Land Use and Urban Form. Reduce air pollution and GHG emissions by discouraging dependence on the private automobile; promoting development that is compact, mixed-use, pedestrian- and bicycle-friendly, and transit-oriented; improving the jobs-housing balance; promoting energy-efficient building design and site planning; using water-efficient systems; and comparable methods defined in the Land Use Section of the Community Development Chapter.	**Consistent**. While the proposed Project would increase emissions of air pollutants and GHG in comparison to the existing golf course, consistency with this policy would be achieved through implementation of substantial measures to reduce air pollutant and GHG emissions and promote energy-efficient building design, including the following: • Structures would be 20 percent more efficient than current (2017) Title 24 standards; • Electrical vehicle charging stations would be provided within the proposed commercial and multi-family residential development; • Single-family residences would be designed to accommodate the installation of solar panel systems, and such solar panel systems would be offered to initial buyers as an option; • 220-volt electrical wiring would be provided in garages suitable for installation of electrical vehicle chargers; • Solar panels would be installed on multi-family residential structures; • Commercial structures would be designed with the ability to install solar panels; • Outdoor electrical outlets would be provided on residential structures to facilitate use of electric landscape equipment; • Shading in commercial areas would be increased by 10 percent; • Heat gain in commercial and multi-family residential areas would be reduced by 50 percent; • Indoor potable water use would be reduced by 20 percent beyond the Energy Policy Act of 1992 fixture performance requirements; • Outdoor potable water use would be reduced by 50 percent from a mid-summer baseline average consumption for the uses proposed within the Project site through irrigation efficiency, native plant selection, and the use of recycled water and/or captured rainwater; • Overall, the proposed Project would result in a substantial reduction in water consumption compared to the existing golf course, thereby reducing air pollutant and GHG emissions related to water delivery; • The Project site is located adjacent to transit along Beach Boulevard; and • A system of pedestrian and bicycle trails connecting housing within the Project site to parks and recreational uses.
AQ 2.3 Development-Infrastructure Concurrency. Manage growth by ensuring the timely provision of infrastructure to serve new development.	**Consistent**. Implementation of the provisions of the proposed Specific Plan would ensure the timely provision of infrastructure to serve proposed development.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
AQ 2.4 Land Use-Air Quality Relationship. Implement zoning and land use practices that have a beneficial impact on air quality and reduce the impacts of climate change.	**Consistent.** The Rancho La Habra EIR includes substantial mitigation measures to reduce air pollutant emissions and to ensure that Project-related GHG emissions per service population would be less than the proposed South Coast Air Quality Management District (SCAQMD) efficiency threshold of 4.8 metric tons of carbon dioxide equivalents ($MTCO_2e$) per capita per year. Additionally, the Project will be required to implement all applicable measures from the La Habra Climate Action Plan, which would reduce air pollutant emissions and maintain consistency with this policy and citywide efforts to achieve GHG reduction targets.
AQ 2.6 Evaluate Air Quality Impacts. Evaluate the significance of air quality impacts from projects or plans as part of the environmental review process and establish necessary and appropriate mitigation requirements for project or plan approval.	**Consistent**. Air quality impacts are evaluated in Section 3.8, *Air Quality*. As outlined in that section, all feasible mitigation measures would be implemented.
AQ 2.7 New Development. Review proposed development applications to ensure that projects incorporate feasible measures to reduce construction and operational emissions for reactive organic gases (ROG), nitrogen oxides (NOX), and particulate matter (PM10 and PM2.5) through project design.	**Consistent**. Air quality impacts are evaluated in Section 3.8, *Air Quality*. As outlined in that section, all feasible mitigation measures would be implemented.
AQ 2.8 Emissions Reduction. Require development projects that exceed SCAQMD ROG and NOX operational thresholds to incorporate feasible measures through design and/or operational features that reduce emissions, where possible, to a less than significant level.	**Consistent**. Air quality impacts are evaluated in Section 3.8, *Air Quality*. As outlined in that section, all feasible mitigation measures would be implemented.
AQ 3.3 Private Development Infrastructure. Facilitate the use of renewable energy and water-efficient systems in residential, commercial, industrial, and other private development projects, provided that they are located and designed consistent with the character and quality of La Habra's neighborhoods and districts.	**Consistent**. As previously noted, the proposed Project would consume approximately 35 percent less water than the current golf course use and would include measures promoting the use of renewable energy.
AQ 5.1 Development Dust and Particulate Emission Control. Regulate development to reduce PM_{10} emissions from construction, demolition, and debris hauling to achieve compliance with federal standards.	**Consistent**. As identified in Section 3.8, *Air Quality*, the Project's PM_{10} emissions impacts would be mitigated to below a level of significance.
SM 1.1 Protect Scenic Views. Protect the viewsheds of the La Habra Basin, West Coyote Hills, Puente Hills, and the San Gabriel Mountains from public parks, major transportation corridors, and public open spaces.	**Consistent**. The proposed Project would not affect scenic vistas of the designated visual resources identified by the City of La Habra, including the La Habra Basin, West Coyote Hills, Puente Hills, and San Gabriel Mountains, as discussed in detail in Section 3.4, *Aesthetic Resources* (Section 3.4.5, Impact AES-1).
SM 1.2 Natural Topography. Preserve the scenic quality of La Habra's natural topography, hillsides, open space, and natural riverine areas.	**Consistent**. The Project is designed in such a manner that it respects existing topography, and the hillsides separating the Project site from the Westridge neighborhood to the south would be maintained. In addition, as discussed in Section 3.4, *Aesthetics*, the proposed Project would not block any scenic viewsheds.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
	While this policy speaks to preserving the visual qualities of La Habra's natural features, it should be noted that the proposed Project would result in the loss of privately-owned open space within the Westridge Golf Club.
SM 1.4 Recreational Viewing Areas. Locate and design recreational areas, parks, and trails in consideration of significant visual and scenic resources and to protect viewsheds of adjoining areas.	**Consistent**. The proposed Project would include a linear park located substantially below grade of existing homes but in a location that would provide views of important aesthetic resources. The design of the linear park includes benches and viewing areas that would enable future residents and visitors to enjoy distant views of the La Habra Basin, Puente Hills, and San Gabriel Mountains.
SM 1.5 Signage. Support building and site signage that is appropriate to the use and location and is not visually intrusive.	**Consistent**. The proposed Specific Plan includes design guidelines for signage and lighting that address size, materials, and related features to ensure that signage would not dominate the character of the area. Site-specific building and site signage would be reviewed for compliance with these design guidelines as part of the City's design review process to ensure compatible size and design.
SM 1.6 Lighting. Support practices that minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary including the design and siting of light fixtures.	**Consistent**. As discussed in Section 3.4, *Aesthetic Resources* (Section 3.4.5, Impact AES-4.1), implementation of the proposed Specific Plan would not create substantial new sources of nighttime lighting that would spill over onto sensitive uses (i.e., residences). The proposed Specific Plan includes design guidelines for Project lighting. All proposed lighting would be reviewed as part of the City's design review process for compliance with these guidelines to ensure that lighting nighttime lighting is necessary for safety or as an important design feature, and the design of lighting standards is consistent with adjacent residential architecture. Thus, proposed lighting would not be misdirected, excessive, or unnecessary.
SM 1.7 Night Sky Lighting. Permit the reasonable use of outdoor lighting for nighttime safety, utility, security, and enjoyment; minimize glare caused by limiting excessive or unnecessary outdoor lighting; conserve energy and resources; and protect the natural environment from the damaging effects of night lighting.	**Consistent**. As discussed in Section 3.4, *Aesthetic Resources* (Section 3.4.5, Impact AES-4.1), implementation of the proposed Specific Plan would not create substantial new sources of nighttime lighting. The proposed Specific Plan includes design guidelines for Project lighting. All proposed lighting would be reviewed as part of the City's design review process for compliance with these guidelines.
SM 1.8 Glare. Support practices in new developments that avoid the creation of incompatible glare or reflection through development design features.	**Consistent**. As discussed in Section 3.4, *Aesthetic Resources* (Section 3.4.5, Impact AES-4.2), implementation of the proposed Specific Plan would not create substantial new sources of daytime glare.
Chapter 7, Community Safety	
NH 1.1 Safety Standards. Enforce state and local seismic and geologic safety laws, standards, and guidelines, including the California Building Code, for site design and construction of new and renovated structures.	**Consistent**. All construction and development within the Project site would be required to comply with applicable provisions of the most recently adopted version of the California Building Code (including all related mechanical, electrical, and plumbing codes).
NH 1.2 Geotechnical Investigations. Require geotechnical investigations prior to approval of development in areas where the potential for geologic or seismic hazards exists	**Consistent**. A Geotechnical Report has been completed to analyze geotechnical conditions, including potential for seismic hazards such as ground shaking, landslides, liquefaction, expansive soils,

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
addressing, as appropriate, groundshaking, landslides, liquefaction, expansive soils, subsidence, and erosion and incorporate recommended mitigation measures to reduce or avoid the identified hazards.	subsidence, and erosion. The mitigation measures recommended in the Geotechnical Report have been incorporated into this EIR and would be implemented to ensure that geologic and/or seismic impacts are reduced to a less-than-significant level.
NH 1.4 Reduce and Control Erosion. Require that development projects involving grading in hillside areas reduce and control erosion potential by utilizing rapid developing planting techniques, slope terracing, replacement with cohesive soils not subject to erosion, and/or the construction of slope drainage improvements.	**Consistent**. The Geotechnical Report prepared for the proposed Project includes recommendations for slope stability and erosion control that have been incorporated into the mitigation measures set forth in this EIR. Furthermore, the proposed Project is required to implement an extensive erosion control plan, including prescribing specific BMPs to reduce potential erosion.
NH 2.1 Urban/Wildland Interface. Locate, design, and construct development within or adjacent to areas subject to high wildland fire risks, such as La Habra's hillsides, to standards that reduce exposure and potential impacts.	**Consistent**. Proposed development is adjacent to a Very High Fire Hazard Severity Zone; however, a fire management plan (see Figure 3.12-2 in Section 3.12, *Hazards and Hazardous Materials*) would be implemented as approved by the Los Angeles County Fire Department. The fuel modification component of the fire management plan restricts certain species and densities of vegetation in more fire-prone locations of the Project site.
NH 2.2 Open Space Fire Suppression Access. Ensure existing access points to La Habra's open space areas are maintained for fire suppression.	**Consistent**. Adequate access points to the Project site, as required by the Los Angeles County Fire Department, would be maintained at all times.
NH 2.3 Fuel Modification and Vegetation Management Review. Continue to support the City's fire service provider's review of new development to assure it complies with fuel modification requirements, creation of defensible space, and incorporates appropriate plantings and proper vegetation management, as applicable.	**Consistent**. The proposed Project has been reviewed by the Los Angeles County Fire Department, which has provided conditions of approval that would be implemented as part of Project development. The fuel modification component of the fire management plan restricts certain species and densities of vegetation in more fire-prone locations of the Project site.
NH 3.1 Protection of People and Property. Adopt, maintain, and implement applicable federal, state, and local laws, standards, and guidelines to protect people and property from the risks of flooding.	**Consistent**. The proposed Project has been designed to detain storm flows such that discharge in the post-development condition is equal to or less than the pre-development condition, thereby minimizing the risk of downstream flooding.
NH 3.5 City Storm Drains. Design and construct storm drains per Orange County Public Works' standards and ensure that City-owned storm drains are operated and maintained to allow for maximum capacity of the system.	**Consistent**. All storm drainage facilities would be constructed in accordance with applicable County and City standards.
EP 1.5 Emergency Site Access. Require that roads, driveways, and other clearances around structures are located and designed to ensure emergency access.	**Consistent**. All roadways, driveways, and buildings would be designed so as to provide adequate clearances to ensure emergency access.
N 1.1 Land Use Compatibility. Restrict the development of noise-sensitive land uses (i.e., schools, medical centers and hospitals, senior centers, and residences) in areas with noise levels that exceed those considered clearly incompatible with the use, as shown in Figure 7-2 and Table 7-1 (Land Use Compatibility with Community Noise Environments), unless measures can be implemented to reduce noise to acceptable levels.	**Consistent**. As discussed in relation to Impact NOI-1.1, traffic along Beach Boulevard and Idaho Street would combine with commercial activities at the Westridge Plaza Shopping Center to exceed a Community Noise Equivalent Level (CNEL) of 60 A-weighted decibels (dBA), exposing future residential uses within the Project site to noise levels exceeding the City's land use compatibility noise standard. Proposed residential uses would not be located within areas exceeding applicable noise standards expect where noise is mitigated to acceptable levels.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
N 1.2 Noise Standards. Require noise attenuation for residential development where the projected exterior and interior noise levels exceed those shown in Table 7-2 (Residential Exterior and Interior Noise Standards).	**Consistent**. Mitigation measures have been prescribed to ensure that both interior and exterior noise levels in residential areas would comply with the City's land use compatibility guidelines and residential noise standards.
N 1.3 Noise Studies for New Development. Require an acoustical study for all new residential developments that lie within the 65 dBA noise contour based on projections of future noise conditions resulting from the Plan's traffic increases to ensure indoor levels will not exceed City standards. In addition, the City will continue to enforce the California Building Code for indoor noise levels.	**Consistent**. A noise study prepared for the proposed Project provides the basis for the analysis and determinations made in Section 3.11, *Noise and Vibratio*n, of this EIR. Additional noise analyses will be required to confirm compliance with the mitigation measures set forth in Section 3.11, *Noise and Vibration*.
N 1.4 Noise Attenuation through Building Design. Require measures that attenuate exterior and/or interior noise levels to acceptable levels to be incorporated into all development projects where current and/or future noise levels may be unacceptable.	**Consistent**. A noise study was prepared for the proposed Project to define locations of needed sound walls and other building design treatments to achieve City exterior and interior noise standards.
N 1.5 Noise Attenuation through Site Design. Require noise reduction features to be used in the site planning process for new projects where current and/or future noise levels may be unacceptable. The focus of these efforts will be site design techniques. Techniques include: • Designing landscaped building setbacks to serve as a buffer between the noise source and receptor. • Placing noise-tolerant land uses such as parking lots, maintenance facilities, and utility areas between the noise source and receptor. • Orienting buildings to shield noise-sensitive outdoor spaces from a noise source. • Locating bedrooms or balconies on the sides of buildings facing away from noise sources. • Utilizing noise barriers (e.g., fences, walls, or landscaped berms) to reduce adverse noise levels in noise-sensitive outdoor activity areas.	**Consistent**. Several design features have been incorporated into the Specific Plan to protect future residents from noise levels in excess of City standards. These design features include landscaped building setbacks to serve as a buffer between the noise source and residential uses, orientation of buildings to shield noise sources from outdoor living areas, and use of walls as noise barriers.
N 1.6 Noise Between Adjacent and Mixed Uses. Require that mixed-use and multi-family residential developments demonstrate adequate isolation of noise between adjacent uses through building design and location of loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noise sources away from the residential portion of the development.	**Consistent**. The noise analysis prepared for the proposed Project included analysis of noise between proposed residential uses and adjacent commercial development.
N 1.7 Interior Vibration Standards. Require construction projects anticipated to generate a significant amount of vibration to ensure acceptable interior vibration levels at nearby residential and commercial uses based on current City or Federal Transit Administration (FTA) criteria.	**Consistent**. A vibration analysis was undertaken for the proposed Project. As discussed in Impact NOI-2 in Section 3.11, *Noise and Vibration*, because local ground attenuation would provide sufficient dampening of vibration from construction equipment to below commonly used human perception and building damage thresholds within existing residential neighborhoods, the impact would be less than significant.
N 1.8 Construction Noise. Require development projects subject to discretionary approval to assess potential	**Consistent**. Construction noise was evaluated as part of the Project noise study. Based on this analysis, all feasible mitigation

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.	measures as specified in Mitigation Measures NOI-4a through NOI-4f in Section 3.11, *Noise and Vibration*, would be implemented.
N 3.1 Protection from Stationary Noise Sources. Continue to enforce interior and exterior noise standards to ensure that sensitive noise receptors are not exposed to excessive noise levels from stationary sources such as machinery, equipment fans, and air conditioning equipment.	**Consistent**. As discussed in Impact NOI-1.2 in Section 3.11, *Noise and Vibration*, implementation of Mitigation Measure NOI-1.2 would require implementation of adequate construction techniques to ensure that the City's interior noise standards would be achieved.
N 3.2 High-Noise Generating Uses. Require that bars, clubs, entertainment venues, and other uses characterized by high levels of patronage and activity be constructed and designed consistent with the City's noise standards to isolate noise to the interiors and limit perceptible exterior noise.	**Consistent**. Any proposed noise-generating uses within the Specific Plan area would be required to comply with City noise standards.
N 3.3 Compatibility with Parks and Recreation Uses. Limit the hours of operation for parks and active recreation uses in residential areas to minimize disturbances to residents.	**Consistent**. Park hours would be limited to ensure compatibility with adjacent residential uses.
N 3.5 Construction Activity Hours. Continue to enforce restrictions on the hours of construction activity to minimize impacts of noise and vibration on adjoining uses from the use of trucks, heavily drilling equipment, and other heavy machinery.	**Consistent**. Project construction would be limited to the hours between 7:00 a.m. and 8:00 p.m. on weekdays and Saturdays.
HW 1.3 Hazardous Material Disclosure. Require that essential information is provided to emergency service personnel of the known use and dangers of hazardous materials present in La Habra, in accordance with La Habra's Hazardous Material Disclosure Ordinance.	**Consistent**. All new uses within the Project site would be required to comply with the City of La Habra's Hazardous Material Disclosure Ordinance.
HW 1.4 Assessment of Known Areas of Contamination. Require new development in known contamination areas to perform comprehensive soil and groundwater contamination assessments, in accordance with applicable regulations, and if contamination exceeds regulatory levels, require new development to undertake remediation procedures consistent with county, regional, and state regulations prior to any site disturbance or development.	**Consistent**. A Soils Management Plan for handling of site soils containing petroleum hydrocarbons has been reviewed and approved by the Orange County Health Care Agency. Management of contaminated soils on-site is also addressed in Section 3.12, *Hazards and Hazardous Materials.*
HW 1.5 Remediation of Known Sites. Require that businesses and property owners of known hazardous materials contamination and waste sites develop and implement a remediation plan to investigate, facilitate, and manage the cleanup in coordination and compliance with Orange County, state, and/or appropriate federal agency requirements including the California Department of Toxic Substances Control (DTSC).	**Consistent**. A Soils Management Plan for handling of site soils containing petroleum hydrocarbons has been reviewed and approved by the Orange County Health Care Agency. Management of contaminated soils on-site is also addressed in Section 3.12, *Hazards and Hazardous Materials.*
HW 1.6 Hazardous Materials Business Plan. Require that owners and/or operators of facilities that handle hazardous materials or a mixture containing hazardous materials having a quantity equal to or greater than 55 gallons for liquid, 500 pounds for solids, or 200 cubic feet of gas complete a Hazardous Materials Business Plan (HMBP) to minimize the potential for accidents involving hazardous	**Consistent**. The residential and small-scale commercial uses proposed for the Project site would not typically meet the criteria for a business plan set forth in Policy HW 1.6.

Table 3.2-2
Project Consistency with Applicable La Habra General Plan Policies

La Habra General Plan Policies	Project Consistency
materials and to facilitate an appropriate response to possible hazardous materials emergencies pursuant to the California Hazardous Materials Release Response Plans and Inventory Law (Business Plan Act).	
HW 1.7 Project Review. Review all proposed development projects that manufacture, use, or transport hazardous materials and waste in coordination with appropriate state and federal agencies.	**Consistent**. Analysis of the potential for routine use and transportation of hazardous materials and waste, as well as analysis of potential risk of upset and accidents related to hazardous materials, is provided in Section 3.12, *Hazards and Hazardous Materials*.
Housing Element	
Policy A-4: Variety of Housing. Promote a variety of housing types at scales, values, and locations carefully selected to provide housing opportunities for all economic segments of the population, while emphasizing the protection and conservation of existing single family neighborhoods.	**Consistent**. The Project provides both single-family and multi-family housing types, with different size units and price points to attract a variety of homebuyers. In addition, the proposed Project will provide funding for lower income housing programs in the City.

Methodology

An inconsistency with a land use or planning policy is not necessarily an impact under CEQA and does not mandate a finding of significance. Therefore, while all inconsistencies with the La Habra General Plan are identified in **Table 3.2-3**, only those inconsistencies that would result in physical impacts were used in determining the significance of impacts related to General Plan consistency. These physical impacts related to land use and planning policies are considered in the evaluation of specific environmental topics in this EIR, including the following sections:

- 3.4 Aesthetic Resources
- 3.5 Biological Resources
- 3.6 Cultural Resources
- 3.7 Traffic and Circulation
- 3.8 Air Quality
- 3.9 Greenhouse Gas Emissions
- 3.10 Energy Resources
- 3.12 Hazards and Hazardous Materials
- 3.13 Hydrology and Water Quality
- 3.14 Geology, Soils, and Seismicity
- 3.15 Public Services
- 3.16 Recreational Resources
- 3.17 Utilities, Service Systems, and Water Supply

The evaluations contained in **Table 3.2-2** related to consistency with policies that do not result in physical impacts represent factors that the Lead Agency and Responsible Agencies will consider in their planning reviews of the proposed Specific Plan, along with subsequent site-specific development. To determine whether a significant impact would result from the proposed Project, inconsistencies with the General Plan were first evaluated. A significant

impact would result if any identified General Plan inconsistency would lead to one of more significant physical environmental impacts.

Impact Assessment

Table 3.2-2 lists the relevant policies from the City of La Habra General Plan and evaluates the proposed Specific Plan's consistency with those policies.

Significance Conclusion for Impact LUP-2.2

As noted in **Table 3.2-2**, the proposed Specific Plan would be inconsistent with certain policies of the La Habra General Plan resulting from an increase in the allowable buildout of the General Plan. This increase in General Plan buildout is reflected in significant physical effects in relation to aesthetics, air quality, GHG, and traffic. Impacts related to this increase in General Plan buildout are evaluated in Section 3.4, *Aesthetics and Visual Resources*, Section 3.7, *Traffic and Circulation*, Section 3.8, *Air Quality*, and Section 3.9, *Greenhouse Gas Emissions*, along with all feasible mitigation measures.

However, approval of the proposed General Plan Amendment would include the proposed Project in the General Plan's buildout, thereby achieving consistency between the proposed Project and the General Plan. Therefore, *no impact* would result in relation to General Plan consistency.

Mitigation Measures

Because no significant impacts would result, no mitigation measures are required.

Threshold LUP-2: **Conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.**

Impact LUP-2.3: **Although the proposed Project would increase the citywide GHG emissions identified in the City's Climate Action Plan (CAP) by ~~5,746.61~~ 8,095.99 $MTCO_2e$ in 2026 and 7,554.69 $MTCO_2e$ in 2030 $MTCO_2e$ annually, the proposed Project would not impede achievement of the CAP's GHG emissions reduction goals, which are based on AB 32 targets. Because (1) the proposed Project would implement all applicable GHG reduction measures set forth in the Climate Action Plan and (2) emissions per service population would be consistent with AB 32 goals as discussed in Section 3.9, *Greenhouse Gas Emissions*, the proposed Project would be consistent with the adopted City's Climate Action Plan. Impacts would therefore be *less than significant*.**

Methodology

A significant impact would occur if the proposed Specific Plan would fail to implement applicable GHG reduction measures set forth in the City's CAP.

In addition to the threshold identified above, a significant impact would occur if the proposed Specific Plan would impede achievement of the Year 2020 GHG reduction goals set forth in the City's CAP consistent with the provisions of AB 32. The proposed Project would impede achievement of the CAP's Year 2020 GHG reduction goals if Project-related emissions per service population[2] would exceed the SCAQMD's proposed efficiency threshold of 4.8 $MTCO_2e$ per service population per year (SCAQMD 2010).

Impact Assessment

As discussed in Section 3.9, *Greenhouse Gas Emissions* (Impact GHG-2), the proposed Project would implement all applicable GHG reduction measures set forth in the City's CAP.

Although the proposed Project would increase the total amount of citywide Year 2020 GHG emissions as reported in the CAP by 5,746.61 $MTCO_2e$ annually, the Project would not impede the City's achievement of the GHG emissions reduction targets set forth in AB 32. As discussed in Impact GHG-2, per service population GHG emissions from the proposed Project would be 4.21 $MTCO_2e$ per year (4.08 $MTCO_2e$ if Planning Area 5 were to be developed with 46 residential units rather than 20,000 s.f. of commercial use). Because these per service population GHG emissions are less than SCAQMD's recommended threshold of 4.8 $MTCO_2e$, the proposed Project would not impede achieving citywide GHG emissions reductions to a sufficient degree as to meet AB 32 GHG emissions reduction targets.

Significance Conclusion for Impact LUP-3

Because all applicable GHG reduction programs set forth in the City's CAP will be implemented, and the proposed Project would not impede achievement of citywide GHG emissions reduction targets set forth in AB 32, impacts would be *less than significant*.

Threshold LUP-3:	**Conflict with any applicable habitat conservation plan or natural community conservation plan.**
Impact LUP-3:	**The Specific Plan area is not located within a "sub-regional focus area" that would be protected by the Central and Coastal Orange County Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP). Therefore, *no impact* would result.**

[2] "Service population" equals the total number of residents and employees within a development.

Methodology

A significant impact would result if development of the proposed Specific Plan would conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan to which the site is subject. This evaluation involves a two-step process of determining (1) whether the Project site is within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan; and (2) if so, whether the Project is within an area proposed for conservation and is consistent with any applicable policies or provisions of the plan.

Impact Assessment

The Central and Coastal Orange County Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP) and its associated implementation agreement cover 13 cities in Orange County, including the City of La Habra. The NCCP/HCP, which was adopted in 1996, was intended to create a multi-species/multi-habitat reserve system and implement a long-term management program that will protect coastal sage scrub and the species that use this habitat. The purpose of the NCCP/HCP is to take a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP/HCP program focuses on the long-term stability of wildlife and plant communities for which large tracts of land have already been set aside for permanent preservation. While the City of La Habra participates in the NCCP/HCP, the Project site is not located within a "sub-regional focus area" that would be protected by the plan.

Significance Conclusion for Impact LUP-3

Because the Specific Plan area is not located within a "sub-regional focus area" that would be protected by the NCCP/HCP, the proposed Project would be consistent with the NCCP/HCP, and no impact would result.

3.2.6 REFERENCES – LAND USE AND PLANNING

California Department of Fish and Wildlife (CDFW), *Natural Community Conservation Plan & Habitat Conservation Plan County of Orange, Central/Coastal Subregions*, July 17, 1996. Accessed at: https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Orange-Coastal.

City of La Habra, *City of La Habra General Plan 2035,* adopted January 21, 2014. Accessed June 2, 2017: http://www.lahabracity.com/320/General-Plan-2035.

City of La Habra, *City of La Habra General Plan Housing Element 2014-2021*, adopted January 21, 2014. Accessed June 2, 2017: http://www.lahabracity.com/DocumentCenter/Home/View/194.

SCAQMD Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group Meeting #15, September 28, 2010 http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf

Southern California Association of Governments (SCAG), *SCAG Proposed Final RTP/SCS*, 2016. Accessed June 2, 2017: http://scagrtpscs.net/Documents/2016/proposed/pf2016RTPSCS.pdf.

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3.3 POPULATION AND HOUSING

3.3.1 INTRODUCTION

a. Overview

This section describes the existing and projected population, housing, and employment characteristics of the Project site, and examines the potential for the proposed Rancho La Habra Specific Plan to (1) induce substantial unplanned population growth either directly or indirectly, or (2) displace existing housing or people.

Although evaluation of population, housing, and employment typically involves economic and social issues, rather than physical environmental issues, population, housing, and employment growth are often precursors to physical environmental impacts. Because growth in population, housing, and employment can be perceived as either positive or negative, depending on individual and collective values and viewpoints, the analysis set forth in this section reports projected changes in population, housing, and employment relative to adopted regional projections.

b. Definitions

- **Affordable Housing**, under state statutes, refers to housing that costs no more than 30 percent of gross household income. Housing costs include rent or mortgage payments, utilities, taxes, insurance, homeowner association fees, and other related costs.
- **California Department of Housing and Community Development (HCD)** is the state agency responsible for administering state-sponsored housing programs and for reviewing city and county housing elements to determine compliance with state housing law.
- **Household** refers to an occupied dwelling unit, including all persons living in the dwelling unit, whether or not they are related. Both a single person living in an apartment and a family living in a house are considered households.
- **Housing Unit or Dwelling Unit** is a room or group of rooms designed to be occupied by one or more individuals living separately from others, containing private toilet and kitchen facilities, and having direct access to the outside or to a public hallway.
- **Jobs-Housing Ratio** is a general measure of the "balance" between the number of jobs and number of housing units within a geographic area, without regard to economic constraints or individual preferences. The ratio expresses quantitatively the relationship between the number of people working and number of dwelling units housing the people living in a given area.
- **Regional Housing Needs Assessment (RHNA)** is a state-mandated process for determining how many housing units, including affordable units, each community must plan to

accommodate to provide housing for all economic segments of the community. The Southern California Association of Governments (SCAG) is responsible for working with HCD to determine the amount of housing needed within the region. SCAG allocates regional total housing needs among city and county jurisdictions within the Southern California area. Allocations are based on factors that consider existing employment, employment growth, household growth, and the availability of transit; need is determined for households in all income categories from very low to above moderate. Specific allocations are defined for very-low-, low-, moderate-, and above- moderate-income groups, which are defined as follows:

  - **Very Low Income**: Household income less than 50 percent of the county median income.
  - **Low Income**: Household income between 50.1 and 80 percent of the county median income.
  - **Moderate Income**: Household income between 80.1 and 120 percent of the County median income.
  - **Above Moderate Income**: Household income greater than 120 percent of the County median income.

- **Southern California Association of Governments (SCAG)** is the regional planning agency for the six-county Southern California area. Among other responsibilities for transportation and environmental quality planning, SCAG is responsible for preparing the RHNA and the regional Sustainable Communities Strategy.

3.3.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Rancho La Habra Specific Plan is subject to a range of state, regional, and local plans, policies, and regulations, which are described below.

a. State Plans, Policies, and Regulations

Senate Bill 375

Adopted into law in 2008, Senate Bill (SB) 375[1] links regional transportation and housing planning with state greenhouse reduction goals. The law requires the California Air Resources Board to establish, for each region of the state, greenhouse gas (GHG) reduction targets for the

[1] SB 375 amended California Government Code Sections 65080, 654000, 65583, 65584.01, 65584.02, 65584.04, 65587, and 65588; added Government Code Sections 14522.1, 14522.2, and 65080.01; amended Public Resources Code (PRC) Section 21063; and added PRC Section 21159.28 and Chapter 4.2 (commencing with Section 21155) to Division 13 of the PRC relating to environmental quality.

automobile and light truck sector, and requires the regional transportation plan for each region to include a Sustainable Communities Strategy (SCS) to achieve its GHG reduction target.

The law assigns responsibility for developing the SCS for Southern California to SCAG. The SCS must identify the general location of uses, residential densities, and building intensities in the region and identify areas within the region that will house all of the region's population, including all economic segments of the population, taking into account migration into the region and population growth, over the next 8 and 25 years. SB 375 requires regional SCSs to forecast development patterns that, when integrated with the region's transportation system, achieve statewide GHG reduction targets.

State of California Housing Element Requirements

California Housing Element Law (Government Code Section 65580, et seq.) requires cities and counties to include, as part of their general plans, a housing element to address housing conditions and needs in the community. The housing element law requires HCD, in consultation with each regional council of governments, to determine each region's existing and projected housing need. The regional council of governments in turn develops a regional housing allocation plan that distributes the need for new housing for all economic segments of the region to the cities and counties within the region. Allocations are based on factors that consider existing employment, employment growth, household growth, and the availability of transit; need is determined for households in all income categories from very low to above moderate (SCAG, 2012). Cities and counties are required to plan for their allocated number of housing units within the housing elements of their general plans. Housing elements are required to be updated every eight years, following timetables adopted by the state. Each agency's housing element must identify and analyze existing and projected housing needs and "make adequate provision for the existing and projected needs of all economic segments of the community," among other requirements.

b. Regional Plans, Policies, and Regulations

Southern California Association of Governments

SCAG is the federally designated "Metropolitan Planning Organization" for the six-county Southern California region, which consists of Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial counties. SCAG is responsible for developing regional plans for transportation, growth management, and hazardous waste management, as well as for developing a regional growth forecast that is the foundation for these plans and for the regional air quality plan developed by the South Coast Air Quality Management District (SCAQMD). SCAG prepares several plans to address regional growth, including the Regional Comprehensive Plan and Guide, the Southern California Compass Growth Vision, the Regional Housing Needs Assessment, the Regional Transportation Plan (RTP), the Regional

Transportation Implementation Plan (RTIP), and annual State of the Region reports to measure progress toward achieving regional planning goals and objectives.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that was adopted by SCAG on April 7, 2016 is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals by focusing new housing and employment near existing transit, so that the region can grow sustainably. The 2016 RTP/SCS Goals that are relevant to the proposed Specific Plan include the following:

1. Align the plan investments and policies with improving regional economic development and competitiveness.
2. Maximize mobility and accessibility for all people and goods in the region.
3. Ensure travel safety and reliability for all people and goods in the region.
4. Preserve and ensure a sustainable regional transportation system.
5. Maximize the productivity of our transportation system.
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
7. Actively encourage and create incentives for energy efficiency, where possible.
8. Encourage land use and growth patterns that facilitate transit and active transportation.

The 2016 RTP/SCS Land Use Policies that are relevant to the proposed Specific Plan include the following:

- **Identify regional strategic areas for infill and investment**: Identify strategic opportunity areas for infill development of aging and underutilized areas and increased investment in order to accommodate future growth. This strategy makes efficient use of existing and planned infrastructure, revitalizes communities, and maintains or improves quality of life. Strategic areas are primarily identified as those with potential for transit-oriented development, existing and emerging centers, and small mixed-use areas.
- **Develop "Complete Communities":** Create mixed-use districts or "complete communities" in strategic growth areas through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other. Focusing a mix of land uses in strategic growth areas creates complete communities wherein most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.
- **Plan for additional housing and jobs near transit:** Pedestrian-friendly environments and more compact development patterns in close proximity to transit serve to support and

improve transit use and ridership. Focusing housing and employment growth in transit-accessible locations through this transit-oriented development approach will serve to reduce auto use and support more multi-modal travel behavior.

- **Plan for changing demand in types of housing:** Shifts in the labor force, as the large cohort of aging "baby boomers" retires over the next 15 years and is replaced by new immigrants and "echo boomers," will likely induce a demand shift in the housing market for additional development types such as multi-family and infill housing in central locations, appealing to the needs and lifestyles of these large populations.
- **Continue to protect stable, existing single-family areas:** Continue to protect stable existing single-family neighborhoods as future growth and a more diverse housing stock are accommodated in infill locations near transit stations, in nodes along corridors and in existing centers. Concurrently, focusing growth in central areas and maintaining less development in outlying areas preserves the housing option for large-lot single-family homes, while reducing the number of long trips and vehicle miles traveled to employment centers.

As part of a triennial process of updating the federally mandated RTP, SCAG is responsible for producing socioeconomic forecasts and developing, refining, and maintaining macro and small-scale forecasting models. These forecasts are developed in close consultation with a Technical Advisory Committee comprised of local government and other public agencies, the Department of Finance (DOF), County Transportation Commissions, and other major stakeholders. The forecasts are developed in five-year increments. The current SCAG projections are provided through the year 2040. The forecast is relied upon for preparation of the RTP, Air Quality Management Plan, RTIP, and RHNA. Consistency with the growth forecast, at the sub-regional level, is one criterion that SCAG uses in exercising its federal mandate to review "regionally significant" development projects for conformity with regional plans. SCAG's 2016 forecast estimates an increase in La Habra's population from 61,100 with 19,000 households in 2012 to 68,500 with 21,700 households in 2040. These household forecasts represent a growth of approximately 12.1 percent in population and 14.2 percent in households, indicating a shrinking overall household size.

Regional Housing Needs Assessment

State law requires that jurisdictions provide their fair share of regional housing needs. HCD is mandated to determine the state-wide housing need. In cooperation with HCD, local governments and councils of governments (COGs) are charged with determining existing and projected housing need as a share of the state-wide housing need of their city or region.

The RHNA is an assessment process performed periodically as part of housing element and general plan updates at the local level. The RHNA quantifies the housing need by income

group[2] within each jurisdiction during specific planning periods. The RHNA identifies the existing and future housing need among income categories, for each city and county in the region. Each city and county must ensure that their current zoning regulations and inventory of land available for the development of housing allow for those units to be built. The RHNA does not stipulate that the units be built, only that the land be available and the appropriate zoning regulations are in place. The fifth cycle RHNA Allocation Plan, which covers the planning period from October 2014 to October 2021, was adopted by the SCAG Regional Council on October 4, 2012. The adopted fifth cycle RHNA for La Habra indicates the following housing needs for the 2014-2021 period:

- Total Household Growth: 135 dwelling units
- New Housing Construction Needed: 4 dwelling units
  - Very Low Income: 1 dwelling unit
  - Low Income: 1 dwelling unit
  - Moderate Income: 1 dwelling unit
  - Above Moderate Income: 1 dwelling unit

In addition to the City's 2014-2021 RHNA allocation, the City was required to "roll over" 76 lower income units from the prior 2008-2014 Housing Element planning period, because the City did not amend its General Plan and Zoning Ordinance to increase the maximum residential density to a minimum of 30 dwelling units per acre in the R-4 zone and the La Habra Boulevard Specific Plan area in order to accommodate future affordable housing within the necessary timeframe.

c. Local Plans, Policies, and Regulations

La Habra General Plan, Chapter 2, Community Development

The City of La Habra's (City) General Plan anticipates and plans for future growth in the City as expressed in Policy LU 1.2:

> **LU 1.2 Development Capacity**. Accommodate the type and density of land uses depicted on the Land Use Diagram to a cumulative (existing and new) maximum of 24,850 housing units and 12,525,000 square feet of commercial and industrial development citywide. These represent increases of 4,213 units and 4.1 million square feet respectively above January 2011 existing development.

[2] "Income groups" are defined based on household income in relation to the county's median income, and include very low income (less than 50 percent of county median income), low income (50.1 to 80 percent of county median income), moderate income (80.1 to 120 percent of county median income), and above moderate income (more than 120 percent of county median income).

La Habra General Plan, Chapter 3, Mobility/Circulation

The City's General Plan also acknowledges the importance of the regional SCS in Policy TDM 1.1:

> **TDM 1.1 Sustainable Communities Strategy**. Support consistency with the Orange County Sustainable Communities Strategy (OC SCS) and SCAG RTP/SCS by providing an integrated land use and transportation plan to meet mandated emissions reduction targets consistent with SB 375.

La Habra General Plan Housing Element

The current La Habra General Plan Housing Element was adopted on January 28, 2014, and was certified by HCD as being in compliance with applicable requirements on February 5, 2014. The Housing Element sets forth goals, policies, and programs to address the City's existing and projected need for housing in the community in terms of affordability, availability, adequacy, and accessibility, pursuant to state law. The goal and supporting policies in the Housing Element that are relevant to the proposed Specific Plan include the following:

GOAL STATEMENT A[3]: NEW HOUSING

> Adequate housing development by the private sector utilizing existing community facilities and structures; minimizing environmental hazards and incompatible land uses, and enhancing the quality of life in residential neighborhoods to meet the economic, social, health, and transportation needs of all citizens.
>
> **Policy A-1: Support State Housing Policy**. Support State Housing policy by emphasizing, "…the use of those public powers which impact on housing, including, but not limited to land use controls, development controls, and regulatory concessions and incentives."
>
> **Policy A-2: Integrated Strategy for Development**. Continue to implement an integrated strategy for the development of new housing, commercial activities, provisions of public facilities, and creation of employment opportunities.
>
> **Policy A-3: Support Private Sector Housing Production**. Facilitate the efforts of the private sector in the production of new housing for all economic segments of the community.

[3] Goal and policy numbering reflects the numbering included in the Housing Element as it was originally adopted and reviewed by the California Department of Housing and Community Development. Numbering of goals and policies was subsequently revised when the Housing element was incorporated into the City's comprehensive General Plan.

Policy A-4: Variety of Housing. Promote a variety of housing types at scales, values, and locations carefully selected to provide housing opportunities for all economic segments of the population, while emphasizing the protection and conservation of existing single family neighborhoods.

Policy A-5: Market and Non-Market Housing Production Needs. Achieve, to the maximum extent feasible, the production of new housing in sufficient quantity to meet both market-rate and non-market rate housing needs of the community.

Policy A-6: Land Use and Housing Components for Jobs/Housing Balance. Implement, through the Community Development Element, a comprehensive set of strategies to produce job/housing balance.

Policy A-7: Inclusionary Housing. Explore the development of an inclusionary housing ordinance.

Policy A-8: Mixed Use Development. Support and encourage the development of affordable residential housing as part of the City's mixed-use land use designations.

As required by the California Government Code, Housing Elements must contain an "inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites." To that end, the La Habra 2014-2021 Housing Element compiles analysis from the City's General Plan 2035, the City's 2005-2010 Consolidated Plan, the state DOF estimates, SCAG's 2012 RHNA, and the 2010 Census. The City inventoried vacant land and potential redevelopment opportunities to meet the RHNA housing requirement.

The adopted Housing Element states that the City's housing stock "will primarily grow as a result of new infill development on residentially zoned vacant land and through the densification of residential land uses as a result of the 2035 General Plan residential land use designation appropriations." According to the Housing Element, the City's land inventory could accommodate a total of 356 new housing units on currently vacant parcels within the City. The vacant land inventory therefore could accommodate the City's 2014-2021 RHNA of 4 units in addition to the 76 lower-income units that were required to be rolled over from the previous Housing Element planning period, with a surplus capacity of 276 units. The Housing Element therefore demonstrates an adequate inventory of land for the production of housing for all economic segments of the community through 2021.

Under Government Code Section 65583(b), the City is required to establish quantified objectives for future housing growth. Government Code Section 65583(b) states: "The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income, that can be constructed, rehabilitated, and conserved over a five-year time period." Housing Element Table 39 shows the quantified objectives for construction of new housing between 2014 and 2021 to be 395 dwelling units as follows:

- Extremely Low Income: 20 dwelling units
- Very Low Income: 40 dwelling units
- Low Income: 100 dwelling units
- Moderate Income: 64 dwelling units
- Above Moderate Income: 171 dwelling units

According to the Housing Element, the new housing construction objective of 395 dwelling units "refers to the number of units that potentially may be constructed over the projection period given La Habra's land resources, constraints which cannot be mitigated or removed, and proposed programs. Such housing could be constructed on existing vacant sites or on land currently developed with other uses. The current construction of new housing on the site of the former La Habra City Hall provides an example of such development. The City's new housing construction objective is estimated based on an analysis of actual construction figures between 2008 and 2012 in La Habra and the City's SCAG regional housing needs allocation. In addition, the City's estimate of new housing construction assumes the housing market will improve modestly and result in some new housing growth tied to implementation of the 2035 General Plan land use designations and economic development strategies."

3.3.3 ENVIRONMENTAL SETTING

a. Regional and Local Population and Housing, 2015

As indicated in **Table 3.3-1**, according to 2016 DOF estimates, Orange County had a population of 3,152,376 in 2015, increasing by 142,144 people (4.7 percent) from 2010. Housing in the County included 1,069,456 dwelling units in 2015, representing an increase of 23,338 units (2.2 percent) in the five years between 2010 and 2015.

Table 3.3-1
Orange County and City of La Habra Population and Housing Growth Trends, 2010 and 2015

	2010	2015	Change (2010-2015)	% Change (2010 - 2015)
County of Orange				
Population	3,010,232	3,152,376	142,144	4.72%
Housing	1,046,118	1,069,456	23,338	2.23%
City of La Habra				
Population	60,223	61,905	1,682	2.79%
Housing	19,918	20,066	148	0.74%

Source: California Department of Finance, E-5 Population and Housing Estimates 2015, May 2015.

In comparison, La Habra had a population of 61,905 in 2015, which accounts for 2.1 percent of the total County population. From 2010 to 2015, the City's population increased by 1,682 (2.8 percent). Housing in the City included 20,066 dwelling units in 2015, representing an increase of 148 units (0.7 percent) in the five years between 2010 and 2015.

As indicated in **Table 3.3-2**, the total housing stock in the City of La Habra in 2015 (20,066 dwelling units) consisted of a mix of single-family and multi-family units, along with mobile homes.

Table 3.3-2
City of La Habra Housing Stock, 2010 and 2015

	2010		2015		Change
	Number	Percent	Number	Percent	(2010-2015)
Single-Family Detached	10,500	52.7	10,667	53.16	167
Single-Family Attached	1,509	7.58	1,509	7.75	0
Multi-Family (2-4 Units)	1,553	7.80	1,553	7.74	0
Multi-Family (5+ Units)	5,467	27.45	5,447	27.14	-20
Mobile Homes	889	4.46	891	4.44	2
Total	**19,918**		**20,066**		**148**

Note: Due to rounding, numbers might not add to totals.
Source: California Department of Finance, E-5 Population and Housing Estimates 2015, May 2015.

Vacancy rates and affordability of the housing stock are also key elements in the balance between supply and demand in the housing market. High vacancy rates usually indicate low demand and/or high prices in the housing market or significant mismatches between the desired and available types of housing. Conversely, low vacancy rates usually indicate high demand and/or low prices in the housing market. Vacancy rates that indicate a "market balance" (i.e., a reasonable level of vacancy to avoid local housing shortages, and appropriate price competition and consumer choice) generally range from 1 to 3 percent for single-family units and from 3 to 5 percent for multi-family units. The vacancy rate in 2015 in Orange County was 4.9 percent. The City of La Habra's vacancy rate was similar to the County's at 4.7 percent, which generally indicates that both areas have a balanced housing market in terms of demand and supply.

b. Regional and Local Population and Housing Projections

SCAG produces socioeconomic projections for Southern California, which are used to develop planning documents, such as the RTP/SCS, Air Quality Management Plan, and Regional Housing Plan. As shown in **Table 3.3-3,** SCAG projects that Orange County's population will increase by 12.66 percent and the number of households will increase by 13.74 percent between 2012 and 2040. The City of La Habra's population is projected to increase at a similar rate. The

City's population is anticipated to increase by 12.11 percent and the number of households by 14.21 percent. As shown in **Table 3.3-3**, SCAG projects population and housing growth in both Orange County and La Habra to be substantially less than for the Southern California region as a whole.

Table 3.3-3
Regional and Local Growth Projections

	2012	2040	Change (2012-2040)	% Change (2012– 2040)
Six-County SCAG Region				
Population	18,322,000	22,138,000	3,816,000	20.83%
Households	5,885,000	7,412,000	1,527,000	25.95%
Employment	7,440,000	9,872,000	2,432,000	32.69%
Employment to Households Ratio	1.26	1.33		--
County of Orange				
Population	3,072,000	3,461,000	389,000	12.66%
Households	999,000	1,135,000	136,000	13.74%
Employment	1,526,000	1,730,000	204,000	13.63%
Employment to Households Ratio	1.54	1.52		--
City of La Habra				
Population	61,100	68,500	7,400	12.11%
Households	19,000	21,700	2,700	14.21%
Employment	17,300	19,900	2,600	15.03%
Employment to Households Ratio	0.91	0.92		--

Source: SCAG 2016 Draft Growth Forecast by Jurisdiction.

SCAG's 2016 Employment Forecasts indicate a similar trend. Countywide employment is anticipated to increase by 13.61 percent between 2012 and 2040, while La Habra's employment base is anticipated to increase by 15.03 percent. Employment within the Southern California region as a whole is projected to increase by 32.69 percent over the same time period.

3.3.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of population and housing impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold POP-1 Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure); or

Threshold POP-2 Displace substantial numbers of housing units or people, necessitating the construction of replacement housing elsewhere.

3.3.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold POP-1: Induce substantial population growth.

Impact POP-1: Implementation of the proposed Rancho La Habra Specific Plan would generate population growth as the direct result of the housing proposed by the Specific Plan. While the proposed Project would not necessarily increase the City's projected growth rate through 2040, it would substantially increase La Habra's inventory of land for the development of housing, and therefore result in substantial population growth. Such population growth would exceed the growth projections used for preparation of the current regional Air Quality Management Plan, would therefore be inconsistent with that plan, and a significant impact would result. This increased population growth would also result in significant and unavoidable physical environmental effects in relation to aesthetics and visual resources, traffic and circulation, and greenhouse gas emissions. The resulting population and housing impact would therefore be *significant and unavoidable*.

Methodology

CEQA Guidelines Section 15064(e) states that a social or economic change generally is not considered a significant effect on the environment unless the changes can be directly linked to a physical adverse change. CEQA Guidelines Appendix G nevertheless indicates that a project would have a significant effect if it would induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). As a result, the analysis of impacts in relation to Threshold POP-1 focuses on population growth itself, rather than on the physical manifestations of population and employment growth, which are analyzed throughout this EIR.

Population impacts are based on an analysis of the number of residents anticipated at buildout of the proposed Specific Plan. The scale of population at buildout is then compared with official population growth forecasts for the City of La Habra. Population growth is considered in the context of local (La Habra General Plan) and regional (RTP/SCS, AQMP) plans that include or

are based on population projections. If the proposed Project would exceed applicable growth projections, the resulting growth would be considered "substantial," and a significant impact would result.

Impact Assessment

Direct Impacts

The Rancho La Habra Specific Plan proposes the development of 402 new dwelling units, which would result in a population increase of 1,206 persons based on the City's current household size of 3.0 persons per dwelling unit. If Planning Area 5 is developed with 46 multi-family dwelling units rather than for commercial use, the Rancho La Habra development would contain 448 dwelling units with an estimated population of 1,344.

SCAG estimates that, by 2040, La Habra would have a total population of 68,500, representing an increase of 7,400 residents over the City's estimated 2015 population of 61,100. The 1,206 people who would reside within the proposed Specific Plan at buildout (1,344 if Planning Area 5 were developed for residential use) are equivalent to 16.3 percent of the City's projected population increase (18.1 percent if Planning Area 5 is developed for residential use).

SCAG also estimates that, by 2040, La Habra would have a total of 21,700 households, representing an increase of 2,700 households from 2012. Assuming the City's 2015 vacancy rate remains at 4.7 percent, this projected increase in households corresponds to an increase of approximately 2,827 dwelling units. The 402 dwelling units proposed in the Rancho La Habra Specific Plan (448 dwelling units if Planning Area 5 were developed for residential use) represents 14.2 percent of this projected growth in needed housing (15.8 percent if Planning Area 5 is developed for residential, rather than commercial use).

The proposed Project would exceed the growth intensities allowed within the current "Open Space- Parks/Flood Channels" General Plan land use designation and result in a net increase in the City's overall development capacity. La Habra General Plan Policy LU 1.2 notes that the General Plan land use diagram provides for development of an increase of 4,213 units above January 2011 existing development. The proposed Rancho La Habra Specific Plan would increase this development capacity to 4,615 new dwelling units (4,661 dwelling units if Planning Area 5 were developed for residential use).

Indirect Impacts

Water, sewer, drainage, and roadway infrastructure proposed for the Rancho La Habra Specific Plan would be sized to serve only Project site development. Development of the proposed Specific Plan would not remove any impediments to development of other properties, and would not indirectly induce substantial population increases.

Construction of the Specific Plan development would include a need for construction labor. Due to the employment patterns of construction workers in Southern California, and the market for construction labor, construction workers are not likely to relocate their households as a consequence of the job opportunities presented by the Project. The construction industry differs from most other industry sectors. There is no regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often-lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day, which starts and ends earlier than a typical 8 am – 5 pm work day.

It is reasonable to assume that project-related construction workers (1) would be drawn from the existing labor force in the surrounding area, and (2) because a typical construction worker would be employed at several different construction sites during any given year, would not relocate their households' places of residence as a consequence of working at the Project site.

Significance Conclusion for Impact POP-1

As noted above, the adopted La Habra General Plan provides for an increase of 4,213 units above January 2011 existing development at buildout. By comparison, SCAG projections set forth in the regional RTP/SCS indicate an increase of 2,700 households from 2012 to 2040, which would represent an increase of approximately 2,827 dwelling units assuming the City's 2015 vacancy rate remains at 4.7 percent. The City's adopted Housing Element indicates that La Habra's vacant land inventory for the development of housing would accommodate 356 new dwelling units. Thus, the General Plan anticipated that future housing development would consist of "new infill development on residentially zoned vacant land and through the densification of residential land uses."

The proposed Project would increase the City's overall development capacity and provide for substantial growth beyond the General Plan's anticipated buildout. As noted in Section 3.8, *Air Quality*, this increase in overall development capacity would be above the growth projections used in preparation of the current South Coast Air Quality Management Plan (AQMP).

While the proposed Project would not induce substantial growth beyond the Project site, the direct population growth proposed by the Rancho La Habra Specific Plan would exceed the growth projections used for preparation of the current regional AQMP. Therefore, the proposed Specific Plan would be inconsistent with the AQMP, and a significant impact would result. This increased population growth would also result in significant and unavoidable physical environmental effects in relation to aesthetics and visual resources, traffic and circulation, and greenhouse gas emissions. Because there are no feasible mitigation measures available to achieve consistency with AQMP growth assumptions and avoid other significant and unavoidable impacts related to population growth, this impact would be *significant and unavoidable*.

Threshold POP-2: Displace housing or people, necessitating the construction of replacement housing elsewhere.

Impact POP-2: Implementation of the proposed Rancho La Habra Specific Plan would not result in displacement of existing housing or people that would necessitate the construction of replacement housing. *No impact* would result.

Methodology

Housing displacement impacts are based on an analysis of whether any dwelling units are anticipated to be demolished and would need to be replaced as part of the proposed Project. As described above, social or economic changes are generally not considered a significant effect on the environment unless such changes can be directly linked to a physical adverse effect. Therefore, impacts related to housing displacement are considered significant if the displacement results in the need for construction of replacement housing that would have the potential to create a significant physical change to the environment.

Impact Assessment

Currently, there is no housing within the Project site. Therefore, implementation of the proposed Rancho La Habra Specific Plan would not displace any existing housing or people, necessitating the construction of replacement housing elsewhere.

Significance Conclusion for Impact POP-2

Because no housing or people would be displaced, the construction of replacement housing elsewhere would be unnecessary. No impacts would therefore result, and no mitigation measures would be required.

3.3.6 REFERENCES – POPULATION AND HOUSING

City of La Habra, *City of La Habra General Plan 2035,* adopted January 21, 2014. Accessed June 2, 2017: http://www.lahabracity.com/320/General-Plan-2035.

City of La Habra, *City of La Habra General Plan Housing Element 2014-2021*, adopted January 21, 2014. Accessed June 2, 2017: http://www.lahabracity.com/DocumentCenter/Home/View/194.

SCAG (Southern California Association of Governments), *SCAG Proposed Final RTP/SCS*, 2016. Accessed June 2, 2017: http://scagrtpscs.net/Documents/2016/proposed/pf2016RTPSCS.pdf.

SCAG (Southern California Association of Governments), *SCAG 2012 Regional Housing Needs Assessment*, 2012. Accessed June 2, 2017: http://rtpscs.scag.ca.gov/Pages/Regional-Housing-Needs-Assessment.aspx.

State of California, Department of Finance, *State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011- 2015, May 2015.* Accessed June 2, 2017: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

3.4 AESTHETIC RESOURCES

3.4.1 INTRODUCTION

a. Overview

This section describes the existing visual setting for the proposed Rancho La Habra Specific Plan, and evaluates changes in the visual and aesthetic environment that would result from its implementation. The analysis focuses on visual changes that would be seen from public viewpoints, including scenic vistas; views of distinctive visual landmarks and scenic resources; and potential impacts of new sources of light and glare. Resources and impacts related to the character or visual quality of the site and its surroundings are also discussed in this section.

This EIR recognizes that assessing whether a proposed project's changes to existing conditions would result in comparatively better (substantially improved) or worse (substantially degraded) aesthetic quality is largely subjective. The analyses in this section, therefore, focus on the extent to which the proposed Rancho La Habra Specific Plan could change existing visual elements or features of the site and surrounding area, rather than on assessing whether such physical environmental changes are "good" or "bad."

b. Definitions

- **Aesthetic Resources** include a combination of numerous elements, such as landforms, vegetation, water features, urban design, and/or architecture, that impart an overall visual impression that is pleasing to, or valued by, its observers. Factors important in describing the aesthetic resources of an area include visual character, scenic resources, and scenic vistas. These factors together not only describe the intrinsic aesthetic appeal of an area, but also communicate the value placed upon a landscape or scene by its observers. These factors include the following:
    - **Scenic Resources**, which are visually significant hillsides, ridges, water bodies, and buildings that are critical in shaping the visual character and scenic identity of the Project site and surrounding lands.
    - **Scenic Vistas**, which are defined as panoramic views of important visual features, as seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. In relation to the proposed Rancho La Habra Specific Plan area, scenic vistas include views of the West Coyote Hills, La Habra Basin, Puente Hills, and San Gabriel Mountains.
    - **Visual Character**, which broadly describes the unique combination of aesthetic elements and scenic resources that characterize a particular area. An area's visual character can be

qualitatively assessed considering the overall visual impression or attractiveness created by the particular landscape characteristics. In urban settings, these characteristics largely include land use type and density; urban landscaping and design; architectural design; topography; and the visual prominence of natural and developed open spaces in relation to buildings, parking areas, streets, and above-ground infrastructure.

- **Glare** is the sensation produced by a source of brightness within the visual field that is sufficiently greater than the luminance to which the eyes are adapted to cause annoyance, discomfort, or loss of vision.

3.4.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Rancho La Habra Specific Plan is subject to a range of state and local plans, policies, and regulations,[1] which are described below.

a. State Plans, Policies, and Regulations

The California Department of Transportation (Caltrans) Landscape Architecture Program administers the Scenic Highway Program contained in the Streets and Highways Code, Sections 260-263. The intent of this program is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. The Project site is not within or visible from any existing designated or eligible scenic highway.

The nearest Designated Scenic Highway is the State Route 91 (SR-91) freeway between State Route 55 (SR-55) and the eastern Anaheim city limits, 10 miles southeast of the Project site. The nearest Eligible Scenic Highway is State Route 57 (SR-57), which is located over 4 miles east of the Project site (Caltrans 2016).

b. Local Plans, Policies, and Regulations

City of La Habra General Plan

The City of La Habra (City) General Plan addresses visual and aesthetics resources in its Conservation/Natural Resources Element. General Plan Goal SM1, Visual Resource Protection, states "Preserve significant visual and scenic resources that provide quality of life amenities and act as assets for recreation and commerce." Relevant land use, community identity, and scenic and resources policies are listed below.

[1] There are no federal regulations, plans, or policies applicable to aesthetics issues relevant to the Rancho La Habra Specific Plan.

Chapter 2, Community Development

LU 4.4 Design Review. Require design review that focuses on achieving appropriate form and function for new and redeveloped projects to assure compatibility with community character, while promoting creativity, innovation, and design quality.

LU 8.1 Neighborhood Identity. Maintain distinguishing characteristics, such as topography, parcel size, housing scale and form, and public streetscapes that differentiate La Habra's single-family neighborhoods.

LU 9.1 Character and Design. Design new and renovated multi-family residential to achieve a high level of architectural design and quality of life for residents, in consideration of the following principles:

a. Consistent architectural design treatment of all elevations, including those not visible from public places;

b. Design elevations of multi-family buildings facing public streets and pedestrian ways to exhibit a high level of visual interest and distinguish entries for separate residences as feasible for security and privacy;

c. Incorporate setbacks, modulate building mass, and design multi- family buildings and projects in consideration of the development patterns of the surrounding neighborhood.

LU 11.7 Architecture and Site Design. Require that new development and renovated or remodeled existing buildings in multi-tenant centers and corridors be located and designed to complement existing uses, as appropriate, and exhibit a high quality of architecture and site planning in consideration of the following principles:

a. Seamless connections and transitions with existing buildings, in terms of building scale, elevations, and materials;

b. Integration of signage with the buildings' architectural character;

c. Landscaping contributing to the appearance and quality of development;

d. Clearly delineated pedestrian connections between business areas, parking areas, and to adjoining neighborhoods and districts;

e. Incorporation of plazas and expanded sidewalks to accommodate pedestrian, outdoor dining, and other activities.

LU 11.8 Buffering Adjoining Residential Areas. Ensure commercial uses adjoining residential neighborhoods or in mixed residential and commercial developments be designed to be compatible with each other.

CI 1.4 Natural Setting. Maintain the City's hillsides and open spaces as elements that separate and distinguish La Habra from surrounding communities.

CI 2. Unique Sense of Place. Promote quality site, architectural, and landscape design that incorporates qualities and characteristics that make La Habra desirable and

memorable including varied architectural styles, tree-lined streets, distinctive parks and open spaces, and walkable blocks.

CI 2.2 Building Scale and Design. Require that buildings and sites are designed to exhibit a high level of visual quality and are sensitive to the human scale.

CI 2.3 Responsiveness to Context. Require building design that respects to the local context in scale, massing, and materials; is responsive to La Habra's climate; and considers the historic and cultural context of its neighborhoods.

CI 2.5 Attractive and Walkable Streets. Enhance the City's identity and image by tree planting and landscaping for the public rights-of-way and front setback areas of all major commercial and mixed-use districts and corridors.

CI 2.6 Sustainable Streetscapes. Develop a consistent palette of drought-tolerant and native street plantings, permeable hardscapes, and low energy lighting fixtures that contribute to a high quality visual environment, while distinguishing La Habra as a model of sustainability.

CI 2.10 Utility Undergrounding. Continue existing programs and seek additional funding to complete the undergrounding of La Habra's utilities.

CI 3.1 Sense of Community. Establish a common logo and design template that will be consistently used for signage of public rights-of-way, places, and buildings.

CI 3.3 Private Signage. Require that signage on private buildings be designed to exhibit a high quality of interest and visual appeal; be integrated into and reflect the building's architectural design character; and sized to not overwhelm its scale and mass.

Chapter 6, Conservation/Natural Resources

SM 1.1 Protect Scenic Views. Protect the viewsheds of the La Habra Basin, West Coyote Hills, Puente Hills, and the San Gabriel Mountains from public parks, major transportation corridors, and public open spaces.

SM 1.2 Natural Topography. Preserve the scenic quality of La Habra's natural topography, hillsides, open space, and natural riverine areas.

SM 1.4 Recreational Viewing Areas. Locate and design recreational areas, parks, and trails in consideration of significant visual and scenic resources and to protect viewsheds of adjoining areas.

SM 1.5 Signage. Support building and site signage that is appropriate to the use and location and is not visually intrusive.

SM 1.6 Lighting. Support practices that minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary including the design and sighting of light fixtures.

SM 1.7 Night Sky Lighting. Permit the reasonable use of outdoor lighting for nighttime safety, utility, security, and enjoyment; minimize glare caused by limiting excessive or unnecessary outdoor lighting; conserve energy and resources; and protect the natural environment from the damaging effects of night lighting.

SM 1.8 Glare. Support practices in new developments that avoid the creation of incompatible glare or reflection through development design features.

La Habra Municipal Code

Chapter 18.68 of Municipal Code Title 18 outlines the City's design review process, which is established to ensure that buildings, structures, signs, and landscaping will be in harmony with other structures and improvements in the vicinity of the proposed development. As outlined in this chapter, before any building or structure that requires design review is erected on any lot, design plans must be submitted to and approved by the City's Planning Commission subject to the provisions of this chapter.

Chapter 18.74, Neighborhood Preservation, Code Enforcement, and Abatement, requires the maintenance of commercial, industrial, and residential property in a manner that will further the stated goals of the City, including the promotion of aesthetic considerations and the protection of its citizens and their property. The chapter outlines the parameters for declaring a private property within the city a public nuisance and the guidelines for preventing such properties from becoming a public nuisance.

Several sections of the Municipal Code address night lighting, including the following:

Section 15.60.100 Multi-family dwelling lighting:

Lighting in multi-family dwellings shall be as follows:

A. Aisles, passageways and recesses related to and within the building complex shall be illuminated with an intensity of at least twenty-five one hundredths foot-candles at the ground level during the hours of darkness. Lighting devices shall be protected by weather-resistant and vandalism-resistant covers.

B. Open parking lots and carports shall be provided with a maintained minimum of one foot-candle of light on the parking surface during the hours of darkness. Lighting devices shall be protected by weather-resistant and vandalism-resistant covers.

Section 18.26.050 Special development standards:

8. Lighting. All lighting of buildings, landscaped parking areas or similar facilities shall be arranged so as not to reflect onto adjoining properties.

Section 18.14.070 Design standards:

4. Lighting. Parking areas shall have lighting capable of providing adequate illumination for security and safety. The minimum requirement is one foot-candle, maintained across the surface of the parking area. Lighting standards shall be energy-efficient and in scale with the height and use of the structure. Any illumination, including security lighting, shall not spill over on to any adjacent properties. In general, lamps should not be visible from any adjoining property. Light standards may not be placed in any required landscape setback area.

La Habra Hills Specific Plan

The Project site is currently within the La Habra Hills Specific Plan, which was adopted in 1992 and provides zoning standards for the Project site. The La Habra Hills Specific Plan provides for a 380-acre master planned community with four residential neighborhoods approved for a maximum of 700 dwelling units, an 18-hole golf course, a 29.5-acre community park, and 2.6 acres of open space. The basic concept of the proposed community, as stated in the specific plan, was to "provide a series of residential neighborhoods that offer views of the golf course and provide a variety of housing opportunities." The residential component of the La Habra Hills Specific Plan was ultimately built out with a total of 556 single-family dwelling units. The northern portion of the La Habra Hills Specific Plan area was developed as the Westridge Golf Club, which is the site of the proposed Rancho La Habra Specific Plan. While located adjacent to the Westridge community, the golf course is not part of the Westridge community or its homeowners' association.

Among the objectives of the La Habra Hills Specific Plan were several statements regarding the proposed golf course, including the following objectives:

- Develop a plan that incorporates contour grading and offers panoramic views of the proposed golf course and surrounding area.
- Enhance the recreational opportunities within the City by developing a private, 18-hole regulation play golf course.

The La Habra Hills Specific Plan describes the then-proposed golf course as follows:

> Golf Course: A regulation play 18-hole private golf course is to be located on approximately 145 acres in the lower elevations of the property. The course includes a clubhouse with associated facilities and a driving range. The course enhances the development character of the Project by providing an open space amenity. It creates an enhanced landscaped treatment along Beach Boulevard and serves as a buffer between the existing business park (at Beach Boulevard and Imperial Highway) and existing single-family homes and the proposed development. Many of the proposed residential units benefit from views of the golf course.

The La Habra Hills Specific Plan permits the following uses within the Project site:

- Permitted uses:
  - Public buildings, leased or used by any governmental jurisdiction, including parks, public easements and water works.
  - Golf course and driving range.
  - Recreation facilities.
  - Oil drilling and production.
- Accessory uses:
  - Buildings and structures necessary to the permitted uses.
- Conditionally permitted uses:
  - Restaurant facilities.
  - Commercial facilities ancillary to permitted uses.

3.4.3 ENVIRONMENTAL SETTING

a. Aesthetic Elements and Views

Project Site

The Project site encompasses the approximately 151-acre Westridge Golf Club. In addition to an 18-hole golf course, on-site development includes a lighted driving range with an upper and lower deck; a clubhouse with a pro shop, bar, and banquet rooms; and a parking lot. A series of golf cart paths traverse the golf course.

The golf course varies in elevation from approximately 220 feet above mean sea level in the northwestern portion of the golf course site to approximately 470 feet above mean sea level in the southeastern corner of the site. Generally, the southern portion of the site is at a higher elevation than the northern portion. To accommodate this elevation change, the golf course fairways are generally designed at different elevations, with interceding slopes.

The Project site consists primarily of irrigated turf and ornamental vegetation. In addition, the site supports lesser amounts of native vegetation communities including coastal sage scrub, coyote brush scrub, riparian wetlands, and mulefat scrub (see Section 3.5, *Biological Resources*, for a complete discussion on vegetation). The Project site contains two drainage features and three ponds, none of which are visible to the general public.

Public views of the Project site tend to be obscured. Motorists traveling along Beach Boulevard, South Idaho Street, and entering the property from South La Habra Hills Drive have views of

gradual slopes that extend from street level to higher elevations on the Project site. These slopes are landscaped with ornamental trees and shrubs, which substantially obscure the visibility of the interior of the Project site from surrounding public streets. Views from surrounding public streets generally have the Project site in the foreground, with the existing Westridge community located on a ridge to the north in the West Coyote Hills. Because public views of the golf course are obstructed by landscaping, topography, and surrounding buildings, the golf course itself is not considered to be a scenic vista.

Scenic Vistas

The La Habra General Plan identifies public views of the West Coyote Hills, La Habra Basin, Puente Hills, and the San Gabriel Mountains as significant scenic vistas. The Project site is located on the north side of the West Coyote Hills, which top out at approximately 604 feet above mean sea level. Views of the existing Westridge community, with the Project site in the foreground of views of the West Coyote Hills ridgeline, are available from Beach Boulevard and Imperial Highway.

The La Habra Basin is located north of the Project site at lower elevations. The Puente Hills, located north of the Project site just beyond the La Habra Basin, are at an elevation of approximately 417 feet above mean sea level. The 10,000-foot-high San Gabriel Mountains are located beyond the La Habra Basin and Puente Hills, to the north of the Project site.

b. Light and Glare

Nighttime lighting associated with the existing golf course includes the driving range which operates seven days a week until 10:00 p.m., parking lot and clubhouse lighting, street lights on La Habra Hills Drive, and illumination from vehicle headlights. Surrounding the Project site are other sources of light, including the Westridge Plaza Shopping Center, other commercial and residential development, and adjacent roadways.

Glare can emanate from many different sources, some of which include direct sunlight, sunlight reflecting from cars or buildings, and bright outdoor or indoor lighting. Glare in the Specific Plan area is generated by building and vehicle windows reflecting light. However, because the clubhouse is largely constructed of non-reflective materials and not surfaced with a substantial amount of windows, it is not a major source of glare. In addition, the golf course parking lot is relatively small in relation to the size of parking lots within area shopping centers, and the amount of glare from sunlight or exterior light reflecting from car windshields would be limited.

3.4.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of aesthetics impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold AES-1 Have a substantial adverse effect on a scenic vista;

Threshold AES-2 Substantially damage scenic resources, including but not limited to trees, rock outcroppings, hillsides, and historic buildings within a state scenic highway;

Threshold AES-3 Substantially degrade the existing visual character or quality of the site and its surroundings; or

Threshold AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.4.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold AES-1: Adversely affect a scenic vista.

Impact AES-1: While portions of proposed Rancho La Habra Specific Plan residential and commercial development would be visible from public locations, such development would not block scenic vistas. The impact would be *less than significant*.

Methodology

Significance of impacts on scenic vistas is based on the extent to which the proposed Project would either hinder views of a scenic vista or result in its visual degradation as viewed from a public location. To make this determination, visual simulations were undertaken to illustrate changes to public views of scenic vistas that would result from the proposed Project. These visual simulations were prepared for eight public viewpoints representing typical public views of the Project site, and compare "before" and "after" views of scenic vistas from these viewpoints. The visual simulations were created using finished floor elevations reflected on the grading plan prepared for the Project. The proposed development was then simulated based on the building "footprint" established for each lot. In addition, building height, architectural character, colors, and landscaping were programmed into the computerized visual simulations to depict post-development views. An adverse effect on a scenic vista (significant impact) would occur if public views of identified scenic resources (West Coyote Hills, La Habra Basin, and the Puente Hills beyond) would be substantially or completely blocked. While the golf course on the Project site provides open space, water features, and landscaping, public views of the golf course do not constitute a "scenic vista," which was defined at the outset of this section

as "panoramic views of important visual features, as seen from public viewing areas." Existing views of the golf course from public viewing locations are largely obstructed by topography and landscaping.

Impact Assessment

Project Construction

Construction activities would involve grading and landform alteration, including removal of vegetation in areas to be graded, extraction and temporary stockpiling of soils, demolition of the driving range and parking lot, crushing activities, storage of construction equipment and building materials, and construction of buildings and infrastructure. While these activities would be visible from several public viewing locations, they would be short term and would not be of a sufficient height or scale as to block or otherwise damage scenic vistas.

Project Operation

Eight publicly accessible viewpoints were analyzed. **Figure 3.4-1** maps the viewpoint locations, and **Tables 3.4-1a** through **3.4-1h** show the existing views and visual simulations of the Project from these viewpoints. As demonstrated by the visual simulations, Project site development would not create any substantial blockages to public views of existing scenic vistas.

Tables 3.4-1a through **3.4-1h** show that proposed Project site development would not substantially block public views of scenic vistas.

Table 3.4-1h shows that beyond the foreground is an existing hillside view of the Westridge residential community (on the upper left portion of the photograph), which is located on the ridgeline of the West Coyote Hills. However, the majority of the West Coyote Hills are behind the ridgeline and not visible across the Project site from Beach Boulevard. Thus, there is no opportunity for expansive views of the West Coyote Hills, and the views of the Westridge community available to the public from Beach Boulevard do not meet the definition of a "scenic vista" previously provided in this section. While proposed commercial development[2] would substantially block views of the existing Westridge community, the views being blocked would not constitute a "scenic vista."

[2] While the visual simulation of Viewpoint H was modeled with commercial uses, this area could also be developed with multi-family dwelling units. In such case, buildings in the visual simulation would look more like the proposed multi-family development in Viewpoint G. Development of multi-family dwellings in this location would not change the conclusions presented in this section or cause different impacts.

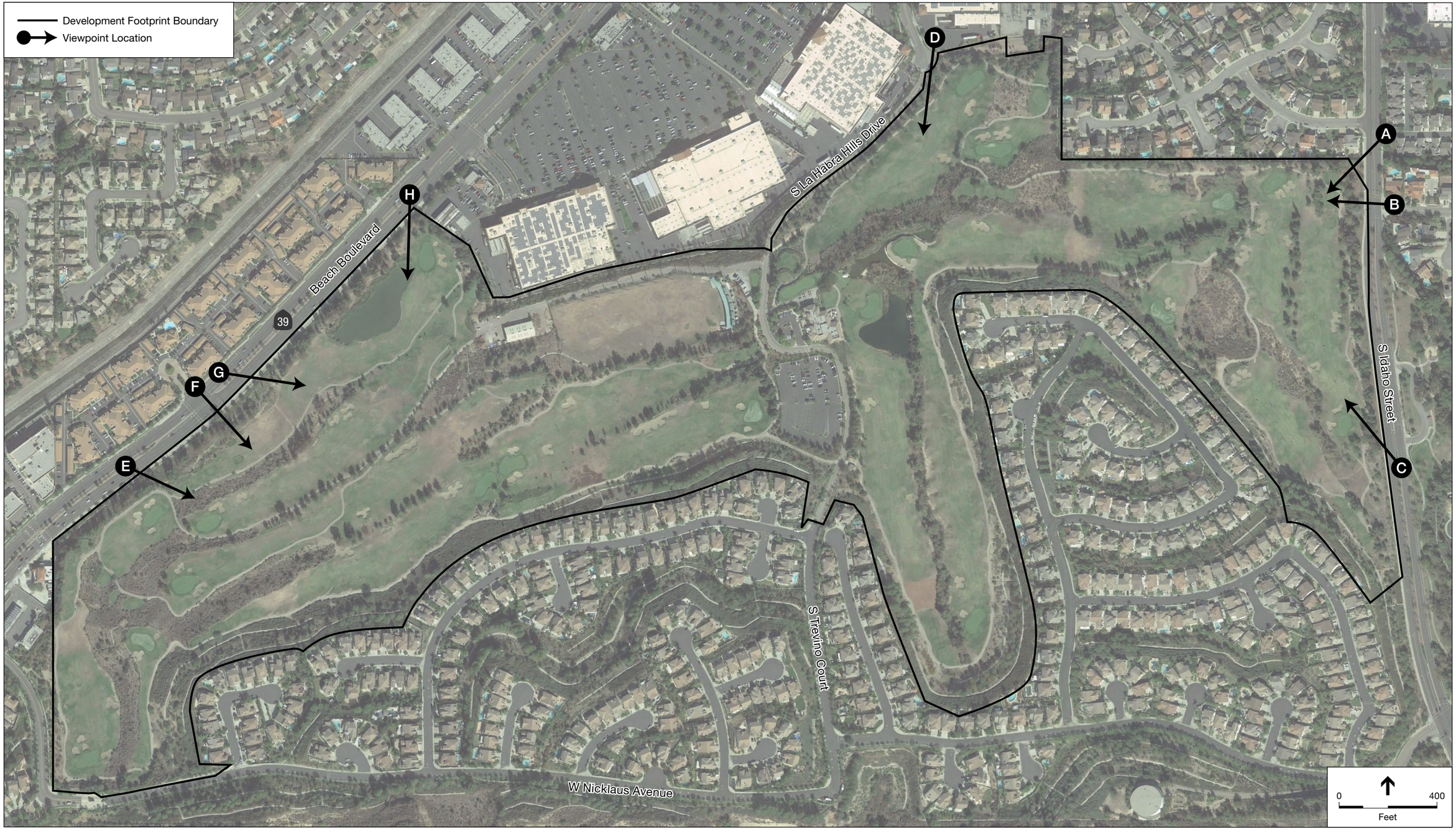


Figure 3.4-1: Visual Simulation Key Map

Source: Google Earth Pro; VisionScape Imagery

Table 3.4-1a
Viewpoints

Viewpoint A: Idaho Street Looking Southwest



Existing View

The existing Westridge Golf Club is visible to the southwest. Scenic vistas of the West Coyote Hills are obscured by landscaping.



View of Proposed Development

Landscaping along the street would be somewhat thinned, providing for views of housing within the Project site. Scenic vistas of the West Coyote Hills would remain obscured by landscaping.

Source: Visionscape Imagery, 2015.

Table 3.4-1b
Viewpoints

Viewpoint B: Idaho Street Looking West



Existing View

The existing Westridge Golf Club is visible to the southwest. Scenic vistas are unavailable.



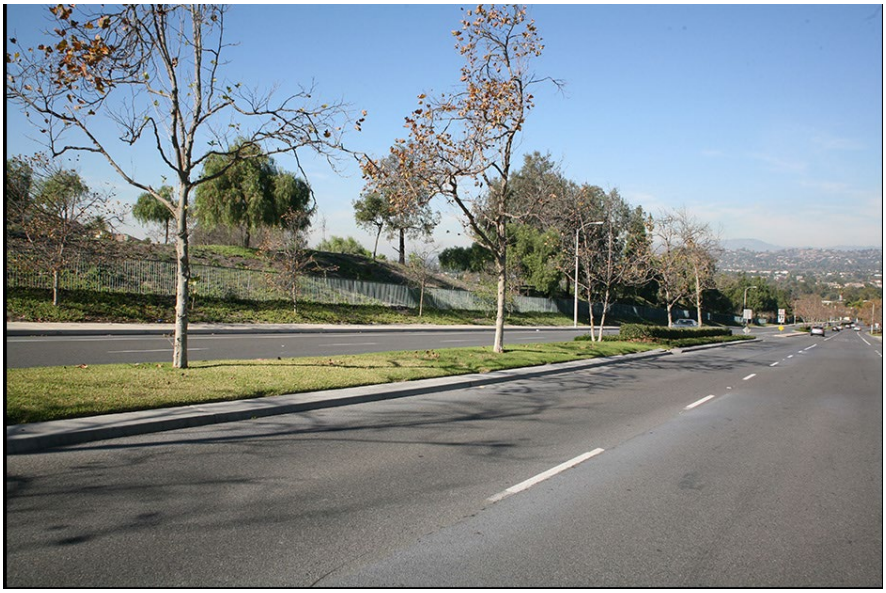
View of Proposed Development

Landscaping would be removed to create the proposed Rancho La Habra entry. Views of the existing golf course would be replaced by views of the street and housing.

Source: Visionscape Imagery, 2015.

Table 3.4-1c
Viewpoints

Viewpoint C: Idaho Street Looking Northwest



Existing View

The existing Westridge Golf Club is visible to the northwest. Long-distance views of the La Habra Basin and San Gabriel Mountains are available along the street; however, no scenic vista is available across the golf course due to existing landscaping and topography.



View of Proposed Development

The existing fence along the street right-of-way would be removed, and landscaping along Idaho Street would become more visible, providing limited views of housing. Long-distance views of the La Habra Basin and San Gabriel Mountains would remain available along the street. Views of the La Habra Basin and mountains across the golf course would remain obscured.

Source: Visionscape Imagery, 2015.

Table 3.4-1d
Viewpoints

Viewpoint D: La Habra Hills Drive Looking South



Existing View

The existing Westridge Golf Club is visible to the south at the current entry to the golf course. Scenic vistas of the West Coyote Hills are obscured by existing topography and landscaping.



View of Proposed Development

Landscaping would be added along the proposed extension of La Habra Hills Drive, as the proposed roadway extension would a more dominant visual feature. Scenic vistas of the West Coyote Hills would remain obscured by topography and landscaping.

Source: Visionscape Imagery, 2015.

Table 3.4-1e
Viewpoints

Viewpoint E: Beach Boulevard Looking Northeast



Existing View

Landscaping for the existing Westridge Golf Club is visible to the east and northeast along Beach Boulevard. Scenic vistas of the West Coyote Hills are obscured by topography and landscaping.



View of Proposed Development

Landscaping along Breach Boulevard would remain the dominant visual feature of the Project site. Scenic vistas of the West Coyote Hills would remain obscured by topography and landscaping.

Source: Visionscape Imagery, 2015.

Table 3.4-1f
Viewpoints

Viewpoint F: Beach Boulevard Looking Southeast



Existing View

The existing Westridge Golf Club is visible to the southeast across Beach Boulevard at the entrance to the Hillsborough Apartments. Scenic vistas of the West Coyote Hills are obscured by topography, landscaping, and the existing Westridge community.



View of Proposed Development

Landscaping would be removed to construct the Project entry road, providing for views of housing within the Project site. Scenic vistas of the West Coyote Hills would remain obscured by landscaping, topography, and the existing Westridge community.

Source: Visionscape Imagery, 2015.

Table 3.4-1g
Viewpoints

Viewpoint G: Beach Boulevard Looking East



Existing View

The existing Westridge Golf Club is visible to the east.



View of Proposed Development

Landscaping along the street would be somewhat thinned, providing for views of multi-family housing within the Project site.

Source: Visionscape Imagery, 2015.

Table 3.4-1h
Viewpoints

Viewpoint H: Beach Boulevard Looking South



Existing View

The existing Westridge Golf Club is visible to the south. Scenic vistas of the West Coyote Hills are obscured by landscaping and the existing Westridge community. The Westridge residential community (on the upper left portion of the photograph) is located on the West Coyote Hills ridgeline. However, the majority of the West Coyote Hills are behind the ridgeline and not visible from this viewpoint.



View of Proposed Development

Landscaping along the street would be thinned, providing for an up-close view of commercial development (with an option for multi-family development in the same location) within the Project site.

Source: Visionscape Imagery, 2015.

Significance Conclusion for Impact AES-1

Because no substantial blockages of scenic vistas from public viewpoints would occur, implementation of the proposed Rancho La Habra Specific Plan would not result in adverse effects on a scenic vista, and the impact would be less than significant.

Threshold AES-2: Damage scenic resources within a state scenic highway.

Impact AES-2: The Project site is not within or visible from a designated or eligible state scenic highway. Implementation of the proposed Rancho La Habra Specific Plan would not, therefore, damage scenic resources within a state scenic highway. *No impact* would result.

Methodology

The significance determination for the aesthetics analysis related to scenic resources within a state scenic highway is based on consideration of (1) whether a state scenic highway exists within or near the Specific Plan area, (2) whether the Specific Plan area can be viewed from the highway, and (3) whether implementation of the Specific Plan has the potential to damage scenic resources within the scenic highway corridor. If the Project site is not within view of a state scenic highway, implementation of the proposed Specific Plan would not result in impacts.

Impact Assessment

The Rancho La Habra Specific Plan area is not within or visible from any existing designated (or eligible) scenic highway. The nearest Designated Scenic Highway is SR-91 between SR-55 and the eastern Anaheim city limits, 10 miles southeast of the Project site. The nearest Eligible Scenic Highway is SR-57, which is located over 4 miles east of the Project site. Due to the lack of a designated (or eligible) scenic highway within view of the Project site, implementation of the proposed Specific Plan would not damage scenic resources within a state scenic highway.

Significance Conclusion for Impact AES-2

Because implementation of the proposed Rancho La Habra Specific Plan would not damage scenic resources along a state scenic highway, no impacts would occur.

Threshold AES-3: Substantially degrade the existing visual character or quality of the site and its surroundings.

Impact AES-3: Implementation of the proposed Rancho La Habra Specific Plan would result in the loss of a major open space resource. While the proposed Project would be well planned and designed, the

substantial loss of open space that would result from project development would degrade the existing visual character of the site. Even with implementation of project design features and compliance with existing regulations, this impact would remain *significant and unavoidable*.

Methodology

The analysis of the potential of the proposed Rancho La Habra Specific Plan to degrade the existing visual character or quality of the site or surrounding area is based on consideration of (1) the extent of Specific Plan-related changes in land use and development intensity, (2) the degree of visual contrast and compatibility in scale and character between development pursuant to the proposed Specific Plan and the existing surroundings, (3) the effect of proposed land use changes on the visual character of the site, and (4) Specific Plan conformance with adopted policies regarding visual resources and urban design quality.

The EIR recognizes that assessment of whether changes in the visual character of development from existing conditions would be comparatively better (substantially improved) or worse (substantially degraded) is largely subjective. The following analysis, therefore, focuses in a factual manner on the extent to which the proposed Rancho La Habra Specific Plan would change the visual character of the site and the consistency of any such changes in visual character with adopted City policies regarding visual and urban design quality.

An impact would be considered significant if the Project would result in development that is incompatible with existing uses in relation to type of use or scale,[3] would result in poorly designed buildings or development, visually detract from nearby existing well-designed built environments, or would be inconsistent with adopted policies regarding visual and urban design quality.

Impact Assessment

Extent of Specific Plan-Related Changes in Land Use and Development Intensity

Implementation of the proposed Project would replace the existing Westridge Golf Club with a residential community consisting of 402 single-family and multi-family dwelling units, a 20,000-square-foot commercial center (or an additional 46 multi-family dwelling units), and open space/park uses. While the majority of the site (approximately 87 acres) would remain in open

[3] "Compatible" land use refers to the characteristics of different uses or activities that permit them to be located near each other in harmony and without conflict. Some elements affecting compatibility include intensity of occupancy as measured by dwelling units per acre, pedestrian or vehicular traffic generated, volume of goods handled, and such environmental effects as noise, vibration, glare, air pollution, or the presence of hazardous materials.

space use, the predominant visual feature of the Project site would be its residential neighborhoods, and the land use and development intensity of the site would be substantially changed from existing conditions.

Visual Contrast and Compatibility with Surrounding Lands

The residential uses and development densities proposed for the Project site would be similar to those existing within developed areas to the east, west, and south of the site. In addition, the proposed 20,000-square-foot commercial area, while of a much smaller scale, would be compatible with the adjacent Westridge Plaza Shopping Center.

Chapter 18.68 of the Municipal Code outlines the City's design review process, which is established to ensure that buildings, structures, signs, and landscaping will be in harmony with other structures and improvements in the vicinity of the proposed development and consistent with the general plan and zoning.

Approval of design review for development within the Specific Plan area will require the La Habra Planning Commission to find that the nature of the proposed land uses and the design of development within Rancho La Habra are appropriate for the proposed location and are compatible with surrounding land uses and improvements. Making such a finding will include, but not be limited to, review of whether (1) the Project's scale, form, and proportion are harmonious, and the materials and colors that are used complement the Project; and (2) the orientation and location of buildings, structures, open spaces, and other features integrate well with each other and maintain a compatible relationship to adjacent development.

Effect of Proposed Land Use Changes on Visual Character of Site

As noted above, replacing the existing Westridge Golf Club with the proposed Rancho La Habra residential community would substantially change the use and development intensity of the site, even though the majority of the site (approximately 87 acres) would remain in open space. **Figure 3.4-2** shows visual simulations prepared for the proposed Project that illustrate this change in land use and development intensity. Both visual simulations are taken from private locations within the Westridge residential community. The first simulation is looking northeast toward Idaho Street across Rancho La Habra Planning Area 4. The second simulation is looking north across the western portion of Rancho La Habra Planning Area 4 near Planning Area 3.

The change in visual character of the Project site illustrated in **Figure 3.4-2** would not, however, occur throughout the Specific Plan area. As illustrated in **Figure 3.4-3** following, portions of the Project site would retain their existing open space character. The first simulation in this figure is looking west across the center drainage/open space area toward the existing clubhouse (future

community center). The second simulation is looking north across center drainage/open space area.

Figure 3.4-2 Change in Visual Character of Project Site



Existing Westridge Golf Club



Proposed Rancho La Habra



Existing Westridge Golf Club



Proposed Rancho La Habra

Conformance with Adopted Policies Regarding Visual Resources and Design Quality

As discussed in **Table 3.2-1** in Section 3.2, *Land Use and Planning Policy*, conversion of the existing golf course to a residential community, along with the resulting loss of open space, would be inconsistent with two General Plan policies:

- **CI 1.4 Natural Setting.** Maintain the City's hillsides and open spaces as elements that separate and distinguish La Habra from surrounding communities.
- **SM 1.2 Natural Topography.** Preserve the scenic quality of La Habra's natural topography, hillsides, open space, and natural riverine areas.

Figure 3.4-3 Retention of Project Site Visual Character



Existing Westridge Golf Club



Proposed Rancho La Habra



Existing Westridge Golf Club



Proposed Rancho La Habra

Significance Conclusion for Impact AES-3

The substantial change in the visual character of the site that would result from replacing the existing Westridge Golf Club with the proposed Rancho La Habra residential community would constitute a significant impact due to the loss of open space, change of character as demonstrated by the visual prominence of housing within the site, and inconsistency with General Plan Policies CI 1.4 and SM 1.2.

Mitigation Measures

While no feasible mitigation measures are available to reduce Impact AES-3 to a less-than-significant level, as discussed in Chapter 7, *Alternatives*, the following project alternatives would eliminate or reduce the identified significant impact in relation to visual character:

3. Golf Course and Hotel Alternative
4. Residential/9-Hole Golf Course Alternative
5. Reduced Density Residential/9-Hole Golf Course Alternative

6. Reduced Density Single Family Residential Alternative

Significance Conclusion for Impact AES-3 with Implementation of Mitigation Measures

To reduce the identified significant visual character impact to less than significant would require substantially reducing the portion of the Project site devoted to residential and commercial uses. Because no feasible mitigation measures are available to address the Project's significant visual character impact, this impact would be significant and unavoidable.

Threshold AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact AES-4.1: Implementation of proposed Rancho La Habra Specific Plan would not create substantial new sources of nighttime lighting that would spill over onto sensitive uses (i.e., residences) for a substantial portion of the night or would impair drivers' vision at night. Project lighting impacts would, therefore, be *less than significant*.

Methodology

The evaluation of nighttime lighting focuses on changes in illumination levels that would result from implementation of the proposed Specific Plan and the extent to which such new sources of light would increase nighttime lighting on adjacent sensitive residential uses. Lighting impacts would be considered significant if nighttime lighting would spill over onto sensitive uses (i.e., residences) for a substantial portion of the nighttime, or lighting would impair drivers' vision at night. Potential lighting impacts on biological habitat areas are addressed in Section 3.5, *Biological Resources*.

Impact Assessment

Construction Impacts

Project construction would be restricted to the City's permitted construction hours between 7:00 a.m. and 8:00 p.m. on weekdays, including Saturday. Construction would not be permitted on Sundays or federal holidays. This would limit most construction to daytime hours, particularly during summer months. However, during winter and other non-summer months, construction activities could occur between dusk and 8:00 p.m., requiring use of temporary auxiliary lights to illuminate construction activities. Maintenance of construction vehicles, including fueling, cleaning, and minor repairs, is proposed by the applicant to occur prior to or

after the completion of construction activities, which would require use of temporary auxiliary lights to illuminate maintenance work areas.

However, temporary lighting for summer construction activities and vehicle maintenance activities would not represent a new substantial source of night lighting in comparison to existing night lighting for the driving range.

Operations Impacts

New sources of exterior nighttime lighting would be associated with the proposed homes and the proposed commercial pad located on Beach Boulevard. The new sources would include:

- Street lighting with standard cobra head design
- Community Center parking lot lighting with shoe-box type design (replaces existing parking lot lighting)
- Linear Park trail lighting with 12-foot-tall decorative lighting
- Commercial building and parking lot lighting with shoe-box type design
- Typical residential lighting

The brightness of nighttime lighting from these sources would be no greater than current levels of nighttime lighting of the roadway leading to the clubhouse and its parking area. However, as the result of the proposed Project, a far greater portion of the site would be lighted at night than at present. In addition, while the brightest existing source of lighting (the golf course driving range) would be discontinued, the driving range also has a substantial physical separation from sensitive residential uses to the south of the Project site.

Even though nighttime lighting sources would be introduced closer to existing sensitive residential uses as the result of Project site development, because of the elevation differences between the existing Westridge neighborhood and the Project site, as well as the physical separation between these uses provided by existing slope areas, spillover of project-related lighting onto properties within the Westridge neighborhood is not anticipated. Other residential neighborhoods near the Project site are separated from the site by existing roadways and would also not experience spillover of nighttime lighting from the Project.

As part of the City's required design review and plan check functions, light emanating from new uses and roadways within the Specific Plan area would be required to be either low-scaled lighting or shielded to focus lighting and prevent lighting from spilling onto adjacent residential properties, or from streaming directly onto streets, which could impair views of drivers on streets at night.

Significance Conclusion for Impact AES-4.1

Implementation of the proposed Rancho La Habra Specific Plan would not create substantial new sources of nighttime lighting that would spill over onto sensitive uses (i.e., residences) for a substantial portion of the night or impair drivers' vision at night. Project lighting impacts would therefore be *less than significant*.

Impact AES-4.2: Implementation of the proposed Rancho La Habra Specific Plan would not create a substantial new source of glare. The impact would be *less than significant*.

Methodology

The analysis of glare focuses on the extent to which implementation of the proposed Specific Plan would increase daytime glare on sensitive uses. Glare impacts would be considered significant if Specific Plan development would create a new source of glare that would negatively affect sensitive uses (i.e., residences) or direct glare onto roadways, thereby causing a safety hazard for drivers.

Glare results from sharply reflected light caused by sunlight or artificial light reflecting from highly finished surfaces such as paving, roofing, or glass. The level of glare is measured using the "albedo concept," which calculates the relative reflectivity of surfaces. For example, soil cover has an albedo of 0.17, which indicates that approximately 17 percent of solar radiation hitting a soil-covered ground would be reflected. Grass cover has an albedo of 0.20, indicating a solar reflectivity of approximately 20 percent, or slightly more glare than soil cover. By comparison a beige-painted stucco finish on a residential structure would have an albedo rating of 0.40, while painting the same stucco surface white would have an albedo rating as high as 0.65. In general, darker or mirrored glass would have a higher solar reflectivity—or glare—than clear glass. Darker or mirrored glass could have an albedo rating of up to 0.80 or more, while clear glass could have an albedo rating as low as 0.08.

The glare emanating from high albedo materials can cause daytime interference with activities in sensitive land use areas, as well as in public roadways and air travel paths where automobile and plane operators can be temporarily blinded by glare, thus causing a safety concern. As such, analysis of the effects of daytime glare considers whether new development would result in an adverse effect by creating a new source of substantial glare.

Impact Assessment

Construction Impacts

Daytime glare associated with construction activities would occur when reflective construction materials or equipment were positioned in highly visible locations where sunlight would be reflected. However, large, flat surfaces of reflective materials, like those needed to generate substantial glare, are typically not associated with construction activities. Moreover, any glare produced during construction activities would be highly transitory and short term, given the movement of construction equipment and materials within the construction site and the temporary nature of construction activities.

Operations Impacts

Glare during operations generally results from structures that use large expanses of glass, metal, and other reflective surfaces for building façades, as well as from direct sunlight, sunlight reflecting from cars, and bright outdoor or indoor lighting. New buildings constructed within the Specific Plan area would include sources of daytime glare, including glass windows, as well as the possible use of metal or other reflective materials for commercial buildings and parking areas. While the proposed 402 dwelling units and the either 20,000 square feet of commercial use or 46 additional multi-family units would each represent a new source of glare within the Specific Plan area, residential uses typically do not include large expanses of reflective glass. In addition, the typical landscaping provided for residential uses tends to further reduce the potential for glare. Retail uses, such as the proposed 20,000-square-foot commercial center, also tend to use clear rather than reflective glass and do not typically feature large reflective metal surfaces.

Including features such as non-reflective textured surfaces on building exteriors, avoiding the use of reflective glass, and shielding external light sources—as would be required by the City's design review process—would reduce the potential for the proposed development to generate glare.

Significance Conclusion for Impact AES-4.2

Implementation of the proposed Rancho La Habra Specific Plan would not create substantial new sources of glare, and the impact would be *less than significant*.

3.4.6 REFERENCES – AESTHETIC RESOURCES

Caltrans, California Scenic Highway Mapping System, 2016. Accessed May 26, 2017: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/.

City of La Habra, *City of La Habra General Plan 2035*, adopted January 21, 2014.

City of La Habra, Municipal Code Chapters 18.68 and 18.74, Planning and Zoning. Accessed May 26, 2017: http://qcode.us/codes/lahabra/.

3.5 BIOLOGICAL RESOURCES

See Section 3.5 of Final EIR Volume 2 – Partially Recirculated Draft EIR for an updated analysis of Biological Resources.

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3.6 CULTURAL RESOURCES

3.6.1 INTRODUCTION

a. Overview

This section describes existing cultural (historic architectural, as well as prehistoric- and historic-period archaeological) resources and paleontological resources, and analyzes impacts on these resources that would result from implementation of the proposed Rancho La Habra Specific Plan and related actions. This section also addresses the results of consultation with Native American tribes and the potential for encountering human remains outside of formal cemeteries.

b. Definitions

- **Archaeological Resources** include any material remains of human life or activities that are at least 100 years of age and that are of scientific interest. A unique or significant archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it (1) contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; (2) has a special and particular quality, such as being the oldest of its type or the best available example of its type; and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.
- **Before Present (BP)** is a time scale used to specify when events in the past occurred. BP, when placed after a number (as in 2,500 BP), means "years before the present." This terminology is used to refer to dates that were obtained through the radiocarbon dating method.
- **Cultural Resources** are defined as buildings, sites, structures, or objects, each of which may have historic, architectural, archaeological, cultural, or scientific importance, according to CEQA.
- **Historic Building** or **Historic Site** is one that is noteworthy for its significance in local, state, or national history or culture, its architecture or design, or its works of art, memorabilia, or artifacts.
- **Historic Context** refers to the broad patterns of historical development in a community or its region that are represented by cultural resources. A historic context statement is organized by themes such as economic, residential, and commercial development.

- **Historic District** means a geographical area or neighborhood containing a collection of residential and/or commercial historical buildings that generally represents a significant aspect of the community's architectural and/or development history.
- **Historic Integrity** is defined as "the ability of a property to convey its significance."
- **Historical Resources** are defined as "a resource listed or eligible for listing on the California Register of Historical Resources" (CRHR) (Public Resources Code, Section 5024.1; 14 Code of California Regulations [CCR] 15064.5). Under CEQA Guidelines Section 15064.5(a), the term "historical resources" includes the following:

  (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code, Section 5024.1).

  (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

  (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1) including the following:

    (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

    (B) Is associated with the lives of persons important in California's past;

    (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

    (D) Has yielded, or may be likely to yield, information important in prehistory or history.

  (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource

may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

- **Paleontological Resources** include any fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include any materials associated with an archaeological resource or any cultural item defined as Native American human remains. Significant paleontological resources are defined as fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

3.6.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Rancho La Habra Specific Plan and related actions is subject to a range of federal and state plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (National Register), which is the official register of designated historic places. The National Register is administered by the National Park Service, and includes listings of buildings, structures, sites, objects, and districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

To be eligible for the National Register, a property must be significant under one or more of the following criteria pursuant to 36 Code of Federal Regulations Part 60:

A. Properties that are associated with events that have made a significant contribution to the broad patterns of our history;

B. Properties that are associated with the lives of persons significant in our past;

C. Properties that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Properties that have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the aforementioned criteria, an eligible property must also possess historic "integrity," which is "the ability of a property to convey its significance." The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

Structures, sites, buildings, districts, and objects over 50 years of age can be listed in the National Register as significant historical resources. Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the National Register. Properties listed in or eligible for listing in the National Register are also eligible for listing in the California Register of Historic Resources (described below), and as such, are considered historical resources for CEQA purposes.

b. State Plans, Policies, and Regulations

California Public Resources Code

Archaeological, paleontological, and historical sites are protected pursuant to a variety of state policies and regulations enumerated under the California Public Resources Code. In addition, cultural and paleontological resources are recognized as non-renewable and therefore receive protection under the California Public Resources Code and CEQA. The following California Public Resources Code sections apply to activities related to this Project:

- **California Public Resources Code Sections 5079–5079.65** define the functions and duties of the Office of Historic Preservation (OHP). The OHP is responsible for the administration of federal- and state-mandated historic preservation programs in California and the California Heritage Fund.
- **California Public Resources Code Section 5097** provides procedures to be followed in the event of the unexpected discovery of human remains on non-federal land.
    - **Section 5097.5** of the code states as follows: "No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor. As used in this section, 'public lands' means lands owned by, or under the jurisdiction of, the state or any city, county, district, authority or public corporation, or agency thereof." Consequently, the City of La Habra is required to comply with Public Resources Code Section 5097.5 because the Project site is within the City's jurisdiction.
    - **Sections 5097.9–5097.991** provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). It also requires notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

California Senate Bill 18

Senate Bill 18 (SB 18) (California Government Code Section 65352.3) sets forth requirements for local governments to consult with Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning for the purpose of protecting, or mitigating impacts on, cultural places. The Tribal Consultation Guidelines: Supplement to General Plan Guidelines (OPR 2005) identifies the following contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the Native American Heritage Commission [NAHC]) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

Because the proposed Project requires a General Plan Amendment and a Specific Plan Amendment, it is subject to the statutory requirements of SB 18 Tribal Consultation Guidelines. The City contacted the NAHC with the Notice of Preparation for this EIR and informational letters were sent to each tribe identified on the NAHC's list.

California Assembly Bill 52

Assembly Bill 52 (AB 52), which became effective in January 2016 as Public Resources Code Section 21080.3.1, established a new requirement under CEQA to consider "tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are

either included or determined to be eligible for inclusion in the California Register of Historical Resources or local registers of historical resources.

In addition, AB 52 implemented a new consultation process, in which lead agencies are required to offer Native American tribes that have submitted written requests the opportunity to participate in consultations to protect tribal cultural resources, and that Native American tribes have the opportunity to consult on CEQA documents prior to public circulation of an EIR. Pursuant to AB 52, lead agencies are required to provide formal notice to the tribes requesting to participate within 14 days of the lead agency's determination that an application package is complete. Tribes have 30 days to respond to request consultation on the Project.

In compliance with AB 52, the City has provided formal notification to California Native American tribal representatives identified by the NAHC to offer consultation with interested tribes regarding the proposed Specific Plan. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in Public Resources Code Section 21074. In addition, the City of La Habra began the public outreach process concurrent with its review of the proposed Specific Plan. Only two Tribes provided written correspondence or contacted the City in response to its formal notification. Joseph Ontiveros of the Soboba Band of Luiseño Indians noted on December 21, 2015 that the Tribe had assessed the Project information provided by the City, and did "not have specific concerns regarding known cultural resources." The Tribe also requested that a Native American Monitor be present during any future ground disturbing activities. The letter also stated that the Tribe "wished to defer to Gabrieleño Tribal Consultants who are in closer proximity to the project." The Gabrieleño Band of Mission Indians-Kizh Nation also provided written correspondence in response to the City's formal notification pursuant to AB 52. Mr. Andy Salas stated that the Gabrieleño Band recognized that the Project site had been previously developed, but also cautioned that "there is still a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities." The Gabrieleño Band therefore requested two mitigation measures: (1) presence of Native American Monitors during construction-related ground disturbing activities and (2) Tribal review of any native vegetation that might be removed, along with making all plants preferred by the Tribe available to the Tribe prior to their removal.

Health and Safety Code Section 7050.5(b)

California Health and Safety Code Section 7050.5(b) specifies protocols when human remains are discovered. Specifically, burials or human remains found inside or outside of a known cemetery are not to be disturbed or removed unless by authority of law, and the area of a discovery of human remains should remain undisturbed until a County coroner is notified and has examined the remains prior to determining the appropriate course of action.

Health and Safety Code Section 7052

Section 7052 of the California Health and Safety Code makes the willful mutilation, disinternment, or removal of human remains a felony. Section 7052.5 requires that any construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the NAHC.

c. Local Plans, Policies, and Regulations

City of La Habra General Plan policies relevant to cultural resources include the following.

CR 1.2 Applicable Laws and Regulations. Ensure that City, State, and Federal historic preservation laws, regulations, and codes are implemented including the California Historical Building Code and State laws pertaining to archaeological resources, to assure the adequate protection of these resources.

CR 1.3 Consultation. Consult with the appropriate organizations and individuals to minimize potential impacts to historic and cultural resources, such as the Information Centers of the California Historical Resources Information System (CHRIS), the Native American Heritage Commission (NAHC), the Native American groups and organizations.

CR 1.5 Planning. Take historical and cultural resources into consideration in the development of planning studies and documents.

CR 1.8 Early Consultation. Minimize potential impacts to historic and cultural resources by consulting with property owners, land developers, and the building industry early in the development review process.

CR 1.9 Compatibility with Historic Context. Review proposed new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context. Pay special attention to the scale, massing, and relationship of proposed new development to surrounding historic resources.

CR 1.13 Archaeological Resources. Develop or ensure compliance with protocols that protect or mitigate impacts to archaeological, historic, and cultural resources including prehistoric resources.

3.6.3 ENVIRONMENTAL SETTING

a. Historic and Archaeological Resources

A records search encompassing a 0.5-mile radius surrounding the Project site was conducted at the South Central Coastal Information Center (SCCIC) on April 2, 2015. The 2015 records search indicated that 23 previous studies have been conducted within a 0.5-mile radius of the Project site. These studies resulted in one cultural resource discovery (P-30-001512) within the Project site boundaries. The resource was described as a portion of a red brick and mortar foundation of an oil retention basin related to past oil field development in the area dating back to 1909. In addition, the studies also revealed 10 previously recorded off-site cultural resources discoveries and one previously unrecorded resource within a 0.5-mile radius of the Project site (see **Table 3.6-1**).

Table 3.6-1
Cultural Resources within One-Half Mile of Project Site

Resource No.	Description	Report
P-19-100280	Prehistoric chert debitage scatter	Bissell, Robert. No date. California Department of Parks and Recreation Form 523A. RMW Paleo Associates, Inc.
P-19-100279	Prehistoric shell fragment	Bissell, Robert. No date. California Department of Parks and Recreation Form 523A. RMW Paleo Associates, Inc.
P-19-100278	Prehistoric granite mano fragment	Bissell, Robert. No date. California Department of Parks and Recreation Form 523A. RMW Paleo Associates, Inc.
P-19-100450	Two fragments of historic period china	Sikes, Nancy E. 2003. Cultural Resources Monitoring for the Emery Ranch / Hawks Pointe Project, La Mirada and Fullerton, Los Angeles And Orange Counties, California. SWCA, Inc.
P-19-100448	Two fragments of historic period brick	Sikes, Nancy E. 2003. Cultural Resources Monitoring for the Emery Ranch / Hawks Pointe Project, La Mirada and Fullerton, Los Angeles And Orange Counties, California. SWCA, Inc.
N/A	Two Chevron derricks, one wooden retaining wall, and a 1940s tank structure	Scientific Resource Surveys, Inc. 1989. Cultural Resource Survey Report on the West Coyote Hills Property. Submitted to Environmental Perspectives, Santa Ana, CA.
P-19-100449	One nearly complete dark brown ceramic insulator, and one fragment of a dark brown ceramic insulator	Sikes, Nancy E. 2003. Cultural Resources Monitoring for the Emery Ranch / Hawks Pointe Project, La Mirada and Fullerton, Los Angeles And Orange Counties, California. SWCA, Inc.
P-19-100338	One *Coca-Cola* bottle and a partial glass insulator	Sikes, Nancy E. 2003. Cultural Resources Monitoring for the Emery Ranch / Hawks Pointe Project, La Mirada and Fullerton, Los Angeles And Orange Counties, California. SWCA, Inc.
P-30-100208	Prehistoric granitic mono fragment	R. Ramirez, J. Covert, G. King, and S. Murray. 2009. California Department of Parks and Recreation Form 523A. SWCA, Inc.
P-30-10003	Prehistoric felsite flake	Shinn, Juanita. 1992. Cultural Resources Assessment for the West Coyote Hills Specific Plan. RMW Paleo Associates, Inc.
P-30-001334	One possible prehistoric hearth with two manos, a hammerstone, and a metate fragment	Shinn, Juanita. 1992. Cultural Resources Assessment for the West Coyote Hills Specific Plan. RMW Paleo Associates, Inc.

Source: Archeological Resource Survey – Rancho La Habra – La Habra Project, September 2016.

Discoveries from this and previous archaeological studies have indicated moderate potential for the discovery of prehistoric and historic period cultural resources in the vicinity of the Project site, mostly within areas comprised of undisturbed native soils. Previous disturbance of the soil within the Project site has resulted from the construction of the existing golf course. However, there are areas within the golf course and elsewhere on the Project site that remain largely undisturbed.

Paleo Solutions Incorporated conducted an archaeological resource survey of the Project site in April 2015. The intensive pedestrian survey involved the visual inspection of ground surfaces in areas within the Project site that had not been previously graded or extensively disturbed for golf course construction. The archaeological resource survey resulted in the discoveries of two small *Cardiidae* fragments in different undeveloped parts of the Project site. However, these are believed to be paleontological rather than archaeological in nature, as the fossil record includes the presence of bivalves in the San Pedro Formation in this region.

b. Paleontological Resources

A paleontological records search was conducted at the Natural History Museum of Los Angeles County (LACM), and searches of the University of California Museum of Paleontology (UCMP) online database and PaleoBiology Database (PBDB) and literature were also conducted. The records and literature reviews indicate that there is one recorded locality (LACM 3861) that produced a specimen of fossil diving duck, *Chendytes milleri*, within or immediately adjacent to the Project site. This locality is within the San Pedro Formation geologic unit, which occurs in the southeastern portion of the Project site, as well as to the southeast of the site.

Discoveries from previous paleontological studies have indicated high potential for the discovery of paleontological resources in the vicinity of the Project site. Recovered vertebrate fossils from the San Pedro Formation include extinct species of horse, bison, mammoth, dire wolf, saber-tooth cat, American lion, camel, ground sloth, pronghorn, diving duck, and birds. Extant species of gray whale, dolphin, sea lion, deer, rodents, rabbits, birds, snakes, turtles, amphibians, sharks, and fish, as well as abundant invertebrate fossils, have also been collected from the San Pedro Formation.

The La Habra Formation, which is present in the southwestern portion of the Project site, has produced a diverse Ice Age fossil assemblage. Within the City of La Habra, fossil specimens of sloth, mammoth, mastodon, horse, camel, deer, pronghorn, and California turkey have been recovered from along Imperial Highway. In the nearby cities of Fullerton and La Mirada, La Habra Formation fossils include sloth, coyote, fox, bear, bison, dire wolf, mastodon, mammoth, horse, camel, tapir, peccary, cat, deer, and pronghorn, as well as microvertebrates such as rodents, rabbits, amphibians, reptiles, birds, and fish.

3.6.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of cultural resources impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold CUL-1 Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5;

Threshold CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;

Threshold CUL-3 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

Threshold CUL-4 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature as defined in CEQA Guidelines Section 15064.5 (3); or

Threshold CUL-5 Disturb any human remains, including those interred outside of formal cemeteries.

3.6.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold CUL-1: Cause a substantial adverse change in the significance of a historic resource.

Impact CUL-1: Because no significant historic resources are present within the Project site, implementation of the proposed Rancho La Habra

Specific Plan would not result in a substantial adverse change in the significance of a historic resource. *No impact* would result.

Methodology

Historic resources are usually 50 years old or older and must meet at least one of the criteria for listing in the California Register (such as association with historical events, important people, or architectural significance), in addition to maintaining a sufficient degree of physical integrity (CEQA Guidelines Section 15064.5(a)(3)).

Additionally, CEQA Guidelines Section 15064.5(b) states that a project that may cause a substantial adverse change in the significance of a historical resource would have a significant effect on the environment. A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Generally, should a historic resource be located within the Project site, following the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings would result in a less-than-significant impact.

Analysis of this threshold involved first determining whether any historic resources are located within the Project site. Should one or more such resources exist, then the analysis would address ways in which the proposed Project might affect the integrity or setting of the historic resource.

Impact Assessment

The Project site does not contain any buildings or other above-ground structures that are more than 50 years old or would be considered to be historical. The above-ground structures associated with the golf course, such as the clubhouse, driving range, and bathrooms, were all constructed when the golf course was built in the early 1990s. None of those structures was designed by notable architects or have any other qualities that would qualify them as a historical resource.

In addition, as noted in Section 3.6.3.a, a portion of a red brick and mortar foundation of an oil retention basin related to past oil field development was identified within the Project site. This partial foundation was determined not to be eligible for the National Register, California Register, or local registers because it does not meet the appropriate criteria. While the resource is associated with Southern California's once-extensive oil industry (Historic Register Criterion 3/A), the resource has been damaged over time, does not retain structural integrity, and does not therefore exhibit or retain distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values (Historic Register Criterion 3/C). Given the extensive historic research that has been conducted into Southern California's oil industry, the fact that the original oil retention basin built upon the foundation no longer exists, and the fact that the foundation itself does not possess integrity, it is not likely that the resource would yield any information important in prehistory or history (Historic Register Criterion 3/D). Therefore, the partial red brick and mortar foundation within the Project site does not meet the definition of "historically significant."

Significance Conclusion for Impact CUL-1

As noted above, there are no significant historic resources located within the Project site, and implementation of proposed Rancho La Habra Specific Plan would therefore not result in a substantial adverse change in the significance of a historic resource. *No impact* would result.

Threshold CUL-2:	**Cause a substantial adverse change in the significance of an archaeological resource.**
Impact CUL-2:	**Implementation of the proposed Rancho La Habra Plan could result in a substantial adverse change in the significance of a previously unknown subsurface archaeological resource during site grading activities within areas previously undisturbed by golf course construction. However, compliance with existing regulations and implementation of mitigation measures would reduce this potential impact to a less-than-significant level. The impact would therefore be *significant but mitigable*.**

Methodology

Archaeology is the recovery and study of material evidence of human life and culture of past ages. Because, over time, this material evidence becomes buried, fragmented, or scattered or otherwise hidden from view, it is not always evident from a field survey of a Project site. Thus, the possible presence of archaeological materials is often determined by the presence of geographic, vegetative, and rock features that are known or thought to be associated with early human life and culture, as well as knowledge of events or material evidence in the area.

Pursuant to Public Resource Code Section 21080.3.1 (AB 52), the City of La Habra contacted the California Native American Tribes identified by the NAHC to offer consultation with the City regarding the potential effect of the proposed Specific Plan. No areas containing sensitive resources within the Specific Plan area were identified as the result of consultation with Native American Tribes.

The analysis of impacts related to archaeology is based on a review of existing literature and previous studies within La Habra and nearby areas, and the likelihood of discovering previously unknown subsurface archaeological resources within the Specific Plan area. The analysis considers the risk of loss of resources that could result from construction and development activities pursuant to implementation of the proposed Specific Plan. In determining whether a significant impact could result from the proposed Project, the analysis includes consideration of the potential of the Specific Plan area to contain unknown subsurface archaeological resources. The proposed Specific Plan would have a significant impact on archaeological resources if Project activities would disturb, damage, or degrade an archaeological resource or an archaeological historic resource defined as being "significant," or by disturbing the contextual setting of such a resource.

Impact Assessment

Previous archaeological studies conducted in the vicinity of the Project site have indicated a moderate potential for the discovery of prehistoric cultural resources. A reconnaissance survey of the Project site did not identify any cultural resources.

Previous disturbance of the soil within the majority of the Project site has resulted from construction of the existing golf course; grading and construction activities within those previously disturbed areas would not disturb, damage, or degrade any archaeological resource or disturb the setting of such a resource. However, there remain areas within the Project site that are largely undisturbed and retain features of the natural landscape. Such previously undisturbed areas have a moderate potential to contain previously unknown prehistoric cultural resources. Proposed development activities in these previously undisturbed areas could disturb, damage, or degrade previously undiscovered archaeological resources or disturb their setting.

Significance Conclusion for Impact CUL-2

Because archaeological studies conducted in the vicinity of the Project site have indicated a moderate potential for the discovery of prehistoric cultural resources, and proposed development activities within previously undisturbed areas could disturb, damage, or degrade previously undiscovered archaeological resources or disturb their setting, a significant impact on cultural resources would result.

Mitigation Measures

Mitigation Measure CUL-2a: A qualified archaeologist shall be retained to conduct spot-checking of site grading activities and to respond on an as-needed basis to address unanticipated archaeological discoveries. In addition, a qualified Native American Monitor shall be present onsite during construction-related ground disturbance activities, including but not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, trenching, and vegetation removal.

In the event that archaeological materials, including stone tools, shells, bones, glass shards, ceramics, or other materials older than 50 years in age, are encountered during ground-disturbing activities, work in the immediate vicinity of the resource shall cease until a qualified archaeologist approved by the City's Chief Building Official and a qualified Native American Monitor have assessed the discovery and appropriate treatment pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5 is determined and implemented.

If archaeological resources are found to be significant, the archaeologist and Native American Monitor shall determine, in consultation with the City and any local Native American groups expressing interest following notification by the City, appropriate avoidance measures or other appropriate mitigation. Pursuant to CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts on archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other

appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as a historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

Mitigation Measure CUL-2b: Prior to removal of any native vegetation from the Project site, Native American monitors or representatives of the Gabrieleño Band of Mission Indians-Kizh Nation shall be invited to the Project site to document and distinguish native vegetation that is preferred by the Tribe. All plants preferred by the Tribe that are proposed to be removed as part of site development shall be made available to the Tribe prior to their removal.

Significance Conclusion for Impact CUL-2 with Implementation of Mitigation Measures

With implementation of **Mitigation Measure CUL-2a** and **Mitigation Measure CUL-2b**, impacts related to a substantial adverse change in the significance of an archaeological resource would be less than significant.

Threshold CUL-3: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact CUL-3: **No tribal cultural resources meeting the definition set forth 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 is known to exist within the Project site. However, there is still a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities. With implementation of Mitigation Measure CUL-2a and Mitigation Measure CUL-2b impacts will be *less than significant*.**

Methodology

The proposed Specific Plan would have a significant impact on a tribal cultural resource, as that term is defined in Public Resources Code Section 21074, would constitute a significant impact if Project activities would disturb, damage, or degrade the tribal cultural resource or its contextual setting resulting in substantial loss of its cultural value.

Impact Assessment

As noted above, the City provided formal notification to California Native American tribal representatives identified by the NAHC to offer consultation with interested tribes regarding the proposed Specific Plan. In addition, the City of La Habra began the public outreach process concurrent with its review of the proposed Specific Plan. Two Tribes responded to this formal notification. Both Tribes requested the presence of Native American Monitor during Project site ground disturbing activities. No specific information on the presence of Tribal Cultural Resources was provided.

Joseph Ontiveros of the Soboba Band of Luiseño Indians noted that the Tribe had assessed the Project information provided by the City, and did "not have specific concerns regarding known cultural resources." The Tribe also requested that a Native American Monitor be present during any future ground disturbing activities. The Gabrieleño Band of Mission Indians-Kizh Nation stated that the Gabrieleño Band recognized that the Project site had been previously developed, but also cautioned that "there is still a possibility that unknown, yet significant, cultural resources will be encountered during ground disturbance activities." The Gabrieleño Band therefore requested two mitigation measures: (1) presence of Native American Monitors during construction-related ground disturbing activities and (2) Tribal review of any native vegetation that might be removed, along with making all plants preferred by the Tribe available to the Tribe prior to their removal.

Significance Conclusion for Impact CUL-3

With implementation of **Mitigation Measure CUL-2a** and **Mitigation Measure CUL-2b**, impacts related to a substantial adverse change in the significance of an archaeological resource would be less than significant.

Threshold CUL-4: Directly or indirectly destroy a unique paleontological resource or unique geologic feature.

Impact CUL-4: Implementation of the proposed Rancho La Habra Specific Plan could destroy a unique paleontological resource or unique geologic feature as the result of future site grading within areas previously undisturbed by golf course construction. However, compliance with existing regulations and implementation of EIR mitigation measures would reduce this potential impact to a less-than-significant level. The impact would therefore be *significant but mitigable*.

Methodology

A formation or rock unit is determined to have paleontological sensitivity based on previous studies of sediment types in the region that contain vertebrate, invertebrate, or plant fossils. All sedimentary rocks and certain volcanic and mildly metamorphosed rocks are considered to have sensitivity for paleontological resources. Hence, a determination of the potential of paleontological resources to exist is based on the types of soils and rock that underlie a site and the potential for fossils suspected to occur in that unit, because generally the actual existence of fossils cannot be known until excavation for a development project is underway.

The potential of the proposed Rancho La Habra Specific Plan to result in impacts on paleontological resources is based on identification of the rock and soils in the Specific Plan area. Ground disturbance in geologic units and geographic areas known to contain scientifically significant fossils would be considered to have a significant impact on non-renewable paleontological resources (CEQA Guidelines Sections 15064.5 and 15023, and CEQA Guidelines Appendix G, Section V, Part C).

A consulting firm, Paleo Solutions, reviewed geologic mapping and literature including published and unpublished scientific papers. A paleontological records search was conducted at the Natural History Museum of Los Angeles County (LACM) for fossil localities occurring within the Project site and a 1-mile radius. Additional searches of available online databases, including the PaleoBiology Database (PBDB) and University of California Museum of Paleontology (UCMP) database, were conducted by Paleo Solutions staff.

In April 2015, Paleo Solutions conducted a paleontological reconnaissance survey to identify any fossil localities within the Project site and to determine the paleontological sensitivity of the geologic deposits that might be affected during Project construction. The results of the paleontological geologic map review, literature and museum records searches, and reconnaissance survey were used to complete a paleontological sensitivity analysis using the Society of Vertebrate Paleontology (SVP) (2010) standard procedural guidelines.

Impact Assessment

Three localities (fossil shell fragments) were observed within the San Pedro Formation portion of the Project site during the onsite paleontological reconnaissance survey:

- Locality 20150415BJW.01 was observed as float (not in-situ) in sediments of the San Pedro Formation on the surface of a drainage adjacent to a golf cart track in the northeast portion of the site. The locality consists of a single bivalve shell fragment.
- A second bivalve shell fragment (Locality 20150415BJW.02) was recorded from the San Pedro Formation along the southern boundary of the site. It was discovered as float in moderately sorted, silty sediments on a steep hillside covered by dense brush.
- The final locality, 20150415BJW.03, was observed in boulder of San Pedro Formation used in the construction of a man-made dam on a drainage adjacent to a golf cart track. The original source of the boulder is unknown, but was likely found locally. The locality consists of a bivalve shell deposit (25+ shells) embedded in a well-indurated, very fine- to fine-grained sandy siltstone matrix.

Based on the SVP procedural guidelines applied to the findings of the literature review, records search, and reconnaissance survey, bedrock of both the La Habra and San Pedro formations has high potential for paleontological resources in the vicinity of the Project site. Previously disturbed areas and areas mapped as Quaternary alluvium have no and moderate/unknown potential, respectively, for discovery of paleontological resources at the surface, but may overlie paleontologically sensitive bedrock.

Previous disturbance of the soil within the majority of the Project site has resulted from construction of the existing golf course; grading and construction activities within those previously disturbed areas would not disturb, damage, or degrade any paleontological resource or disturb the setting of such a resource. However, there remain areas within the Project site that are largely undisturbed and retain features of the natural landscape. Such previously undisturbed areas have a moderate potential to contain previously unknown paleontological resources. Proposed development activities in these previously undisturbed areas and in areas where excavation may occur to greater depths than were previously undertaken could disturb, damage, or degrade previously undiscovered paleontological resources.

Significance Conclusion for Impact CUL-4

Because the La Habra and San Pedro formations present within the Project site have high potential for paleontological resources, and on-site Quaternary alluvium has a moderate/ unknown potential to contain such resources, Project grading, and other earth-moving activities within previously undisturbed portions of the Project site could disturb paleontological resources and have a significant impact.

Mitigation Measures

Mitigation Measure CUL-4: The applicant/developer shall retain a County-certified paleontologist approved by the City's Chief Building Official to conduct full-time monitoring during all earth-moving activities involving previously undisturbed sediments of the La Habra and San Pedro Formations along with periodic paleontological spot checks within excavation areas mapped as Quaternary alluvium exceeding depths of 5 feet to determine if older, paleontologically sensitive sediments are present. If such older, paleontologically sensitive sediments are present, full-time monitoring shall be implemented.

If paleontological resources are encountered during ground-disturbing activities, work in the immediate vicinity of the resource shall cease until a County-certified paleontologist has assessed the discovery and appropriate treatment is determined and implemented.

Significance Conclusion for Impact CUL-4 with Implementation of Mitigation Measure

With implementation of **Mitigation Measure CUL-4**, impacts related to destruction of a unique paleontological resource would be less than significant.

Threshold CUL-5: Disturb any human remains, including those interred outside of formal cemeteries.

Impact CUL-5: Implementation of the proposed Rancho La Habra Specific Plan could disturb previously unknown human remains interred outside of formal cemeteries. However, compliance with existing regulations would ensure that this potential impact would be *less than significant*.

Methodology

The assessment of potential impacts related to human remains consists of a qualitative review of the existing cultural resource conditions and previous land uses within the Specific Plan area, the potential for human remains to be located within the Project site, and a determination of whether there are adequate provisions to ensure protection of human remains, if found during Project construction activities. An impact would be considered significant if human remains are disturbed outside of the guidelines of the California Health and Safety Code and the Public Resources Code.

Impact Assessment

As described previously, almost all of the Project site has been previously disturbed and developed as a golf course; however, Specific Plan implementation could involve grading in previously undisturbed areas.

In the event of an inadvertent discovery or recognition of any human remains during ground disturbance activities, regulations pursuant to California Health and Safety Code Section 7050.5 would be implemented. These regulations require that if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings regarding the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98, which outlines the NAHC notification process and the appropriate procedures if the Coroner determines the human remains to be Native American.

Significance Conclusion for Impact CUL-5

The Specific Plan would be implemented in compliance with Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Compliance with these regulations would protect any previously unidentified human remains, and impacts would be less than significant.

3.6.6 REFERENCES – CULTURAL RESOURCES

City of La Habra, *City of La Habra General Plan 2035,* adopted January 21, 2014.

Paleo Solutions, Archaeological Resource Survey – Rancho La Habra – La Habra Project, September 2016.

Paleo Solutions, Paleontological Technical Study – Rancho La Habra – La Habra Project, September 2016.

State of California, Governor's Office of Planning and Research (OPR), State of California Tribal Consultation Guidelines: Supplement to General Plan Guidelines 2005. Accessed May 7, 2017: http://www.parks.ca.gov/pages/22491/files/tribal_consultation_guidelines_vol-4.pdf.

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3.7 TRAFFIC AND CIRCULATION

See Section 3.7 of Final EIR Volume 2 – Partially Recirculated Draft EIR for an updated analysis of Traffic and Circulation.

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3.8 AIR QUALITY

See Section 3.8 of Final EIR Volume 2 – Partially Recirculated Draft EIR for an updated analysis of Air Quality.

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3.9 GREENHOUSE GAS EMISSIONS

See Section 3.9 of Final EIR Volume 2 – Partially Recirculated Draft EIR for an updated analysis of Greenhouse Gas Emissions.

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3.10 ENERGY RESOURCES

See Section 3.10 of Final EIR Volume 2 – Partially Recirculated Draft EIR for an updated analysis of Energy Resources.

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3.11 NOISE AND VIBRATION

See Section 3.11 of Final EIR Volume 2 – Partially Recirculated Draft EIR for an updated analysis of Noise and Vibration.

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3.12 HAZARDS AND HAZARDOUS MATERIALS

3.12.1 INTRODUCTION

a. Overview

This section considers the nature and range of foreseeable hazardous materials and physical hazards/impacts that would result from implementation of the proposed Rancho La Habra Specific Plan. It identifies the ways that hazardous materials and other types of hazards could expose people and the environment to various health and safety risks during construction activities and operation of proposed land uses within and adjacent to the Specific Plan area.

This section also describes routine hazardous materials that are likely to be used, handled, or processed within the Specific Plan area, and the potential for upset and accident conditions in which hazardous materials could be released. The impact analysis identifies ways in which hazardous materials might be routinely used, stored, handled, processed, or transported, and evaluates the extent to which existing and future populations could be exposed to hazardous materials. The potential for fire hazards and emergency response/access issues associated with proposed development of the Specific Plan is also addressed.

Air emissions can also carry hazardous materials and create potential risks to human health and the environment. Sources of hazardous or toxic air emissions include but are not limited to industrial processes, vehicle use (diesel particulate emissions from exhaust), and proximity to existing or relocated sources of diesel or other toxic air emissions. Impacts related to toxic air contaminants, including the release of diesel particulate matter, from construction truck trips and/or delivery truck trips (when the haul routes are located within 0.25-miles of an existing or proposed school) are identified in Section 3.8, *Air Quality*. Flooding is addressed in Section 3.13, *Hydrology and Water Quality*. Other safety hazards, such as earthquakes, are addressed in Section 3.14, *Geology, Soils, and Seismicity*.

b. Definitions

Some of the key terms used in the management of hazardous materials and the context within which they apply to sites where contaminants have been identified in soil or groundwater are presented below.

- **Constituent of Concern** or **Contaminant of Concern** is a hazardous material that has the potential to cause damage to human health or the environment and create a "risk" to human health and the environment.
- **Exposure Pathway** is the course a chemical or pollutant takes from the source to the organism exposed. A "complete" exposure pathway consists of four elements: chemical

sources, migration routes (i.e., transport in the environment), an exposure point for contact (i.e., soil, air, or, water), and exposure routes.

- **Exposure Route** is the way a chemical or pollutant enters the organism after contact. Four exposure routes are recognized in risk evaluation methods: ingestion, inhalation, dermal (skin and eye), and injection.
- **Extremely Hazardous Substance**, in the context of Public Resources Code Section 21151.4 pertaining to hazardous materials emissions near schools, refers to a material included on lists compiled pursuant to Section 25532 of the California Health and Safety Code, which incorporates regulated toxic and flammable substances under Section 112(r) of the federal Clean Air Act. Table 3 of Section 112(r) lists those regulated substances pursuant to Section 25532(g)(2) of the California Health and Safety Code.
- **Hazard** includes any condition, practice, or procedure that is or may be dangerous, harmful, or perilous to employees, property, neighbors, or the general public.
- **Hazardous Material** refers to any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or an administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment (California Health and Safety Code, Section 25501).
- **Hazardous Materials Release Site** refers to any area, location, or facility where a hazardous material has been released or threatens to be released to the environment.
- **Hazardous Waste** refers to any waste substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may either cause or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed (California Health and Safety Code, Section 25117).
- **Recognized Environmental Concerns** are defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property (1) due to any release to the environment, (2) under conditions indicative of a release to the environment, or (3) under conditions that pose a material threat of a future release to the environment.[1]
- **Remedial Action** or **Remediation** refers to actions required by federal, state, or local laws, ordinances, or regulations necessary to prevent, minimize, or mitigate damage that may result from the release or threatened release of a hazardous material. These actions include

[1] As per ASTM Standard Practice E 1527-13.

site cleanup; monitoring, testing, and analysis of site conditions; site operation and maintenance; and placing conditions or restrictions on the land use of a site upon completion of remedial actions.

- **Risk** is determined by the probability of exposure to a hazardous material or a hazardous condition and the severity of harm such exposure would pose. Accordingly, the likelihood and means of exposure, in addition to the inherent toxicity of a material or damage that could be caused by a hazardous condition, are used to determine the degree of risk to human health or the environment.

3.12.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Federal and state laws require that hazardous materials be specially managed and that excavated soils having concentrations of contaminants that are higher than specified acceptable levels be specially managed, treated, transported, and/or disposed of as a hazardous waste. Title 22 of the California Code of Regulations Sections 66261.20–24 contains technical descriptions of characteristics that would cause a soil, once excavated and discarded, to be designated a hazardous waste. California regulations are compliant with federal regulations and, in most cases, are more stringent. State and federal regulations also set standards for allowable concentrations of contaminants in order to protect the public health from harmful concentrations of hazardous materials.

Numerous federal, state, and local regulations have been enacted to prevent or mitigate damage to public health and safety and the environment from the release or threatened release of hazardous substances into the environment or workplace, to protect human health and environmental resources from existing site contamination, and to protect human health and safety in relation to airport operations. Thus, implementation of the proposed Rancho La Habra Specific Plan is subject to a range of federal, state, regional, and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

The primary federal agencies responsible for hazardous materials management include the U.S. Environmental Protection Agency (USEPA) and the U.S. Department of Labor Occupational Safety and Health Administration (OSHA).

Resource Conservation and Recovery Act of 1976

Federal hazardous waste regulations are generally promulgated under the Resource Conservation and Recovery Act (RCRA). Pursuant to RCRA, USEPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in a "cradle to grave" manner. RCRA was designed to protect human health and the environment, reduce or eliminate the generation of hazardous waste, and conserve energy and natural resources.

The Hazardous and Solid Waste Amendments of 1984 both expanded the scope of RCRA and increased the level of detail in many of its provisions, reaffirming the regulation from generation to disposal and prohibiting the use of certain techniques for hazardous waste disposal. USEPA has largely delegated responsibility for implementing the RCRA program to the State of California, which implements this program through the California Hazardous Waste Control Act.

RCRA regulates landfill siting, design, operation, and closure (including identifying liner and capping requirements) for licensed landfills. In California, RCRA landfill requirements are delegated to the California Department of Resources Recycling and Recovery (CalRecycle), which is discussed in detail below.

RCRA allows USEPA to oversee the closure and post-closure of landfills. Additionally, the federal Safe Drinking Water Act, 40 Code of Federal Regulations (CFR) Part 141, gives USEPA the power to establish water quality standards and beneficial uses for waters from below- or above-ground sources of contamination. For the Specific Plan area, water quality standards are administered by the Regional Water Quality Control Board (RWQCB).

RCRA also allows USEPA to control risk to human health at contaminated sites. Vapor intrusion presents a significant risk to human populations overlying contaminated soil and groundwater and is considered when conducting human health risk assessments and developing Remedial Action Objectives.

Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendments and Reauthorization Act of 1986

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA in 1986, stressing the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations, provided new enforcement authorities and settlement tools, increased state involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to $8.5 billion. There are no Superfund sites within the Specific Plan area.

Emergency Planning and Community Right-to-Know Act of 1986

Through the Emergency Planning and Community Right-to-Know Act of 1986 (also known as Title III of Superfund), USEPA also imposes requirements that hazardous materials are properly handled in order to prevent or mitigate risk to human or environmental health in the event of an accidental release.

Occupational Safety and Health Act of 1970

Federal and state occupational health and safety regulations also contain provisions regarding hazardous waste management through the Occupational Safety and Health Act of 1970 (amended), which is implemented by OSHA. Code 29 of Federal Regulations (29 CFR) requires special training of handlers of hazardous materials; notification to employees who work in the vicinity of hazardous materials; acquisition from the manufacturer of material safety data sheets (MSDS), which describe the proper use of hazardous materials; and training of employees to remediate any hazardous material accidental releases. OSHA regulates administration of 29 CFR.

OSHA also establishes standards regarding safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulations for Construction (29 CFR 1926.65 Appendix C) contains requirements for construction activities, which include occupational health and environmental controls to protect worker health and safety. The guidelines describe the health and safety plan(s) that must be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Due to the existence of hazardous materials in the vicinity of the Specific Plan area, adherence to applicable hazard-specific OSHA standards would be required to maintain worker safety. For example, methane is regulated by OSHA under 29 CFR Part 1910.146 relative to worker exposure to a "hazardous atmosphere" within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport, and Title 42, Chapter 82 governs solid waste disposal and resource recovery.

Hazardous Materials Transportation Act

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (HMTA), which is administered by the Research and Special Programs Administration (RSPA) of the U.S. Department of Transportation (USDOT). The HMTA provides USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property, which is

inherent in the commercial transportation of hazardous materials. The HMTA governs the safe transportation of hazardous materials by all modes, excluding bulk transportation by water. The Research and Special Programs Administration carries out these responsibilities by prescribing regulations and managing a user-funded grant program for planning and training grants for states and Indian tribes. USDOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or is involved in any way with the manufacture or testing of hazardous materials packaging or containers. USDOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational standards, and highway routing. Additionally, USDOT is responsible for developing curricula to train for emergency response, and administers grants to states and Indian tribes for ensuring the proper training of emergency responders. The HMTA was enacted in 1975 and was amended and reauthorized in 1990, 1994, and 2005.

b. State Plans, Policies, and Regulations

Hazardous Materials Management

In the regulation of hazardous waste management, California law often mirrors or is more stringent than federal law. The California Environmental Protection Agency (CalEPA) and California Occupational Safety and Health Administration (CalOSHA) are the primary state agencies responsible for hazardous materials management. Additionally, the California Emergency Management Agency (CalEMA) administers the California Accidental Release Prevention (CalARP) program. The California Department of Toxic Substances Control (DTSC), which is a branch of CalEPA, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste, as well as the investigation and remediation of hazardous waste sites. The California DTSC program incorporates the provisions of both federal (RCRA) and state hazardous waste laws.

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Act was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program, as follows:

- The regulations included definitions of what was a waste and what was hazardous as well as what was necessary for appropriate handling, processing, and disposal of hazardous and

extremely hazardous waste in a manner that would protect the public, livestock, and wildlife from hazards to health and safety.

- The early regulations also established a tracking system for the handling and transportation of hazardous waste from the point of waste generation to the point of ultimate disposition, as well as a system of fees to cover the costs of operating the hazardous waste management program.
- Advancing the newly developing awareness of hazardous waste management issues, the program established a technical reference center, for public and private use, dealing with all aspects of hazardous waste management.

California Government Code Section 65962.5 (a), Cortese List

The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the state, local agencies, and developers to comply with CEQA requirements for providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires CalEPA to develop an updated Cortese List at least annually. The DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Hazardous Materials Business Plans

Article 1 of Chapter 6.95 of the California Health and Safety Code (Sections 25500–25520) requires that any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. An HMBP includes three sections: (1) an inventory of hazardous materials, including a site map that details their location; (2) an emergency response plan; and (3) an employee-training program. HMBPs serve as an aid to employers and employees in managing emergencies at a given facility. They also help better prepare emergency response personnel for handling a wide range of emergencies that might occur at the facility.

HMBPs are submitted to the Department of Environmental Health Hazardous Materials Division. The plans must be resubmitted, reviewed, revised, or amended as necessary every 3 years. The HMBP must also be amended within 30 days whenever there are changes in the amount or location of stored hazardous chemicals on a site. The Hazardous Materials Division conducts routine inspections at businesses required to submit business plans. The purpose of these inspections is to (1) ensure compliance with existing laws and regulations concerning HMBP requirements, (2) identify existing safety hazards that could cause or contribute to an

accidental spill or release, and (3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials. After initial submission of an HMBP, the business must review and recertify the HMBP every year.

Risk Management Plans

Article 2 of Chapter 6.95 of the California Health and Safety Code (Sections 25531–25543.3) requires the owner or operator of a stationary source (non-transportation) with more than a threshold quantity of a regulated substance to prepare a risk management plan. The state statutes and regulations—called the CalARP program—combine federal and state program requirements for the prevention of accidental releases of listed substances into the atmosphere. The CalARP program requires that a risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The risk management plan must be revised every 5 years or as necessary. Typical facilities or businesses that are required to prepare risk management plans include ammonia refrigeration facilities, water treatment and wastewater treatment plants that handle chlorine gas, and facilities that store flammable chemicals such as methane and propane.

Title 22 of California Code of Regulations and Hazardous Waste Control Law, Chapter 6.5

The DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Act. Both laws impose "cradle-to-grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Act to county health departments and other Certified Unified Program Agencies.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In 1996, CalEPA adopted the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates and coordinates the six state programs that regulate business and industry use, storage, handling, and disposal of hazardous materials and wastes. The Los Angeles County Fire Department Health and Hazardous Materials Division provides the regulatory oversight for federal, state, and local laws and regulations related to hazardous materials use and disposal within the City of La Habra (City).[2] This County agency protects the public health and the environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response,

[2] The Orange County Health Care Agency, as the Certified Unified Program Agency (CUPA), has local authority for site remediation.

enforcement, and site mitigation oversight. In addition, the County Fire Department Health and Hazardous Materials Division implements the following programs that are relevant to existing uses and the new uses that are proposed by the Specific Plan:

- Hazardous Materials Reporting and Response Planning (Hazardous Materials Disclosure)
- Uniform Fire Code Business Plan
- Hazardous Waste Generation and Onsite Treatment
- Accidental Release Prevention Program
- Above-Ground Storage Tank Regulations
- Underground Storage Tank Regulations

Title 23 of California Code of Regulations, Underground Storage Tank Act

The underground storage tank monitoring and response program is required under Chapter 6.7 of the California Health and Safety Code and Title 23 of the California Code of Regulations. The program was developed to ensure that facilities meet regulatory requirements for design, monitoring, maintenance, and emergency response in operating or owning underground storage tanks. Health departments are the local administering agencies for this program.

Title 27 of California Code of Regulations, Solid Waste

Title 27 of the California Code of Regulations contains a waste classification system that applies to solid wastes that cannot be discharged directly or indirectly to waters of the state and that therefore must be discharged to waste management sites for treatment, storage, or disposal. CalRecycle and its certified Local Enforcement Agency regulate the operation, inspection, permitting, and oversight of maintenance activities at active and closed solid waste management sites and operations.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or "Chisels") are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by USEPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

Senate Bill 1889, Accidental Release Prevention Law/CalARP

Senate Bill (SB) 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, the CalARP program replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. The CalARP program addresses facilities that contain specified hazardous materials, known as "regulated substances," which if involved in an accidental release could result in adverse off-site consequences. The CalARP program defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

Occupational Safety

Title 8 – CalOSHA

CalOSHA administers federal occupational safety requirements and additional state requirements in accordance with California Code of Regulations Title 8. CalOSHA requires preparation of an Injury and Illness Prevention Program (IIPP), which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. This program is administered via inspections by the local CalOSHA enforcement unit.

CalOSHA regulates lead exposure during construction activities under California Code of Regulations Title 8, Section 1532.1, Lead, which establishes the rules and procedures for conducting demolition and construction activities such that worker exposure to lead contamination is minimized or avoided.

Compliance with CalOSHA regulations and associated programs would be required for the proposed Specific Plan due to the potential hazards posed by on-site construction activities and contamination from former uses.

Emergency Response to Hazardous Materials Incidents

The State of California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local governments and private agencies. The plan is administered by CalEMA and includes response to hazardous materials incidents. CalEMA coordinates the response of other agencies, including CalEPA, California Highway Patrol, California Department of Fish and Wildlife, Regional Water Quality Control Board Santa Ana Region, South Coast Air Quality Management District, County of Los Angeles Fire Department, and the Orange County Health Care Agency.

California Emergency Services Act

The California Emergency Services Act was adopted to establish the state's roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the state. This Act is intended to protect health and safety by preserving the lives and property of the people of the state.

California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act provides financial aid to local agencies to assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The California Natural Disaster Assistance Act is activated after the following occurs: (1) a local declaration of emergency is issued, or (2) CalEMA gives concurrence with the local declaration, or the governor issues a proclamation of a state emergency. Once the Act is activated, local government is eligible for certain types of assistance, depending upon the specific declaration or proclamation issued.

State Fire Regulations

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The state fire marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

California Fire Code (Chapter 33, Fire Safety During Construction and Demolition)

California Fire Code Chapter 33 related to fire safety during construction and demolition prescribes safeguards to provide reasonable safety to life and property from fire during such operations. Specific safeguards relate to oil-fired heaters, gas heaters, refueling, smoking, waste disposal, welding, electrical, flammable and combustible odors, water supply for fire protection, and fire extinguishers. Implementation of these safeguards is designed to reduce the potential for fire-related hazards during construction and demolition activities.

Abandoned Oil Wells – Public Resources Code Section 3208.1a

The Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR) is charged with implementing Section 3208.1 of the Public Resources Code. As a result, DOGGR developed the Construction Site Well Review Program to assist local permitting agencies in

identifying and reviewing the status of oil or gas wells located near or beneath proposed structures.

Before issuing building or grading permits, local permitting agencies review and implement DOGGR's pre-construction well requirements. DOGGR recommends interaction between local permitting agencies and DOGGR to help resolve land use issues and allow for "responsible development in oil and gas fields."

As part of DOGGR's construction site plan review process, DOGGR requires wells to be tested for leakage, and wells under buildings or with restricted access to be vented and abandoned or re-abandoned to present-day standards.

Fire Safety

California Building Code and Fire Code

California Building Code Chapter 7a, Materials and Construction Methods For Exterior Wildfire Exposure, and California Fire Code Chapter 47, Requirements for Wildland-Urban Interface Fire Areas, set forth minimum standards to increase the ability of a building to resist the intrusion of flame or burning embers being projected by a vegetation fire, and are intended to reduce fire losses along the interface between wildlands and urban areas through the use of performance and prescriptive requirements. These standards are applied in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area designated by the enforcing agency (e.g., City of La Habra, Los Angeles County Fire Department). These California Building Code provisions establish requirements for building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a Fire Hazard Zone or a Wildland-Urban Interface Fire Area.

General Guidelines for Creating Defensible Space

Following changes to Public Resources Code Section 4291 that expanded the defensible space clearance requirement to be maintained around buildings and structures from 30 feet to a distance of 100 feet, the State of California developed guidelines to provide property owners with examples of fuel modification measures that can be used to create an area around buildings or structures to create defensible space. The intent of defensible space guidelines is to establish a perimeter around buildings and structures that provides firefighters a working environment to protect buildings and structures from encroaching wildfires, as well as to minimize the chance that a structure fire will escape to the surrounding wildland.

c. Regional and Local Plans, Policies, and Regulations

South Coast Air Quality Management District Rule 1166

Rule 1166 sets requirements to control the emission of volatile organic compounds (VOC) from excavating, grading, handling, and treating soil containing VOCs due to leakage from storage or transfer operations, accidental spillage, or other deposition. This rule requires development and approval of a mitigation plan, monitoring of VOC concentrations, and implementation of the mitigation plan if VOC-contaminated soil is detected. Worker safety and health are also regulated by the federal Occupational Safety and Health Act of 1970 and CalOSHA. Exposure limits define the maximum amount of hazardous airborne chemicals to which an employee may be exposed over specific periods. When administrative or engineering controls cannot achieve compliance with exposure limits, protective equipment or other protective measures must be used. Employers are also required to provide a written health and safety program, worker training, emergency response training, and medical surveillance.

Orange County Health Care Agency

Hazardous Waste Inspection Program

The OCHCA Environmental Health Division implements a Hazardous Waste Inspection Program throughout Orange County. The purpose of this program is to ensure that all hazardous wastes generated by Orange County businesses are properly handled, recycled, treated, stored and disposed.

Specialists in this program inspect facilities that generate hazardous waste, evaluate hazardous waste generating industries, investigate reports of illegal hazardous waste disposal, and respond to emergency spills of hazardous chemicals. Specialists also participate in public education programs designed to inform industries and residents about the laws and regulations relating to safe disposal of hazardous waste.

Underground Storage Tank Inspection Program

The OCHCA Environmental Health Division oversees an underground storage tank inspection program throughout Orange County, with the exception of cities of Anaheim, Fullerton, and Orange. As the Certified Unified Program Agency (CUPA), the Environmental Health Division is tasked by the California Secretary for Environmental Protection to implement and enforce the underground storage tank codes. To this end, specialists from Environmental Health Division inspect underground storage tanks, monitoring equipment and compliance documents of UST systems to ensure that these systems are in compliance with the applicable laws and regulations. The OCHCA also serves to educate and assist tank owners and operators with regulatory requirements.

Above-Ground Petroleum Storage Act Compliance

Effective January 1st, 2008, Assembly Bill 1130 (Above-ground Petroleum Storage Act) authorized implementation of the Above-ground Petroleum Storage Tank Program to the local Certified Unified Program Agency (CUPA). The Act applies to business with a total storage capacity, at any one site of more than 1,320 gallons of petroleum products in tanks or containers larger than 55 gallons.

As the Certified Unified Program Agency responsible for the inspections of these facilities in all cities in Orange County, except for Anaheim. Tank facilities that are regulated under the Aboveground Petroleum Storage Act (APSA) are also regulated by the USEPA Region 9 Oil Program Clean Water Act Compliance Office. The Federal standards regulates non-petroleum oils that are not regulated under the Act, such as vegetable oil. It is possible for a tank facility to be regulated and inspected by both the USEPA and Orange County, or just the USEPA.

Hazardous Material Disclosure and Business Emergency Plan Programs

The Hazardous Material Disclosure and Business Emergency Plan programs require businesses that handle hazardous materials in quantities equal to or greater than 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity, report this information to the local implementing agency called the Certified Unified Program Agency (CUPA). The purpose of the programs is to prevent or minimize damage to public health and safety and the environment, from a release or threatened release of hazardous materials. These locally implemented programs also satisfy federal community right-to-know laws.

The Environmental Health Division was designated as the Certified Unified Program Agency for the County of Orange by the State Secretary for Environmental Protection on January 1, 1997. The Hazardous Material Disclosure and Business Emergency Plan programs require Orange County businesses to

- Inventory their hazardous materials;
- Develop a site map;
- Develop an emergency plan; and
- Implement a training program for employees.

The Environmental Health Division verifies information disclosed by businesses and provides it to agencies that are responsible for the protection of public health and safety and the environment, such as fire departments, hazardous materials response teams, and other local environmental regulatory groups. The public also has a right to review this information, with the exception of documents containing trade secrets or other confidential information.

City of La Habra General Plan

City of La Habra General Plan policies relevant to hazards and hazardous materials include the following.

Chapter 7, Community Safety

NH 2.1 Urban/Wildland Interface. Locate, design, and construct development within or adjacent to areas subject to high wildland fire risks, such as La Habra's hillsides, to standards that reduce exposure and potential impacts.

NH 2.2 Open Space Fire Suppression Access. Ensure existing access points to La Habra's open space areas are maintained for fire suppression.

NH 2.3 Fuel Modification and Vegetation Management Review. Continue to support the City's fire service provider's review of new development to assure it complies with fuel modification requirements, creation of defensible space, and incorporates appropriate plantings and proper vegetation management, as applicable.

NH 2.4 Wildland Fire Coordination. Work with the City's fire service provider and surrounding jurisdictions that are subject to wildland fires which may impact La Habra to ensure coordinated wildland fire hazard protection and prevention services.

EP 1.1 Emergency and Hazard Mitigation Plans. Maintain and implement emergency response and disaster preparedness/hazard mitigation plans to reduce or eliminate the long-term risk to life and property from natural or human-induced disasters and emergencies and to be eligible for certain disaster assistance and mitigation funding including the La Habra Emergency Response Plan (ERP) and the La Habra Hazard Mitigation Plan (HMP).

EP 1.2 Emergency Management Systems. Maintain and implement compliance standards and protocol provisions for emergency response organization, communication, and incident management to retain eligibility for federal and state grant and recovery funds including the National Incident Management System (NIMS) and California's Standardized Emergency Management System (SEMS).

EP 1.4 Adequate Emergency Services. Coordinate with fire and police service, emergency medical aid providers, and other support services that include first-response to disasters and emergencies including hazardous materials spills.

EP 1.5 Emergency Site Access. Require that roads, driveways, and other clearances around structures are located and designed to ensure emergency access.

HW 1.1 Hazardous Materials Response. Maintain and periodically update the City's Hazardous Material Response Plan for the disclosure, regulation, and mitigation of the hazards created by the use, creation, storage, or on-site processing of hazardous materials.

HW 1.3 Hazardous Material Disclosure. Require that essential information is provided to emergency service personnel of the known use and dangers of hazardous materials present in La Habra, in accordance with La Habra's Hazardous Material Disclosure Ordinance.

HW 1.4 Assessment of Known Areas of Contamination. Require new development in known contamination areas to perform comprehensive soil and groundwater contamination assessments, in accordance with applicable regulations, and if contamination exceeds regulatory levels, require new development to undertake remediation procedures consistent with county, regional, and state regulations prior to any site disturbance or development.

HW 1.5 Remediation of Known Sites. Require that businesses and property owners of known hazardous materials contamination and waste sites develop and implement a remediation plan to investigate, facilitate, and manage the cleanup in coordination and compliance with Orange County, state, and/or appropriate federal agency requirements including the California Department of Toxic Substances Control (DTSC).

HW 1.6 Hazardous Materials Business Plan. Require that owners and/or operators of facilities that handle hazardous materials or a mixture containing hazardous materials having a quantity equal to or greater than 55 gallons for liquid, 500 pounds for solids, or 200 cubic feet of gas complete a Hazardous Materials Business Plan (HMBP) to minimize the potential for accidents involving hazardous materials and to facilitate an appropriate response to possible hazardous materials emergencies pursuant to the California Hazardous Materials Release Response Plans and Inventory Law (Business Plan Act).

HW 1.7 Project Review. Review all proposed development projects that manufacture, use, or transport hazardous materials and waste in coordination with appropriate state and federal agencies.

HW 1.8 Best Practices and New Technologies. Encourage industries, businesses, and residents to utilize best practices and technologies to reduce the use of hazardous materials and generation of hazardous wastes.

HW 1.9 Hazardous Materials Transport. Coordinate with Orange County and other relevant agencies to enforce applicable state and local laws regulating the transport of hazardous materials through the City of La Habra including the restriction of hazardous materials transport to designated routes.

HW 3.1 Household Hazardous Waste Program. Provide incentives, when available, to encourage source reduction of hazardous wastes through the City's Household Hazardous Waste Program.

HW 3.2 Hazardous Waste Collection. Encourage La Habra residents to safely dispose of household hazardous waste such as batteries and paints and E-waste at community collection events or at designated Orange County collection centers.

HW 3.3 Used Motor Oil. Encourage La Habra residents to safely dispose of used motor oil at the certified oil recycling centers in the City.

HW 3.6 Proper Disposal of Prescription and Over-the-Counter Medications. Continue to collect unused and waste prescription and other over-the-counter medications at the Police Department's annual collection event and work with pharmacies in La Habra to expand their collection throughout the year for proper disposal.

City of La Habra Hazard Mitigation Plan

The City of La Habra Hazard Mitigation Plan was developed to reduce or eliminate long-term risk to human life and property from the hazards identified in **Table 3.12-1**.

La Habra Emergency Response Plan

The City prepared an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan includes information on the Emergency Operations Organization, the roles and responsibilities of each City division, and operational checklists to guide response actions.

The Emergency Response Plan identifies the actions to be taken by the City to prevent disasters where possible, reduce the vulnerability of residents to any disasters that cannot be prevented, establish capabilities for protecting citizens from the effects of disasters, respond effectively to the actual occurrence of disasters, and provide for recovery in the aftermath of any emergency involving extensive damage or other debilitating influence on the normal pattern of life within the community. The response procedures and organization strategies provided in the plan are a step-by-step guide to response and operations during disasters and events necessitating emergency response. Although the City planning area is exposed to hazardous waste incidents that have the potential to disrupt the community and cause localized damage and severe injury or disability, the City adopted several policies intended to ensure that adequate emergency response is maintained throughout the City.

Table 3.12-1
Hazards Addressed in La Habra Hazard Mitigation Plan

	Risk Rank				
Hazard	Low	Moderately Low	Moderate	Moderately High	High
Earthquake					√
Pandemic					√
Extreme Heat				√	
Terrorism				√	
Power Failure				√	
Wildfire				√	
Pipeline Failure				√	
Severe Storm				√	
Nuclear Plant Failure				√	
Transportation Accident - Air			√		
Drought Risk			√		
Transportation Accident - Rail		√			
Civil Unrest		√			
Tornado - Wind		√			
Hazmat Release		√			
Flood		√			
Reservoir Failure		√			

Source: La Habra Hazard Mitigation Plan, 2014.

The Emergency Response Plan provides for (1) the maintenance, organization, communication, and management of the plan; (2) a comprehensive evacuation plan that identifies evacuation strategies, routes, and resources required for the safe and orderly evacuation of affected areas of the City and provides emergency shelters; (3) coordination with fire and police service, emergency medical aid providers, and other support services that include first response to disasters and emergencies including hazardous materials spills; and (4) requirements that roads, driveways, and other clearances around structures be located and designed to ensure emergency access.

City of La Habra Municipal Code

La Habra Municipal Code Chapter 18.36, Hazardous Materials Disclosure, requires any person or business handling at least 500 pounds or 55 gallons per year, whichever is the lesser, of a

hazardous material to submit a completed disclosure form to the Los Angeles County Fire Department each January and July. The form describes the types of hazardous substances being handled, their quantity, and information on how and where the hazardous materials are handling or used, including submission of general floor plans of the facility and specific site plans that designate exact locations where chemicals are stored, so as to allow safety personnel to prepare adequate emergency response plans for potential releases of hazardous materials. Municipal Code Chapter 15.46 of the La Habra Municipal Code adopts the Los Angeles County Fire Code, and sets fire safety standards.

3.12.3 ENVIRONMENTAL SETTING

a. Historic Uses of Project Site

Oil and Gas Production

The Project site was used for oil production from the early 1900s through 1995. Oil operations at the West Coyote Hills oil field were principally conducted by Chevron USA, Inc. (Chevron), and oil produced from the property was transferred by pipeline to the Chevron Refinery in El Segundo, California. Natural gas produced from the field was piped to Chevron's former Murphy-Coyote gas processing plant in Fullerton south of the Westridge property. Water produced during oil field operations was re-injected to enhance secondary oil recovery. A total of 23 oil wells were formerly in production within the Project site, all of which have since been abandoned in accordance with DOGGR regulations (see **Figure 3.12-1**). Other oil field operational facilities, such as tank sites, sumps, pipelines, condensate drips, transformer sites, and a fueling facility that were formerly present on the Project site, were investigated and remediated during development of the Westridge Golf Club in 1996-1997. Copies of the closure reports are included as an appendix to the Phase I report for the Project site (EIR Appendix M).

La Habra Hills Specific Plan/Westridge Golf Club

In 1992, the City of approved the La Habra Hills Specific Plan to create a master planned community on the 380-acre portion of the 915-acre West Coyote Hills oil field within La Habra. The remaining 535 acres of the 915-acre West Coyote Hills oil field are located within the City of Fullerton. The approved La Habra Hills Specific Plan set forth a development plan consisting of four residential neighborhoods with a maximum of 700 dwelling units, an 18-hole golf course (which is the current site of the proposed Rancho La Habra Specific Plan), a 29.5-acre community park, and 2.6 acres of open space. The residential component of the La Habra Hills Specific Plan was ultimately built out with 556 dwelling units.

The northern portion of the La Habra Hills Specific Plan area was developed as the Westridge Golf Club. The privately-owned golf course, clubhouse, and driving range are open to the public. The golf course includes a clubhouse with a restaurant and pro shop.

b. Existing Environmental Hazard Conditions

The Los Angeles County Fire Department, Orange County Health Care Agency (OCHCA), DTSC, and State Water Resources Control Board (SWRCB) were contacted as part of preparation of the Phase I report for the Project site, and other state and federal databases were reviewed to determine if the Project site or any adjacent properties were listed as hazardous waste generators or underground storage tank (UST) release sites, or as having other environmental concerns (i.e., spill, leak, or above-ground tank).

Project Site

Abandoned Oil Wells

A review of the DOGGR website for oil and gas fields in California indicated the historic presence of 23 former oil and gas wells, which had been operated by Chevron USA, Inc., on or immediately adjacent to the Project site. According to information on file at DOGGR, these wells were drilled as early as the 1920s and were used for oil and gas production until their abandonment under the regulatory guidance of DOGGR during the 1960s through the 1990s. Well records currently list the wells as plugged and indicate they were abandoned pursuant to DOGGR guidelines.

Based on information provided by DOGGR staff, that agency requires construction review only for wells either directly on top of or in close proximity to (i.e., approximately 50 feet from) an existing well. Many of the existing wells have permanent vents to allow methane gas to escape. Although DOGGR does not mandate methane testing prior to construction, methane testing was conducted by EEI Geotechnical & Environmental Solutions (EEI) as part of the Phase I environmental site assessment to evaluate the potential for methane on the Project site. A total of 28 locations were sampled for the presence of methane gas at a depth of 5 feet below ground surface. Nineteen of the locations were in the western half of the golf course, either above or in close proximity to the crude oil-impacted soil designated reuse areas. Nine of the locations were in the eastern half of the golf course, in areas of former oil field operations. Of the 28 locations surveyed, only five (5) indicated detectable methane concentrations (i.e., 0.01 percent or 1,000 ppm). The remaining 23 locations had no detectable concentrations of methane.



Figure 3.12-1: Abandoned Well Locations

Source: Google Earth Pro; Carlson SLS

Contaminated Soils

Starting in 1986, Chevron began a 10-year investigation and cleanup that involved 17 oil well sites, 10 "historical" sites impacted with crude oil, three above-ground tank areas, and numerous "miscellaneous" locations including pipelines, sumps, pits, and detention basins. Soils in these areas were excavated, stockpiled on-site, and tested to determine the degree of crude oil contaminants on-site. Testing determined that the principal contamination was heavy petroleum hydrocarbons (crude oil) with minor fractions of VOCs and lighter end hydrocarbons. Once tested, the soils were placed in the three designated reuse areas as approved by the Santa Ana RWQCB and the OCHCA, due to the low potential for the crude oil contamination to leach from the soil in the future. Approximately 220,000 cubic yards of impacted soil was placed in Reuse Area 1 (beneath the western half of the golf course), 30,000 cubic yards in Reuse Area 2 (beneath the driving range), and 176,000 cubic yards in Reuse Area 3 (beneath the far western portion of the golf course). During placement, the impacted soils were "landfarmed" (discing and hydration to promote natural biodegradation of the soil) to reduce overall hydrocarbon concentrations in accordance with the Santa Ana RWQCB's approval. Upon successful completion of the fill placement and capping, the property received regulatory closure from the RWQCB and OCHCA in 1999.

The subject property, identified as Westridge Golf Course, was also reported as an active current OCHCA Industrial Cleanup Program site (Case #15IC004), related to the management of soil in place at the subject property. EEI prepared a Soils Management Plan (SMP) (dated September 29, 2015) related to known environmental conditions for the subject property, as well as action for potential unknown environmental conditions that may be encountered during future site improvements for a proposed residential development. The SMP was submitted to the OCHCA for review and comment. On October 29, 2015, the OCHCA responded to EEI regarding the SMP dated September 29, 2015. The OCHCA provided several comments regarding the SMP and requested that EEI submit an addendum to the SMP that addressed the comments. To address OCHCA comments, EEI prepared and submitted an SMP Addendum dated July 14, 2016. The information provided in the addendum was deemed sufficient and the SMP received final approval by the OCHCA on September 9, 2016. The Soil Management Plan and Addendum are provided in Appendix M.

As part of the Phase I environmental site assessment, Tier 1 Vapor Encroachment Screen was conducted for the Project site to evaluate whether potential chemicals of concern may migrate as vapors onto the property as a result of contaminated soil and/or groundwater that may be present on or near the property (i.e., a Vapor Encroachment Condition). Based on the Tier 1 screening evaluation, the past use of the Project site was considered to pose a potential Vapor Encroachment Condition.

During grading of the golf course, approximately 430,000 cubic yards of soil containing total petroleum hydrocarbons (TPH) were placed in three designated soil reuse areas beneath the

golf course. However, the grading and compaction that occurred to accommodate the golf course and create the reuse areas were neither suitable for, nor compatible with, residential development. As a result, two of the three reuse areas will need to be removed and replaced, along with surrounding fill soils, and properly compacted prior to final grading and construction.

The presence of the impacted soil beneath portions of the subject property necessitated a Tier 2 screening, consisting of a review of existing data related to the former oil production operation and designated soil reuse areas at the site. In the Tier 2 screening, EEI concluded that a Vapor Encroachment Condition can be ruled out for the former oil production operation area and soil reuse areas because site-specific invasive testing data collected during previous investigations indicated that the soil beneath the property contains crude oil contamination (not refined fuel products) with a lack of significant VOCs.

As stated in the Phase I environmental site assessment of the Project site, based on the presence of the on-site golf course maintenance facilities, petroleum hydrocarbons and chemicals of concern are likely to have affected the subsurface beneath the Project site. Areas of concern include above-ground waste oil and gasoline storage tanks, a chemical storage shed, a grease interceptor (clarifier), and a wash area with surface drains present in the vicinity of the maintenance facilities.

Phase I Environmental Site Assessment Site Reconnaissance

A site reconnaissance was conducted on March 16, 2016 as part of the Phase I Environmental Site Assessment (provided in Appendix M) to physically observe the site and adjoining properties for conditions indicating a potential environmental concern, including any evidence of contamination, distressed vegetation, petroleum hydrocarbon staining, waste drums, illegal dumping, or improper waste storage and/or handling. Apart from the presence of the abandoned oil wells noted above and two above-ground storage tanks (ASTs), no other evidence of environmental concerns, including contamination, distressed vegetation, petroleum hydrocarbon surface staining, waste drums, USTs, illegal dumping, or improper waste storage/handling, was noted during the site reconnaissance, as reflected in **Table 3.12-2**.

Historical Conditions

The former occupant of the Project site, Environmental Golf, was listed under the Hazardous Waste Information System database (HAZNET), which tracks data from hazardous waste manifests received by the DTSC. The date of the listing was 2000, and the waste category included "aged or surplus organics." The disposal method was listed as "Transfer Station." The current occupant of the Project site, Westridge Golf Club, was also listed on the HAZNET database with the date of 2004. The waste category was listed as "waste oil/mixed oil" and the disposal method was "recycler." The Westridge Golf Club was also listed under the

Table 3.12-2
Summary of Site Reconnaissance (Phase I Environmental Site Assessment)

Item	Concerns	Comments
General Housekeeping	No	No concerns observed.
Surface Spills	No	No concerns observed.
Stained Surfaces	No	No concerns observed.
Fill Materials	No	No concerns observed.
Pits/Ponds/Lagoons	No	No concerns observed.
Surface Impoundments	No	No concerns observed.
ASTs/USTs	No	A waste oil AST and a gasoline AST were noted on the west and north sides of the maintenance building, respectively.
Oil Wells	No	Several former oil wells are located throughout the Project site, although they were not apparent during the site reconnaissance.
Distressed Vegetation	No	No concerns observed.
Wetlands	No	No concerns observed.
Electrical Substations	No	No concerns observed.
Areas of Dumping	No	No concerns observed.
Transformers	No	No concerns observed.
Waste/Scrap Storage	No	No concerns observed.
Chemical Use/Storage	No	No concerns observed.

Source: Phase I Environmental Assessment; EEI, April 15, 2016.

Above-ground Storage Tank (AST) database as the site of a 1,320-gallon capacity tank (type of content not provided). The Westridge Golf Club was also listed under the OCHCA databases as the site of an AST and as a hazardous waste facility.

In addition, the former occupant of the Project site, Chevron USA, Inc., was listed under the following databases: Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) – No Further Assessment Planned (NFRAP), Federal Resource Conservation Recovery Act (RCRA) hazardous waste generator database, NY Manifest, and Historical Auto Station. The site was also listed under the OCHCA Industrial Cleanup Program and Local Oversight Program databases (PLC Land Company, Tracts 15030 and 15031), as a closed oil field cleanup site with on-site soil reuse areas and a closed UST site.

Other Environmental Conditions

Asbestos-Containing Materials

Most friable (i.e., easily broken or crushed) asbestos-containing materials were banned in building materials by 1978. In October 1995, OSHA redefined the manner by which building materials are classified in regard to asbestos and also the way these materials are to be handled. Under this ruling, "thermal system insulation and sprayed-on or troweled on or otherwise applied surfacing materials," as well as floor or ceiling tiles, siding, roofing, and transite panels applied or installed before 1980 are presumed to contain asbestos-containing materials.

Because golf course facility structures located on the Project site were constructed in 1998, the presence of asbestos-containing materials is considered unlikely.

Lead-Based Paint

Lead-based paint has been identified by OSHA, USEPA, and the Department of Housing and Urban Development (HUD) as being a potential health risk to humans, particularly children, based on its effects to the central nervous system, kidneys, and bloodstream. Because structures on the Project site were built in 1998 or after, the presence of lead-based paint is unlikely.

Radon

Radon is a radioactive gas that has been identified as a human carcinogen. Radon gas is typically associated with fine-grained rock and soil, and results from the radioactive decay of radium. USEPA recommends that homeowners in areas with radon screening levels greater than 4 Picocurries per liter (pCi/L) conduct mitigation of radon gas to reduce exposure. USEPA's Map of Radon Zones (EPA-402-R-93-071) assigns each of the 3,141 counties in the U.S. to one of three zones based on radon potential. Based on such factors as indoor radon measurements, geology, aerial radioactivity, and soil permeability, USEPA has identified Orange County as Zone 2 (i.e., a predicted average indoor radon screening level between 2 and 4 pCi/L), which is less than the 4 p/Ci/L threshold recommended by USEPA.

Surrounding Area

The Phase I environmental site assessment included the results of a search of electronic database listings that identify possible hazardous waste generating establishments in the vicinity of the Project site, as well as adjacent sites with known environmental concerns. Facilities that generate, store, or dispose of hazardous materials were identified by county, state, or federal agencies. Although several sites were identified as having known environmental concerns, only those discussed below were identified as a potential concern. A complete listing of all sites is included in the Phase I Environmental Site Assessment (refer to Appendix M).

Federal RCRA Generators List (RCRA-LQG SQG CESQG)

Several listings were reported within a 0.25-mile radius of the Project site. Generator permits are not generally cause for an environmental concern, unless a release has occurred at the site. The aforementioned sites were not listed with a release on the Leaky Underground Storage Tank (LUST) database. However, the following two sites are located adjacent to the Project site, although neither of them have a documented release:

- Sam's Club No. 4735 (1390 South Beach Boulevard, adjacent to the north).
- ARCO Facility No. 06545 (13550 South Beach Boulevard, adjacent to the southwest).

In addition, the Westridge Plaza Shopping Center was listed as the site of a waste oil release, the case for which was closed by the OCHCA in August 2001. Since the case has been closed by a regulatory agency, this site is not considered an ongoing environmental concern.

EDR US Historical Auto State List

Three listings were reported within a 0.25-mile radius of the Project site:

- 1300 South Beach Boulevard, which is historically associated with Chevron USA, Inc.
- 1390 South Beach Boulevard, which is the adjacent Sam's Club #4735 Service Station.
- 1950 West Imperial Highway, which is a Chevron gas station.

c. Wildland Fire Hazards

The City of La Habra Hazard Mitigation Plan identified wildland fire risk as a "moderately high" hazard with moderate warning time and the potential to occur between once every 8 years and once every 50 years. Anticipated consequences of wildland fire are extensive building damage in a localized area; widespread loss of water, gas, electricity, sanitation, and roads; and potential loss of life. Secondary impacts could include evacuations and increased water supply demand. A wildfire in the City of La Habra Heights to the north may represent the greatest fire threat for the La Habra planning area; however, a mandatory vegetation management program is in place within La Habra Heights to mitigate wildlife damage.

Portions of the Project site are designated as having "Very High," "High," and "Moderate" fire hazard potential as reflected in the La Habra General Plan EIR. In September 2015, a fire that started in the West Coyote Hills to the south in Fullerton consumed over 100 acres and posed a risk to the adjacent Westridge residential development south of the Project site.

The California Department of Forestry and Fire Protection (CAL FIRE) assesses fire danger through the creation of maps designating Very High Fire Hazard Severity Zones. It appears that

the hillside portions of the Project site, the existing Westridge community, and the West Coyote Hills property to the south in Fullerton fall within a Very High Fire Hazard Severity Zone.

3.12.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of hazards and hazardous materials impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;

Threshold HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment;

Threshold HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25-mile of an existing or proposed school;

Threshold HAZ-4 Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;

Threshold HAZ-5 Result in a safety hazard for people residing or working in the project area for a project located within an airport land use plan or, where such plan has not been adopted, within 2 miles of a public airport;

Threshold HAZ-6 Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area;

Threshold HAZ-7 Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or

Threshold HAZ-8 Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

3.12.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.

Impact HAZ-1: **Because site demolition and construction activities, as well as operation of proposed new residential and commercial uses, would be required to comply with applicable regulations for the use of hazardous materials, the impact related due to routine transport, use, or disposal of hazardous materials would be *less than significant*.**

Methodology

Analysis in this impact discussion is focused on the day-to-day (routine) use, disposal, transport, or management of hazardous or potentially hazardous materials that would occur as the result of the residential and commercial uses proposed in the Rancho La Habra Specific Plan. The severity of potential hazards to people, property, and the environment associated with the day-to-day use, transport, and/or disposal of hazardous materials by proposed residential and commercial uses is analyzed. Additionally, this section addresses short-term impacts resulting from demolition of existing structures and facilities associated with the golf course and construction of the proposed residential and commercial uses.

In determining the level of significance, the analysis recognizes that all development under the proposed Specific Plan would be required to comply with relevant federal, state, and local regulations that are designed to ensure the safety of routine transport, use, or disposal of hazardous materials.

A significant impact would result if the Project would not comply with applicable federal, state, and local regulations, or would otherwise expose people to health risks or create an environmental hazard due to the day-to-day use, disposal, transport, or management of hazardous or potentially hazardous materials.

Impact Assessment

Demolition and Construction

Construction activities would include demolition and crushing of the existing large parking lot, golf cart paths, maintenance yard, and driving range; grading; and construction of residential and commercial structures and related infrastructure.

Demolition of existing structures is not anticipated to result in the use, transport, or release of hazardous materials. As documented in the Phase I environmental site assessment, due to the age of the existing structures to be demolished (i.e., after 1998), it is unlikely that either asbestos-containing materials or lead-based paint are present. The asphalt and concrete from demolition would be crushed and reused on the Project site. Crushing asphalt and concrete has the potential to cause dust, but not the release of hazardous materials.

Construction of residential and commercial structures and related infrastructure would use hazardous materials in the form of paints, solvents, glues, roofing materials, and other common construction materials containing potentially toxic substances. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials is regulated by County of Los Angeles Fire Department Health and Hazardous Materials Division and the OCHCA, which provide regulatory oversight for federal, state, and local laws related to hazardous materials use. In addition, construction-related refueling would take place in a designated, protected area of the Project site in accordance with best management practices (BMPs) outlined in the Stormwater Pollution Prevention Plan (SWPPP) required to be prepared and implemented for the Project (see Section 3.13, *Hydrology and Water Quality*).

Operations

The Rancho La Habra Specific Plan proposes residential and retail commercial development with open space. These uses would routinely use limited quantities of potentially hazardous materials consisting of typical household and maintenance products (e.g., paints, fuels, lubricants, cleaning solvents, adhesives, sealers, pesticides/herbicides) that are common in residential neighborhoods and neighborhood commercial centers. Industrial and other uses that would involve the transport, use, or disposal of large quantities of hazardous materials would not be permitted under the Specific Plan.

Significance Conclusion for Impact HAZ-1

Because site demolition and construction activities, as well as operations of new residential and commercial uses, would be required to comply with applicable regulations for the use of hazardous materials, and would not otherwise expose people to health risks or create an environmental hazard, the impact related to routine transport, use, or disposal of hazardous materials would be less than significant, and no mitigation measures would be required.

Threshold HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

Impact HAZ-2.1: Demolition, grading, and construction activities related to the proposed Specific Plan would be required to comply with existing laws and regulations for the routine transport, use, and disposal of hazardous materials. As a result, the impact would be *less than significant*.

Methodology

Analysis in this impact discussion is focused on the potential of a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment from construction under the proposed Specific Plan. This section addresses short-term impacts resulting from demolition of existing golf course facilities, as well as from site grading and construction. Impacts related to the handling of previously buried TPH-affected soils are addressed in Impact HAZ-2.2.

In determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to comply with relevant federal, state, and local laws and regulations that are designed to minimize the potential for upset or accident conditions, and to protect public health and safety from foreseeable upset or accident conditions involving release of hazardous materials into the environment.

A significant impact would result if the Project would not comply with applicable federal, state, and local regulations, or would otherwise expose people to health risks or create an environmental hazard due to a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment.

Impact Assessment

While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during demolition, grading, and construction activities as discussed in Impact HAZ-1, above, would not pose health risks or result in significant impacts, improper use, storage, transportation, or disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. Thus, construction under the proposed Specific Plan could result in the accidental release of hazardous materials. Additionally, exposure to unanticipated hazardous substances could occur from currently unknown soil contamination that may be present.

The use of BMPs during construction, implemented as part of a SWPPP as required by the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, would minimize potential adverse effects on the general public and the environment. Construction contract specifications would include strict on-site handling rules to keep construction and maintenance materials out of groundwater and soils. BMPs include but are not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;

- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Significance Conclusion for Impact HAZ-2.1

Because construction activities related to the proposed Specific Plan would be required to comply with existing laws and regulations, impacts related due to routine transport, use, or disposal of hazardous materials would be less than significant, and no mitigation measures would be required.

Threshold HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

Impact HAZ-2.2: Soils containing petroleum hydrocarbons would be encountered during site grading. A Soils Management Plan approved by the Orange County Health Care Agency sets forth extensive controls that make a substantial health risk unlikely; however, a health risk is nevertheless possible. The impact would be *significant but mitigable*.

Methodology

Analysis in this impact discussion is focused on the potential of a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment from the exposure, excavation, and re-burying of TPH-affected soils during site grading activities.

In determining the level of significance, the analysis recognizes that management of TPH-affected soils during site grading activities would be required to comply with relevant federal, state, and local laws and regulations that are designed to minimize the potential for upset or accident conditions, and to protect public health and safety from foreseeable upset or accident conditions. Specifically, the EIR's analysis recognizes that exposure, excavation, and placement of previously buried on-site soils containing TPH-affected soils would occur under the regulatory authority and supervision of the OCHCA.

A significant impact would result if the Project would not comply with applicable federal, state, and local regulations, or would otherwise expose people to health risks or create an environmental hazard due to a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment.

Impact Assessment

Release of hazardous materials into the environment could occur during transport of equipment and fuel to and from the Project site and/or during remedial grading of contaminated soils. The transport of equipment and fuel to the Project site would create the potential for spills of gasoline or diesel fuel. Refueling is limited to a designated location with BMPs to be specified in the required SWPPP for the Project site. Furthermore, the transport of fuel onto the Project site would be regulated by federal and state laws, which minimize the potential for upset or an accident condition.

As discussed in Chapter 2, *Project Description*, to provide for adequate soil compaction and adequate depth below ground surface to allow for proposed residential development, approximately 260,000 cubic yards of previously buried TPH-affected soil would be excavated and placed in one of four pre-designated deep fill locations in accordance with standards previously established by the OCHCA and the RWQCB (see **Figure 2-6** and **Figure 2-7** in Chapter 2, *Project Description*). Thus, grading, utility trenching, soils excavation and stockpiling, and related activities would be conducted in areas previously identified as having VOCs and/or petroleum hydrocarbon-impacted soils, which could expose construction workers to potential health hazards and risks associated with the impacted soil. Improper handling of these soils (and any other TPH-affected soil that may be encountered) could also result in their release into the environment as fugitive dust, erosion, or infiltration into groundwater.

In addition, to provide for adequate soil compaction, soils previously placed during golf course construction would be excavated down to bedrock and re-compacted to provide an adequate base for proposed residential and commercial development. During the drilling and sampling of 10 geotechnical soil borings at the site in 2014, EEI screened samples collected for evidence of contamination (dark staining and/or odor) and retained a total of 18 samples for laboratory analysis of petroleum hydrocarbons. Of the 18 samples, three showed evidence of crude oil-impacted soil at specific depths. These locations were along the southern margin of the golf course (at a depth of 50 to 70 feet), near the maintenance building (at a depth of 2 to 3 feet), and in the northwest corner of the golf course along Beach Boulevard (at a depth of 10 to 40 feet). Site grading activities would expose these soils.

Grading and excavation of sites during construction under the proposed Specific Plan may expose construction workers and the public to potentially unknown hazardous substances present in the soil. If any previously unidentified sources of contamination are encountered during grading or excavation, the handling and removal activities required could pose health and safety risks to workers and the public. Soil, water, or air contamination could cause various short-term or long-term adverse health effects in persons exposed to the hazardous substances.

Significance Conclusion for Impact HAZ-2.2

The reuse of soil containing crude oil on-site as deep fill and the overlaying of that fill with clean soil (i.e., soil capping) is a standard industry practice that is a common form of engineering control at regulated cleanup sites. This practice is regularly approved by USEPA, the SWRCB, RWQCBs, and cities and counties throughout the state, including the OCHCA, because it has been found to eliminate the risk of contaminants being released from soil into the environment.

Soil capping, as proposed for the Project site, involves the placement of a defined thickness of clean soil over the top of reused soil. The clean soil layer provides a buffer separating the contamination from future site occupants and the environment. USEPA requires the thickness of clean soil to be at least 2 to 3 feet in non-residential locations, and 10 feet for residential uses. In accordance with the approved Soils Management Plan for Rancho La Habra, the Project would use a total of 20 feet of clean soil throughout the site. Underneath the reused soil, there would also be a 20-foot clean soil buffer maintained between the base of the contaminated fill and the estimated groundwater surface, as required by the RWQCB. This buffer would prevent any potential mixing of soil containing crude oil and shallow groundwater.

The OCHCA has directed that soil used in the buffer must contain less than 100 milligrams per kilogram (mg/kg) TPH, and must meet the screening levels outlined in USEPA's Regional Screening Levels and supplemented by DTSC HERO Note 3. These buffer soils would be tested by a remediation specialist to ensure compliance with the mandated soil screening levels.

The Soils Management Plan for the Project site, approved for the Project site by the OCHCA, sets forth the following requirements to minimize hazards from the excavation and placement of TPH-affected soils:

- Standard work practices, such as suppressing dust, performing proposed site improvements in the upwind position, and monitoring for the potential presence of VOCs, shall be observed. Where impractical, the site safety officer, or designated alternate, is to be consulted to identify acceptable alternatives. If an inhalation hazard is identified, Level C respiratory protection using National Institute for Occupational Safety and Health (NIOSH)-approved half-face air purifying respirators with volatile organic or combination high-efficiency particulate (HEPA)/volatile organic cartridges shall be required.
- Skin exposure of workers is to be limited by use of gloves, eye protection, and hard hat; hand washing; and limiting incidental ingestion of soil.

The excavation, stockpiling, sampling, and placement of TPH-affected soils must follow the approved Soils Management Plan. This includes the proper handling of potentially impacted soils during removal and placement such that potential impacts due to odor, dust, runoff, and physical contact are mitigated.

In addition, control of petroleum hydrocarbon vapor emissions would follow the guidelines set forth by South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. While significant VOCs are not anticipated at this site, based on previous testing, impacted soil would be monitored during grading with an Organic Vapor Analyzer for vapor emissions and control measures would be implemented whenever levels exceed applicable thresholds (i.e., greater than 50 ppm).

Soil testing is required to be performed by a qualified remediation specialist, as overseen by the OCHCA, and would occur prior to completion of grading to (1) verify the complete removal of previously placed fill soil in the original reuse areas, (2) characterize the excavated fill once it is placed in stockpiles, and (3) verify that all soils in the upper 10 feet meet the criteria established by the OCHCA.

During construction, soil piles would be watered (misted) or covered when necessary to prevent fugitive dust. This would prevent the potential release of contaminated soil into the environment.

In addition, the fugitive dust control measures set forth in EIR Section 3.8, *Air Quality*, and the erosion control measures set forth in EIR Section 3.13, *Hydrology and Water Quality*, would be maintained.

Recognizing the potential of encountering TPH-affected soil outside of existing reuse areas, the Soils Management Plan also provides requirements for general site grading, as follows:

- During site grading, excavated soil originating from outside of the three reuse areas that visually displays dark discoloration/staining shall be flagged and segregated during the excavation process. These segregated soils shall be tested to determine whether the soil can be reused as cover or must be placed within a deep fill location.
- Potentially impacted soils shall be stockpiled on plastic sheeting to segregate contaminated soils from clean soils. Vapor and dust from excavation and stockpiling activities shall be controlled using one or more of the following: water misting, covering with poly sheeting; backfilling of off-gassing excavations, locating stockpiles away from and/or downwind of on-site workers and public receptors, and reducing the pace of Project site activities and/or halting activities. In general, flagged (impacted) locations outside of the reuse areas are to be visually located, and confirmed by hand-held (or equivalent) global positioning system (GPS) equipment, when necessary.
- Excavation efforts shall proceed at individual flagged (impacted) suspect areas based upon visual staining and/or other methods (i.e., air monitoring equipment). Confirmation soil samples shall be collected from stockpiled soil and excavation limits, and properly documented as excavation proceeds. Final excavation confirmation sampling should be conducted at a rate of at least one soil sample per 5-foot vertical interval/20-foot horizontal interval of exposed sidewall and/or excavation floor. However, this sample frequency may

be modified in the field based on site-specific conditions such as accessibility, soil homogeneity, and results of previous sampling data.

- Soil samples shall be collected using appropriate hand sampling tools or from the bucket of the excavation equipment and placed in laboratory-supplied glass sample jars and/or stainless steel sleeves, as required. In either case, samples should be compacted within the sample container to remove any head space. Soil samples shall be sealed with Teflon-lined lids/caps, labeled with a number unique to the sample, placed in a chilled cooler, and logged under proper chain-of-custody (COC) protocol for transportation to a California-state certified laboratory. A mobile laboratory may be used to analyze soil samples during the excavation confirmation process, depending upon the nature of the contaminant and/or the scheduling needs of the Project.

The Soils Management Plan does not, however, mandate preparation of a human health risk assessment to quantify exposure of workers and neighborhood residents to airborne contaminants during proposed remedial grading activities. Although the controls mandated by the Soils Management Plan make a substantial health risk unlikely, a health risk is nevertheless possible. Thus, a significant impact would result.

Mitigation Measures

Mitigation Measure HAZ-2.2: Excavation, handling, and placement of contaminated soils within the Project site shall be undertaken so as to achieve a residential cleanup standard of an acceptable excess cancer risk (ECR) of 1×10^{-5} for construction workers, residents and workers within proposed uses on-site, and residents of adjacent neighborhoods.

Significance Conclusion for Impact HAZ-2.2 with Implementation of Mitigation Measures

Implementation of **Mitigation Measure HAZ-2.2**, combined with the controls mandated by the Soils Management Plan, would ensure that the Project would not result in a substantial health risk. The Soils Management Plan, in combination with **Mitigation Measure HAZ-2.2**, would reduce the impact to a less-than-significant level.

Threshold HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

Impact HAZ-2.3: Three dwelling units are proposed directly over previously abandoned wells, and site grading, including lowering of ground

elevations over previously abandoned wells, could affect their integrity. Compliance with site review requirements of the Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR) would ensure public safety. The impact would be *less than significant*.

Methodology

Analysis in this impact discussion is focused on the potential of a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment from development envisioned under the proposed Specific Plan. This section addresses impacts that proposed site grading might have on former oil wells within the Project site that were previously abandoned pursuant to DOGGR regulations at the time of golf course construction.

In determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to comply with relevant federal, state, and local laws and regulations that are designed to minimize the potential for upset or accident conditions, and to protect public health and safety from foreseeable upset or accident conditions.

A significant impact would result if the Project would not comply with applicable federal, state, and local regulations, or would otherwise expose people to health risks or create an environmental hazard due to a reasonably foreseeable upset or accident condition involving damage to a previously abandoned oil well.

Impact Assessment

Three dwelling units are proposed over wells in the western portion of the Project site (see **Figure 3.12-1**). These wells were previously abandoned per DOGGR requirements as part of golf course construction. In addition, grading of the Project site would occur and lower existing grades in some areas over abandoned wells, potentially affecting as many as 20 of the abandoned wells, damaging their integrity and requiring previously abandoned wells to be cut and capped (re-abandoned). According to the Phase I environmental site assessment, the DOGGR would require construction review for wells where development is either directly on top of or in close proximity to (i.e., roughly 50 feet from) an existing well.

Significance Conclusion for Impact HAZ-2.3

Although three dwelling units are proposed directly over previously abandoned wells and site grading over abandoned wells could affect their integrity, compliance with DOGGR site review requirements would ensure public safety. Where homes are being built over an abandoned well, as a condition of approval, the City will require full disclosure of this fact be made to the homebuyer, the condition noted on the grant deed, and a disclosure form signed with a copy to be provided to the City. The impact would be less than significant.

Threshold HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment.

Impact HAZ-2.4: Proposed residential and commercial uses would routinely use and store result small quantities of common chemicals (e.g., paints, solvents, and cleaning products). Such hazardous materials would be used and stored in accordance with applicable regulations. As a result, reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be unlikely, and the impact would be *less than significant*.

Methodology

Analysis in this impact discussion is focused on the potential of a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment from proposed residential and commercial uses during ongoing operations. This section addresses the potential for risk of upset and the severity of consequences to people or property associated with the potential release of hazardous materials into the environment from operation of proposed land uses.

In determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to comply with relevant federal, state, and local laws and regulations that are designed to minimize the potential for upset or accident conditions, and to protect public health and safety from foreseeable upset or accident conditions involving release of hazardous materials into the environment.

A significant impact would result if proposed uses would not comply with applicable federal, state, and local regulations, or would otherwise expose people to health risks or create an environmental hazard due to a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment.

Impact Assessment

Development under the proposed Specific Plan would involve residential and commercial land uses, and would include the use of and storage of common hazardous materials such as paints, solvents, and cleaning products. Additionally, building mechanical systems and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials, including fuels, cleaners, lubricants, adhesives, sealers, and pesticides/herbicides. The environmental and health effects of different chemicals are unique to each chemical and depend on the extent to which an individual is exposed. The extent and exposure of individuals

to hazardous materials would be limited by the relatively small quantities of these materials that would be stored and used on the proposed residential and commercial portions of the Project site.

Significance Conclusion for Impact HAZ-2.4

Proposed residential and commercial uses would routinely use and store small quantities of common chemicals (e.g., paints, solvents, and cleaning products) in accordance with applicable regulations designed to reduce the potential consequences of hazardous materials accidents. As a result, reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be unlikely, and the impact would be less than significant.

Threshold HAZ-3:	**Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25-mile of an existing or proposed school.**
Impact HAZ-3:	**While Project site development would not result in hazardous emissions or handling of acutely hazardous materials, site grading would result in the excavation, stockpiling, and placement of total petroleum hydrocarbon (TPH)-affected soils below the Project site, which is within 0.25-mile of Las Positas Elementary School. TPH-affected soils would be handled pursuant to a Soils Management Plan approved by the Orange County Health Care Agency, and the Project would be required to comply with applicable rules of the South Coast Air Quality Management District; however, a hazard is nevertheless possible. The impact would be *significant but mitigable*.**

Methodology

Analysis in this impact discussion is focused on the potential of the proposed Specific Plan to result in hazardous emissions or handling of hazardous or acutely hazardous materials within 0.25-mile of an existing or proposed school. The potential severity of consequences to people or property at school facilities in the event of a release of hazardous materials into the environment from operation of proposed residential and commercial uses is analyzed.

In determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to comply with relevant federal, state, and local laws and regulations that are designed to minimize emission or release into the environment of hazardous or acutely hazardous materials, particularly within 0.25-mile of an existing or proposed school.

A significant impact would occur if (1) the proposed Project would handle hazardous or acutely hazardous materials within 0.25-mile of an existing or proposed school, either due to routine use or an upset or accident condition; and (2) such handling could result in the release of these materials into the environment.

Impact Assessment

Las Positas Elementary School is located approximately 0.25 miles northeast of the Project site.

Common hazardous materials would be used in the construction and operation of new residential and commercial uses within the Specific Plan area. Materials used would include standard construction materials (e.g., paints, solvents, and adhesives), cleaning and other maintenance products, diesel and other fuels (used in construction and maintenance equipment and vehicles), and pesticides associated with landscaping around new developments. The Specific Plan provides for residential and commercial uses, and does not propose industrial uses that would result in hazardous emissions or that are considered acutely hazardous.

Additionally, routine use, transport, and disposal of hazardous materials would occur with implementation of the Specific Plan; however, the types of uses that would emit or release hazardous or acutely hazardous materials into the environment are typically industrial manufacturing facilities, which are not proposed by the Specific Plan. In addition, retail businesses that handle or store hazardous materials (such as cleaning solvent) would be required to comply with the provisions of previously described state and federal regulations for hazardous wastes. The laws and regulations related to the generation of hazardous emissions and handling hazardous materials are intended to minimize potential health risks associated with their use or the accidental release of such substances. Compliance with existing regulations would minimize the risks to sensitive receptors, including schools.

As previously discussed, development of the Westridge neighborhood and the Westridge Golf Club involved extensive grading of an abandoned oil field, including placement of approximately 430,000 cubic yards of soil containing TPHs, a chemical compound associated with crude oil, in several low-lying locations beneath the golf course.

On-site grading would require removal of all previously placed fill material until either bedrock or suitable material is reached. Once grading for the proposed Project reaches bedrock or suitable material, approximately 260,000 cubic yards of TPH-affected soils would be removed and placed a minimum of 20 feet below the ground surface in accordance with standards previously established by the OCHCA and the RWQCB. Excavation, stockpiling, and placement of TPH-affected soils below the ground surface could result in exposure of TPH to the surrounding environment.

Significance Conclusion for Impact HAZ-3

While Project site development would not result in hazardous emissions or handling of acutely hazardous materials, site grading would result in the excavation, stockpiling, and placement of TPH-affected soils below the Project site, which is within 0.25-mile of Las Positas Elementary School. Thus, a significant impact would result, requiring mitigation.

Mitigation Measures

See **Mitigation Measure HAZ-2.2**.

Significance Conclusion for Impact HAZ-3 with Implementation of Mitigation Measures

Because TPH-affected soils would be handled pursuant to a Soils Management Plan approved by the OCHCA and such handling would be required to comply with applicable rules of the South Coast Air Quality Management District and the requirements of **Mitigation Measure HAZ-2.2**, the impact would be reduced to a less- than-significant level.

Threshold HAZ-4:	**Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.**
Impact HAZ-4:	**Due to past oil extraction activities, the Project site is included on a list of hazardous materials sites. TPH-affected soils would be handled pursuant to a Soils Management Plan approved by the Orange County Health Care Agency, and such handling would be required to comply with applicable rules of the South Coast Air Quality Management District; however, a hazard is nevertheless possible. The impact would be *significant but mitigable*.**

Methodology

The methodology used in this assessment includes review of database information to assess the potential presence of hazards and hazardous materials sites within the Specific Plan area. The Specific Plan area was evaluated for the presence of hazardous materials based on a review of the USEPA CERCLIS database, the DTSC EnviroStor database, and the RWQCB GeoTracker database. In addition, a Phase I environmental site assessment report (EEI 2016) was prepared for the Project site.

To identify the level of significance in relation to this threshold, the first step is to determine whether the Specific Plan area encompasses any sites that are included on a list of hazardous

materials sites or that contain unidentified/unknown contaminants. Next, the analysis recognizes that all development would be required to comply with relevant federal, state, and local laws and regulations that are designed to remediate such sites so as to protect the public health.

A significant impact would occur if development would occur on a hazardous materials site that could endanger public health or the environment.

Impact Assessment

Given past oil activities, the Project site is included on lists of hazardous materials sites.

As discussed in relation to **Impacts HAZ-2.2 and HAZ-3**, on-site grading would require removal of all previously placed fill material until either bedrock or suitable material is reached. Once grading for the proposed Project reaches bedrock or suitable material, approximately 260,000 cubic yards of TPH-affected soils would be removed and placed a minimum of 20 feet below the ground surface in accordance with standards previously established by the OCHCA and the RWQCB. Excavation, stockpiling, and placement of TPH-affected soils below the ground surface could result in exposure of TPH to the surrounding environment.

Significance Conclusion for Impact HAZ-4

While Project site development would not result in hazardous emissions or handling of acutely hazardous materials, development would occur on a hazardous materials site that could endanger public health or the environment. Thus, a significant impact would result, requiring mitigation.

Mitigation Measures

See **Mitigation Measure HAZ-2.2**.

Significance Conclusion for Impact HAZ-4 with Implementation of Mitigation Measures

Because TPH-affected soils would be handled pursuant to a Soils Management Plan approved by the OCHCA and such handling would be required to comply with applicable rules of the South Coast Air Quality Management District and the requirements of **Mitigation Measure HAZ-2.2**, the impact would be reduced to a less- than-significant level.

Threshold HAZ-5: Result in a safety hazard for people residing or working in the project area for a project located within an airport land use plan or, where such plan has not been adopted, be within 2 miles of a public airport use airport or public use airport.

Impact HAZ-5: Because the Project site is not within an airport land use plan or within 2 miles of a public airport for which an airport land use plan has not been adopted, *no impact* would result.

Methodology

The first test in evaluating whether a significant impact would occur is to determine whether any portion of proposed development within the Specific Plan area would be within an airport land use plan or within 2 miles of a public airport for which an airport land use plan has not been adopted. Because development pursuant to the proposed Specific Plan would not be located within a noise contour or airport influence area of any public airport facility that has an airport land use plan, and would also not be within 2 miles of a public use airport for which an airport land use plan has not been adopted, further analysis related to the potential hazards related to public airports was unnecessary.

Impact Assessment

The Project site is not located within an airport land use plan or within 2 miles of an airport for which an airport land use plan has been adopted. Fullerton Municipal Airport is the closest airport to the Project site, located approximately 2.5 miles to the south. According to the Airport Environs Land Use Plan adopted for Fullerton Municipal Airport (Orange County Airport Land Use Commission 2004), the plan affects the cities of Anaheim, Buena Park and Fullerton, as well as unincorporated areas of the County of Orange. The Project site and the City are not affected by the plan since they are not within either the Federal Aviation Administration (FAA) Part 77 Fullerton Municipal Airport Notification Area (10,000-foot radius at 50:1 slope) or the FAA Part 77 Fullerton Municipal Airport Obstruction Imaginary Surfaces.

Significance Conclusion for Impact HAZ-5

Because the Project site is not within an airport land use plan or within 2 miles of a public airport for which an airport land use plan has not been adopted, there would be no impact. No mitigation is required.

Threshold HAZ-6: Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area.

Impact HAZ-6: Because the Project site is not within 2 miles of a private airstrip, there would be *no impact*.

Methodology

The first test in evaluating whether a significant impact would occur is to determine whether any private airstrips were located within 2 miles of the Specific Plan area. Because there are no

private airstrips within 2 miles of the Specific Plan area, further analysis related to the potential hazards related to private airstrips was unnecessary.

Impact Assessment

No private airstrips are located within 2 miles of the Project site. Therefore, future residents would not be exposed to safety hazards associated with aviation operations related to a private airstrip.

Significance Conclusion for Impact HAZ-6

Because the Project site is not within 2 miles of a private airstrip, there would be no impact. No mitigation is required.

Threshold HAZ-7: **Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.**

Impact HAZ-7: **La Habra Hills Drive would be temporarily closed during site grading, temporarily eliminating emergency access to the Westridge community during Project construction. The temporary closure of La Habra Hills Drive that would occur during Project site grading would not affect emergency access from the two closest fire stations serving the Project site and the Westridge community. In addition, as a standard condition for issuance of a building permit, the applicant would be required to prepare and implement a Construction Phase Emergency Fire Access Plan and a Construction Phase Emergency Access Plan, which would ensure adequate emergency response is available to the Project site and the adjacent Westridge community in the event of an emergency. Therefore, the impact would be *less than significant*.**

Methodology

The following analysis determines whether the proposed Specific Plan would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan due to proposed site access or another configuration.

In determining the level of significance, the analysis assumes that if implementation of the Specific Plan would interfere with implementation of an adopted emergency plan, impede evacuation routes, or restrict access of emergency response personnel, impacts would be considered significant.

Impact Assessment

In the existing condition, La Habra Hills Drive extends from Imperial Highway to the golf course clubhouse and then south to a gated access at the Westridge community. For approximately 15 months during Project site grading and infrastructure installation, La Habra Hills Drive would be closed to Westridge residents across the Project site. During this time, the remaining two access points to the Westridge community—Hillsborough west to Beach Boulevard and Nicklaus Avenue east to Idaho Street—would remain available for daily traffic and emergency access.

The temporary closure of La Habra Hills Drive would not affect response time to the Westridge community from the two closest Los Angeles County fire stations, both of which are within 0.5-mile of the Westridge community. The two fire stations are:

- Station 193 at 1000 Risner Way, La Habra, located just east of Idaho Street, near the entry to the eastern portion of the Westridge community; and
- 13540 Beach Boulevard, La Mirada, located near the entry to the western portion of the Westridge community.

Following grading and infrastructure improvements, La Habra Hills Drive would be re-opened to the Westridge community. The public road would be re-routed around the parking lot to the future Community Center, minimizing potential pedestrian/automobile conflicts for park users. The roadway would provide continued access to the Westridge community for both daily and emergency use.

Significance Conclusion for Impact HAZ-7

The temporary closure of La Habra Hills Drive that would occur during Project site grading would not affect emergency access from the two closest fire stations serving the Westridge community. In addition, as a standard condition for issuance of a building permit, the applicant would be required to prepare and implement a Construction Phase Emergency Fire Access Plan and a Construction Phase Emergency Access Plan, subject to approval of the Fire Chief, Police Chief, and Community Development Director. These plans would ensure adequate emergency response is available to the Project site and adjacent Westridge community. Therefore, the impact would be considered less than significant, and no mitigation would be required.

Threshold HAZ-8: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Impact HAZ-8: ~~**Proposed Project site development would place new residential uses within a Very High Fire Hazard Area and intensify**~~

~~development along a wildland-urban interface, increasing fire hazards. Compliance with existing codes, along with implementation of the proposed Fire Management Plan as approved by the Los Angeles County Fire Department, would ensure an adequate level of fire safety.~~ The City of La Habra and the County of Los Angeles Fire Department require that development complies with building and fire codes that include sprinkler and fire hydrant requirements in new structures and remodels, standards for road widths and design to accommodate the passage of fire trucks and engines, and requirements for minimum fire flow rates for water mains and fire hydrants. The City has also adopted the most recent edition of the California Building Code that includes sections on fire-resistant construction material requirements based on building use and occupancy. The proposed Project would also be required to comply with the City's Fire Code (Section 15.46 of the La Habra Municipal Code). Compliance with existing codes would ensure an adequate level of fire safety within high fire hazard zones and along the wildland-urban interface. As a result, the impact would be *less than significant*.

Methodology

A significant impact would occur if development were proposed within or adjacent to a high fire hazard zone or within a wildland-urban interface. To determine whether a significant impact would result from the proposed Project, the Specific Plan was evaluated against existing State of California wildland fire hazard maps, ~~as well as~~ discussion of wildland fire hazards in the La Habra General Plan and General Plan EIR, and correspondence from the Los Angeles County Fire Department.

Impact Assessment

According to the Los Angeles County Fire Department[3], VTTM 17845 (Rancho La Habra Specific Plan) "does not exist within the very high fire hazard zone and does not qualify for fuel modification plan review." Proposed Project site development would therefore not place new residential uses within a Very High Fire Hazard Area ~~and~~ or intensify development along a wildland-urban interface. As a result, proposed residential structures would not be subject to hazards from wildland fires~~, and the potential would exist for a structural fire within the Project site to spread into adjacent wildland areas~~.

[3] Email from Robert Walton, Los Angeles County Fire Department, to David Otais, Los Angeles County Fire Department, October 24, 2018.

Significance Conclusion for Impact HAZ-8

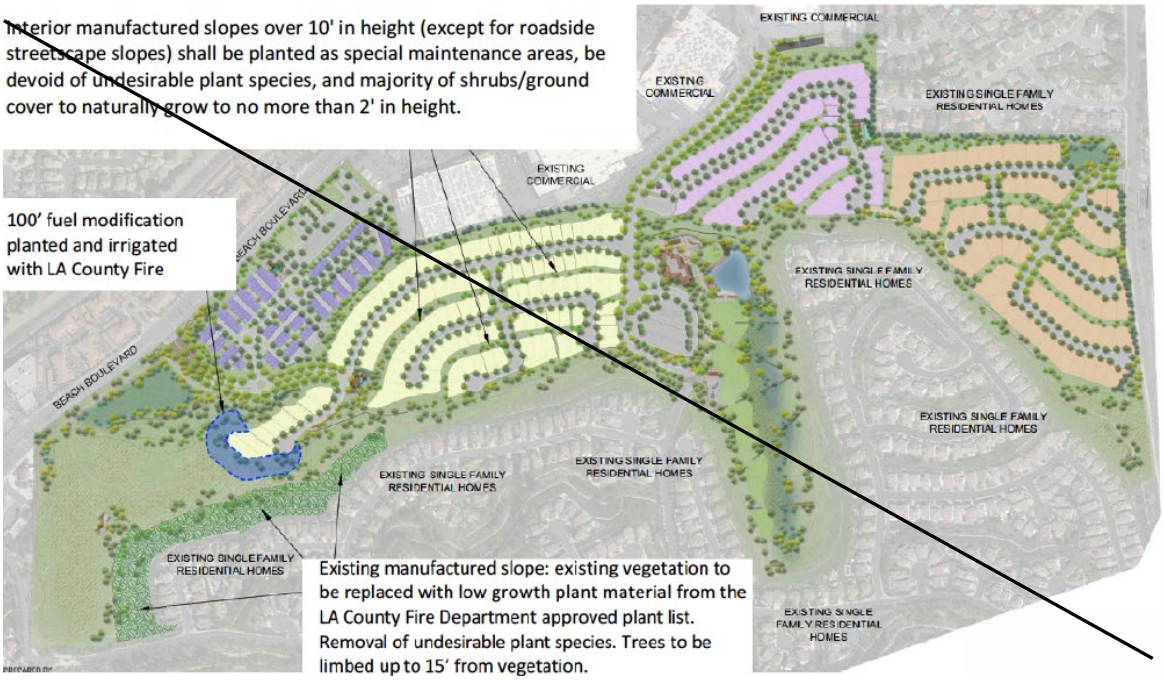
~~The proposed Project includes a Fire Management Plan (**Figure 3.12-2**). The plan would require fuel modification on newly-constructed slopes between residential lots and the approximately 11 acres of Coastal Sage Scrub habitat in the southwest corner of the Project site and on a portion of the existing slope separating the Project site from the existing Westridge community. As a condition of approval, prior to issuance of a grading permit, the Chief Building Official would ensure that the proposed Fire Management Plan has been submitted to and review by the Los Angeles County Fire Department, and that the Fire Department has approved the plan along with any required revisions to the plan.~~

Fire suppression services in La Habra are provided by the Los Angeles County Fire Department. To help protect the City and its residents from fire hazards, the City of La Habra and the County of Los Angeles require that development complies with both building and fire codes. Provisions include sprinkler and fire hydrant requirements in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for minimum fire flow rates for water mains and fire hydrants. The City has also adopted the most recent edition of the California Building Code that includes sections on fire-resistant construction material requirements based on building use and occupancy. The construction requirements are a function of building size, purpose, type, materials, location, proximity to other structures, and the type of fire suppression systems installed.

The proposed Project would also be required to comply with the City's Fire Code (Section 15.46 of the La Habra Municipal Code).

Compliance with existing codes~~, along with implementation of the proposed Fire Management Plan as approved by the Los Angeles County Fire Department,~~ would ensure an adequate level of fire safety within high fire hazard zones and along the wildland-urban interface. As a result, the proposed Project would have a less-than-significant impact, and no mitigation measures are required.

~~Figure 3.12-2 Proposed Fire Management Plan~~



3.12.6 REFERENCES – HAZARDS AND HAZARDOUS MATERIALS

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3.13 HYDROLOGY AND WATER QUALITY

3.13.1 INTRODUCTION

a. Overview

This section addresses hydrology and water quality issues associated with proposed Rancho La Habra Specific Plan, and evaluates the potential for environmental impacts related to surface and groundwater quality, groundwater supplies, erosion, flood zones, levee and dam failure, and inundation due to seiche, tsunami, or mudflow.

Issues related to the capacity and construction of construction of stormwater drainage facilities are addressed in Section 3.17, *Utilities, Service Systems, and Water Supply*.

b. Definitions

- **100-Year Flood** is a flood that has a 1 percent statistical chance of occurring in any given year. The 100-year flood can, however, occur in consecutive years or multiple times within a year.
- **100-Year Storm** is a storm that has a 1 percent statistical chance of occurring in any given year. The 100-year storm can, however, occur in consecutive years or multiple times within a year.
- **Aquifer** refers to a body of rock or sediment that is sufficiently porous and permeable to store, transmit, and yield significant or economic quantities of groundwater to wells and springs.
- **Area of Shallow Flooding** includes lands designated as Zone AO, AH, or VO on the Flood Insurance Rate Map (FIRM). The base flood depths range from 1 to 3 feet; a clearly defined channel does not exist; the path of flooding is unpredictable and indeterminate; and velocity flow may be evident. Such flooding is characterized by ponding or sheet flow.
- **Area of Special Flood Hazard** includes lands in the floodplain within a community subject to a 1 percent or greater chance of flooding in any given year; sometimes referred to as the "Base Flood." This area is designated as Zone A, AO, AH, A1-A30, AE, A99, VO, V1-30, VE, or V on the FIRM.
- **Base Flood** is a flood having a 1 percent chance of being equaled or exceeded in any given year (also called the "100-year flood").

- **Basin Plan** refers to a water quality control plan developed pursuant to the federal Clean Water Act[1] Section 13240. The Basin Plan is a master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the region. The Basin Plan must include (1) a statement of beneficial water uses that the Regional Water Quality Control Water Board (RWQCB) will protect, (2) the water quality objectives needed to protect the designated beneficial water uses, and (3) the strategies and time schedules for achieving the water quality objectives. Factors to be considered by a RWQCB in establishing water quality objectives must include, but are not necessarily limited to, all of the following: (1) past, present, and probable future beneficial uses of water; (2) environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto; (3) water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area; (4) economic considerations; (5) the need for developing housing within the region; and (6) the need to develop and use recycled water.
- **Best Management Practices (BMPs)**, in relation to stormwater management, are control measures taken to mitigate changes to both quantity and quality of urban runoff caused through changes to land use. BMPs are designed to reduce stormwater volume, peak flows, and/or nonpoint source pollution through evapotranspiration, infiltration, detention, and filtration or biological and chemical actions. Stormwater BMPs are often classified as "structural" (i.e., devices installed or constructed on a site) or "non-structural" (procedures, such as modified landscaping practices). The U.S. Environmental Protection Agency (USEPA) publishes lists of stormwater BMPs for use by local governments, builders, and property owners.
- **FEMA** refers to the Federal Emergency Management Agency.
- **Flood Insurance Rate Map (FIRM)** refers to the official map on which the Federal Insurance and Mitigation Administration has delineated both the Areas of Special Flood Hazards and the risk premium zones applicable to the community.
- **Flooded** refers to any condition in which the soil surface is temporarily covered with flowing water from any source, such as streams overflowing their banks, runoff from adjacent or surrounding slopes, inflow from high tides, or any combination of sources.
- **Frequency (Inundation)** refers to the average frequency of flooding by surface water or soil saturation. It is usually expressed as the number of years (e.g., 50 years) the soil is inundated or saturated at least once during a year.

[1] The Clean Water Act (CWA) was originally known as the Federal Water Pollution Control Act of 1948, which was the first major U.S. law to address water pollution. Concern for controlling water pollution led to sweeping amendments in 1972. As amended in 1972, the law became commonly known as the Clean Water Act (CWA).

- **Groundwater** includes water that occurs beneath the land surface and fills the pore spaces of the alluvium, soil, or rock formation in which it is situated. It excludes soil moisture, which refers to water held by capillary action in the upper unsaturated zones of soil or rock.
- **Groundwater Basin** refers to any basin identified in the California Department of Water Resources "California's Groundwater: Bulletin No. 118" (September 1975, updated 2003), and any amendments to that bulletin, but does not include a basin in which the average well yield, excluding domestic wells that supply water to a single-unit dwelling, is less than 100 gallons per minute.
- **Groundwater Table** refers to the upper surface of the zone of saturation in an unconfined aquifer.
- **Hydrologic Conditions of Concern** represent a combination of upland hydrologic conditions and stream biological and physical conditions that present a condition of concern for physical and/or biological degradation of streams.
- **Hydromodification** refers to any activity that increases the velocity and volume (flow rate)—and often the timing—of runoff, such as development of impervious surfaces, vegetation removal, dredging/filling, or other alterations to natural land contours for the purposes of new development.
- **Inundation** is the condition in which water from any source temporarily or permanently covers a land surface.
- **Low Impact Development (LID)** is an approach to land development that uses various land planning and design practices and technologies to simultaneously conserve and protect natural resource systems and reduce infrastructure costs. Typically, emphasis is on employing natural and constructed features that reduce the rate of stormwater runoff, filter out pollutants, facilitate stormwater storage on-site, infiltrate stormwater into the ground to replenish groundwater supplies, or improve the quality of receiving groundwater and surface water.
- **Mudflow** refers to a landslide composed of saturated rock debris and soil with a consistency of wet cement.
- **National Flood Insurance Program (NFIP)** is the federal program that authorizes the sale of federally subsidized flood insurance in communities where such flood insurance is not available privately.
- **National Pollutant Discharge Elimination System (NPDES)** refers to the provision of the federal Clean Water Act that prohibits discharge of pollutants into waters of the United States unless a special permit is issued by the USEPA, a state, or another delegated agency.
- **Nonpoint Source Pollution** refers to pollution that enters water from dispersed and uncontrolled sources, such as surface runoff, rather than through pipes. Nonpoint sources (e.g., landscape practices, on-site sewage disposal, and automobiles) may contribute

pathogens, suspended solids, and toxicants. While individual sources may seem insignificant, the cumulative effects of nonpoint source pollution can be significant.

- **Non-Stormwater Discharge** includes any discharge that is not entirely composed of stormwater except those noted within an NPDES permit.
- **Pollutant of Concern** refers to a contaminant that would contribute to impairments in downstream receiving waters.
- **Receiving Waters** refers to water bodies, (including streams or rivers, existing lakes, or the ocean) that receive treated or untreated runoff from upland areas.
- **Seiche** is a surface wave created when a body of water is shaken, usually by earthquake activity.
- **Stormwater** refers to discharges generated by runoff from land and impervious areas, such as paved streets, parking lots, and building rooftops, during rainfall and snow events that often contain pollutants in quantities that could adversely affect water quality. Most stormwater discharges are considered point sources and require coverage by a NPDES permit.
- **Surface Water** refers to water present above the substrate or soil surface.
- **Total Maximum Daily Loads (TMDLs)** is a regulatory term in the U.S. Clean Water Act, describing a plan for restoring impaired waters that identifies the maximum amount of a pollutant that a body of water can receive while still meeting water quality standards.
- **Tsunami** refers to the ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. Tsunamis are sometimes referred to as "tidal waves" due to their common appearance as that of an extraordinarily high, rapidly rising, and forceful tide. The use of this term to describe tsunamis is discouraged by the scientific community, however.

3.13.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Rancho La Habra Specific Plan is subject to a range of federal, state, regional, and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

Clean Water Act

The Clean Water Act established the basic structure for regulating discharges of pollutants into "waters of the U.S." The act specifies a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. Key components of the Clean Water Act that are relevant to the proposed Specific Plan are as follows:

- Sections 303 and 304, which provide for water quality standards, criteria, and guidelines. Section 303(d) requires the state to develop lists of water bodies that do not attain water quality objectives (are impaired) after implementation of required levels of treatment by point-source dischargers (municipalities and industries). Section 303(d) also requires that the state develop TMDLs for each of the listed pollutants. The TMDL is the amount of pollutant loading that the water body can receive and still be in compliance with water quality objectives. After implementation of the TMDL, it is anticipated that the contamination that led to the 303(d) listing would be remediated. Preparation and management of the Section 303(d) list are administered by the RWQCBs.
- Section 401 requires every applicant for a federal permit or license for any activity that may result in a discharge to a water body to obtain a water quality certification that the proposed activity would comply with applicable water quality standards.
- Section 402 regulates point- and nonpoint-source discharges to surface waters through the NPDES program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the RWQCBs. The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.
- Section 404 establishes a program to regulate the discharge of dredged or fill material into "waters of the United States," including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from Section 404 regulation (e.g., certain farming and forestry activities).
- The basic premise of the 404 program is that no discharge of dredged or fill material may be permitted if (1) a practicable alternative exists that is less damaging to the aquatic environment, or (2) the nation's waters would be significantly degraded. In other words, permit applicants must show that steps have been taken to avoid impacts on wetlands, streams, and other aquatic resources; that potential impacts have been minimized; and that compensation will be provided for all remaining unavoidable impacts.
- Proposed activities are regulated through a permit review process. For most discharges that will have only minimal adverse effects, a "general permit" may be suitable. General permits are issued on a nation-wide, regional, or state basis for particular categories of activities. The general permit process eliminates individual review, and allows certain activities to proceed with little or no delay, provided that the applicable conditions for the general permit are met. For example, minor road improvements and utility lines are activities that can be considered for a general permit. States also have a role in Section 404 decisions, through state program general permits, water quality certification, or program assumption.

- An individual permit is required for potentially significant impacts. Individual permits are reviewed by the U.S. Corps of Engineers, which evaluates applications under a public interest review, as well as the environmental criteria set forth in the Clean Water Act Section 404(b)(1) Guidelines, regulations promulgated by USEPA.

National Pollutant Discharge Elimination System

The NPDES permit system was established in the Clean Water Act to regulate municipal and industrial discharges to the surface waters of the United States. Section 402 of the Clean Water Act contains general requirements regarding NPDES permits. Section 307 of the Clean Water Act describes the factors that USEPA must consider in setting effluent limits for priority pollutants.

The purpose of the NPDES municipal program is to establish a comprehensive water quality program to manage urban stormwater in order to minimize pollution of the environment to the maximum extent practicable. The NPDES program consists of characterization of the receiving water quality, identification of harmful constituents, identification of potential sources of pollutants, and implementation of a Comprehensive Storm Water Management Program. One of the primary objectives of water quality regulations, including the NPDES program, is the reduction of pollutants and sediments in urban stormwater runoff to the maximum extent possible through the use of BMPs.

There are two categories of BMPs: structural and non-structural. Structural BMPs involve the specific construction, modification, operation, maintenance, or monitoring of facilities to minimize the introduction of pollutants from the drainage system. Non-structural BMPs are activities, programs, and other non-physical measures that would contribute to the reduction of pollutants from nonpoint source pollutants to the drainage system.

National Flood Insurance Program

The City of La Habra (City) is a participant in the NFIP, which is administered by FEMA. Participants in the NFIP must satisfy certain mandated floodplain management criteria, including adopting an ordinance that is in compliance with minimum regulatory standards issued by FEMA and monitoring construction and building permits and the status of the City ordinance to ensure that all are in compliance with federal laws and regulations.

Established in 1968 with the passage of the National Flood Insurance Act, the NFIP is a federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for state and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the federal government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in

floodplains, the federal government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an affordable insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. Communities are occasionally audited by the California Department of Water Resources to ensure the proper implementation of FEMA floodplain management regulations.

b. State Plans, Policies, and Regulations

Porter-Cologne Act

The SWRCB and the RWQCB share the responsibility under the Porter-Cologne Act to formulate and adopt water policies and plans, and to adopt and implement measures to fulfill Clean Water Act requirements. In order to meet this requirement for the Los Angeles area, the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) (discussed below) was prepared by the RWQCB to protect the water quality of the state according to the beneficial uses identified for each water body. Prior to authorizations of waste discharge by the RWQCB, the Porter-Cologne Act requires reports of waste discharges to be filed. The RWQCB then prescribes Waste Discharge Requirements, which serve as NPDES permits under a provision of the Porter-Cologne Act.

Anti-Degradation Policy

A key policy of California's water quality program is the state's Anti-Degradation Policy. This policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California (SWRCB Resolution No. 68-16), restricts degradation of surface and ground waters. In particular, this policy protects water bodies where existing quality is higher than necessary for the protection of beneficial uses. Under the Anti-Degradation Policy, any actions that can adversely affect water quality in all surface and ground waters must (1) be consistent with maximum benefit to the people of the state, (2) not unreasonably affect present and anticipated beneficial use of the water, and (3) not result in water quality less than that prescribed in water quality plans and policies, (i.e., will not result in exceedances of water quality objectives) (SWRCB 1968).

Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment became effective on February 16, 2012. The Construction General Permit regulates construction site stormwater management. Dischargers whose projects disturb 1 or more acres of soil, or whose projects disturb less than 1 acre but are part of a larger common plan of development

that in total disturbs 1 or more acres, are required to obtain coverage under the general permit for discharges of stormwater associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents, including a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during construction, rain event action plans, and numeric action levels (NALs) for pH and turbidity as well as requirements for qualified professionals to prepare and implement the plan. An appropriate permit fee must also be mailed to SWRCB.

The Construction General Permit requires the SWPPP to identify BMPs that will be implemented to reduce potential chemical contaminants that would affect water quality. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), non-storm-water management (e.g., water conservation), and waste management. The SWPPP also includes descriptions of BMPs to reduce pollutants in stormwater discharges after all construction phases have been completed at the site (post-construction BMPs).

Recycled Water General Permit for Landscape Irrigation

In July 2009, the SWRCB released General Waste Discharge Requirements for Landscaping Irrigation Uses of Municipal Recycled Water (Recycled Water General Permit), allowing municipal entities to distribute disinfected tertiary-treated recycled water to select customers for landscape irrigation (Order No. 2009-0006-DWQ). The Recycled Water General Permit is intended to further the state's Recycled Water Policy (California Code of Regulations [CCR] Title 22) and California Water Code Section 13552.5, both of which encourage recycled water for non-potable uses.

Under the Recycled Water General Permit, recycled water is limited to recycled water produced by a public entity at a municipal wastewater treatment plant. The Recycled Water General Permit does not apply to water produced from the treatment of other non-municipal wastewaters (e.g., oil field production, food processing, stormwater, etc.) and other types of treatment facilities (e.g., industrial wastewater treatment plants). To obtain coverage under the Recycled Water General Permit, the producer/distributor of recycled water must submit a Notice of Intent (NOI) and Operations and Maintenance Plan to the SWRCB. The Operations and Maintenance Plan must contain a detailed operations plan for use areas, including procedures for implementation of regulations regarding recycled water use and maintenance of equipment and emergency backup systems to maintain compliance with the conditions of the Recycled Water General Permit. In addition, it must have an irrigation management plan

specifying measures to ensure that recycled water is applied efficiently, at an agronomic rate, and using practices necessary to minimize application of salinity constituents to use areas. Characteristics of the soil, the recycled water, plant species being irrigated, climatic conditions, and other relevant conditions must be considered in this plan.

The Recycled Water General Permit notes that the use of recycled water may not be appropriate for all situations because of unique site-specific characteristics and conditions. In addition, because there are certain public health concerns associated with recycled water, the Recycled Water General Permit includes exposure control measures, including minimum setback distances, signage, method of application, and use restrictions and only allows use of water treated to CCR Title 22 tertiary treatment requirements. Other potential public health issues, such as cross-contamination of recycled water and potable water sources, control of recycled water salinity, and chlorination, are regulated under the Recycled Water Policy and the Water Code. Landscape irrigation with recycled water would require coverage under this Recycled Water General Permit or an individual permit.

State Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development Policy which, at its core, promotes the idea of "sustainability" as a key priority in the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions.

The intent of the LID policy is to benefit water supply, contribute to water quality protection, and manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed Phase I municipal stormwater NPDES permits.

c. Regional and Local Plans, Policies, and Regulations

City of La Habra Stormwater Requirements

The following three NPDES permits apply to stormwater regulations within the City:

1. State General Permit CAS000001, which regulates discharges of stormwater associated with industrial activities;
2. State General Permit CAS000002, which regulates discharge of stormwater runoff associated with construction activities; and
3. Santa Ana Regional Water Quality Control Board Order Number R8-2009-0030 as Amended by Order No. R8-2010-0062, State Permit CAS618030, which regulates waste discharge requirements (WDR).

Fourth Term Municipal Stormwater (MS4) Permit R8-2009-0030 requires cities and the County of Orange to mitigate, among other things, illegal discharges into the storm drainage system. The programs include (1) inspections of commercial and industrial properties, (2) inspection and cleaning of stormwater pipelines, and (3) responses to complaints. The permit also requires development to maintain existing drainage patterns.

Stormwater requirements must comply with Chapter 13.24 (Water Quality Ordinance) of the La Habra Municipal Code. The intent of this ordinance is to control urban runoff. The ordinance requires compliance with the Drainage Area Management Plan and the preparation of a Water Quality Management Plan (WQMP).

Model Water Quality Management Plan (MWQMP)

The Model Water Quality Management Plan (MWQMP) and Technical Guidance Document (TGD) were developed to aid the County of Orange, the Orange County Flood Control District, and cities of Orange County (the Permittees) and development project proponents with addressing post-construction urban runoff and stormwater pollution from new development and significant redevelopment projects.

The MWQMP describes the process that the Permittees would employ for developing a Project WQMP for individual new development and significant redevelopment projects. A Project WQMP is a plan for minimizing the adverse effects of urbanization on site hydrology, runoff flow rates, and pollutant loads. Development of an MWQMP to provide guidance for preparation of a Project WQMP is required by the two NPDES permits held jointly by the Permittees administered by two RWQCBs. The permits also require development of Conceptual or Preliminary WQMPs prior to submission of a Project WQMP.

Drainage Area Management Plan

The Drainage Area Management Plan (DAMP) is Orange County's principal policy and guidance document for the NPDES program. The County and stakeholders created the DAMP, which has been in effect since 1993, with subsequent updated elements. A revised DAMP, known as the 2007 DAMP, was submitted to the Santa Ana RWQCB in July 2006. In May 2009, the Santa Ana RWQCB re-issued the MS4 Permit for the Santa Ana Region of Orange County (fourth term permit), which would result in future changes to the Orange County DAMP and stormwater program. In addition to the previous requirements under the third term permit, the requirements of the new fourth term permit include requirements pertaining to hydro-modification and LID features associated with new developments and redevelopments.

City of La Habra General Plan

City of La Habra General Plan policies relevant to hydrology and water quality include the following.

Chapter 2, Community Development

LU 17.9 Stormwater Facilities. Work with the Orange County Flood Control District to ensure that structures channeling or retaining water be designed and constructed of materials and colors so as to blend with the natural environment.

Chapter 4, Infrastructure

SD 1.1 Storm Drain Master Plan. Implement the City's Storm Drain Master Plan to ensure an adequate storm drainage system.

SD 1.2 NPDES Permit. Require new development and rehabilitated structures to minimize stormwater runoff and pollutants consistent with the City's National Pollutant Discharge Elimination System (NPDES) permit.

SD 1.3 Adequate Storm Drainage Infrastructure. Ensure that the City's storm drainage culverts, channels, and facilities are adequately sized, maintained, and upgraded to adequately convey stormwater runoff and prevent flooding for existing and new development.

SD 1.4 Facility Design. Design stormwater drainage systems to be environmentally sustainable, appear natural in character, and to be compatible with surrounding uses.

SD 1.5 Best Practices. Use and update best practices for stormwater management.

SD 1.7 Drainage Channels. Maintain storm drainage channels to adequately convey stormwater.

SD 1.9 No Net Increase. Require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.

WQ 1.1 National Pollutant Discharge Elimination System and Regional Water Quality Control Board. Implement the requirements of the Regional Water Quality Control Board (RWQCB) for compliance with the National Pollutant Discharge Elimination System permit and apply best management practices for point source discharges.

WQ 1.2 Orange County Drainage Area Management Plan and Water Quality Management Plan. Continue to enforce that all new developments and redevelopments

comply with the Orange County Drainage Area Management Plan (DAMP) and that all applicable new developments and redevelopments prepare a Water Quality Management Plan (WQMP).

WQ 1.3 Low Impact Development. Encourage the incorporation of Low Impact Development (LID) techniques (e.g., permeable paving, cells, bioswales, tree box filters, rain barrels, rooftop runoff for irrigating lawns) to manage stormwater and urban runoff, reduce runoff and pollution, and assist in maintaining or restoring the natural hydrology.

WQ 1.4 Protection of Water Bodies. Require new development to protect the quality of water bodies and natural drainage systems consistent with the City's NPDES permit.

WQ 1.5 New Development. Require new development to protect the quality of water resources and natural drainage systems through site design, and use of source controls, stormwater treatment, runoff reduction measures, best management practices, and LID techniques.

WQ 1.6 Site Development. Encourage site design and development to minimize lot coverage and impervious surfaces.

WQ 1.8 City Department Integration. Integrate water management planning, land use planning, watershed planning, environmental planning, greenhouse gas reductions, climate change measures, and hazard mitigation planning into local decision-making processes to protect the watershed.

Chapter 6, Conservation/Natural Resources

W 1.5 New Development and Post-Development Stormwater Runoff. Require new development and post-development stormwater runoff to control sources of pollutants and improve and maintain urban runoff water quality through site design, stormwater treatment and protection measures, and best management practices (BMPs) consistent with the City's National Pollutant Discharge Elimination System (NPDES) Permit.

W 1.8 Pervious Surfaces. Encourage maximizing pervious surfaces within new or substantially renovated public, institutional, residential, commercial, and industrial development projects.

W 1.9 Percolation. Design landscaping and other open space areas in development projects to capture stormwater runoff and percolate into the groundwater basin, to the extent feasible.

Chapter 7, Community Safety

NH 3.1 Protection of People and Property. Adopt, maintain, and implement applicable federal, state, and local laws, standards, and guidelines to protect people and property from the risks of flooding.

NH 3.2 National Flood Insurance Program. Continue to participate in the National Flood Insurance Program (NFIP) and floodplain management practices in accordance with federal guidelines to maintain the City's eligibility for flood insurance and qualification for disaster assistance.

NH 3.3 Flood Hazard Zones. Require new development and substantial improvements or upgrades in identified Federal Emergency Management Agency (FEMA) flood hazard zones (i.e., 100- and 500-year floodplains), as shown on General Plan Figure 7-1 (Flood Hazards) be constructed in accordance with applicable city, state, and federal regulations including compliance with the minimum standards of FEMA's National Flood Insurance Act to avoid or minimize the risk of flood damage.

NH 3.5 City Storm Drains. Design and construct storm drains per Orange County Public Works' standards and ensure that City-owned storm drains are operated and maintained to allow for maximum capacity of the system.

3.13.3 ENVIRONMENTAL SETTING

The Project site was originally part of the 915-acre West Coyote Hills oil field, located within the cities of La Habra and Fullerton. In 1992, the City adopted the La Habra Hills Specific Plan to create a master-planned community on the 380 acres of the former oil field located within the City limits. The La Habra Hills Specific Plan provided for development of an 18-hole golf course (Westridge Golf Club) in the northern part of this area and residential neighborhoods and parks in the southern part.

Existing impervious surfaces within the Project site currently consist of 0.74-acre of building and other structures, 5.17 acres of concrete cart paths, 4.82 acres of concrete pavement, 2.00 acres of concrete lined v-ditches, and 2.20 acres of water features. The combined existing impervious area equals 14.93 acres, equating to 9.9 percent of the 151-acre Project site.

a. Hydrology and Drainage

Runoff from the Project site is conveyed as sheet flow northerly and westerly, where it is collected by an underground storm drain system that outlets into the various water features throughout the golf course before discharging to the City's existing 48-inch storm drain system within Imperial Highway and its 60-inch storm drain system within Beach Boulevard. Runoff is then conveyed southwesterly in these systems and discharged into Coyote Creek, which is

located approximately 400 feet to the west of the site on the west side of Beach Boulevard, before discharging to the San Gabriel River, Alamitos Bay, San Pedro Bay and the Pacific Ocean.

Existing topography divides the Project site into seven distinct drainage areas—'A', 'B', 'C', 'D', 'E', 'F', and 'G'—with Coyote Creek flowing from northeast to southwest behind the existing commercial/industrial and residential properties located west of Beach Boulevard (see **Figure 3.13-1**). Drainage Area 'G' consists of the slopes along the northeasterly boundary of the Project site, which drain off-site in both the existing and proposed conditions. There are no improvements proposed in association with Drainage Area 'G', and it was therefore not analyzed.

In 1999, when the Project site was graded and the Westridge Golf Club was constructed, it was designed to accept stormwater drainage from the residential neighborhoods to the south. Two residential tracts (Westridge Tracts 15030 and 15031) were developed south of the golf course and their off-site storm drain system was integrated into the golf course design. A portion of the runoff from both of these tracts co-mingles with existing water features along the golf course fairways. The water features were intended to act as retarding basins, ultimately mitigating the increase in stormwater runoff associated with the development of both the residential tracts and the golf course.

Existing runoff volumes on the Project site are summarized in **Table 3.13-1**.

Table 3.13-1
Existing Project Site Hydrology

	Runoff Volume (acre-feet over 24 hours)			
Drainage Area	2-Year Storm	10-Year Storm	25-Year Storm	100-Year Storm
A	0.8	1.8	5.8	11.0
B	0.6	1.5	4.5	8.1
C	3.5	8.3	26.4	49.1
D	0.7	1.7	4.9	8.7
E	0.8	1.3	2.0	2.6
F	0.2	0.4	0.6	0.8

Source: Hydrology Analysis, Vesting Tentative Tract Map 17485, 2016.

According to FEMA floodplain mapping, the Project site is outside of the 100-year flood zone and within the 0.2 percent chance (500-year) flood zone.

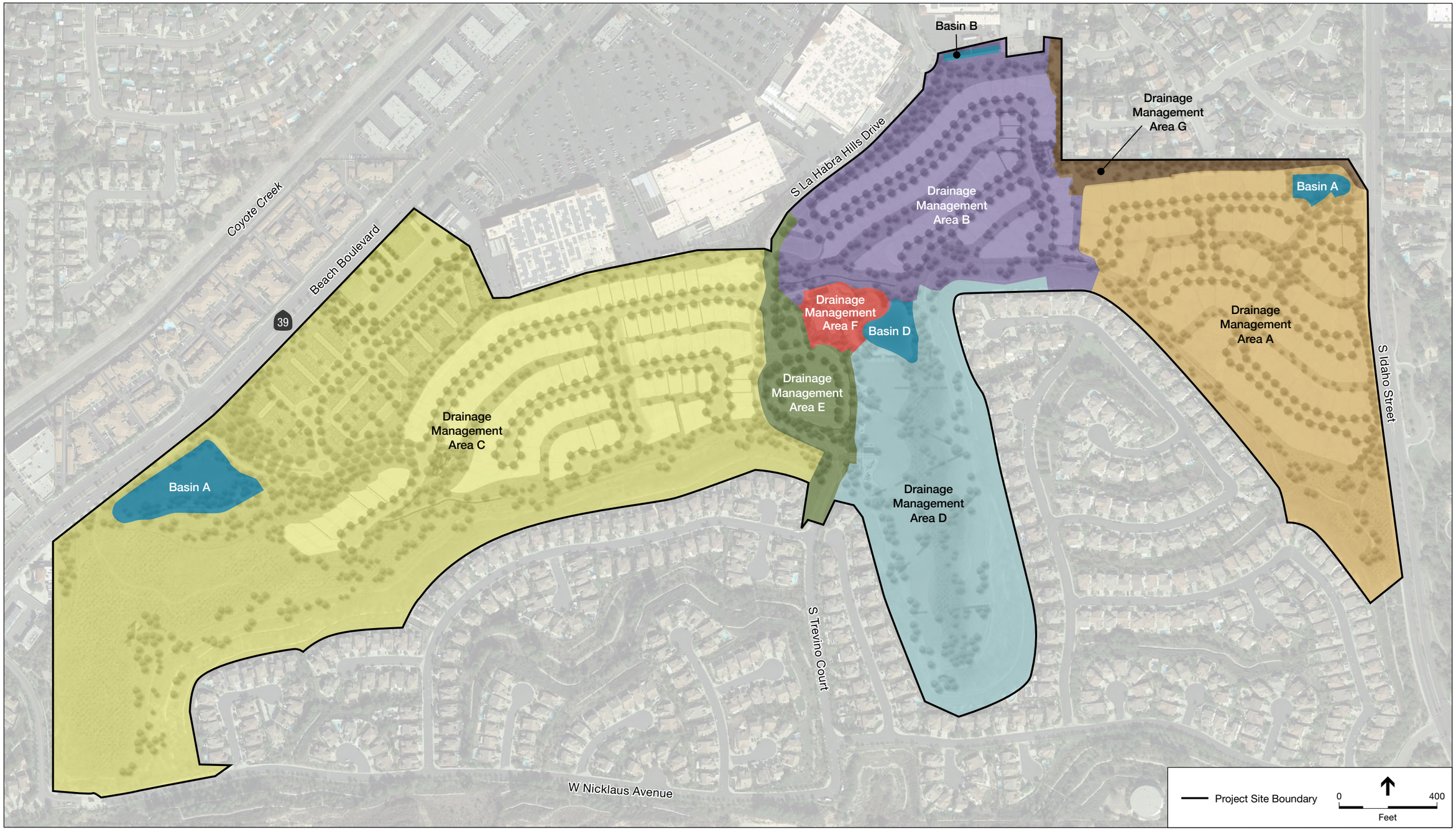


Figure 3.13-1: Drainage Management Areas and Basin Locations

Source: Google Earth Pro; Carlson SLS

b. Water Quality

The downstream receiving waters for stormwater from the Project site include Coyote Creek, San Gabriel River (Reach 1 and Estuary), Alamitos Bay, San Pedro Bay, and the Pacific Ocean. Coyote Creek and San Gabriel River (Estuary) are listed as impaired under Section 303(d) of the Clean Water Act, and are therefore designated as Environmentally Sensitive Areas pursuant to the Orange County Drainage Area Management Plan. However, the Project site is not located adjacent to (within 200 feet of) these water bodies and does not directly discharge to them. Based on the most current 303(d) list, downstream receiving waters are impaired by the following contaminants:

- **Coyote Creek ~~Channel~~**: ammonia, copper (dissolved), diazinon, indicator bacteria, lead, pH, toxicity.
- ~~**Coyote Creek**: diazinon, indicator bacteria, pH, toxicity.~~
- **San Gabriel River (Reach 1)**: coliform bacteria, pH.
- **San Gabriel River (Estuary):** copper, dioxin, nickel, dissolved oxygen.
- **Alamitos Bay:** indicator bacteria.
- **San Pedro Bay:** chlordane, DDT, polychlorinated biphenyls (PCBs), sediment toxicity.

The Los Angeles RWQCB (Region 4) has approved TMDLs for Coyote Creek/San Gabriel River that apply to those portions of Orange County that drain to Coyote Creek and the San Gabriel River.

3.13.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of identified impacts on hydrology and water quality. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect on the environment if it were to:

Threshold HWQ-1 Violate any water quality standards or waste discharge requirements;

Threshold HWQ-2 Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);

Threshold HWQ-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-

site, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Threshold HWQ-4 Otherwise substantially degrade water quality;

Threshold HWQ-5 Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;

Threshold HWQ-6 Place within a 100-year flood hazard area structures which would impede or redirect flood flows;

Threshold HWQ-7 Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or

Threshold HWQ-8 Cause inundation by seiche, tsunami, or mudflow.

3.13.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold HWQ-1: Violate any water quality standards or waste discharge requirements.

Impact HWQ-1.1: Site grading and construction activities would result in short-term increases in the transport of silt and sediment, along with hydrocarbon-based pollutants, to receiving waters. Site construction activities would also allow for infiltration of hydrocarbon and other pollutant discharges into the groundwater. However, compliance with National Pollutant Discharge Elimination System (NPDES) requirements, as well as implementation of a Stormwater Pollution Prevention Plan (SWPPP), including Best Management Practices (BMPs), would avoid the potential to violate any water quality standards or waste discharge requirements. The impact would therefore be *less than significant*.

Methodology

A project's impacts on water quality generally occur during three periods: (1) the earthwork and construction phase of site development, when the potential for erosion, siltation, and sedimentation is the greatest; (2) following construction, prior to the establishment of ground cover, when erosion potential remains relatively high; and (3) following completion of future development, when impacts related to erosion and sedimentation decrease markedly, but those

associated with urban runoff and waste discharges increase. Impact HWQ-1.1 addresses the first two of these three periods, while the third period, ongoing operations, is addressed in Impact HWQ-1.2.

The potential for impacts in relation to water quality standards and waste discharge requirements was evaluated by considering the general type of pollutants that development projects under the proposed Specific Plan would generate during construction. In determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to comply with relevant federal, state, regional, and local laws and regulations that are designed to ensure that applicable water quality standards and waste discharge requirements are met. These laws and regulations have been developed to reduce the potential for pollutants in receiving waters (as described in Section 3.13.2 above).

A violation of water quality standards or waste discharge requirements would occur if the Specific Plan would not implement or would be inconsistent with existing regulatory requirements designed to protect water quality and prevent erosion and sedimentation during construction. Conversely, implementation of all relevant water quality requirements would ensure that impacts related to an exceedance of water quality standards would not occur and that impacts would be less than significant.

Impact Assessment

Construction and grading within the Project site would involve removal of vegetative cover and temporary disturbance of surface soils. During the construction period, grading, excavation, and remediation activities would result in exposure of soil to runoff, causing erosion and entrainment of sediment and contaminants in the runoff. In addition, construction equipment used on-site would operate, park, and be maintained within unpaved areas, leading to the potential for accidental spillage of fuels and oils.

Soil stockpiles and excavated areas within the Project site would be exposed to runoff from initial clearing of vegetation and demolition of golf course facilities until grading and excavation activities are completed and new ground cover (landscaping, hardscape, paving, buildings) is established. During this period of time, which is expected to last approximately 11 to 12 months, approximately 3,400,000 cubic yards of soil would be moved within the Project site.

If not properly managed, runoff from exposed ground would cause erosion and increased sedimentation and pollutants in stormwater. The potential for chemical releases would also be present during construction given the types of materials that would be used, including fuels,

oils, paints, and solvents. Because of buried contaminants within subsurface soils[2] in some areas, erosion could also result in release of those contaminants. If released, these substances could be transported to the Pacific Ocean via receiving waters in stormwater runoff, causing an incremental reduction in water quality.

Significance Conclusion for Impact HWQ-1.1

The Project applicant would be required to submit a notice of intent with the appropriate fees to the SWRCB under the Construction General Permit prior to initiation of construction.

In addition, the Project applicant would be required to prepare a SWPPP, which would establish BMPs in order to reduce sedimentation and erosion and prevent construction pollutants from leaving the site. The Project would also incorporate all monitoring elements as required in the General Construction Permit. The Project applicant would also develop an erosion and sediment control plan to be reviewed and approved by the City of La Habra Chief Building Official prior to issuance of a grading permit.

Implementation of the BMPs prescribed in the SWPPP that must be prepared for the proposed Project would ensure that site grading would minimize the amount of silt and sediment that is transported to downstream locations, as well as control peak stormwater flows and velocities.

BMPs that would be installed for the Project include temporary stormwater detention/desilting basins, silt fences, fiber rolls, and gravel bags, as appropriate, designed to retain storm flows on-site, slow surface runoff velocities, and provide pollutant/silt containment. Implementation of stormwater detention/desilting basins would be designed to capture and temporarily hold peak storm flows prior to discharge to the storm drain system to prevent runoff from the Project site from exceeding capacity of the system. The basin would also allow provide for settlement of solids prior to discharge. The silt fences, fiber rolls, and gravel bags would also be used in appropriate locations approved by the City to direct and slow storm runoff. As a result, these BMPs would reduce sediment discharge.

In addition, other standard conditions (e.g., compliance with the drainage controls prescribed in the California Building Code and Chapter 15.44, Excavations and Grading, of the La Habra Municipal Code) would further minimize potential construction-related erosion and siltation impacts.

As a result, the impact would be less than significant, and no mitigation measures would be required.

[2] See Section 3.12, *Hazards and Hazardous Materials*, of this EIR, for a discussion of on-site contamination and remediation requirements.

Threshold HWQ-1: Violate any water quality standards or waste discharge requirements.

Impact HWQ-1.2: Following completion of grading and construction, urban runoff and waste discharges from Project streets, parking lots, and other paved areas, as well as runoff from landscaped areas, would carry a variety of pollutants to receiving waters. However, implementation of Best Management Practices (BMPs) as required to be set forth in the Project's Stormwater Management Plan and Water Quality Management Plan would avoid the potential to violate any water quality standards or waste discharge requirements during ongoing operations. The impact would therefore be *less than significant*.

Methodology

The potential for impacts in relation to water quality standards and waste discharge requirements was evaluated by considering the general type of pollutants that development projects under the proposed Specific Plan would generate during ongoing operations. In determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to comply with relevant federal, state, and regional laws and regulations that are designed to ensure that applicable water quality standards and waste discharge requirements are met.

A violation of water quality standards or waste discharge requirements would occur if the Specific Plan would not implement or would be inconsistent with existing regulatory requirements designed to protect water quality and prevent erosion and sedimentation during Project operations. Thus, a significant water quality impact could occur if increased runoff generated by the new development is not properly detained and treated for specified pollutants before being released into the downstream drainage system. Conversely, implementation of all relevant water quality requirements, including proper on-site detention and treatment for specified pollutants, would ensure that impacts related to an exceedance of water quality standards would not occur and that impacts would be less than significant.

Impact Assessment

Urban Runoff

Conversion of the Westridge Golf Club into the proposed Rancho La Habra community would introduce new or additional pollutants to receiving waters.

Sedimentation would not be considered a potential environmental effect post-construction because the site would be paved, covered with buildings, or landscaped, which would stabilize soils for the long term. Project site development would result in greater vehicular use of new and existing nearby roadways, which would lead to the accumulation and release of petroleum hydrocarbons, lubricants, sediments, and metals (generated by the wear of automobile parts). The management of landscaped areas would result in runoff and/or infiltration of herbicides and pesticides. These types of common urban pollutants would be transported in runoff, adversely affecting the quality of receiving waters and groundwater. Therefore, post-construction during the life of Project site development, nonpoint source pollutants would be the primary contributors to potential water quality degradation. Nonpoint source pollutants would be washed by rainwater from rooftops and landscaped areas into on-site and local drainage networks. Potential nonpoint source pollutants include products used in landscaping (e.g., pesticides, herbicides, and fertilizers); oil, grease, gasoline, heavy metals (nickel, copper, zinc, cadmium, and lead), and trash from roads and parking areas; and petroleum hydrocarbons from fuels. Roof runoff can also contribute zinc if galvanized rain gutters are provided.

Pollutants of Concern

As noted above, the Project site drains to receiving waters that are impaired by one or more pollutants. **Table 3.13-2** reflects anticipated pollutants of concern that would be generated by the proposed Project.

Table 3.13-2
Pollutants of Concern

Pollutant	Expected from Project?	Additional Information and Comments
Suspended-Solid/Sediment	Yes	Potential sources of sediment include existing landscaping areas and disturbed earth surfaces.
Nutrients	Yes	Potential sources of nutrients include fertilizers, sediment, and trash/debris.
Heavy Metals	Yes	Potential sources of heavy metals include streets, as well as commercial and multi-family parking areas.
Pathogens (Bacteria/Virus)	Yes	Potential sources of pathogens include pets, food wastes, and landscaping/sediment areas.
Pesticides	Yes	Potential sources of pesticides include landscaping and open space areas.
Oil and Grease	Yes	Potential sources of oil and grease include streets and parked vehicles.
Toxic Organic Compounds	~~No~~ Yes	~~Toxic organic compounds are not expected to be of concern due to the predominance of residential development.~~ The Project includes land uses where generation of toxic organic compounds is anticipated.
Trash and Debris	Yes	Potential sources include common litter and trash cans from homes. Project design would incorporate trash treatment devices meeting the full capture system definition of SWRCB Resolution Order No. 2015-0019 (Trash Amendments).

Source: Hunsaker Associates, *Rancho La Habra Preliminary Water Quality Management Plan*, 2018.

Hydrologic Conditions of Concern

In the North Orange County area, hydrologic conditions of concern are considered to exist if any streams located downstream from the Project are determined to be potentially susceptible to hydromodification impacts and either of the following conditions exists:

- Post-development runoff volume for the 2-year, 24-hour storm exceeds the pre-development runoff volume for the 2-year, 24-hour storm by more than 5 percent; or
- Time of concentration (Tc) of post-development runoff for the 2-year, 24-hour storm event is less than the time of concentration of the pre-development condition for the 2-year, 24-hour storm event by more than 5 percent.

If these conditions do not exist or streams are not potentially susceptible to hydromodification impacts, a hydrologic conditions of concern would not exist and hydromodification would not need to be considered further. Although all downstream storm water drainage conveyances have been improved and earthen channels have been stabilized, the most current Orange County Hydromodification Susceptibility map indicates that the Project site is within an area that is susceptible to hydromodification impacts. A summary of the Project's hydromodification analysis is provided in **Table 3.13-3**. Blue values indicate an insignificant change between the Project's existing condition and the developed condition where the developed condition is greater than 5 percent of the pre-project condition. Red values indicate a change where the developed condition is less than 5 percent of the pre-project condition, thus requiring detention of the 2-year event to address the increase in developed condition runoff.

Based on the results of the analysis, detention of post-development condition is required for Areas A, B and C. The proposed Project provides for on-site detention basins (flow-through design) to detain the increase in runoff volume (2-year event) that would occur as the result of Project development.

Significance Conclusion for Impact HWQ-1.2

The Draft WQMP for Rancho La Habra includes BMPs that would be incorporated into the design of the Project. These BMPs, including those for LID, site design, and source control, are described below. Because (1) downstream storm water drainage conveyances have been improved and earthen channels have been stabilized and (2) the proposed Project provides for detention of increase in runoff volume (2-year event) that would occur as the result of Project development hydromodification is not a concern for the Project and impacts would be less than significant.

Pursuant to the Fourth Term MS4 Storm Water Permit (Order No. R8-2009-0030, as amended by Order No. R8-2010-0062), LID BMPs must be incorporated into design features and source controls to reduce Project-related stormwater pollutants. The incorporation of LID BMPs into

Table 3.13-3
Hydromodification Analysis

Drainage Area	Condition	Acres	Q_2 (cfs)	Tc (min)	V_{2YR} (ac-ft)	Hydromodification Control
	Existing	27.40	19.5	21.84	0.81	
A	Developed	27.40	27.0	14.78	2.18	Detention Basin
	Change	**0.00**	**+7.5**	**-7.06**	**+1.37**	
	Existing	19.60	18.3	13.95	0.63	
B	Developed	19.70	20.9	13.73	1.77	Subsurface Detention
	Change	**+0.10**	**+2.6**	**-0.22**	**+1.14**	
	Existing	121.00	86.5	17.88	3.47	
C	Developed	117.30	104.1	11.37	7.05	Detention Basin
	Change	**-3.70**	**+17.6**	**-6.51**	**+3.58**	
	Existing	20.31	15.97	16.73	0.7845	
D	Developed	20.54	16.24	16.67	0.7531	None
	Change	**+0.23**	**+0.27**	**-0.06**	**+0.0046**	
	Existing	5.81	6.8	9.87	0.81	
E	Developed	5.79	8.4	9.64	0.81	None
	Change	**-0.02**	**+1.6**	**-0.23**	**0.00**	
	Existing	1.68	2.6	5.44	0.25	
F	Developed	1.68	2.6	5.44	0.25	None
	Change	**0.00**	**0.0**	**0.00**	**0.00**	

Notes:
Q_2 (cfs) = Two-year storm flow measured in cubic feet per second.
Tc (min)= Time of concentration measured in minutes.
V_{2YR} (ac-ft) = Volume of 2-year storm flows measured in acre-feet.
Source: Preliminary Water Quality Management Plan, Vesting Tentative Tract Map 17845, Rancho La Habra, February 2015.

Project design requires evaluation of LID measures in the following treatment hierarchy: infiltration, evapotranspiration, harvest/reuse, and biotreatment. The Project proposes the use of flow-through LID BMPs to address pollutants from the Project's runoff.

The following site design BMPs have been incorporated into the proposed Project:

Minimize Impervious Area

- The Project's permeable area has been maximized by limiting the impermeable areas primarily to the roadways, driveways, and building footprints.
- Open jointed paving materials would not be used within the Project site.
- All roadways have been designed to the minimum City requirements.

Maximize Natural Infiltration Capacity

- The Project would consist of approximately 69.3 percent landscaped or open area, which would reduce runoff and maximize the potential for natural infiltration.

Preserve Existing Drainage Patterns and Time of Concentration

- Although the Project proposes to increase the percentage of impervious area, the time of concentration is anticipated to increase due to longer flow lengths and routed conditions, as compared to the pre-developed condition.

Disconnect Impervious Areas

- Landscaping would be provided adjacent to walkways and within common areas and private homeowner areas in an effort to disconnect impervious areas, avoid large impervious surface areas that could direct urban pollutants into receiving waters, and increase pervious surface areas above their water quality filtration capabilities.

Protect Existing Vegetation and Sensitive Habitat Areas, and Revegetate Disturbed Areas

- Before development of the existing golf course, the Project site consisted of dry brush in a chaparral climate. The existing condition is that of a developed and irrigated golf course. Where feasible, existing landscaping would be preserved. Approximately 13 acres of the Project site would be preserved as natural habitat.

Xeriscape Landscaping

- Native and/or tolerant landscaping would be incorporated into the site design consistent with City guidelines to reduce the need for use of pesticides and herbicides.

Biotreatment BMPs

- The proposed Project would incorporate a proprietary vegetated biotreatment system in its design to reduce pollutant loading in site runoff prior to discharging into the storm drain system. Runoff from the Project's development areas would be conveyed as surface flow toward and into the public right-of-way. Runoff would then be concentrated in the gutter and directed into one of the proposed water quality basins via a network of underground storm drain pipes. The basins would outlet through a series of modular wetland systems by BioClean for treatment prior to discharging into the municipal storm drain system. These proprietary biotreatment BMPs have been selected for use based on the system's proven pollutant removal efficiencies, small footprint, and the ease of incorporating into the Project's site design.

Non-Structural BMPs

- **Education for Property Owners, Tenants, and Occupants**. Educational materials would be provided to homeowners at close of escrow by owner and periodically thereafter by the homeowners' association (HOA) to inform them of potential impacts on downstream water quality. Materials would include those described in the WQMP.
- **Activity Restrictions**. Activity restrictions[3] to minimize potential impacts on water quality and with the purpose of protecting water quality would be prescribed by the Project's Covenant, Conditions, and Restrictions (CC&Rs), or other equally effective measure.
- **Common Area Landscape Management**. Maintenance activities for landscape areas would be required to be consistent with County and manufacturer guidelines for fertilizer and pesticide use (Orange County DAMP Section 5.5). Maintenance includes trimming, weeding, debris removal, and vegetation planting and replacement. Materials stockpiled during maintenance activities would be required to be placed away from drain inlets and runoff conveyance devices. Wastes would be required to be properly disposed of or recycled.
- **BMP Maintenance**. Responsibility for implementation, inspection, and maintenance of all BMPs (structural and non-structural) would be required to be consistent with the BMP Inspection and Maintenance Responsibilities Matrix provided in Section V of the WQMP, with documented records of inspections and maintenance activities completed.
- **Common Area Litter Control**. Litter control on-site would include the use of HOA litter patrols, violation reporting, and cleanup during landscaping maintenance activities and as needed to ensure good housekeeping of the Project's common areas.
- **Employee Training**. All employees, contractors, and subcontractors of the HOA would be required to be trained on the proper use and staging of landscaping and other materials with the potential to affect runoff and proper cleanup of spills and materials.
- **Common Area Catch Basin**. At least 80 percent of the Project's private drainage facilities would be inspected, cleaned, and maintained annually, with 100 percent of facilities inspected and maintained within a 2-year period.
- **Street Sweeping, Private Streets, and Parking Lots**. The Project's private streets and its parking lots within commercial and multi-family development areas would be swept, at minimum, on a weekly basis and as needed. Responsibility for maintaining such activities would be vested with the Project's homeowners' association.

[3] "Activity restrictions" refers to prohibitions or limitations on specific types of activities (e.g., use of pesticides, herbicides).

Structural Source Control BMPs

- **Storm Drain Stenciling**. Storm drain stencils or signage prohibiting dumping and discharge of materials ("No Dumping – Drains to Ocean") would be provided adjacent to each of the Project's proposed inlets. The stencils would be inspected and re-stenciled as needed to maintain legibility.
- **Trash Storage Areas**. Trash container areas would be designed in such a way so that drainage from adjoining roofs and pavement would be diverted around the area(s) to avoid run-on. This might include berming or grading the waste handling area to prevent run-on of stormwater. Trash enclosures would be designed with either a roof or awning to minimize direct precipitation and prevent rain from entering containers.
- **Use Efficient Irrigation Systems and Landscape Design**. In conjunction with routine landscaping maintenance activities, irrigation systems would be inspected for signs of leaks and overspray and repaired or adjusted accordingly. The system cycle would be adjusted to accommodate seasonal fluctuations in water demand and temperatures. Native or drought tolerant/non-invasive plant species would be used to minimize water consumption.
- **Protect Slopes and Channels**. To prevent storm and/or irrigation runoff from causing erosion, all manufactured slopes would be stabilized with vegetation and/or mulch in accordance with the "Use Efficient Irrigation Systems and Landscape Design" source control BMP. To minimize runoff and infiltration, slope landscaping would consist of drought-tolerant plantings that would require little or no irrigation. The property owner and/or the HOA would be responsible for maintaining the vegetative cover and/or mulch on the Project area slopes to eliminate exposed soils, and would inspect the slopes to check for signs of erosion, gullies, and sloughing at least twice a year, at the beginning and end of the rainy season, and after all major storm events.
- **Hillside Landscaping**. To prevent storm and/or irrigation runoff from causing erosion, all manufactured slopes would be stabilized with vegetation and/or mulch in accordance with the "Use Efficient Irrigation Systems and Landscape Design" source control BMP. Slope landscaping would consist of drought-tolerant plantings that would require little or no irrigation to minimize runoff and infiltration. The property owner and/or the HOA would be responsible for maintaining the vegetative cover and/or mulch on the Project area slopes to eliminate exposed soils, and would inspect the slopes to check for signs of erosion, gullies, and sloughing at least twice a year, at the beginning and end of the rainy season, and after all major storm events.

Based on the provisions of the Project's WQMP, it is concluded that proposed drainage facilities and BMPs would adequately protect downstream water quality in accordance with local, state, and federal water quality requirements. Therefore, impacts would be less than significant and no mitigation is required.

Threshold HWQ-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

Impact HWQ-2: Implementation of the proposed Rancho La Habra Specific Plan would increase the impervious surface area within the Project site, reducing groundwater infiltration. However, because the proposed Project would also substantially reduce the amount of groundwater consumed within the Project site, the proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. This impact would be *less than significant*.

Methodology

The analysis of impacts on groundwater considers changes in groundwater recharge due to increases in impervious surfaces, increase in water demand, and the condition of the local groundwater basin.

Impacts are considered significant if the Specific Plan would result in a depletion of groundwater supplies or interfere with groundwater recharge such that there would be a lowering of the groundwater levels. In determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to use municipal water supplies.

Impact Assessment

Development of the proposed Project would result in a substantial decrease in the existing use of groundwater and would result in an increase in impervious surfaces within the Project site that would reduce infiltration into the groundwater table (see **Table 3.13-4**).

This reduction in pervious surfaces within the Project site would be offset by a substantially decreased use of groundwater. As discussed in Section 3.17, *Utilities, Services Systems, and Water Supply*, water consumption for the Westridge Golf Club averaged 276 acre feet per year (AFY) from 2011 through 2014. Because recycled water was not available, all of the water consumed by the golf course use was potable supply. As noted in Section 3.17, approximately 38 percent of

Table 3.13-4
Existing and Post-Project Impervious and Pervious Surfaces

	Pervious		Impervious	
	Area (Acres)	Percentage	Area (Acres)	Percentage
Existing Conditions	135.9	90.1	15.0	9.9
Buildout Conditions	104.5	69.3	46.4	30.7

Source: Rancho La Habra Preliminary Water Quality Management Plan, 2018.

the City's water supply comes from local groundwater. Thus, approximately 104.9 AFY of local groundwater is being consumed by the existing golf course. At build-out, the proposed Project would consume 180 AFY (80 AFY for indoor uses and 100 AFY for outdoor uses). Assuming a decrease in the proportion of local groundwater used in the City's water supply to 25 percent,[4] the proposed Project would consume approximately 45 AFY of groundwater. Thus, the proposed Project would result in a reduction in the consumption of local groundwater of 59.9 AFY.

Significance Conclusion for Impact HWQ-2

Because the amount of local groundwater that would be used by the proposed development would be 57 percent less than is currently being used by the existing golf course, the proposed Specific Plan would not deplete groundwater supplies even if the amount of onsite pervious surface area would be increase. The impact would be less than significant.

Threshold HWQ-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Impact HWQ-3: The proposed Rancho La Habra Specific Plan would maintain existing drainage patterns within the Project site but would substantially increase the site's impervious surface area, increasing runoff. Because drainage would be directed through a series of detention basins, runoff from the Project site would not increase beyond the capacity of downstream drainage facilities, with one exception: the existing 48-inch drainage pipe crossing Beach Boulevard, which is deficient in the existing condition.

[4] The City is in the process of increasing use of imported groundwater supply to 65 percent and local groundwater production to 25 percent of the City's water supply.

The on-site flooding that could result would be addressed by construction of a second drainage pipeline under Beach Boulevard. The impact therefore would be *significant but mitigable*.

Methodology

The potential for erosion and siltation, on- or off-site, was analyzed in Impacts HWQ-1.1 and HWQ-1.2.

As required by the Santa Ana RWQCB and the applicable MS4 Permit, existing drainage patterns are to be maintained. Thus, proposed Project site grading has been designed to maintain existing drainage patterns, and no further analysis of changes to drainage patterns was undertaken.

In relation to increases in the rate or amount of runoff and flooding, on- or off-site, a significant impact would result if increased runoff generated by the new development would increase the flow rates to levels that could overload the downstream storm drain system.

To determine impacts related to hydrology and drainage at the Project site and in the downstream stormwater system, a hydrology study was undertaken to evaluate pre-and post-development conditions for the 2-year, 5-year, 25-year, and 100-year storm events. Orange County Flood Division rational methods and unit hydrograph methodologies were used to determine pre-and post-development flow rates. The hydrology study is provided as EIR Appendix N. The hydrology study addressed stormwater flows for the seven distinct drainage management areas identified as 'A', 'B', 'C', 'D', 'E', 'F' and 'G' and illustrated in **Figure 3.13-1**, as follows:

- Area 'A' consists of the eastern quarter of the site and would generally drain northeasterly into a proposed water quality and detention basin.
- Area 'B' consists of the western half of the eastern half of the site and would generally drain northerly into a proposed water quality and detention basin.
- Area 'C' consists of the western half of the site and would generally drain northerly into a proposed water quality and detention basin.
- Area 'D' consists of the southern center portion of the site that would remain in open space use. This area would continue to generally drain northerly toward and into an existing water feature that would remain and directly connect to a realigned storm drain system.
- Area 'E' consists of La Habra Hills Drive and would continue to generally drain northerly toward and into existing catch basins that would remain.
- Area 'F' consists of the existing clubhouse along La Habra Hills Drive and would continue to generally drain toward the existing water feature within Area 'D'.

- Area 'G' consists of the slopes that adjoin the northeasterly boundary of the site and drain off-site in existing and proposed conditions.[5]

Impact Assessment

As shown in **Table 3.13-4**, development of the proposed Project would decrease the perviousness of the site through the addition of pavement, sidewalks, residential and commercial structures, and parking areas. Reduction in pervious area would reduce the ability for rain water to be captured and infiltrated, and would thus increase total stormwater runoff volumes as indicated in **Table 3.13-5**.

Table 3.13-5
Existing and Post-Project Site Runoff

	Unit Hydrograph – Storm Volume over 24 Hours (Acre Feet)			
	2-Year Storm	**5-Year Storm**	**25-Year Storm**	**100-Year Storm**
Existing Condition – Area 'A'	0.8	1.8	5.8	11.0
Proposed Condition – Area 'A'	2.2	3.6	7.1	11.0
Increase – Area 'A'	**1.4**	**1.8**	**1.3**	**0.0**
Existing Condition – Area 'B'	0.6	1.5	4.5	8.1
Proposed Condition – Area 'B'	1.8	2.9	5.4	8.0
Increase – Area 'B'	**1.2**	**1.4**	**0.9**	**-0.1**
Existing Condition – Area 'C'	3.5	8.3	26.4	49.1
Proposed Condition – Area 'C'	7.1	12.9	29.1	48.9
Increase – Area 'C'	**3.6**	**4.6**	**2.7**	**-0.2**
Existing Condition – Area 'D'	0.7	1.7	4.9	8.7
Proposed Condition – Area 'D'	0.8	1.7	5.0	8.7
Increase – Area 'D'	**0.1**	**0.0**	**0.1**	**0.0**
Existing Condition – Area 'E'	0.8	1.3	2.0	2.6
Proposed Condition – Area 'E'	0.8	1.2	2.0	2.6
Increase – Area 'E'	**0.0**	**-0.1**	**0.0**	**0.0**
Existing Condition – Area 'F'	0.2	0.4	0.6	0.8
Proposed Condition – Area 'F'	0.2	0.4	0.6	0.8
Increase – Area 'F'	**0.0**	**0.0**	**0.0**	**0.0**

Note: Drainage Area 'G' encompasses slopes along the northeasterly boundary of the site that drain off-site under existing conditions. Because there are no improvements proposed that would alter drainage within Area 'G,' changes in runoff from Area 'G' were not analyzed.
Source: Hydrology Analysis, Vesting Tentative Map 17845, 2016.

[5] There are no improvements proposed within Area 'G' that would increase storm water flow, and the area was therefore not analyzed.

As shown in **Table 3.13-6** through **Table 3.13-11**, a series of proposed water quality basins and detention basins would be provided to meet water quality requirements, mitigate for increases in runoff volume and flow rates associated with proposed development, and ensure that flow rates would be reduced to be equal to or less than the existing flow rates.

Drainage Area 'A' – Basin 'A'

Area 'A' contains 27 acres that would drain to the proposed Basin 'A'. Development in Area 'A' would produce a peak flow of 69.8 cubic feet per second (cfs) during the 100-year storm, which is the major storm event of primary design concern. The existing 30-inch storm drain pipe in Tract 9590, into which flows from Area 'A' would drain, has a maximum capacity of 47.12 cfs. Therefore, the outlet structure for Basin 'A' would be designed to reduce the peak flows to a maximum of 47.12 cfs. In addition, water quality would be addressed by installing a "modular wetlands" system (or approved equivalent) on the outlet pipe that would be sized to treat the entire BMP volume. This BMP device would be installed in such a way as to not restrict or prevent larger storm volumes from safely passing through the basin while still addressing water quality requirements.

Table 3.13-6
Basin 'A' Pre-Project and Post-Project Peak Flow Rate Comparison

Basin 'A' - Unit Hydrograph - Peak Flow Rate (cfs)								
	2-Year		5-Year		25-Year		100-Year	
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
3-Hour 6-Hour 12-Hour 24-Hour	13.3	27.0	32.1	35.0	52.5	54.3	69.8	69.8

Source: Hydrology Analysis, Vesting Tentative Map 17845, 2016.

Drainage Area 'B' – Basin 'B'

Approximately 24.95 acres would be tributary to the proposed underground storage Basin 'B' in Area 'B', which produce a peak flow of 58.2 cfs during the 100-year storm. Any increase in storm flow would be retained by the proposed underground storage Basin 'B'.

Table 3.13-7
Basin 'B' Pre-Project and Post-Project Peak Flow Rate Comparison

Basin 'B' - Unit Hydrograph – Peak Flow Rate (cfs)								
	2-Year		5-Year		25-Year		100-Year	
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
3-Hour 6-Hour 12-Hour 24-Hour	18.5	19.3	28.6	29.3	45.6	45.2	60.1	58.2

Source: Hydrology Analysis, Vesting Tentative Map 17845, 2016.

Drainage Area 'C' – Basin 'C'

Approximately 121 acres in Area 'C', including 47 tributary off-site acres, would drain to Basin 'C'. Development within this drainage area would produce a peak flow of 360.1 cfs during the 100-year storm. Every storm that was modeled experienced an increased peak flow rate in the developed condition as compared to the existing condition. Increased flows resulting from increased impervious surface area from the proposed Project would be detained by the proposed water quality/detention Basin 'C' located on the westernmost portion of the Project site. Basin 'C' would restrict flows leaving the basin to a peak rate of 48.6 cfs, which equals the existing flow rate within Line 'M' of Tract 15030 into which the basin would drain.

Table 3.13-8
Basin 'C' Pre-Project and Post-Project Peak Flow Rate Comparison

Basin 'C' - Unit Hydrograph – Peak Flow Rate (cfs)								
	2-Year		5-Year		25-Year		100-Year	
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
3-Hour 6-Hour 12-Hour 24-Hour	86.5	104.1	140.4	165.9	239.6	271.0	327.5	360.1

Source: Hydrology Analysis, Vesting Tentative Map 17845, 2016.

Runoff in the existing condition is directed toward a manmade lake within the golf course fairway, which acts as a detention basin, reducing the peak 25-year 24-hour storm flow rate with the effluent pipe (Line 'M' in Tract 15030[6]) to 48.6 cfs.

The proposed development would mirror the existing condition by restricting the outlet flow rates to a maximum of 48.6 cfs for all storms except the 100-year storm, where the maximum flow rate would be 63.4 cfs. The proposed detention basin would have a 16.2-acre-foot storage capacity and could route all of the storm events that were analyzed through the basin without using the emergency spillway.

However, the existing storm drain under Beach Boulevard is substandard in size for existing conditions. In the 25-year storm, 254 cfs pass through the golf course in a 48-inch pipe from the Westridge community. Another 140 cfs are conveyed through an existing 48-inch pipe from off-site areas to the south. The design capacity of the existing 48-inch pipe under Beach Boulevard is approximately 101 cfs and the 25-year peak storm event is approximately 320 cfs. Therefore, even without development of the Project site, the existing storm drain facility is substandard.

[6] Line 'M' in Tract 15030 is a dedicated storm drain pipe serving as the outlet for an existing lake in the golf course fairway. Line 'M' is connected to the existing municipal storm drain system, which outlets into Coyote Creek.

The existing substandard facility could cause flooding within Beach Boulevard or the Project site.

Drainage Area 'D' – Basin 'D'

Area 'D' would consist of 21.19 acres and would generally be left undeveloped with the exception of some minor remedial grading. The existing water feature along the northerly boundary of Area 'D' would act as a detention facility to detain anticipated runoff from this area. Area 'D' would produce a peak flow of 59.4 cfs during the 100-year storm. The 0.7-cfs increase during the 100-year storm event could be accommodated by downstream facilities, which have adequate capacity to accept this drainage.

Table 3.13-9
Basin 'D' Pre-Project and Post-Project Flow Rate Comparison

Basin 'D' - Unit Hydrograph - Peak Flow Rate (cfs)								
	2-Year		5-Year		25-Year		100-Year	
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
3-Hour 6-Hour 12-Hour 24-Hour	16.0	16.3	26.1	26.5	43.3	44.2	58.7	59.4

Source: Hydrology Analysis, Vesting Tentative Map 17845, 2016.

Drainage Area 'E'

Approximately 5.8 acres would be tributary to Area 'E', which includes realigning La Habra Hills Drive and the clubhouse parking lot. The post-project hydrology condition would be substantially similar to the existing condition, with negligible difference in impervious surface area. The 5.8-acre area within Area 'E' flows toward and into two existing catch basins along La Habra Hills Drive and produces a peak flow of 24.0 cfs during the 100-year storm. The existing 42-inch storm drain has a capacity of 171 cfs with a 25-year design flow rate of 147 cfs. Sufficient capacity in that storm drainage exists to accept an additional 3.7 cfs flow.

Table 3.13-10
Area 'E' Pre-Project and Post-Project Peak Flow Rate Comparison

Area 'E' - Unit Hydrograph - Peak Flow Rate (cfs)								
	2-Year		5-Year		25-Year		100-Year	
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
3-Hour 6-Hour 12-Hour 24-Hour	6.8	8.4	10.0	12.0	15.6	18.5	20.3	24.0

Source: Hydrology Analysis, Vesting Tentative Map 17845, 2016.

Drainage Area 'F'

Area 'F' encompasses 1.68 acres, consisting of the existing clubhouse along La Habra Hills Drive, and produces a peak flow of 7.1 cfs during the 100-year storm. The area would continue to generally drain toward the existing water feature within Area 'D'.

Table 3.13-11
Area 'F' Pre-Project and Post-Project Peak Flow Rate Comparison

Basin 'F' - Unit Hydrograph - Peak Flow Rate (cfs)								
	2-Year		5-Year		25-Year		100-Year	
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
3-Hour 6-Hour 12-Hour 24-Hour	2.6	2.6	3.6	3.6	5.5	5.5	7.1	7.1

Source: Hydrology Analysis, Vesting Tentative Map 17845, 2016.

Significance Conclusion for Impact HWQ-3

Because insufficient capacity exists within the existing 48-inch storm drain under Beach Boulevard, flooding could occur within Beach Boulevard and portions of the Project site adjacent to Beach Boulevard. Placing new development within an area where such flooding could occur would represent a significant impact for which mitigation is required.

Mitigation Measures

Mitigation Measure HWQ-3: The applicant shall construct a 48-inch storm drain underneath Beach Boulevard parallel to the existing storm drain pipe that connects the on-site detention basin with the existing storm drain pipe on the west side of Beach Boulevard. The applicant shall perform the work using a jack and bore method to avoid impacts on traffic on Beach Boulevard. The applicant shall also obtain (1) approval from Caltrans to jack and bore underneath Beach Boulevard and, (2) to the extent necessary, a temporary construction easement from the Hillsborough Apartment complex on the west side of Beach Boulevard. Furthermore, the applicant shall recalculate the size of the detention basin, and if additional storage is necessary, the Applicant shall show underground buried stormwater storage adjacent to the detention basin shown on the Vesting Tentative Tract Map. The final hydraulic calculations document that existing off-site storm flows and the additional on-site storm flows would not

exceed the design capacity of the existing and new storm drain pipes under Beach Boulevard. All final calculations and design plans shall be approved by the City of La Habra.

Significance Conclusion for Impact HWQ-3 with Implementation of Mitigation Measures

With implementation of **Mitigation Measure HWQ-3**, adequate capacity to carry increased stormwater drainage resulting for the proposed Project would be available, and impacts related to on-site flooding would be less than significant.

Threshold HWQ-4: Otherwise substantially degrade water quality.

Impact HWQ-4: Implementation of the proposed Project would introduce water quality pollutants during site grading and construction and ongoing operations. Implementation of BMPs and compliance with applicable requirements designed to protect water quality would ensure that water quality in receiving waters and groundwater would not be substantially degraded. The impact would therefore be *less than significant*.

Methodology

Impacts on water quality were evaluated by considering the general type of pollutants that future site-specific development pursuant to the Specific Plan would generate during construction and operation and whether meeting the requirements of applicable regulations would reduce potential impacts to a less-than-significant level.

The analysis also takes into consideration mandatory compliance with applicable federal, state, and local regulations addressing water quality and urban runoff. In determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to comply with relevant federal and state laws and regulations that are designed to ensure that water quality is not substantially degraded. Thus, implementation of all relevant water quality requirements would ensure that an exceedance of water quality standards would not occur.

Impact Assessment

Construction

Implementation of the proposed Specific Plan would involve demolition of the existing golf course, site preparation and grading, construction of new buildings, stockpiling of materials,

landscaping activities, and infrastructure improvements that could result in degradation of water quality.

However, as described in Impact HWQ-1.1, the proposed Specific Plan would be required to comply with applicable NPDES requirements to control pollutants and protect water quality during construction. The SWRCB Construction General Permit (that would be implemented through the City's permitting process) requires the implementation of BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, and prohibits the discharge of non-stormwater from construction sites as these non-stormwater discharges are likely to carry pollutants to receiving waters. The proposed Project would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction. The BMPs are designed to protect water quality and thereby avoid significant impacts. Therefore, with compliance with the required permit actions, Project construction activities would not result in a substantial degradation of water quality.

Operation

The residential and commercial land uses that would result from the Rancho La Habra Specific Plan could introduce new or additional pollutants, such as sediments, trash, petroleum products, metals, and chemicals, that could potentially discharge into surface waters by storm drains either directly or during stormwater runoff events. Therefore, Specific Plan development would be required to implement BMPs to reduce the discharge of pollutants to the maximum extent practicable. Implementation of BMPs (such as those identified in Impact HWQ-1.2) would remove potential pollutants from runoff and would ensure that the Project would not contribute additional pollutant loads into receiving waters. With implementation of BMPs and LID standards, the proposed Specific Plan would not result in a substantial degradation of water quality, and impacts would be less than significant during ongoing operations.

Significance Conclusion for Impact HWQ-4

Based on the analysis of Impact HQW-1.1 and HWQ-1.2, as well as the findings of the Project's WQMP, it is concluded that proposed drainage facilities and BMPs would adequately protect downstream water quality in accordance with local, state, and federal water quality requirements. Therefore, the impact would be less than significant and no mitigation is required.

Threshold HWQ-5: Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

Impact HWQ-5: Implementation of the proposed Specific Plan would not place housing within a 100-year flood hazard area. *No impact* would occur.

Methodology

Because the Project site does not include any land areas within a 100-year flood area, no housing development pursuant to the proposed Specific Plan would be located within a 100-year flood area. Thus, further analysis related to the potential hazards of placing housing within a 100-year flood area is unnecessary.

Impact Assessment

No land areas within the Project site are designated as Areas of Special Flood Hazards by FEMA under the NFIP (i.e., areas subject to a 1 percent or greater chance of flooding in any given year; 100-year flood zone). As a result, implementation of the proposed Specific Plan would not result in placement of housing within a 100-year flood hazard, and no impact would occur.

Significance Conclusion for Impact HWQ-5

No impacts related to the placement of housing within a 100-year flood area would occur from implementation of the proposed Specific Plan.

Threshold HWQ-6: Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Impact HWQ-6: Implementation of the Rancho La Habra Specific Plan would not place within a 100-year flood area structures that could impede or redirect flood flows. *No impact* would occur.

Methodology

Because no portion of the Project site is within a 100-year flood area, all specific development pursuant to the proposed Specific Plan would be located outside of 100-year flood areas, and no structures could impede or redirect 100-year flood flows. Thus, further analysis of potential hazards related to impeding or redirecting 100-year flood flows is unnecessary.

Impact Assessment

No portion of the Project site is subject to a 1 percent or greater chance of flooding in any given year (also identified as a 100-year flood area). Therefore, implementation of the proposed

Specific Plan would not place within a 100-year flood area structures that could impede or redirect flood flows.

Significance Conclusion for Impact HWQ-6

Because no structures that could impede or redirect flood flows would be placed within a 100-year flood area, no impacts would occur.

Threshold HWQ-7: Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

Impact HWQ-7: Implementation of the proposed Rancho La Habra Specific Plan would not expose people or structures to risks related to flooding due to the failure of a levee or dam. *No impact* would occur.

Methodology

The Project site is not within a dam inundation area, nor is any portion of the site at risk of flooding due to failure of a levee. Thus, no development pursuant to the proposed Specific Plan would be at risk of flooding due to failure of a dam or levee, and further analysis related to potential dam or levee inundation hazards is unnecessary.

Impact Assessment

The Project site is not located within a dam inundation area, nor are any portions of the site at risk of flooding due to failure of a levee.

Significance Conclusion for Impact *HWQ-7*

No impacts related to the exposure of people or structures to significant risk involving flooding due to the failure of a levee or dam would occur.

Threshold HWQ-8: Cause inundation by seiche, tsunami, or mudflow.

Impact HWQ-8: Implementation of the proposed Rancho La Habra Specific Plan would not cause or be subject to inundation due to seiche, tsunami, or mudflow. *No impact* would result.

Methodology

Because the Project site does not include any areas that are at risk of a seiche, tsunami, or mudflow, development pursuant to the proposed Specific Plan would not be located within

areas that have risks related to these hazards. Thus, analysis related to seiche, tsunami, or mudflow impacts is not necessary.

Impact Assessment

Inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The Specific Plan area does not contain or adjoin any large water bodies that could have seiche risks and, as a result, implementation of the proposed Specific Plan would have no impact related to seiche. The Specific Plan area is not located adjacent to the Pacific Ocean, and is not at risk of flooding due to a tsunami. The slopes within the Specific Plan area have not been identified as being at risk for mudflow.

Significance Conclusion for Impact HWQ-8

No impacts related to inundation from seiche, tsunami, or mudflow would occur from implementation of the proposed Specific Plan.

3.13.3 REFERENCES – HYDROLOGY AND WATER QUALITY

City of La Habra, *City of La Habra General Plan 2035*, adopted January 21, 2014.

City of La Habra, *Hazard Mitigation Plan*, October 2007.

Hunsaker Associates, *Hydrology Analysis, Vesting Tentative Tract Map 17845, Rancho La Habra*, December 2016.

Hunsaker Associates, *Preliminary Water Quality Management Plan, Tentative Tract Map 17845, Rancho La Habra*, February 2018.

SWRCB, Statement of Policy with Respect to Maintaining High Quality of Waters in California. Resolution No. 68-16, 1968.

3.14 GEOLOGY, SOILS, AND SEISMICITY

3.14.1 INTRODUCTION

a. Overview

This section addresses potential environmental effects of the proposed Rancho La Habra Specific Plan related to geology, soils, and seismicity. The impacts examined include risks related to geologic hazards such as earthquakes, landslides, liquefaction, and expansive soils, and impacts on the environment related to soil erosion and sedimentation.

b. Definitions

- **Buttress Keyway** refers to an engineering technique for stabilizing slopes in areas of poor foundational soil conditions. Poor stability soils are over-excavated to create what is called a "key," the dimensions of which are based on site-specific calculations that define the specific blends of engineered soils needed to backfill the key and slope to meet applicable slope stability standards.
- **Earthquake** is the result of a sudden release of energy in the earth's crust that creates seismic waves. Earthquakes are classified by their magnitude, which is a measure of the amount of energy released during an event. The seismicity or seismic activity of an area refers to the frequency, type, and size of earthquakes experienced over a period of time.
- **Erosion** refers to the loosening and transportation of rock and soil debris by wind, rain, or running water.
- **Expansive Soils** are soils containing water-absorbing minerals that expand as they take in water. These soils can damage buildings due to the force they exert as they expand.
- **Factor of Safety** refers to the ratio of forces resisting movement to those causing movement. When a calculated factor of safety is less than 1.0, forces that make a slope susceptible to failure have exceeded those that tend to hold it in place.
- **Fault** refers to a fracture in the earth's crust forming a boundary between rock masses that have shifted.
- **Fault, Active** is defined by the State Mining and Geology Board as one that has had surface displacement within Holocene time (about the last 11,000 years).
- **Fault, Inactive** is defined by the State Mining and Geology Board as one that has had not surface displacement since before the Quaternary period (more than 1,800,000 years ago).
- **Fault, Potentially Active** is defined by the State Mining and Geology Board as one that has had surface displacement within Quaternary tine (the last 1,800,000 years).

- **Fill** refers to earth or any other substance or material, including pilings placed for the purposes of erecting structures thereon.
- **Fill Material** refers to any material placed in an area to increase surface elevation.
- **Ground Failure** includes mudslides, landslides, liquefaction, or the compaction of soils due to groundshaking from an earthquake.
- **Liquefaction** is the phenomenon in which saturated granular soils temporarily lose their shear strength during periods of earthquake-induced strong groundshaking. The susceptibility of a site to liquefaction is a function of depth to density, water content of granular sediments, and the magnitude and frequency of earthquakes in the surrounding region. Saturated, unconsolidated silt, sand, and silty sand within 50 feet of the ground surface are most susceptible to liquefaction. Liquefaction-related phenomena may include lateral spreading, ground oscillation, loss of load bearing strength, subsidence, and buoyancy effects.
- **Richter Scale** is a scale used to quantify the energy released by an earthquake. The Richter scale is logarithmic, which means that an earthquake registering 5.0 on the Richter scale has a shaking amplitude 10 times that of an earthquake that registered 4.0, and thus corresponds to a release of energy 31.6 times that released by the lesser earthquake.

3.14.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Specific Plan is subject to a range of federal, state, and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

The Earthquake Hazards Reduction Act was enacted in 1997 to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." To accomplish this, the Act established the National Earthquake Hazards Reduction Program, which provides for characterization and prediction of hazards and vulnerabilities, improvement of building codes and land use practices, risk reduction through post-earthquake investigations and education, development and improvement of design and construction techniques, improvement of mitigation capacity, and accelerated application of research results. This Act designated the Federal Emergency Management Agency (FEMA) as the lead agency of the program and assigns it several planning, coordinating, and reporting responsibilities. Programs under this Act provide building code requirements such as emergency evacuation responsibilities and seismic code standards such as those to which developments under the proposed Specific Plan would be required to adhere.

b. State Plans, Policies, and Regulations

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface fault rupture in structures used for human occupancy. The main purpose of the Act is to prevent the construction of buildings for human occupancy on top of the traces of active faults. It was passed into law following the February 1971 magnitude (M) 6.5 San Fernando (Sylmar) Earthquake that resulted in over $500 million in property damage and 65 deaths. Although the Act addresses the hazards associated with surface fault rupture, it does not address other earthquake-related hazards, such as seismically induced groundshaking, liquefaction, or landslides.

This Act requires the State Geologist to establish regulatory zones, now referred to as Earthquake Fault Zones, around the mapped surface traces of active faults, and to publish appropriate maps that depict these zones. Earthquake Fault Zone maps are publicly available and distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. The Act requires local agencies to regulate development within Earthquake Fault Zones. Before a development project can be permitted within an Earthquake Fault Zone, a geologic investigation is required to demonstrate that proposed buildings would not be constructed across active faults. A site-specific evaluation and written report must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back a minimum of 50 feet from the fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, which was passed by the California legislature in 1990, addresses earthquake hazards related to liquefaction and seismically induced landslides. Under the act, seismic hazard zones are mapped by the State Geologist in order to assist local governments in land use planning. The Act states that "it is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety." Public Resources Code Section 2697(a) states that "cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard."

California Building Code

The California Building Code (CBC) is included in Title 24 of the California Code of Regulations. The CBC incorporates the International Building Code, a model building code adopted across the United States. Current state law requires every city, county, and other local

public agency enforcing building regulations to adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent version of the CBC was published as of July 1, 2016. The effective date of the 2016 Code is January 1, 2017.

The current CBC was adopted by the City of La Habra (City) in Chapter 15.04 of the City's Municipal Code. These codes provide standards to protect property and public safety. They regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements, and thereby mitigate the effects of seismic shaking and adverse soil conditions. The codes also regulate grading activities, including drainage and erosion control.

California Construction General Permit

The State of California adopted a Statewide National Pollutant Discharge Elimination System (NPDES) Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment became effective on February 16, 2012. The Construction General Permit regulates construction site storm water management. Dischargers whose projects disturb 1 or more acres of soil, or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the Construction General Permit for discharges of storm water associated with construction activity.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents, including a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during construction, rain event action plans, and numeric action levels (NALs) for pH and turbidity, as well as requirements for qualified professionals to prepare and implement the plan.

The Construction General Permit requires the SWPPP to identify best management practices (BMPs) that will be implemented to reduce soil erosion. Types of BMPs include preservation of vegetation and sediment control (e.g., fiber rolls).

c. Local Plans, Policies, and Regulations

City of La Habra General Plan

City of La Habra General Plan policies relevant to geology, soils, and seismicity include the following.

Chapter 7, Community Safety

NH 1.1 Safety Standards. Enforce state and local seismic and geologic safety laws, standards, and guidelines, including the California Building Code, for site design and construction of new and renovated structures.

NH 1.2 Geotechnical Investigations. Require geotechnical investigations prior to approval of development in areas where the potential for geologic or seismic hazards exists addressing, as appropriate, groundshaking, landslides, liquefaction, expansive soils, subsidence, and erosion and incorporate recommended mitigation measures to reduce or avoid the identified hazards.

NH 1.4 Reduce and Control Erosion. Require that development projects involving grading in hillside areas reduce and control erosion potential by utilizing rapid developing planting techniques, slope terracing, replacement with cohesive soils not subject to erosion, and/or the construction of slope drainage improvements.

d. City of La Habra Municipal Code

The La Habra Municipal Code incorporates the CBC, 2013 Edition, including Appendix Chapter J, as the building code of the City "for regulating the erection, construction, enlargement, alteration, repair, moving, removal, demolition, conversion, occupancy, equipment, use, height, area, and maintenance of all buildings and/or structures in the city."

3.14.3 ENVIRONMENTAL SETTING

The approximately 151-acre Project site is located within a portion of the former West Coyote Oil Field located along the southern boundary of La Habra. As part of oil production activities, site topography was altered slightly with construction of oil extraction pads and roads throughout the hills. The transition from an oil field to a golf course was undertaken over several years with the involvement of various geotechnical and environmental consultants, as detailed in the Geotechnical Report (refer to Appendix P).

a. Faulting and Seismicity

The La Habra area is in a high seismic risk zone, subject to seismic activity from earthquake faults, including the San Andreas, Sierra Madre, Newport-Inglewood-Rose Canyon, and Whittier-Elsinore. The Puente Hills Thrust Fault covers a broad, rectangular area, including northern Orange County, and would affect La Habra with seismic shaking if an earthquake were to occur on that fault. In addition, there is an unnamed fault listed in the Alquist-Priolo Map within La Habra; it is approximately 0.5 mile long, runs north–south, and is south of Imperial Highway and east of Idaho Street.

San Andreas Fault Zone

The San Andreas Fault Zone runs northwest–southeast approximately 35 miles northeast of La Habra and is the dominant active fault in California. Because the San Andreas Fault is the primary surface boundary between the Pacific and North American plates, it is thought to be capable of producing an M 8.0 to 8.5 earthquake. The last major earthquake on the Southern San Andreas Fault occurred in 1857 and registered M 8.0. The Project site and the rest of La Habra would experience strong groundshaking, which would result in damage to older structures, if and when a major episode occurs on this fault.

Sierra Madre Fault Zone

The Sierra Madre Fault Zone is associated with surface rupturing and groundshaking and generally runs east–west through Los Angeles County approximately 15 miles to the north of La Habra. The 1971 San Fernando earthquake occurred on a branch of the Sierra Madre Fault Zone. As a result, the entire length of the Sierra Madre Fault Zone is now being considered to be potentially active.

Newport-Inglewood-Rose Canyon Fault Zone

The Newport-Inglewood-Rose Canyon Fault Zone is approximately 15 miles southwest of La Habra and runs northwest–southeast near Santa Monica, Long Beach, Huntington Beach, and Newport Beach. This fault zone is considered active. Historic earthquakes caused by movement in this fault zone include the Long Beach earthquake (March 10, 1933; M 6.3), the Signal Hill earthquake (October 2, 1933; M 5.0), and the Gardena earthquake (November 14, 1941; M 5.5).

Whittier-Elsinore Fault Zone

The active Whittier-Elsinore Fault Zone runs through the Puente Hills, just over 2 miles north of La Habra, and poses the most significant earthquake threat to the Project site and the rest of the City. An M 6.9 earthquake on the northwest segment of this fault zone has been estimated to have a return period of 450 years. Earthquakes with surface rupture on only the Whittier Fault are estimated to have return intervals of 100 years for an M 6.5 earthquake and 1,200 years for an M 7.5 earthquake. An unpublished paleoseismic investigation suggests that the Whittier Fault segment has not moved for 2,000 years, suggesting that an earthquake along this fault is overdue.

Puente Hills Thrust Fault

The Puente Hills Thrust Fault is a broad, rectangular area 25 miles long and 15 miles wide running through the counties of Los Angeles, Orange, and San Bernardino, including northern La Habra. The 1987 M 5.9 Whittier-Narrows earthquake led to the discovery of the Puente Hills Thrust Fault. This fault has ruptured at least four times in the past 11,000 years with

magnitudes ranging from M 7.2 to M 7.5. Scientists with the Southern California Earthquake Center (SCEC) and the United States Geological Survey (USGS) estimate that an M 7.0 earthquake along this fault would result in substantial damage to structures in the La Habra area.

Unnamed West Coyote Hills Fault

On October 1, 1968, while the Project site was still an active oil field, a fault ruptured off-site to the east near Idaho Street. Subsequent extensive fault trenching in 1970 allowed for detailed mapping of the approximately 3-inch, vertically offset fault trace. The well-defined fault lineament was documented, evaluated, and became known as the "Unnamed West Coyote Hills Fault." Oil field operations (subsidence due to oil extraction and groundwater injection activities) were presumed to be a probable cause of the fault rupture. The fault was mapped as an Alquist-Priolo Earthquake Fault Zone.

A fault study of the region was performed in the early 1990s by trenching the area of the Project site and the two now-existing adjacent tracts to the south. Numerous inactive north-south trending faults, along with the historically active off-site Unnamed West Coyote Hills Fault, were documented as part of this study. This early 1990s study led to a recommended structural setback extending 100 feet from either side of the Unnamed West Coyote Hills Fault lineament. With the exception of the Unnamed West Coyote Hills Fault, no other documented faults or fault splays within or adjacent to the Project site were determined to be active or potentially active.

b. Seismic Hazards

Surface Rupture

Surface rupture or displacement occurs as a fault breaks the ground surface during an earthquake. Generally, this hazard occurs along known, pre-existing faults. Because surface rupture cannot be prevented, faults are identified in order to avoid construction over the surface trace of potentially hazardous faults. Buildings typically collapse or suffer significant damage as a result of differential movement through a foundation. The Unnamed West Coyote Hills Fault, located south of Imperial Highway and east of Idaho Street within the Coyote Hills, has been mapped as an Alquist-Priolo Earthquake Fault Zone and could cause surface rupturing in an earthquake.

Groundshaking

La Habra and surrounding communities experienced an M 5.1 earthquake on March 28, 2014, along with numerous smaller foreshocks and aftershocks. The earthquake epicenter was estimated to be located about 1 mile east of La Habra, at a depth of approximately 3 miles below

ground. Based on USGS reports, the earthquake was associated with the Puente Hills Blind Thrust Fault System, the same fault that caused the 1987 Whittier Narrows earthquake but not related to the Unnamed West Coyote Hills Fault that is located east of the Project site.

Nearby active faults and corresponding maximum magnitude are summarized in **Table 3.14-1**.

Table 3.14-1
Regional Earthquake Faults

Fault	Distance from Project Site (miles)	Maximum Magnitude Earthquake
Puente Hills (Coyote Hills section)	2.7	6.8
Lake Elsinore (Whittier section)	3.2	6.9
Puente Hills (Santa Fe Springs section)	2.0	6.6
Unnamed West Coyote Hills	<0.1	2.2 to 2.6

Source: Preliminary Geotechnical Report for Rancho La Habra Residential Development, 2016.

c. Project Site Soils and Geology

The existing golf course was rough graded between 1997 and 1999 concurrent with grading of adjacent residential Tracts 15030 and 15031 within the Westridge neighborhood south of the Project site. Grading of the golf course generally involved cuts and fills of up to approximately 35 feet, greater in some areas of the westernmost portion of the site. Remedial grading also included removal and stockpiling of crude oil-affected soils (see Section 3.12, *Hazards and Hazardous Materials*, for a discussion of crude oil-affected soils within the Project site).

Grading of the existing golf course included placement of both structural fill (i.e., compacted fill with a required minimum relative compaction of 90 percent) and non-structural fill considered unsuitable for support of structures (i.e., fill placed with a required minimum relative compaction of 85 percent). Structural fill was reportedly placed along the southern perimeter of the golf course in support of the adjacent Westridge residential developments (Tracts 15030 and 15031), below structures and utility alignments across the golf course, and within adjacent perimeter slopes and roadways. Non-structural artificial fill was placed within the central area of the western portion of the Project site and within several small canyons at the eastern portion of the site. Removals of the near-surface weathered alluvial deposits were reportedly limited in these areas, and the deposits were not specifically removed to competent native soils prior to fill placement.

Buttress keyways were constructed for stabilization of ascending slopes to the south of the golf course, and smaller stabilization fill keyways were constructed for the 2:1 (horizontal to vertical) slopes along the northern perimeter of the golf course. During grading, approximately nine ancient "major" and numerous "minor" northwest and northeast trending normal faults

(typical for the region) were encountered and mapped. As stated above, these faults were not considered active or potentially active.

The Project site is located partially on alluvium deposits and partially within the uplifted bedrock that forms the low hills of the Coyote Hills geologic complex south of the site. The comparatively young alluvium locally incised a broad, very old alluvial fan that spans the La Habra area to the north. The local alluvium consists of interfingered deposits derived from upstream to the northeast and from the low hills ascending to the south of the site. The bedrock unit underlying the site consists of Quaternary San Pedro Formation, and two existing landslides derived from this material have been identified within the limits of the site. Also, both structural and non-structural artificial fills mantle portions of the site. A brief description of these geologic units is presented below. Their approximate locations are depicted in **Figure 3.14-1**.

Artificial Fill – Older (Map Symbol - Afo)

Older artificial fill soils encountered at the Project site are generally considered structural, reportedly having been placed in relatively thin lifts, at near optimum moisture content, and compacted with heavy construction equipment to achieve a minimum relative compaction of at least 90 percent. Structural fill was placed at certain locations for support of golf course structures and utility alignments, along the southern perimeter of the site for support of adjacent tracts to the south, and along the northern perimeter in areas of 2:1 (horizontal to vertical) slopes. The material consists of variable layers of silty clay to clayey sand with some gravel, generally moist to very moist, stiff to very stiff/dense.

Artificial Fill – Unsuitable (Map Symbol – Afu)

Unsuitable artificial fill soils occur within the western-central area of the Project site and within several small canyon fill areas within the eastern portion of the site. The unsuitable fill is considered non-structural and has a minimum relative compaction of 85 percent. Reportedly, the non-structural fill was placed directly on native soils with minimal remedial grading with the exception of areas graded for environmental mitigation. The material consists of variable layers of silty clay to clayey sand with some gravel, generally moist to very moist, stiff to very stiff/medium dense to dense. Reuse Areas (areas with crude oil-affected soils placed under regulatory agency supervision during golf course construction) are located within this material (see **Figure 2-6** in Chapter 2, *Project Description*)

Quaternary Alluvium (Map Symbol – Qal)

Quaternary alluvium underlies the majority of the western portion of the Project site, and is undifferentiated from colluvium within the smaller canyons of the Coyote Hills to the south. It

generally consists of medium dense silty and clayey sands and stiff to very stiff sandy clays with minor amounts of gravel.

Quaternary Landslide Deposit (Map Symbol – Qls)

Several bedrock-block type landslides occur in the vicinity of the Project site. Two landslides were removed during grading of the adjacent tracts to the south within the Westridge community, and one on-site landslide at the western side of the Project site was previously stabilized with shear keyways and left in place. Another small, relatively thin landslide was identified at the northeastern edge of the site and was subsequently determined to have been left in place. Where encountered, the landslide material was observed to be similar to the bedrock unit at the site, but highly fractured and weathered.

Quaternary San Pedro Formation (Map Symbol – Qsp)

The sedimentary bedrock unit that underlies the Project site is the Pleistocene-age Quaternary San Pedro Formation, derived from a shallow marine depositional environment. The formation is broken into four units that vary in dominant material type, variably exposed between the faults that intersect the site. The fossiliferous material generally consists of sandy siltstone and minor amounts of claystone interbedded with medium to coarse, weakly to well-cemented sandstone. The eastern portion of the site has more sandstone, while the central and western portions of the site have a more variable mix of interbedded siltstone, sandstone, and clayey siltstone.

d. Liquefaction Potential

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similar to a fluid when subject to high-intensity groundshaking. Liquefaction occurs when three general conditions co-exist: (a) shallow groundwater, (b) low-density non-cohesive (granular) soils, and (c) high-intensity ground motion. Studies indicate that saturated, loose, near-surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential. In general, cohesive soils are not considered susceptible to liquefaction. Effects of liquefaction on level ground include settlement, sand boils, and bearing capacity failures below structures. Dynamic settlement of dry loose sands can occur as the sand particles tend to settle and densify as a result of a seismic event.

The lower portions of the Project site are located within a State of California Seismic Hazard Zone for liquefaction potential. The majority of the developed site would consist of compacted fill over dense/hard bedrock and would not be considered susceptible to liquefaction. However, the west portion of the site contains alluvial soils that may be susceptible to

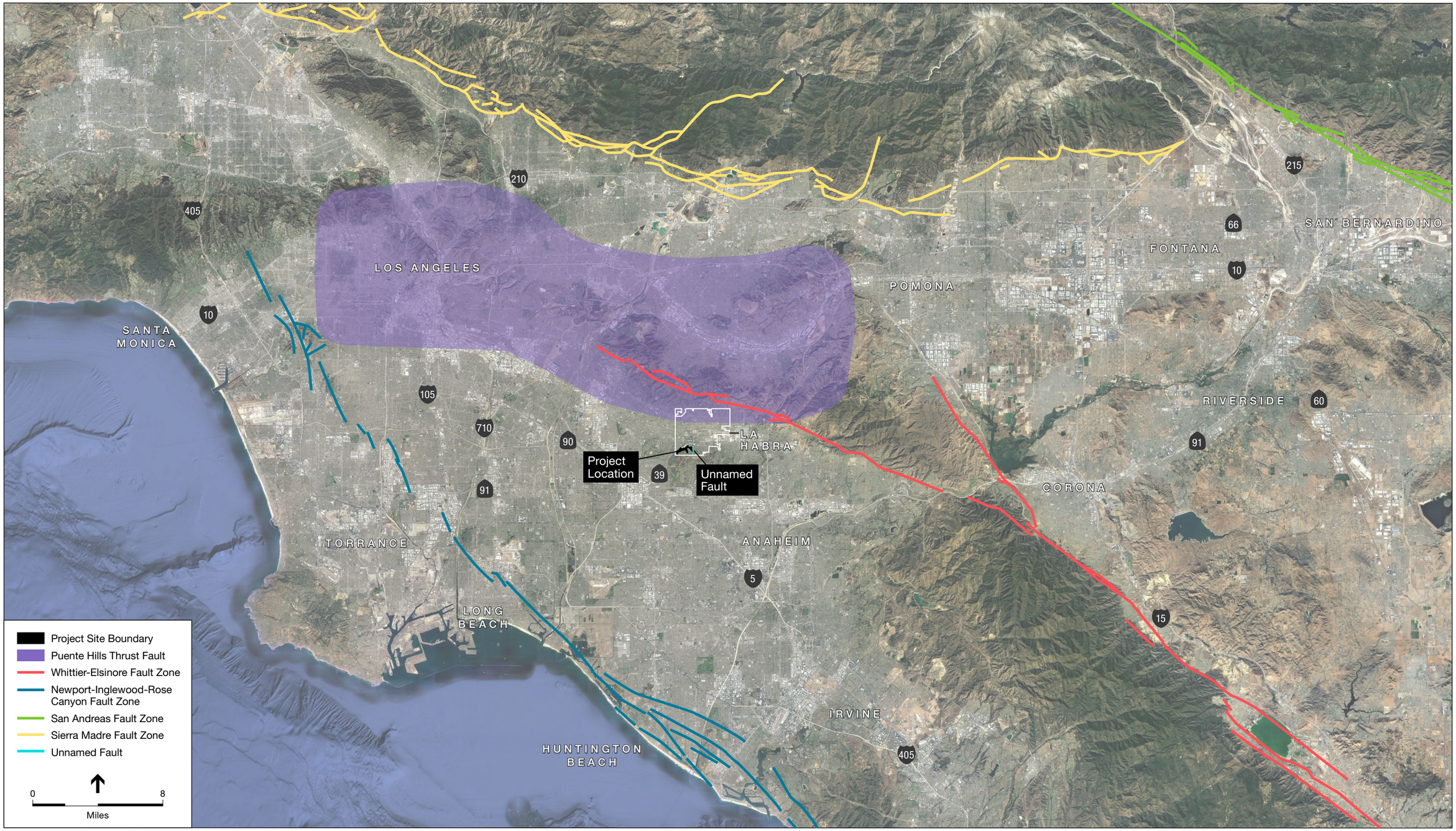


Figure 3.14-1: Area Faults

Source: Google Earth Pro; Atkins

liquefaction depending primarily on their apparent density (e.g., loose to dense) and plasticity. The majority of the alluvial soils that were tested were found to be cohesive and not susceptible to liquefaction based on their saturated moisture content compared to their liquid limit.

Based on the applicable seismic criteria (e.g., 2013 CBC), the data obtained from field evaluation indicate that the site contains isolated sandy layers susceptible to liquefaction in the upper 50 feet. Based on the data obtained from field evaluation, total seismic settlements are estimated to be on the order of 1 to 2 inches. Differential seismic settlement can be estimated as half of the total estimated settlement over a horizontal span of about 30 feet.

e. Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope toward a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements, and such movement typically damages pipelines, utilities, bridges, and structures. Due to the lack of an adjacent free face at the Project site, the potential for lateral spreading was determined to be very low.

f. Earthquake-Induced Landslides

The slopes within the southwestern and eastern portions of the Project site are located within a State of California Seismic Hazard Zone for earthquake-induced landslide. The remedial grading that was conducted for construction of the golf course and the Westridge residential tracts to the south of the golf course consisted of buttress keyways and replacement fill slopes. As a result, the current potential for earthquake-induced landslides within the Project site is low.

g. Expansive Soils

As part of the Geotechnical Report, previous studies conducted at the Project site during grading for the existing golf course and surrounding development were reviewed, along with laboratory testing of on-site soils. These data sources indicate a "very low" to "very high" potential for expansive soils, with a high degree of variability in expansion potential across the Project site.

h. Corrosive Soils

Preliminary corrosion testing undertaken for the Geotechnical Report indicated soluble sulfate contents ranging from 0.01 to 0.05 percent, chloride contents ranging from 33 to 175 parts per

million (ppm), pH values ranging from 7.6 to 8.2, and minimum resistivity values ranging from 478 to 1,898 ohms centimeter (ohms-cm). Caltrans Corrosion Guidelines indicate that soils are considered corrosive to structural elements if the pH is 5.5 or less, or the chloride concentration is 500 ppm or greater, or the sulfate concentration is 2,000 ppm (0.2 percent) or greater. Based on preliminary and previous laboratory sulfate test results at the Project site, near-surface soils have a severity categorization of "Not Applicable" to "Severe."

3.14.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of cultural resources impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold GEO-1 Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42);

ii) Strong seismic groundshaking;

iii) Seismic-related ground failure, including liquefaction; and/or

iv) Landslides.

Threshold GEO-2 Result in substantial soil erosion or the loss of topsoil.

Threshold GEO-3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Threshold GEO-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; or

Threshold GEO-5 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.

3.14.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic

groundshaking, seismic-related ground failure, and/or landslides.

Impact GEO-1.1: Proposed residential structures on Lots 12, 28 and 29 would be located within the Alquist-Priolo Earthquake Fault Zone, which could potentially expose those structures and people to a significant safety risk should active faults or active fault splays be located within 100 feet of the lots. The resulting impact would be *significant but mitigable*.

Methodology

In determining whether a significant impact would result from the proposed Project, the analysis includes consideration of state law, including the Alquist-Priolo Earthquake Fault Zoning Act, which prohibits construction of structures for human occupancy astride an active fault, as well as the CBC, which sets standards for buildings to withstand seismic events. In general, existing state law and building codes provide for an adequate level of safety such that buildings built to code would withstand groundshaking forces of a minor earthquake without damage, of a moderate earthquake without structural damage, and of a major earthquake without collapse of the structure. In addition, critical facilities and structures (e.g., hospitals, emergency operations centers) built to code would remain standing and functional following an earthquake. Any building designed for human occupancy that would not meet applicable seismic design standards would be considered to have a significant impact.

The analysis of impacts is based on the "Preliminary Geotechnical Report for Proposed Westridge Residential Development, VTTM 17845, City of La Habra, California" (Geotechnical Report) prepared by LGC Geotechnical, Inc. (LGC), dated June 23, 2016. The Geotechnical Report, which can be found in Appendix P, includes (1) a review of previous geotechnical reports, geologic maps, and air photos pertinent to the Project site; (2) the results of a subsurface geotechnical evaluation of the site; (3) a geotechnical map of the site incorporating available geotechnical information; (4) geotechnical cross-sections depicting the interpreted subsurface conditions of the site relative to the proposed design; (5) a global slope stability analysis in support of the proposed design; and (6) preliminary recommendations for the site in consideration of the proposed development.

In July 2014, February 2015, and November 2016, LGC performed a subsurface geotechnical evaluation of the Project site consisting of the excavation of six large-diameter bucket auger borings, 18 hollow-stem auger borings, and 11 Cone Penetration Test (CPT) soundings to evaluate on-site geotechnical conditions. In addition, laboratory testing included in-situ moisture content and in-situ dry density, Atterberg Limits, grain size analysis, consolidation, direct shear, expansion index, and laboratory compaction and corrosion (sulfate, chloride, pH and minimum resistivity) (see **Figure 3.14-2**). LGC's review of previous reports and literature

included analysis of information and data that has been collected for the Project site and existing development dating back to the early 1900s, when the site was associated with petroleum production as part of the now former West Coyote Hills oil field, and through the 1990s, when the site was graded and developed as the now existing Westridge Golf Club.

Impact Assessment

As indicated in the Geotechnical Report (Appendix P), a small portion of the Project site along Idaho Street is located within the Alquist-Priolo Earthquake Fault Zone of the Unnamed West Coyote Hills Fault. Proposed Vesting Tentative Tract Map 17845 indicates that Lots 12, 28 and 29 would be located within the Alquist-Priolo Earthquake Fault Zone.

The residential structures proposed for these lots would be located at least 200 feet away from the reported surface trace of the Unnamed West Coyote Hills Fault, exceeding the previously recommended 100-foot structural setback described in 1992 as part of the previous Westridge development. The Geotechnical Report concluded that proposed Lots 12, 28 and 29 are not underlain by an active fault. However, the Geotechnical Report also stated that "those three lots will require verification geologic mapping prior to construction of habitable structures." The Geotechnical Report further stated, "Due to the distance of proposed structures from the surface trace of the Unnamed West Coyote Hills Fault, the possibility of damage due to ground rupture is considered low, provided that the portion of development located within the Earthquake Fault Zone is verified to be lacking fault indicators."

Significance Conclusion for Impact GEO-1.1

While the three proposed residential lots within Alquist-Priolo Earthquake Fault Zone would be located at least 200 feet from the Unnamed West Coyote Hills Fault, exceeding the setback distance required by law (50 feet) and previous geotechnical recommendations for the Westridge development (100 feet), until the recommended verification is provided that Lots 12, 28, and 29 are lacking fault indicators, a significant impact relative to risk of fault rupture along a known fault would result from development of residential structures on Lots 12, 28 and 29.

Mitigation Measures

Mitigation Measure GEO-1.1: A minimum 100-foot setback for all residential structures shall be maintained from any active fault or fault splay.

Significance Conclusion for Impact GEO-1.1 with Implementation of Mitigation Measures

With implementation of **Mitigation Measure GEO-1.1**, all residential structures would have an adequate setback from active faults, and impacts related to risk of fault rupture would be less than significant.

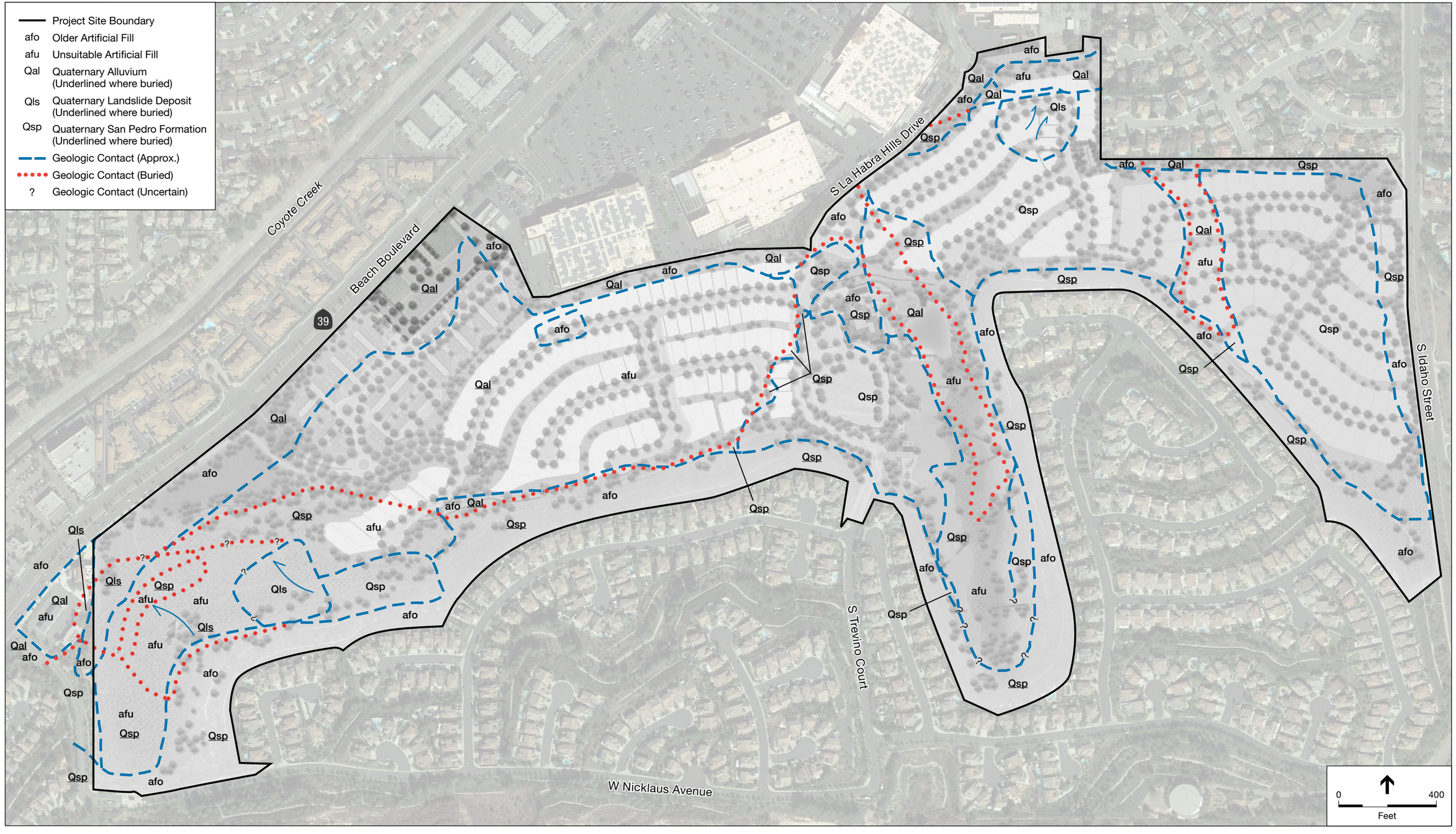


Figure 3.14-2: Onsite Geotechnical Conditions

Source: Google Earth Pro; Carlson SLS

Threshold GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and/or landslides.

Impact GEO-1.2: Implementation of the Rancho La Habra Specific Plan would expose people and structures to strong seismic groundshaking. However, compliance with existing California Building Code requirements as they would apply to site-specific conditions would ensure that impacts related to risk of loss, injury, or death involving strong seismic groundshaking would be *less than significant*.

Methodology

The analysis of impacts related to risk of loss, injury, or death as the result of strong seismic groundshaking is based on the Geotechnical Report (Appendix P). The analysis considers the risk of loss, injury, or death due to strong seismic groundshaking that would result from the proposed Specific Plan increasing the number of people and buildings the Project site. In determining whether a significant impact would result from the proposed Project, the analysis includes consideration of CBC requirements for new construction aimed at minimizing earthquake hazards to life and property.

Impact Assessment

The City and the Project site are located within a seismically active region. Implementation of the proposed Project would add residents, employees, and new structures for human occupancy within the Specific Plan area. Therefore, Project implementation would result in an increased number of people and structures subject to hazards from strong groundshaking. However, seismic groundshaking is a risk throughout Southern California, and seismic risks within the Specific Plan area are typical of those throughout the region.

The Specific Plan provides for new structures for human occupancy to be constructed pursuant to applicable seismic design regulations at the time of construction. The CBC, as currently adopted in the La Habra Municipal Code, includes provisions to reduce impacts caused by potential major structural failures or loss of life resulting from earthquakes or other geologic hazards. For example, the CBC requires that a California Certified Engineering Geologist or California-licensed civil engineer prepare a site-specific engineering analysis that demonstrates the satisfactory performance of proposed structures, and contains requirements for design and construction of structures to resist loads and peak ground accelerations that could result from earthquakes. In addition, the City (through implementation of the CBC) requires that a site-specific soil engineering report be prepared to include appropriate subsurface exploration,

laboratory testing and engineering analysis necessary to provide specific foundation, floor slab, and grading recommendations that include considerations for type of occupancy, and building structural system, and height that are required to be incorporated into grading plans and specifications as a condition of Project approval.

Significance Conclusion for Impact GEO-1.2

Specific Plan development would be required to conform to the seismic design parameters of the CBC, which are reviewed by the City for appropriate inclusion into the building plan check and development review process. The Geotechnical Report identifies the specific seismic design parameters that would be required by the City for on-site development to comply with the CBC based on site-specific conditions. Because the Specific Plan area is located in a seismically active region, some risk related to seismic groundshaking would remain, even with compliance with all applicable regulatory standards. However, compliance with CBC and La Habra Municipal Code requirements for structural safety would provide an appropriate level of safety and reduce hazards from strong seismic groundshaking to a less-than-significant level.

Threshold GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and/or landslides.

Impact GEO-1.3: Implementation of the Rancho La Habra Specific Plan would expose people and structures to seismic-related ground failure, including liquefaction. The impact would be *significant but mitigable*.

Methodology

The analysis of impacts related to risk of loss, injury, or death as the result of seismic-related ground failure, including liquefaction, is based on the Geotechnical Report (Appendix P). The analysis considers the risk of loss, injury, or death due to seismic-related ground failure that would result from the proposed Specific Plan increasing the number of people and buildings within the Project site. In determining whether a significant impact would result from the proposed Project, the analysis includes consideration of CBC requirements for new construction aimed at minimizing the risks of seismic-related ground failure, including liquefaction, to life and property.

Impact Assessment

Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region include ground lurching and shallow ground rupture, soil liquefaction, dynamic settlement, and landsliding. These secondary effects of seismic shaking

are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault and the on-site geology.

As previously indicated, a portion of the Project site is located in a State of California Seismic Hazard Zone for liquefaction potential. Upon completion of Project grading, the areas within which structures would be located would generally consist of compacted fill over dense/hard bedrock, which would provide for conditions that are not considered susceptible to liquefaction. However, a portion of the site contains alluvial soils that are generally considered susceptible to liquefaction depending on their apparent density and plasticity. Based on laboratory testing, the majority of the site's alluvial soils are cohesive and not susceptible to liquefaction. However, subsurface data indicate that relatively isolated sandy layers within alluvial soils are susceptible to liquefaction and dynamic settlement within the upper 50 feet of the surface. Total dynamic settlement is estimated to be on the order of 1 to 2 inches. Differential dynamic settlement can be estimated at half of the total settlement over a horizontal span of 30 feet for design of foundations.

Significance Conclusion for Impact GEO-1.3

Because the Project site contains relatively isolated sandy layers within alluvial soils that are susceptible to liquefaction and dynamic settlement within the upper 50 feet of the surface, the potential for liquefaction and dynamic settlement exists within the proposed development area, and a significant impact would result, requiring mitigation.

Mitigation Measures

Mitigation Measure GEO-1.3: Stiffened and/or post-tensioned slab foundations shall be used to support all new proposed development within the Project site. Pre-soaking of the subgrade soils shall be required to reduce the potential impact of expansive soils.

Significance Conclusion for Impact GEO-1.3 with Implementation of Mitigation Measures

Compliance with CBC requirements for new construction aimed at minimizing seismic-related ground failure, including liquefaction, along with implementation of **Mitigation Measure GEO-1.3**, which reflects the recommendation of the Geotechnical Report, will reduce impacts related to the exposure of people or structures to risk of loss, injury, or death involving seismic related ground failure, including liquefaction, to a less-than-significant level.

Threshold GEO-1: Expose people or structures to risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic groundshaking, seismic-related ground failure, and/or landslides.

Impact GEO-1.4: The mechanically stabilized earth (MSE) wall below proposed Lots 241 through 245 would be at risk from landslide. In addition, site grading activities would result in removal of a buttress keyway in the southern portion of the site, requiring slope stabilization and remedial grading of an existing landslide. The impact related to risk of loss, injury, or death involving landslides would be *significant but mitigable*.

Methodology

The analysis of impacts related to risk of loss, injury, or death as the result of landslides is based on the Geotechnical Report (Appendix P). The analysis considers the risk of loss, injury, or death due to landslides that would result from the proposed Specific Plan permitting development adjacent to existing slopes, as well as the effect of site grading on those slopes in relation to existing development within the Westridge community to the south. In determining whether a significant impact would result from the proposed Project, the analysis includes consideration of CBC requirements for new construction aimed at minimizing landslide hazards to life and property.

As stated in the Geotechnical Report, a minimum factor of safety of 1.5 is typically required for static loading conditions. In addition, the County of Orange Grading Manual requires a horizontal seismic coefficient (Kh) of 0.15 with a minimum resulting factor of safety of 1.1. Therefore, a significant impact would occur if (1) any slope constructed as part of the proposed Project would not meet these factor-of-safety standards, (2) site grading would cause an existing manufactured slope to drop below these factor-of-safety standards, or (3) new structures were sited so as to be susceptible to a landslide of a slope not affected by site grading.

Impact Assessment

The maximum proposed cut and fill slopes shown on the Project grading plan are approximately 80 feet and 40 feet, respectively. Slope stability analyses were performed as part of the geotechnical analysis to evaluate the stability of proposed manufactured fill slopes within the Project site. The analyses indicate a factor of safety greater than 1.5 and 1.1 for static and pseudo-static (seismic) loading conditions, respectively, which meet applicable safety requirements for slope stability and indicate that proposed manufactured slopes are anticipated to be both grossly and surficially stable as proposed. In addition, the Geotechnical Report

concluded that existing native and cut slopes surrounding the development are anticipated to be grossly stable; however, minor surficial failures may occur.

Numerous mechanically stabilized earth (MSE) retaining walls up to approximately 13 feet in height are proposed, including a mid-slope MSE retaining wall (see **Figure 2-8** in Chapter 2, *Project Description*). In addition, numerous relatively small conventional retaining walls are proposed. According to the Geotechnical Report, proposed MSE and retaining walls would be stable. However, global slope stability analysis also indicated that reinforcement is necessary in order to provide an adequate factor of safety for the proposed mid-slope MSE wall located below Lots 241 through 245 of Vesting Tentative Tract Map 17845 due to the proposed height of the wall.

~~Proposed site grading would not cut into or otherwise modify existing perimeter slopes adjacent to the Westridge community. As stated earlier, these slopes were provided with buttress keyways and remedial grading when first constructed to ensure that stability.~~ During site grading, a buttress keyway in the southern portion of the site would be removed and an existing landslide would undergo remedial grading. Analysis of the temporary slope stability following removal of the buttress keyway indicates a factor of safety of approximately 1.2, which would require specific actions to be undertaken to ensure slope stability following removal of the buttress keyway. Based on the results and recommendations of the Geotechnical Report and supplemental analysis, proposed site development would not adversely affect adjacent perimeter properties.

Significance Conclusion for Impact GEO-1.4

As indicated in the Geotechnical Report and supplemental analysis, slopes within the project site would be stable and structures would not be at risk from landslide with ~~one~~ two exceptions. Reinforcement is necessary in order to provide an adequate factor of safety for the proposed MSE walls located below Lots 241 through 245 of Vesting Tentative Tract Map 17845. In addition, removal of a buttress keyway in the southern portion of the site during grading activities would require slope stabilization and remedial grading of an existing landslide. As a result, a significant impact would result, requiring mitigation.

Mitigation Measures

Mitigation Measure GEO-1.4a: Additional geogrid reinforcement length beyond local stability requirements to be determined by the MSE wall designer and approved by the Chief Building Official shall be required to provide adequate global stability factors of safety (greater than 1.5 and 1.1 for static and pseudo-static [seismic] loading

conditions, respectively, for the MSE wall located below Lots 241 through 245 of Vesting Tentative Tract Map 17845.[1]

Mitigation Measure GEO-1.4b: The planned landslide removal at Cross Section 2-2′-2″ shall be undertaken prior to excavation of the keyway back-cut slope north of the proposed landslide removal area as depicted on **Figure 3.14-3**, *Revised Portion of Cross Section 2-2′-2″*. Additionally, the landslide removal shall be excavated in slots, or sections, where an area of landslide approximately 80 feet long (measured parallel to the slope face) is removed and replaced as compacted fill, prior to excavation of the adjacent 80-feet wide section. A minimum of approximately 15 vertical feet of compacted fill shall be placed above the landslide rupture surface within each completed slot, prior to the next section of landslide removal. The landslide removal operation shall be performed so that no sections are left open (defined as lacking a minimum of 15 vertical feet in front of the landslide) over a weekend/holiday or when a significant rain event if predicted over the next three days. Full-time observation and testing shall be monitored by a qualified geotechnical expert during the landslide removal operation, and provide supplemental recommendations based on observed field conditions.

Significance Conclusion for Impact GEO-1.4 after Implementation of Mitigation Measures

With the implementation of **Mitigation Measures GEO-1.4a and GEO-1.4b**, all slopes within the project site would have an adequate factor of safety both during and following site grading activities and would not pose a landslide risk, resulting in a less-than-significant impact.

Threshold GEO-2: Result in substantial soil erosion or the loss of topsoil.

Impact GEO-2: Site grading and construction activities would result in short-term increases in the transport of silt and sediment to receiving waters. However, compliance with National Pollutant Discharge

[1] Preliminary slope stability analysis set forth in the Project geotechnical report indicates at least 6 layers of geogrid reinforcement lengths of 60 feet, with an allowable strength (after appropriate reduction factors are applied by the manufacturer) of approximately 3.5 kips per foot, spaced at a maximum vertical spacing of 2 feet, are required for adequate global factors of safety. Further refinement of the design for required global stability geogrid will occur during preparation of the 40-scale grading plan and with input from the MSE wall designer subject to approval of the La Habra Chief Building Official.

Elimination System (NPDES) requirements, as well as implementation of a Stormwater Pollution Prevention Plan (SWPPP), including best management practices (BMPs), would avoid substantial erosion or loss of topsoil. The resulting impact would therefore be *less than significant*.

Methodology

Erosion-related impacts are addressed in detail in Section 3.14, *Hydrology and Water Quality*. As stated under **Impact HWQ-3**, in determining the level of significance, the analysis recognizes that development under the proposed Specific Plan would be required to comply with relevant federal, state, and regional laws and regulations that are designed to reduce erosion and siltation during construction and ensure that applicable water quality standards and waste discharge requirements are met.

A significant impact related to erosion would occur if the Specific Plan would not implement or would be inconsistent with existing regulatory requirements designed to prevent erosion and sedimentation during construction. Conversely, implementation of all relevant erosion control requirements would ensure that impacts would be less than significant.

Impact Assessment

Construction and grading within the Project site would involve removal of vegetative cover and temporary disturbance of surface soils. During the construction period, grading, excavation, and remediation activities would result in exposure of soil to runoff, causing erosion and entrainment of sediment in the runoff.

Soil stockpiles and excavated areas within the Project site would be exposed to runoff from initial clearing of vegetation and demolition of golf course facilities until grading and excavation activities are completed and new ground cover (landscaping, hardscape, paving, buildings) is established. During this period of time, which is expected to last approximately 11 to 12 months, approximately 3,400,000 cubic yards of soil would be moved within the Project site.

If not properly managed, runoff from exposed ground would cause erosion and increased sedimentation and pollutants in storm water. Because of buried contaminants within subsurface soils[2] in some areas, erosion could also result in release of those contaminants. If released, these substances could be transported to the Pacific Ocean via receiving waters in storm water runoff, causing an incremental reduction in water quality.

[2] See Section 3.12, *Hazards and Hazardous Materials*, of this EIR for a discussion of on-site contamination and remediation requirements.

Significance Conclusion for Impact GEO-2

Before construction begins, the Project applicant would be required to submit a notice of intent with the appropriate fees to the State Water Resources Control Board under the Construction General Permit.

In addition, the Project applicant would be required to prepare a SWPPP, which would establish BMPs in order to reduce sedimentation and erosion. The Project would also incorporate all monitoring elements as required in the Construction General Permit. The Project applicant would also develop an erosion and sediment control plan to be reviewed and approved by the City Chief Building Official prior to issuance of grading permit.

Implementation of the BMPs prescribed in the SWPPP that must be prepared for the proposed Project would ensure that the construction-related impacts resulting from site grading would minimize the amount of silt and sediment that is transported to downstream locations.

BMPs that would be installed for the Project include temporary storm water detention/desilting basins, silt fences, fiber rolls, and gravel bags, as appropriate, designed to retain storm flows on-site, slow surface runoff velocities, and provide pollutant/silt containment. Implementation of storm water detention/desilting basins would be designed to capture and temporarily hold peak storm flows prior to discharge to the storm drain system to provide for settlement of solids prior to discharge. The silt fences, fiber rolls, and gravel bags would also be used in appropriate locations approved by the City to direct and slow storm runoff. As a result, these BMPs would reduce sediment discharge.

In addition, other standard conditions (e.g., compliance with the drainage controls prescribed in the CBC and Chapter 15.44, Excavations and Grading, of the La Habra Municipal Code) would further minimize potential construction-related erosion and siltation impacts.

As a result, impacts would be less than significant, and no mitigation measures would be required.

Threshold GEO-3:	**Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.**
Impact GEO-3:	**The Project would be located on unstable soils susceptible to landslides, liquefaction, settlement, and corrosivity. However, implementation of mitigation measures based on the recommendations of the Project's Geotechnical Report and compliance with the California Building Code would resolve soil**

stability issues. The impact would therefore be *significant but mitigable*.

Methodology

The analysis of impacts related to risk of loss, injury, or death as the result of on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse is based on the Geotechnical Report (Appendix P). The analysis considers the risk of loss, injury, or death due to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse that would result from the proposed Specific Plan increasing the number of people and buildings that may be subject to such hazards. In determining whether a significant impact would result from the proposed Project, the analysis includes consideration of CBC requirements for new construction aimed at minimizing hazards to life and property in relation to landslide, lateral spreading, subsidence, and liquefaction.

Impact Assessment

Landslides

As discussed above in **Impact GEO-1.4**, the Geotechnical Report indicates that all slopes within the Project site would be stable and structures would not be at risk from landslide with one exception: Needed factors of safety would not be achieved and reinforcement would be necessary to provide an adequate factor of safety for the proposed MSE walls located below Lots 241 through 245 of Vesting Tentative Tract Map 17845.

Lateral Spreading

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope toward a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements, and such movement typically damages pipelines, utilities, bridges, and structures. Due to the lack of an adjacent free face, the Geotechnical Report concluded that the potential for lateral spreading within the Project site is very low.

Subsidence

The Geotechnical Report concluded that, from a geotechnical perspective, existing on-site soils including existing fill are suitable for use as general fill (with the exception of MSE wall backfill and conventional retaining wall backfill), provided that they are relatively free from rocks (larger than 8 inches in maximum dimension), construction debris, and significant organic

material. Moisture conditioning would be required to obtain the required compaction. Select grading and/or stockpiling of appropriate materials would be required. In addition, import of soils suitable for backfill of MSE and conventional retaining walls would likely be required.

Because the Project site contains previously placed non-structural fill and near-surface alluvium soils in various locations that are not suitable for the proposed development in their present condition due to lack of compaction, earthwork removals would be required as outlined in the Geotechnical Report's recommendations to achieve a stable platform for proposed site development.

The proposed increase of grades over existing alluvium in portions of the site is estimated to induce up to 2½ inches of settlement within the alluvium. The Geotechnical Report estimates that settlement of alluvial soils would take approximately 6 to 12 months after the completion of rough grading, and that due to proposed fill depths and an increase of grades over existing alluvium, settlement monitoring would be required at the completion of grading.

Liquefaction

As noted in Geotechnical Report and discussed in **Impact GEO-1.3**, the Project site contains relatively isolated sandy layers within alluvial soils that are susceptible to liquefaction and dynamic settlement within the upper 50 feet of the surface. The potential for liquefaction and dynamic settlement exists within the proposed development area.

Corrosivity

The presence of corrosive soil could affect the long-term integrity of proposed structures' foundation systems. However, because soils would be mixed and moved around the site during grading operations, as noted in the Geotechnical Report, the ultimate determination of soil corrosivity and appropriate design must be based on test results completed for "as-graded" conditions.

Significance Conclusion for Impact GEO-3

Project impacts would be significant for the following reasons:

- Slopes within the Project site would have an appropriate factor of safety with one exception: the mid-slope MSE walls located below Lots 241 through 245, which would require reinforcement to provide an adequate factor of safety.
- The Project site contains relatively isolated sandy layers within alluvial soils that are susceptible to liquefaction and dynamic settlement within the upper 50 feet of the surface, resulting in the potential for liquefaction and dynamic settlement.

- The Project site contains previously placed non-structural fill and near-surface alluvium soils in various locations that are not suitable for the proposed development in their present condition due to lack of compaction. The proposed increase of grades over existing alluvium in portions of the site is estimated to induce up to 2½ inches of settlement, which is estimated to occur over approximately 6 to 12 months after completion of rough grading.
- The presence of corrosive soil could affect the long-term integrity of proposed structures' foundation systems.

Mitigation Measures

Mitigation Measure GEO-3a: Removals of unsuitable fill material up to approximately 50 feet deep below existing grades shall be performed for the western portion of the Project site and within several isolated small canyon areas at the eastern portion of the site, in accordance with recommendations of the Geotechnical Report.

Mitigation Measure GEO-3b: As part of remedial grading, unsuitable soils shall be removed to competent soils, temporarily stockpiled (where necessary) and replaced as properly compacted fill. Prior to placement as compacted fill, significant organic materials or other unsuitable materials shall be removed and properly exported off-site.

Mitigation Measure GEO-3c: Any concrete material from site demolition used in general fill shall be environmentally suitable and crushed such that it is no larger than 8 inches in maximum dimension and well blended (i.e., no nesting and voids) into site fills. Any concrete material placed in MSE wall backfill areas (refer to **Mitigation Measure GEO-3i**) shall be crushed to meet gradation requirements of aggregate base in accordance with the last edition of the Greenbook: Standard Specifications for Public Works Construction. The actual depths and lateral extents of grading shall be determined by the geotechnical consultant, based on subsurface conditions encountered during grading.

Mitigation Measure GEO-3d: Stabilization fill keyways shall be constructed for design cut slopes that are not undercut by remedial grading. Locations of the stabilization fill keyways shall be constructed in accordance with recommendations made in the Geotechnical Report, with final locations and design specifications made by the Project's geotechnical consultant subject to review and approval by the City's Chief Building Official. Keyways shall

be shown on the final grading plans. Design cut lots, or lots with less than 5 feet of design fill, shall be over-excavated a minimum of 5 feet below respective pad grades.

Mitigation Measure GEO-3e: Proposed fill slopes shall be constructed at a slope ratio of 2:1 (horizontal to vertical) or flatter so as to achieve the factors of safety recommended in the Geotechnical Report.

Mitigation Measure GEO-3f: Fills placed deeper than 40 feet below proposed grade shall be compacted to an increased minimum relative compaction of 93 percent relative compaction. Fill shall be moisture-conditioned to be between optimum moisture content and 2 percent over optimum moisture content, pursuant to ASTM D1557.

Mitigation Measure GEO-3g: Settlement monuments shall be installed within four weeks after completion of grading within fill areas greater than approximately 40 feet below finish grade and where significant amounts of fill are placed over left-in-place alluvium. Settlement monuments shall be read by a licensed surveyor with an off-site benchmark. The survey readings shall be obtained four times in the first two months, twice in the third month, and then once a month unless otherwise requested by the geotechnical consultant. Shallow footings and slab-on-grade foundations shall be constructed after settlement monitoring data indicate future total settlements are within tolerable limits. Tolerable limits shall include a determination by the Project's geotechnical engineer, subject to review and approval by the City's Chief Building Official, that the surveyed areas would maintain a predicted 3 inches or less of settlement for the next 50 years. If a determination is made that tolerable limits are not met, either impacted areas shall be surcharged with additional fill material and surveyed for an additional three months to determine that tolerable limits are met, or construction shall be delayed until additional settlement monitoring determines that tolerable limits are met.

Mitigation Measure GEO-3h: Additional geogrid reinforcement length (beyond local stability requirements) shall be required for adequate global stability factors of safety of the MSE retaining wall located at various areas throughout the site, as determined during final design and as approved by the City. Final design requirements including geogrid reinforcement length shall be determined

by the MSE wall designer during preparation of the 40-scale grading plan and approved by the City based on the recommendation made in the Geotechnical Report. Geogrid reinforcement length requirements shall be noted on the final approved construction plans.

Mitigation Measure GEO-3i: MSE walls and conventional retaining walls shall be backfilled with relatively sandy soils obtained from either on-site or off-site locations. Sandy soils shall comprise the geogrid zone required for local stability as determined by the MSE wall designer and approved by the City. For conventional retaining walls, the sandy import zone shall be a minimum of one-half the height of the retaining wall. These requirements shall be noted on the final approved construction plans.

Mitigation Measure GEO-3j: Soil samples shall be collected and tested for presence of corrosive soils at the completion of rough grading. If corrosive soils are detected with (1) pH levels of 5.5 or less, (2) chloride concentration of 500 parts per million (ppm) or greater, or (3) sulfate concentration of 2,000 ppm or greater, specific remediation methods—such as increased compressive strength for structural concrete, decreased water-to-cement ratio for structural concrete and/or encapsulation of post-tensioned cables—shall be implemented as approved by the Chief Building Official. Specific remediation methods shall include one or more of the above-listed options as determined by the foundation design engineer and as approved by the City. If corrosive soils are not detected at levels described above, no mitigation shall be required.

Significance Conclusion for Impact GEO-3 after Implementation of Mitigation Measures

Implementation of **Mitigation Measures GEO-3.a** through **GEO-3.j** would ensure compliance with the CBC and the recommendations of the Geotechnical report, and would therefore reduce unstable soils impacts to a less-than-significant level.

Threshold GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact GEO-4: **Soils within portions of the Project site tested as having very high potential for expansion. However, implementation of mitigation measures based on the recommendations of the Project's Geotechnical Report and compliance with the California Building Code would resolve expansive soil issues. The impact would therefore be *significant but mitigable*.**

Methodology

The analysis of impacts related to risk related to expansive soils is based on the Geotechnical Report (Appendix P). In determining whether a significant impact would result from the proposed Project, the analysis includes consideration of CBC requirements for new construction aimed at minimizing hazards to life and property in relation to landslide, lateral spreading, subsidence, and liquefaction.

Impact Assessment

Based on the results of previous nearby and current laboratory testing, site soils have a "Very Low" to "Very High" expansion potential. The presence of expansive soils within the Project site could affect the long-term integrity of proposed structures' foundation systems. However, because soils would be mixed and moved around the site during grading operations, as noted in the Geotechnical Report, the ultimate determination of expansion potential and appropriate design must be based on test results completed for "as-graded" conditions.

Significance Conclusion for Impact GEO-4

Because the presence of expansive soils could affect the long-term integrity of proposed structures' foundation systems, a significant impact would result, requiring mitigation.

Mitigation Measures

Mitigation Measure GEO-4: Soil samples shall be collected and tested at the completion of rough grading to assess expansive soil conditions. Based on the test results, the Project shall incorporate specific recommendations set forth by the foundation design engineer, subject to review and approval by the City, such as the use of stiffened and/or post-tensioned slab foundations, pre-soaking of the subgrade soils, and establishment of minimum setbacks for structures located near slopes.

Significance Conclusion for Impact GEO-4 after Implementation of Mitigation Measures

Implementation of **Mitigation Measure GEO-4** would ensure compliance with the provisions of the CBC and the recommendations of the Geotechnical Report. As a result, the impact of expansive soils would be reduced to a less-than-significant level.

Threshold GEO-5: 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.

Impact GEO-5: Implementation of the Rancho La Habra Specific Plan would require all development to connect to municipal sewage systems, and no septic tanks or alternative wastewater disposal systems would be used. As a result, there would be *no impact*.

Methodology

Because all development pursuant to the proposed Specific Plan would be connected to municipal sewage systems, no impact would result, and no analysis related to the potential use of septic tanks or alternative wastewater disposal systems was necessary.

Impact Assessment

The city of La Habra, including the Specific Plan area, is served by a comprehensive network of sewer lines that are owned and maintained by the City's Department of Public Works Water/Sewer Division. All development that would occur under the proposed Specific Plan would be connected to the municipal system, with sewage treated at Orange County Sanitation District regional treatment facilities. No septic tanks or alternative wastewater systems would be used within the Specific Plan area, and no impacts related to whether soils are capable of supporting such systems would result.

Significance Conclusion for Impact GEO-5

No impacts related to soils being incapable of supporting septic tanks or alternative wastewater disposal systems would occur.

3.14.6 REFERENCES – GEOLOGY, SOILS, AND SEISMICITY

City of La Habra, *City of La Habra General Plan 2035*, adopted January 21, 2014. Accessed September 5, 2017: http://www.lahabracity.com/320/General-Plan-2035

LGC Geotechnical, Inc., *Preliminary Geotechnical Report, Proposed Rancho La Habra Residential Development, VTTM 17845, City of La Habra, California*, September 15, 2016.

3.15 PUBLIC SERVICES AND FACILITIES

3.15.1 INTRODUCTION

This section of the EIR addresses the physical environmental effects of new or expanded governmental facilities that are necessary to maintain acceptable service levels for police, fire protection, schools, and libraries. Because CEQA focuses on physical environmental effects, this section analyzes whether increased service demands from development pursuant to the proposed Specific Plan could lead to the need for new or expanded public facilities that would in turn cause significant adverse environmental effects. Thus, an increase in demand for public services, expansion of staffing associated with provision of a public service, or an increase in students at local schools would not, by itself, be considered a physical change in the environment. However, physical changes to the environment resulting from construction of new facilities or an expansion of existing facilities to accommodate the increased demand, staff, or students could constitute a significant impact.

3.15.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Rancho La Habra Specific Plan is subject to a range of state and local plans, policies, and regulations,[1] which are described below.

a. State Plans, Policies, and Regulations

Building Standards

The California Building Standards Code establishes building requirements for construction and renovation. The most recent version of the California Building Standards Code was adopted in 2016 by the California Building Standards Commission and took effect January 1, 2017. It is based on the International Code Council's Building and Fire Codes. Included in the California Building Standards Code are the Electrical Code, Mechanical Code, Plumbing Code, Energy Code, and Fire Code.

The California Health and Safety Code, Section 13000, et seq., includes regulations concerning building standards (as also set forth in the California Building Code), fire protection systems, fire protection devices (such as extinguishers and smoke alarms, and high-rise building standards), and standards for building inspection and certification.

[1] There are no federal regulations, plans, or policies applicable to public services and facilities issues relevant to the Rancho La Habra Specific Plan.

The California Fire Code (CFC) and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The CFC also establishes minimum requirements that would provide a reasonable degree of safety from fire, panic, and explosion.

School Facilities Financing Act and Education Code

The State of California Government Code Sections 53080, 65995, and 66001 authorize school districts to collect fees from new residential and commercial development. Additionally, California Education Code Sections 17620 through 17626 state that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities, subject to any limitations set forth in Chapter 4.9 (commencing with Section 65995) of Division 1 of Title 7 of the Government Code.

Senate Bill 50 – Leroy F. Greene Schools Facilities Act of 1998

Senate Bill (SB) 50, or the Leroy F. Greene School Facilities Act of 1998, restricts the ability of local agencies to deny project approvals on the basis that public school facilities (classrooms, auditoriums, etc.) are inadequate. School impact fees are collected at the time when building permits are issued. Payment of school fees is required by SB 50 for all new residential development projects and is considered "full and complete mitigation" of any school impacts. School impact fees are payments to offset capital cost impacts associated with new developments, which result primarily from costs of additional facilities, related furnishings and equipment, and projected capital maintenance requirements. As such, agencies cannot require additional mitigation for any school impacts.

b. Local Plans, Policies, and Regulations

City of La Habra Municipal Code

Chapter 2.52, Emergency Services, of the La Habra Municipal Code addresses emergency preparedness powers and duties. The declared purposes of this chapter are to provide for the preparation and carrying out of plans for protection of persons and property within the City of La Habra in the event of an emergency; the direction of the emergency organization; and the coordination of the emergency functions of the City with all other public agencies, corporations, organizations and affected private persons. This chapter creates a disaster council and establishes its powers and duties. It is the duty of the disaster council to develop, and recommend for adoption by the city council, emergency and mutual aid plans and agreements as well as ordinances, resolutions, rules, and regulations to implement such plans and agreements.

City of La Habra Emergency Response Plan

The City of La Habra Emergency Response Plan determines the actions to be taken by the City to prevent disasters where possible, to reduce the vulnerability of residents to any disasters that cannot be prevented, to establish capabilities for protecting citizens from the effects of disasters, to respond effectively to the actual occurrence of disasters, and to provide for recovery in the aftermath of any emergency involving extensive damage or other debilitating influence on the normal pattern of life within the community.

City of La Habra General Plan

City of La Habra General Plan policies relevant to hazards and hazardous materials include the following:

Chapter 5, Community Services

PS 1.1 Response Time. Maintain appropriate police service response times for all call priority levels that ensure the safety of La Habra's residents, businesses, and visitors.

PS 1.2 Sworn Personnel. Maintain an acceptable sworn officer-to-resident ratio.

PS 1.3 Non-sworn Staffing. Maintain acceptable non-sworn or civilian staff to provide quality police services.

PS 1.4 Operations and Facilities. Ensure that police operations and facilities are adequate to accommodate increases in functions, staff, and technology as needed.

PS 1.7 Security and Design Features. Require that security measures are integrated into the design of new development projects, and support the incorporation of Crime Prevention through Environmental Design (CPTED) principles, or other comparable concepts.

FS 1.1 Support Fire Service Provider. Continue to work with and support the City's fire service provider to ensure adequate personnel, facilities, and infrastructure to maintain an acceptable level of fire protection and emergency services in La Habra.

FS 1.2 Adequate Water Supply. Maintain adequate water supply and fire flow pressure for fire suppression in La Habra.

FS 1.3 Enforcement of Codes to Reduce the Risk of Fire. Continue to enforce all relevant federal, state, and county codes and local ordinances to reduce the risk of fire hazards and implement into the design of all new developments, fire prevention measures as required by the La Habra Municipal Code.

FS 1.5 Review of Development Proposals. Include the City's fire service provider in the review of development proposals to ensure that projects adequately address safe design and onsite fire protection.

S 1.1 School Capacity. Cooperate with school districts to ensure that school facilities with sufficient capacity are reserved, constructed, and phased to meet the needs of current and projected enrollment, as permitted by State law.

S 1.2 Review of Development Proposals. Include school districts in the review of residential development proposals to ensure that projects adequately address school impacts and issues.

S 1.9 Developer Fees. Ensure that residential development fully mitigates its impact on school facilities through the payment of fees or other negotiated methods, as permitted by State law.

L.1.1 Library Services, Facilities, and Programs. Support OCPL in the provision of library services, facilities, and programs that meet the needs of all residents.

3.15.3 ENVIRONMENTAL SETTING

a. Police Services

Police services for La Habra, including the Project site, are provided by the La Habra Police Department (LHPD). The LHPD headquarters are located at 150 North Euclid Street, La Habra, approximately 2.6 miles northeast of the Project site. In addition, LHPD maintains a mutual aid agreement with all law enforcement agencies in Orange County in the event supplementary assistance is needed. The City has authorized 71 sworn officers. Based on a city-wide population of 61,905 (Department of Finance 2015), this equals a ratio of 1.15 officers to 1,000 citizens. There are currently 28 officers, 6 corporals, 8 sergeants, and 2 lieutenants assigned to patrol. In 2015, officers handled 47,478 calls for service, or an average of 3,957 calls per month, or about 132 calls for service daily. LHPD responded to Priority 1 emergency calls in 3:43 minutes in 2015, which is less than LHPD's response time goal of 4 minutes for Priority 1 calls. The less urgent Priority 2 response time goal remains less than 13 minutes (Price 2015).

b. Fire Protection Services

The City of La Habra contracts with the Los Angeles County Fire Department (LACoFD) for fire suppression and emergency medical services. LACoFD and other fire departments in Orange and Los Angeles counties operate on a "boundary drop" basis, which means that the closest available fire unit responds to a call regardless of the jurisdiction from which the call originated. There are four LACoFD stations serving La Habra, as shown in **Table 3.15-1**.

Table 3.15-1
Los Angeles County Fire Department Fire Stations Serving La Habra

Station No.	Station Address	Distance from Station to Project Site Entry[a]
Station No. 191	850 West La Habra Boulevard, La Habra	1.49 miles northeast
Station No. 192	520 South Harbor Boulevard, La Habra	2.50 miles northeast
Station No. 193	1000 Risner Way, La Habra	0.62 mile southeast
Station No. 194	13540 South Beach Boulevard, La Mirada	0.16 mile southwest

[a] Distance based on Google Earth measurement from the station to approximate entry point to the proposed Project.

As indicated in **Table 3.15-1**, Fire Station No. 194, located at 13540 South Beach Boulevard in La Mirada, is the closest fire station to the Project site and is the jurisdictional station (i.e., first responder) for the site. The station is approximately 0.16 miles from the Project site and is estimated to have an emergency response time of 3:20 minutes or less. Fire Station No. 194 is staffed with a four-person assessment engine company consisting of one fire captain, one fire fighter specialist, one fire fighter/paramedic, and one fire fighter. Though the station is located in La Mirada, the City of La Habra owns the property.

Fire Station No. 193, located at 1000 Risner Way in La Habra, is the second jurisdictional station. This station is approximately 0.62 miles away and has an estimated emergency response time of 4:20 minutes or less. It is staffed with a three-person assessment engine company consisting of one fire captain, one fire fighter specialist, and one fire fighter/paramedic.

c. Schools

The Project site lies within the boundaries of three public school districts: La Habra City School District (LHCSD) and Lowell Joint School District (LJSD), which serve students in grades Kindergarten (K)-8; and the Fullerton Joint Union High School District (FJUHSD), which serves students in grades 9-12. As shown in **Figure 3.15-1**, the Project site is split between the LJSD (a small area in the western portion of the Project site) and the LHCSD (the balance of the Project site). The entire Project site is within the FJUHSD for grades 9-12.

Students from the proposed Rancho La Habra community within the LHCSD would attend Las Lomas Elementary School (K-2), Las Positas Elementary School (3-5), Imperial Middle School (6-8), and Sonora High School (9-12). Students from the proposed Rancho La Habra community within the LJSD would attend Olita Elementary School (K-6), Rancho-Starbuck Intermediate School (7-8), and Sonora High School (9-12). It should be noted that the FJUHSD has an open enrollment policy allowing students to enroll in high schools within the FJUHSD other than the high school specified by geographic location.

La Habra City School District

The LHCSD covers a 5-mile area that includes La Habra and parts of Brea and Fullerton. The nine schools in the LHCSD serve approximately 5,600 students. The LHCSD operates seven elementary schools in three teamed school areas for grades K-5 and two middle schools for grades 6-8. In the teamed areas, students in grades K-2 attend school at one site and students in grades 3-5 attend at another site. Students in grades 6-8 attend one of the middle schools in the LHCSD.

According to the La Habra City School District Facilities Assessment and Implementation Plan prepared by Caldwell Flores Winters, Inc. in 2012, the capacity of a school is determined by the number of classrooms at the site, and the number of students per classroom used to "load" or populate those classrooms. This information is useful in determining the need for additional school facilities to be added or constructed in order to house students. The school capacity analysis used in the Facilities Assessment and Implementation Plan is based on local standards that include educational objectives, General Fund limitations, Education Code provisions, collective bargaining agreements, programs that require specialized spaces, and other considerations determined by the local district governing board. Local standard calculations do not include physical education facilities and core facilities, such as cafeterias, libraries, and administrative spaces. Classrooms that are used for music, libraries, and other uses are included in the calculation. Classrooms are loaded at 31 students for Kindergarten, 30 students for grades 2-5, and 30 students for grades 6-8 (Caldwell Flores Winters 2012).

Assuming the maximum loading standard for the different types of classrooms, the total student capacity in the LHCSD according to local standards is 8,278 students. Estimated enrollment in 2011 for the LHCSD was 5,418 students. This creates a surplus of space available in the LHCSD that would theoretically allow enrollment of as many as 2,860 more students. According to the Facilities Assessment and Implementation Plan, it is very unlikely that the LHCSD will experience enrollment increases that will test either local or state capacity standards used to determine funding for facilities upgrades due to overcrowding. Thus, the LHCSD is unlikely to receive state funding for new facilities construction or upgrades to mitigate overcrowding, and current and future enrollment should be adequately served through upgrades to existing facilities rather than construction of new buildings or sites.

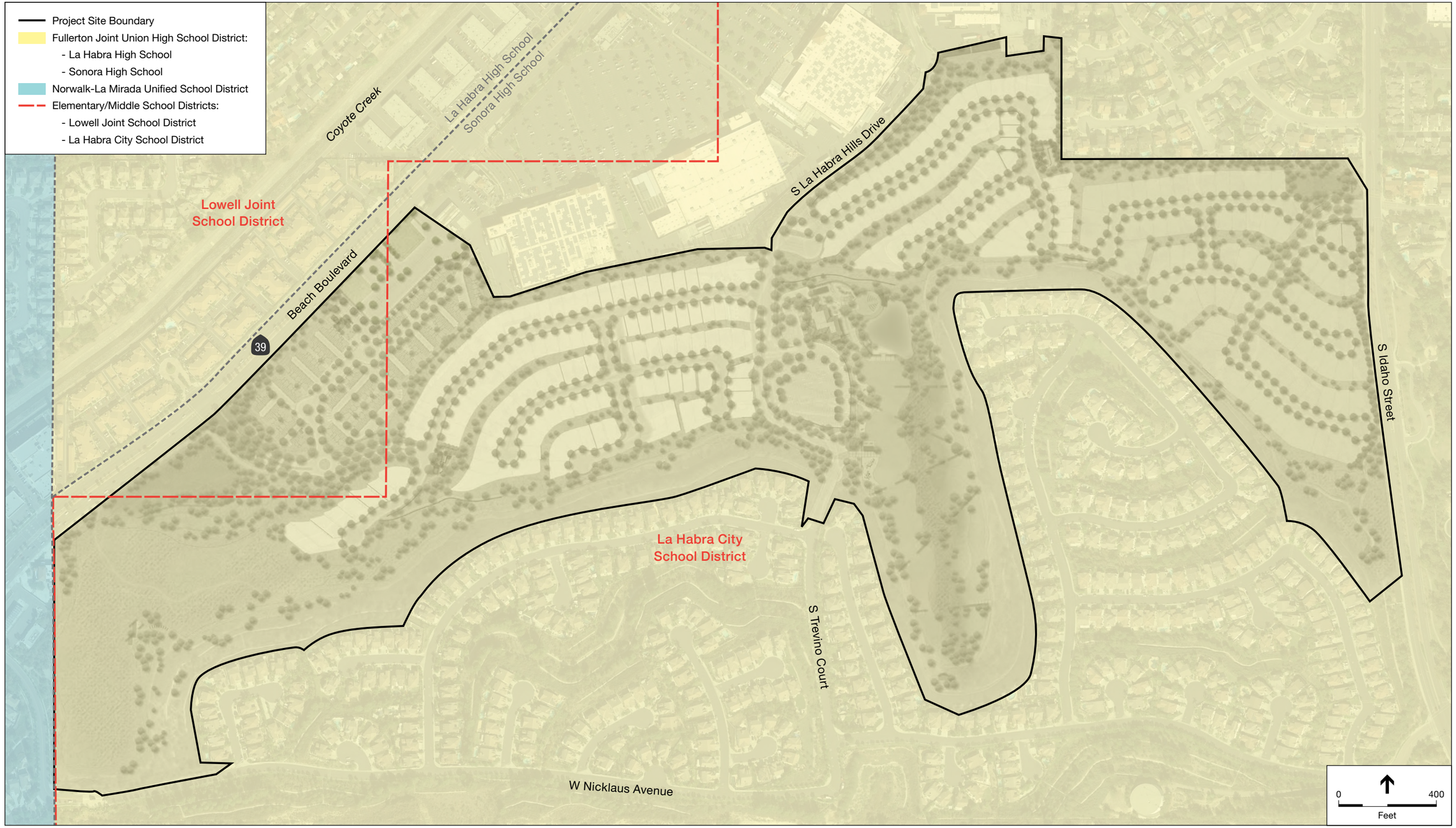


Figure 3.15-1: School District Boundaries

Source: Google Earth; Carlson SLS

Table 3.15-2 compares enrollment and capacity for the schools within the LHCSD that would serve the proposed Project.

Table 3.15-2
Capacity Analysis For La Habra City School District Schools Serving Project Site

School	Grades	Total Local Standards Capacity[a]	Estimated Enrollment (2011)[b]	Local Capacity Surplus
Las Lomas Elementary	K-2	785	540	245
Las Positas Elementary	3-5	656	576	80
Imperial Middle	6-8	1,393	923	470
Total		**2,834**	**2,039**	**795**

[a] Based on projected number of students per classroom and number of classrooms
[b] The enrollment numbers in the table come from the Facilities Assessment and Implementation Plan prepared in 2012. More current California Department of Education enrollment numbers indicate that enrollment has gone down in more recent years. For example, enrollment for Las Lomas Elementary was 403 students in 2016. However, the 2011 numbers are included to show a more conservative estimate of capacity surplus.
Source: La Habra City School District Facilities Assessment and Implementation Plan

Lowell Joint School District

The La Habra General Plan included capacity data for the LJSD, shown in **Table 3.15-3**. Enrollment data was derived from California Department of Education data for 2016.

Table 3.15-3
Capacity Analysis for Lowell Joint School District Schools Serving Project Site

School	Grades	Total Local Standards Capacity[b]	Estimated Enrollment (2016)[a]	Local Capacity Surplus
Olita Elementary	K-6	600	450	150
Rancho-Starbuck Intermediate	7-8	1,091	790	301
Total		**1,691**	**1,240**	**451**

[a] Based on projected number of students per classroom and number of classrooms.
[b] Enrollment data from California Department of Education School Profiles, 2017. http://www.cde.ca.gov/sdprofile/details.aspx?cds=19647666020200 .
Source: City of La Habra General Plan.

Fullerton Joint Union High School District

According to the La Habra General Plan EIR, Sonora High School has capacity for 2,133 students. Latest enrollment numbers from the California Department of Education website show that 1,884 students attend the high school (CDE 2017). Therefore, Sonora High School has a capacity surplus of 249 students.

d. Public Libraries

Library services in the City of La Habra are provided by the Orange County Public Libraries, which is a network of 33 community branch libraries. The La Habra Library branch building, located at 221 East La Habra Boulevard, is owned by the City. The La Habra Library staffs 8.5 full-time employees. The building and its maintenance and improvements are the City's responsibility, while its operations are run and funded by the Orange County Public Libraries.

The La Habra Library includes a number of materials and databases, including books, magazines, periodicals, business materials, reference documents, and community information available for use by patrons. The La Habra Library contains approximately 101,900 books. Although not all special subject collections may be available at the La Habra Library branch, special subject collections—including government documents, music scores, consumer health information, cookbooks, and genealogy records—are available at specific branches and are available to La Habra. Additionally, the Interlibrary Loan Service provides access to books, journal articles, microfilm, and other materials that are not available from the Orange County Public Libraries system. Services offered by the La Habra Library include computer services; eBooks, which are available on four of the computers; cultural events; and book discussion groups.

As reported in the La Habra General Plan EIR, the county-wide average, for cities that have public libraries operated by the Orange County Public Libraries system, is 1.3 volumes per capita and 0.2-square-foot of space per capita.

3.15.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of impacts related to public services. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold PSF-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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 the following public services: police protection, fire protection, schools, parks,[2] or other public facilities.

[2] Analysis of impacts related to parks is provided in Section 3.16, *Recreational Resources*, of this EIR.

3.15.5 IMPACTS AND MITIGATION MEASURES

Threshold PSF-1: **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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.**

Impact PSF-1.1: **Implementation of the proposed Rancho La Habra Specific Plan would increase demand for police services during construction and ongoing operations, but would not necessitate provision of new facilities or physical expansion of existing police facilities. Thus, *no impact* would result.**

Methodology

Determining the significance of impacts on police services is based on evaluating:

- The extent to which the proposed Project would increase demand for services;
- Whether Project-related increased demand for services would result in inadequate staffing levels and/or response times requiring construction of new facilities or expansion of existing facilities; and
- Whether such construction of new facilities or expansion of existing facilities would have an adverse physical effect on the environment.

For police services, a significant impact would occur if (1) the Project generated the need for additional personnel or equipment that could not be accommodated within the existing station and would require the construction of a new station or an expansion of the existing station that (2) would have an adverse physical effect on the environment.

Impact Assessment

Construction

As part of construction activities, a substantial amount of construction equipment and materials would be stored on-site during non-working hours, creating a target for theft and vandalism. The result could be calls for service to the LHPD. It is unlikely, however, that the number of calls for police service to the Project site during construction would be substantially greater than the number of calls for service to the existing golf course.

Operations

A total of 402 new households (448 if Planning Area 5 is developed for residential use), along with new businesses in the commercial portion of the Project site, would generate service calls to the LHPD. Assuming that calls for service from the Project site occur at the same rate as for existing residents and businesses, a total of 87 calls per month, or about 3 calls for service daily, would occur (97 calls per month if Planning Area 5 is developed for residential use or about 3 calls per day). In addition to services calls placed by new residents, site design concerns expressed by the LHPD in relation to increased demands for police services include the proposed linear park trail system and natural open space, which could provide places where crime or homelessness might occur.

Significance Conclusion for Impact PSF-1.1

To address the issue of safety within the Project site and homelessness along the Project's trail system, the applicant has committed to provide lighting and video cameras along the trail system. The applicant has also offered to install license plate readers at entry gates into the Project's residential neighborhoods, and to work with the LHPD on the transmittal, storage, and review of the data collected by the readers. Implementation of these measures would assist the LHPD in patrolling and addressing crime and vandalism issues associated with new development. These commitments would be reflected in conditions of approval for the proposed Project.

While increased police staffing would likely be needed over time as the result of cumulative development within the City, including the proposed Project, an increase of three calls for service per day from the Project site would not require new police facilities, or expansion of existing facilities. Because no new facilities would be constructed and existing facilities would not require expansion as the result of the proposed Project, no impact would result.

Threshold PSF-1:	**Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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.**
Impact PSF-1.2:	**Implementation of the proposed Rancho La Habra Specific Plan would increase demand for fire protection services, but would not necessitate provision of new facilities or physical expansion of existing fire protection facilities. Thus, *no impact* would result.**

Methodology

Determining the significance of impacts on fire protection services is based on evaluating:

- The extent to which the proposed Project would increase demand for services;
- Whether Project-related increased demand for services would result in inadequate staffing levels and/or response times requiring construction of new facilities or expansion of existing facilities; and
- Whether such construction of new facilities or expansion of existing facilities would have an adverse physical effect on the environment.

For fire protection services, a significant impact would occur if (1) the Project generated the need for additional personnel or equipment that could not be accommodated within existing fire stations and would require the construction of a new station or an expansion of one or more existing fire stations that (2) would have an adverse physical effect on the environment.

Impact Assessment

Construction

Site preparation and construction activities could require fire protection services as the result of accidents, fires, spills of hazardous materials, or other similar incidents associated with demolition of existing structures, clearing and grubbing, site grading, and storage of flammable materials (e.g., lumber, paints, and solvents) for construction of new structures. These activities are typical of site development and construction activities.

Based on correspondence from the LACoFD (Appendix Q), the potential increase in services associated with construction of the proposed Project would not increase response times or require additional resources.

Operations

The addition of 402 dwelling units (448 dwelling units if Planning Area 5 is developed for residential use) with approximately 1,206 residents (1,264 residents if Planning Area 5 is developed for residential use), plus additional businesses in the commercial portion of the Project site would increase demand for fire protection and emergency medical assistance services in the City compared to the existing golf course. Areas proposed for development within the Project site are located within and adjacent to a Very High Fire Hazard Severity Zone. Thus, implementation of the proposed Specific Plan would result in the potential for a wildland fire to threaten on-site structures, or for a structural fire to expand into the adjacent wildland area.

Significance Conclusion for Impact PSF-1.2

The May 26, 2015 letter from the LACoFD (Appendix Q) states that existing resources and personnel are "well within" the LACoFD's service standards. The letter further states that, with the implementation of the proposed Project, the LACoFD can accommodate the increased demand without compromising service levels and without construction of new facilities. The LACoFD's letter states that "While each additional development does create a greater demand on existing resources, this Project is expected to have a less than significant effect on Fire Department services." When provided with the cumulative condition (demand from the Project and other foreseeable projects in the City and service area), the LACoFD provided the same response, that the cumulative condition would result in a less-than-significant effect on LACoFD services.

In addition, the applicant has committed to implementation of a fire management plan that provides for areas of fuel modification between the coastal sage scrub habitat and the slope that separates the existing Westridge community from the Project site. Approval and implementation of the fire management plan by the LACoFD prior to issuance of certificates of occupancy within the Project site would be a condition of approval for the proposed Rancho La Habra development.

In its May 26, 2015 letter, the LACoFD also provided a list of requirements for Project site development that would be conditions of Project approval, including the following:

1. The proposed development will include multiple ingress/egress access points for the circulation of traffic and emergency response.
2. The development of this Project will comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
3. Every building constructed will be accessible to Fire Department's apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadways will be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
4. The Fire Department's requirements for access, fire flows, and hydrants will be addressed during the subdivision tentative map stage.
5. Fire sprinkler systems will be installed in all residential and commercial occupancies on the subject property.
6. The development may require fire flows up to 8,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be determined per the County of Los Angeles Fire Code Appendix B Table 8105.1.
7. Fire hydrant spacing will be 300 feet and will meet the following requirements: a) No portion of lot frontage will be more than 200 feet via vehicular access from a public fire

hydrant. b) No portion of a building will exceed 400 feet via vehicular access from a properly spaced public fire hydrant. c) Additional hydrants will be required if hydrant spacing exceeds specified distances. d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants will be required at the corner and midblock. e) A cul-de-sac will not be more than 500 feet in length when serving land zoned for commercial use.

8. Non-Residential and High Density Residential Turning Radius - Turning radii will not be less than 32 feet. This measurement will be determined at the centerline of the road. Any Non-Residential, High Density Residential, and Single Family Dwellings that require a Fire Department approved turning area will have driveways exceeding 150 feet in length at the end of all cul-de-sacs.
9. For Non-Residential Access and High Density Residential Access, a minimum unobstructed width of 28 feet exclusive of shoulders except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance "clear to sky" Fire Department's vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Department's vehicular access road is more than 30 feet high or the building is more than three stories. The access roadway will be located a minimum of 15 feet and a maximum of 30 feet from the building and will be positioned parallel to entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned will be approved by the fire code official. Fire Code 503.1.1 and 503.2.2. The Fire Department's vehicular access will be cross hatched on the site plan and the required width will be clearly depicted. For Single Family Dwelling Access, the Fire Department's access will be provided through a minimum unobstructed width of 20 feet, clear-to-sky and will be within 150 feet of all portions of the exterior walls of the first story of any single unit.
10. For Non-Residential Access Widths – Driveway width for non-residential developments will be increased when any of the following conditions exist: a) Provide 34 feet in-width when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure. b) Provide 42 feet in-width, when parallel parking is allowed on each side of the access roadway/driveway. c) Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map and final building plans. d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet will be posted with Fire Department approved signs stating "NO PARKING- FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
11. High Density Residential Access Widths - The 28 feet in width will be increased to: a) 34 feet in width when parallel parking is allowed on one side of the access way. b) 36 feet in width when parallel parking is allowed on both sides of the access way. c) Any access way less than 34 feet in width will be labeled "Fire Lane" on the final recording map and final building plans. d) For streets or driveways with parking restrictions: The entrance to the

street/driveway and intermittent spacing distances of 150 feet will be posted with Fire Department approved signs stating "NO PARKING- FIRE LANE" in three-inch high letters. Driveways will be labeled to ensure access for Fire Department use.

12. Single Family Dwelling Access – Fire Department's access will be provided through a minimum unobstructed width of 20 feet, clear-to-sky and will be within 150 feet of all portions of the exterior walls of the first story of any single unit.
13. High Density Residential Fire Flow – The development may require fire flows up to 8,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be determined by the County of Los Angeles Fire Code Appendix B Table 8105.1.
14. Single Family Dwelling Fire Flow – Single-family detached homes will require a minimum fire flow of 1,250 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration. Two family dwelling units (duplexes) will require a fire flow of 1,500 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration. When there are five or more units taking access on a single driveway, the minimum fire flow will be increased to 1,500 gallons per minute at 20 pounds per square inch residual pressure for a 2-hour duration.
15. High Density Residential Hydrant Requirements – Fire hydrant spacing will be 300 feet and will meet the following requirements: a) No portion of lot frontage will be more than 200 feet via vehicular access from a public fire hydrant. b) No portion of a building will exceed 400 feet via vehicular access from a properly spaced fire hydrant. c) When cul-de-sac depth exceeds 200 feet, hydrants will be installed at the corner and midblock. d) Additional hydrants will be installed if the hydrant spacing exceeds specified distances.
16. Single-Family Dwelling Hydrant Requirement - Fire hydrant spacing will be 600 feet and will meet the following requirements: a) No portion of lot frontage will be more than 450 feet via vehicular access from a public fire hydrant. b) No portion of a structure will be placed on a lot where it exceeds 750 feet via vehicular access from a properly spaced public fire hydrant. c) When cul-de-sac depth exceeds 450 feet on a residential street, hydrants will be required at the corner and midblock. d) Additional hydrants will be required if hydrant spacing exceeds specified distances.
17. High Density Residential Net Acre – When serving land zoned for residential uses having a density of more than four units per net acre: a) A cul-de-sac will be a minimum of 34 feet in width and will not be more than 700 feet in length. b) The length of the cul-de-sac may be increased to 1000 feet if a minimum of 36 feet in width is provided.
18. All access devices and gates will meet the following requirements: a) Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width, clear-to-sky. b) Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky. c) Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided

with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device. d) All limited access devices shall be of a type approved by the Fire Department. e) Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths, and details of the proposed gates.

Because of the proximity of existing fire stations and implementation of these LACoFD requirements, no new fire facilities would need to be constructed, nor would any existing fire facilities need to be expanded. No impacts would therefore result, and no mitigation measures would be required.

Threshold PSF-1:	**Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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.**
Impact PSF-1.3:	**Implementation of the proposed Rancho La Habra Specific Plan would generate additional students within the Lowell Joint School District and the La Habra City School District for grades Kindergarten (K)-8, and within the Fullerton Joint Union High School District for grades 9-12. Payment of required school impact fees to these districts would constitute mitigation in full for the increased number of students. Thus, *no impact* would result.**

Methodology

Determining the significance of impacts on schools is based on evaluating:

- The extent to which the proposed Project would generate new students for local school districts;
- Whether the increased number of students generated by the proposed Project could be accommodated within existing school facilities; and
- Whether any needed construction of new facilities or expansion of existing facilities would have an adverse physical effect on the environment.

For school facilities, a significant impact would occur if (1) the Project generated an increased number of students that could not be accommodated within existing school facilities and would require the construction of a new school or an expansion of existing facilities that (2) would have an adverse physical effect on the environment.

Pursuant to the provisions of SB 50 (described above), impacts related to schools are considered to be less than significant with payment of development fees that were established to provide for school facilities construction, improvements, and expansion.

Impact Assessment

The proposed 277 single-family and 125 multi-family dwelling units (171 multi-family dwelling units if Planning Area 5 is developed for residential use) would generate school-age children and would result in an increased demand for school services and facilities within the LJSD and LHCSD for grades K-8, and within the FJUHSD for grades 9-12. As shown in **Figure 3.15-1**, while the entire Project site is within the FJUHSD, some proposed housing would be located within the LJSD while other proposed housing would be located within the LHCSD.

A review of proposed site development and Tentative Vesting Tract Map 17845 indicates that the fronts of all single-family dwellings would be within the La Habra City School District, and all K-8 students within the single-family portions of the Project site would therefore attend La Habra City School District schools.

The proposed 277 single-family and 125 multiple-family dwelling units (or 171 if the commercial is developed as residential) would generate school-age children and would result in an increased demand for school services and facilities. Three school districts overlap the Project site. Lowell Joint School District (LJSD) and La Habra City School District (LHCSD) provide elementary and middle school education. The boundary between the two school districts cuts across the multi-family planning area and partially into PA 2 – single-family detached, see **Figure 3.15-1**.

Based on an acreage estimate of the where the school district boundary crosses the multi-family planning area (PA-1), approximately 59 percent of the planning area's students would attend LJSD and 41 percent would attend LHCSD. Thus, of the 105 proposed multi-family dwelling units, 74 dwelling units would occur in LJSD and 51 dwelling units would occur in LHCSD. Should Planning Area 5 be developed for residential use, an additional 46 dwelling units would generate students. Since approximately 65 percent of the land within Planning Area 5 would fall within LHCSD with 35 percent of the land area within LJSD, it is estimated that 30 dwelling units would be located within LHCSD and 16 dwelling units would be located within LJSD.

School districts adopt student generation rates to estimate the number of students that might attend schools based on the number of dwelling units. **Table 3.15-4** quantifies the number of students that would be generated by the proposed Project for the proposed 402-dwelling unit project. **Table 3.15-5** quantifies the number of students that would be generated by the proposed Project should Planning Area 5 be developed for residential use.

Table 3.15-4
Project-Related Student Generation (402 Dwelling Units)

School District	Grade Level	Number of Project Dwelling Units	Student Generation Rate (Student/ Dwelling Unit)	Projected Number of Students
La Habra City	Elementary (Grades K-5)	277 single-family	0.2246	63
		74 multi-family	0.2188	16
		Total Grades K-6		**79**
	Intermediate (Grades 6-8)	277 single-family	0.1173	33
		74 multi-family	0.1093	8
		Total Grades 7-8		**41**
Lowell Joint	Elementary (Grades K-6)	51 multi-family	0.1794	9
		Total Grades K-6		**9**
	Intermediate (Grades 7-8)	51 multi-family	0.0589	4
		Total Grades 7-8		**4**
Fullerton Joint Union High	High School (Grades 9-12)	277 single-family	0.181	51
		125 multi-family	0.120	15
		Total Grades 9-12		**66**

Sources: La Habra City School District: School Fee Justification Study, June 10, 2014.
Lowell Joint School District: School Fee Justification Study, March 24, 2016.
Fullerton Joint Union High School District: School Fee Justification Study, June 10, 2016.

As shown in **Table 3.15-2**, the surplus capacity for the schools within the LHCSD that would serve the Project site is 795 students (325 elementary students and 470 middle/intermediate students). The addition of 120-130 students (79-86 elementary students and 41-44 middle/intermediate students) could be accommodated within existing facilities.

Similarly, as shown in **Table 3.15-3**, the surplus capacity for the schools within the LJSD that would serve the Project site is 451 students (150 elementary students and 301 middle/ intermediate students). The addition of 13-16 students (9-12 elementary students and 4 middle/intermediate students) could be accommodated within existing facilities.

Finally, Sonora High School has surplus capacity of 249 students, and therefore could accommodate the additional 66-72 students that would be generated by the proposed Project.

Table 3.15-5
Project-Related Student Generation (448 Dwelling Units)

School District	Grade Level	Number of Project Dwelling Units	Student Generation Rate (Student/ Dwelling Unit)	Projected Number of Students
La Habra City	Elementary (Grades K-5)	277 single-family	0.2246	63
		104 multi-family	0.2188	23
		Total Grades K-6		**86**
	Intermediate (Grades 6-8)	277 single-family	0.1173	33
		104 multi-family	0.1093	11
		Total Grades 7-8		**44**
Lowell Joint	Elementary (Grades K-6)	67 multi-family	0.1794	12
		Total Grades K-6		**12**
	Intermediate (Grades 7-8)	67 multi-family	0.0589	4
		Total Grades 7-8		**4**
Fullerton Joint Union High	High School (Grades 9-12)	277 single-family	0.181	51
		171 multi-family	0.120	21
		Total Grades 9-12		**72**

Sources: La Habra City School District: School Fee Justification Study, June 10, 2014.
Lowell Joint School District: School Fee Justification Study, March 24, 2016.
Fullerton Joint Union High School District: School Fee Justification Study, June 10, 2016.

Significance Conclusion for Impact PSF-1.3

The proposed 277 single-family and 125 multi-family dwelling units (171 multi-family dwelling units if Planning Area 5 is developed for residential use) would generate 199 school-age children (218 students if Planning Area 5 is developed for residential use), and would result in an increased demand for school services and facilities within the LJSD and LHCSD for grades K-8, and within the FJUHSD for grades 9-12. However, as demonstrated above, the existing school facilities would have enough capacity to accommodate the additional students. Therefore, no new facilities would need to be built, and no physical effects on the environment would occur. Furthermore, payment of required school impact fees to these districts would constitute mitigation in full for the increased number of students. Thus, no impact would result, and no mitigation measures would be required.

Threshold PSF-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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.

Impact PSF-1.4: Implementation of the proposed Rancho La Habra Specific Plan would increase demand for library services but would not necessitate provision of new facilities or physical expansion of existing facilities. Thus, *no impact* would result.

Methodology

Determining the significance of impacts on library services is based on evaluating:

- The extent to which the proposed Project would increase demand for services;
- Whether Project-related increased demand for services would result in inadequate facilities requiring construction of new facilities or expansion of existing facilities; and
- Whether such construction of new facilities or expansion of existing facilities would have an adverse physical effect on the environment.

For library services, a significant impact would occur if (1) the Project generated the need for library space that could not be accommodated within the existing La Habra Library, and would require the construction of a library or an expansion of the existing library that (2) would have an adverse physical effect on the environment.

Impact Assessment

By increasing the City's population, the proposed Project would also increase demands for library services. Based on a 2015 population of 61,905, the addition of 402 dwelling units, which would result in a population increase of 1,206 persons, would represent a 2 percent population increase, which would result in a 1.9 percent increase in demand for library services. If Planning Area 5 is developed for residential use, the proposed Project would generate a population of 1,264, which would result in a 2.0 percent increase in demand for library services. Based on the county-wide average of 0.2-square-foot of library space per capita, the proposed Project would result in the demand for 241 square feet of library space (253 square feet if Planning Area 5 is developed for residential use). Given the widespread availability of research materials online, this small increase in the City's population would not cause the need for a new library facility or physical expansion of the existing library.

Significance Conclusion for Impact PSF-1.4

While it is not likely that the existing La Habra Library would need to be expanded or a new facility constructed to accommodate the increased demands from the proposed Project, given the projected increase in city-wide population of more than 13,600 discussed in the La Habra General Plan, it is reasonable to conclude that construction of new or expanded library facilities would be needed in the foreseeable future, and the proposed Project would contribute to that need. As noted in the La Habra General Plan EIR, while localized environmental impacts would result from the construction of new facilities, "the location and size of future facilities is unknown, (and) it would be speculative to analyze the site-specific environmental impacts" of future library facilities. The La Habra General Plan EIR concluded that "impacts to library services resulting from buildout of the General Plan Update would be less than significant." Thus, impacts of the proposed Project in relation to library services would also be less than significant.

3.15.6 REFERENCES – PUBLIC SERVICES AND FACILITIES

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State of California, Department of Finance, *State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011- 2015*, May 2015. Accessed June 2, 2017: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

3.16 RECREATIONAL RESOURCES

3.16.1 INTRODUCTION

a. Overview

This section of the EIR analyzes whether the proposed Rancho La Habra Specific Plan would (1) increase the use of existing parks and recreational facilities such that substantial physical deterioration or degradation of the facilities would occur or be accelerated, or (2) result in adverse physical effects on the environment associated with the provision of new or expanded parks and recreational facilities.

b. Definitions

- **Bikeway, Class 1,** often referred to as a **bike path**, is a hiking/biking trail with improved surface of concrete or asphalt for the bike and an unimproved surface for jogging; minimum width for two bikes is 8 feet, one bike is 5 feet, and hikers is 4 feet.
- **Bikeway, Class 2**, often referred to as a **bike lane**, is for use along roadways in urban settings; it has a minimum lane width of 4 feet between the gutter or parking lane and the auto travel lane.
- **Bikeway, Class 3**, often referred to as a **bike route**, connects Class 1 and 2 bikeways; it is usually used only for a few blocks, often in developed areas.
- **Parks and Recreational Facilities**, as used in this EIR, include (1) active recreational use areas such as a children's play apparatus area, paved game concrete area, turf playfield, picnic area, community garden, dog park, running or walking trail, swimming pool, or recreation center building; (2) passive recreational use areas such as a landscaped park, public open space, or open space available only to the residents of the development; (3) special facilities open to the public such as lakes or golf courses; and (4) special facilities only open to the residents of the development such as such as swimming pools and tennis courts.

3.16.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed Specific Plan is subject to a range of state and local plans, policies, and regulations, which are described below.

a. State Plans, Policies, and Regulations

Mitigation Fee Act

The California Mitigation Fee Act, Government Code Sections 66000, et seq., allows cities to establish fees to be imposed upon development projects for the purpose of mitigating the impact that the development projects have upon the city's ability to provide specified public facilities. In order to comply with the Mitigation Fee Act, the city must follow four primary requirements:

(1) Make certain determinations regarding the purpose and use of a fee and establish a nexus or connection between a development project or class of project and the public improvement being financed with the fee;

(2) Segregate fee revenue from the General Fund in order to avoid commingling of capital facilities fees and general funds;

(3) For fees that have been in the possession of the city for five years or more and for which the dollars have not been spent or committed to a project, make findings each fiscal year describing the continuing need for the money; and

(4) Refund any fees with interest for developer deposits for which the findings noted above cannot be made.

As described below, the City of La Habra has adopted a parkland dedication or in-lieu fee that is included as Municipal Code Chapter 15.48.

Quimby Act

The Quimby Act was established by the California legislature in 1975 to provide parks for the growing communities in California. The Act authorizes cities to adopt ordinances to require dedication of parkland and/or in-lieu fees for residential subdivisions for the purpose of providing parklands and recreational facilities. The Quimby Act is part of the Subdivision Map Act and applies to residential subdivisions. It permits cities and counties to require new residential development to dedicate land or pay fees for park and recreational purposes. The Quimby Act establishes a standard of dedicating 3 acres of parkland per 1,000 residents for subdivisions for jurisdictions.

A 2013 amendment to the Quimby Act (Assembly Bill [AB] 1359) allowed cities and counties to use developer-paid Quimby Act fees to provide parks in neighborhoods other than the one in which the developer's subdivision is located. Previously, a city or county could only use these fees to provide parks that served the developer's proposed subdivision. Overall, AB 1359 provides cities and counties with opportunities to improve parks and create new parks in areas that would not have benefited before, if certain requirements are met, including the following:

- The neighborhood where the city or county is proposing to use the fees to provide parks must have fewer than 3 acres of park area per 1,000 population;
- The neighborhood where the proposed subdivision is located must have at least 3 acres of park area or more per 1,000 population;
- The city or county must hold a public hearing before using the fees in another neighborhood.
- The city or county must find it reasonably foreseeable that the new subdivision's residents will use the park facilities in the other neighborhood; and
- The city or county must use the fees in areas consistent with the city or county's local Quimby Act ordinance and General Plan.

AB 1359 also allows a city or county to enter into a joint or shared use agreement with one or more public districts in order to provide additional park and recreational access.

b. Local Plans, Policies, and Regulations

City of La Habra General Plan

City of La Habra General Plan policies relevant to recreational resources include the following.

Chapter 2, Community Development

> **LU 8.3 Parks and Open Space Amenities**. Ensure that existing neighborhoods contain a diverse mix of parks and open spaces that are connected by trails, pathways, and bikeways and are within easy walking distance of residents.
>
> **LU 17.6 Parks and Open Spaces**. Seek to expand the City's parklands, greenways, and open spaces as land becomes available and funding is available and coordinate with other appropriate agencies, as provided for in the Open Space, Parks, Trails, and Recreation (OS) Element.

Chapter 5, Community Services

> **OS 2.1 Parkland Standard**. Provide, maintain, and support open space resources including parks, recreational facilities, and open space at a ratio of 2.5 acres per 1,000 residents for active and passive recreational purposes to allow residents opportunities to enjoy physical and mental health.
>
> **OS 2.2 Incentives for Additional Parklands**. Encourage developers to provide land dedications for parks and improvements exceeding minimum City requirements in exchange for incentives established by the City.

OS 2.4 Park Types. Maintain a diverse and accessible system of parks and recreation facilities throughout La Habra, which include mini parks designed to provide passive open space, neighborhood parks generally planned for younger children and family groups, and community parks offering a wide range of indoor and outdoor recreation opportunities.

OS 2.5 New Parks and Recreational Facilities. Prioritize the development of new parks and recreational facilities with community needs including consideration of a community park.

OS 2.8 Privately Owned Open Space Areas. Enforce compliance with conditions placed on development projects where open space has been set aside for use as a recreational amenity for La Habra's residents and visitors.

OS 2.10 Quimby Act Park Fees and/or In Lieu Dedication. Continue to enforce local ordinances that require subdivision developments with residential land uses including large high-density residential and mixed-use projects to contribute fees or dedicate land, or combination thereof, for development or rehabilitation of parklands or recreational facilities accurately reflecting the burden of the new development on the City's recreational facilities and programs.

OS 2.12 Compatibility. Ensure that parks, recreation, and community centers are located and designed for compatibility with adjacent uses addressing such issues as noise, lighting, and parking.

OS 2.13. Sustainable Parks. Require that new parks are designed and existing parks are retrofitted over time to incorporate sustainable development and landscape practices that reduce water and energy consumption.

OS 2.14 Healthy Parks. Require that new parks are designed and existing parks retrofitted over time to incorporate elements that enhance opportunities for residents to engage in vigorous recreational activities and improve their health.

OS 2.15 Accessible Facilities. When renovating and creating new recreational facilities, ensure accessibility standards are met as specified in state and federal laws such as the American with Disabilities Act (ADA).

OS 2.17 Private Commercial Recreational Facilities. Encourage the development of private commercial recreational facilities, health clubs, and similar uses to help meet the needs and improve the health of La Habra's residents, workforce, and visitors.

OS 3.1 Recreational Programs and Services. Continue to provide a wide range of recreational programs and services for La Habra residents of all ages and abilities including passive, active, individual, team, and other organized opportunities.

OS 3.2 Youth, Adults, and Seniors. Continue to provide community services and programs that meet the social, recreational, and health needs of individuals and groups including youth, adults, and seniors.

OS 4.1 Connections. Connect recreational facilities, residential neighborhoods, and key commercial and activity centers, to the extent feasible, with walking paths, trails, and bikeways.

La Habra Municipal Code

La Habra Municipal Code Chapter 15.48 (Residential Building Fees) provides the mechanism in accordance with California Government Code Section 66477 (Quimby Act) for the payment of fees or dedication of land, or combination thereof, for developing or rehabilitating existing neighborhood or community parks or recreational facilities to serve proposed subdivisions. Requirements for dedication of land or payment of fee in lieu of dedication are based on 3 acres of parkland per 1,000 population in the proposed subdivision.

The fees collected under this ordinance are solely for the purpose of producing revenue for the acquisition, development, and maintenance of public parks. Upon filing residential tentative subdivision map applications, Municipal Code Section 15.48.064 requires the owner of the property "as part of such filing, (to) indicate whether they desire to dedicate property for park and recreational purposes, or whether they desire to pay a fee in lieu thereof." If the owner desires to dedicate land for park and recreational purposes, the Municipal Code requires that the lands to be dedicated be designated as such on the tentative map as submitted.

Municipal Code Section 15.48.064 also states that, "Prior to approval of the tentative map, the La Habra Community Services Commission and Planning Commission shall review and recommend to City staff whether to require a dedication of land within the subdivision, payment of a fee in-lieu thereof, or a combination of both.

3.16.3 ENVIRONMENTAL SETTING

La Habra has a wide range of park and recreational facilities. The La Habra Recreation Division offers a variety of services that include recreation classes, excursions for adults and youth, special events, summer day camp and a summer aquatic program, two youth sports leagues, and facility rentals. The Recreation Division also manages the use of City parks, as well as coordinating the joint use of City and school athletic fields with the various school districts in

La Habra, and working closely with local non-profit organizations such as Little League and the American Youth Soccer Organization.

a. Parks

The City of La Habra currently operates and maintains 141.7 acres of parkland, encompassing 24 individual parks, all of which are within 3.3 miles of the proposed Specific Plan area. These parks are grouped into the following three categories based on usage (see **Table 3.16-1**):

Table 3.16-1
Existing City of La Habra Parks

Park Name	Acres	Facilities
Mini-Parks		
Constitution Plaza Park	1.0	Urban open space to commemorate the City's history, with three large flagpoles and park benches
Town Center Park	2.1	Open lawn area
Leslie Park	0.5	Natural open area with trees and lawn
Mahoney Park	2.2	Small landscaped-only area with a nearby historical plaque marking the location where former President Richard Nixon opened his first law office in La Habra
Richard's Park	0.3	Open space area with water-conserving landscaping features
Mini-Parks Subtotal	*6.1*	
Neighborhood Parks		
Guadalupe Park	5.0	Linear nature park and greenbelt area with a bike trail, two playgrounds, the Gary Center, Community Resource Center, and a boxing club at Guadalupe Hall
Las Lomas Park	2.2	Picnic facilities, restroom, playground, walking path and an oval dirt walking path for the nearby residential neighborhood
Loma Norte Park	4.9	Immediately west of Ladera Palma Elementary School and Esteli Park to the east, provides playground facilities, picnic areas, restroom, drinking fountains, barbecues, and concrete walkways
Loma Verde Park	1.7	Basketball court, multipurpose play field, and picnic tables
Montwood Park	0.6	Two playground areas, picnic tables
Portola Park	10.1	Children's Museum of La Habra, two City-operated day care centers, enclosed playground, community theater, La Habra Tennis Center, and three ball fields
Oeste Park	4.6	Open space area
Old Reservoir Park	1.1	Picnic facilities, park benches
Osornio Park	5.4	Basketball courts, turf area used by local soccer groups
San Miguel De Allende Park	3.0	Picnic facilities and playground, Cleata Harder Developmental School
Terraza Park	2.4	Picnic facilities, open grass area, playground
Corona Park	0.1	Picnic area, playground

Table 3.16-1
Existing City of La Habra Parks

Park Name	Acres	Facilities
Descanso Park	0.9	Playground, paved walking paths
Brio Park	1.2	Playground, picnic facilities, restroom, performing arts area, open grass area
Neighborhood Parks Subtotal	*43.2*	
Community Parks		
El Centro-Lions Park	6.1	Two playgrounds, restrooms, two basketball courts, patio area with shade structures, sinks, barbecues; serves as a focal point of the community with the annual Corn Festival
Esteli Park	9.8	Football and two baseball diamonds with bleachers and a concession building.
La Bonita	22.6	Picnic facilities, playgrounds, playgrounds, restrooms, softball fields, skate park, Girl Scouts Pavilion, Boys and Girls Club, four lighted baseball diamonds, basketball court, and batting cage
Vista del Valle	36.4	Picnic facilities, play equipment, restrooms, picnic facilities, playgrounds, and a gazebo; includes decomposed granite hiking trails and other walking paths that have informational signage about the plants and trees within the park
Vista Grande Park	17.5	Primarily an open space wilderness area and bird sanctuary, but also includes walking paths and a Head Start School
Community Parks Subtotal	*92.4*	

Source: City of La Habra General Plan, 2014; City of La Habra, 2017.

- **Mini Parks.** The City's five mini parks are designed to provide passive open space with an emphasis on aesthetics rather than formal recreational facilities.
- **Neighborhood Parks.** The City has 14 neighborhood parks within walking distance of homes. These parks are primarily planned for use by younger children and family groups. They contain a variety of community recreational facilities with areas available for organized sports (baseball/softball diamonds), day care, basketball courts, soccer fields, football field, and tennis courts. The City also offers places for informal recreational activities, including barbecues, walking and biking paths, picnic areas, and playgrounds.
- **Community Parks.** The City's five community parks serve several residential neighborhoods and have a wide range of indoor and outdoor recreation opportunities. All of the community parks are located within a 1-mile radius of the Project site.

The closest existing parks to the Project site are:

- Vista del Valle Park (0.5 miles away);
- Vista Grande Park (0.7 miles away); and
- Oeste Park: (0.9 miles away).

b. Recreational Facilities

The City's parks contain a variety of community recreational facilities with areas available for organized sports (baseball/softball diamonds), day care, basketball courts, soccer fields, football field, and tennis courts. The City also offers places for informal recreational activities, including barbecues, walking and biking paths, picnic areas, and playgrounds. The City's recreational facilities are identified in **Table 3.16-2**.

Table 3.16-2
Recreational Facilities in La Habra

Name	Location	Facilities/Activities
Children's Museum	Portola Park	Located in the historic 1923 Train Depot, the Children's Museum includes galleries, hands-on exhibits, an outdoor dinosaur topiary, a historic 1942 caboose, and other railroad cars.
La Habra Community Center	101 W La Habra Blvd.	A variety of recreation programs and services are offered at the community center, and the facility includes meeting rooms and a grand ballroom.
Girl Scouts Pavilion	La Bonita Park	This facility is used by the Girls Scouts of America and is available to the public to rent.
Boys and Girls Club	La Bonita Park	The Boys and Girls Club is focused primarily on teen-aged activities and includes a gym, classrooms, and programs (i.e., cultural enrichment classes, health and physical education, professional development, educational classes, social recreation, citizenship and leadership classes).
Veterans' Hall	209 Orange St.	Built in the 1920s, this facility accommodates 150 people.

Source: City of La Habra General Plan.

c. Walking Trails and Bicycle Paths

The City's parks include natural and paved walking trails and bicycle paths. The 0.9-acre Descanso Park includes a paved walking path, the 2.2-acre Las Lomas Park includes an oval dirt walking path, the 4.9-acre Loma Norte Park includes concrete walkways, the 4.6-acre Oeste Park includes a gravel walkway, the 10.1-acre Portola Park includes concrete and asphalt walking paths, the 17.5-acre Vista Grande Park includes dirt trails, the 22.6-acre La Bonita Park includes landscaped trails and paved bicycle paths, and the 36.4-acre Vista Del Valle Park includes hiking trails and walking paths. Paved bicycle paths are also included within the 5-acre Guadalupe Park.

d. Golf Course

The La Habra General Plan identifies the 18-hole Westridge Golf Club, located on the Project site, as the "major recreational facility in the City." The General Plan further states as follows: "Panoramic views of the golf course, Puente Hills, and the San Gabriel Mountains can be seen

looking north from the Westridge Golf Club. The facility is privately owned but restrictions have been placed by the City to assure it remains recreational open space."

e. School Facilities and Joint Use Agreement

Another source of recreational open space within La Habra is playgrounds and ball fields located at public schools. Although schools are not under the control of the City and school sites do not fit the official criteria for parks, the La Habra General Plan states that "schools nevertheless provide play fields and playground equipment that neighborhood residents utilize during off-school hours." The City of La Habra participates in the conservation of recreational areas through a joint use agreement between the City and the La Habra City School District for the following schools:

- Arbolita Elementary School (West) Field: used primarily for practice field during the year and regulation field for spring soccer;
- Walnut Elementary School (North) Field: used for Pop Warner Football practice, girls softball practice, and potential soccer practice;
- Las Positas Elementary School (West and Northeast) Fields: used for practice and regulation play for youth/adult soccer and girls softball;
- Sierra Vista Elementary School (Southwest) Field: practice field used only for Little League and youth soccer;
- Las Lomas Elementary School (North) Field: practice field used for soccer;
- Ladera Palma Elementary School (North) Field: used for practice and regulation play for Pop Warner Football, Little League, and some soccer;
- Imperial Middle School (North) Field: used for practice and regulation play for youth soccer—or adult when available—and girls softball; and
- Washington Middle School (South) Field: practice field used only for soccer, baseball, and girls/adult softball.

The total collective acreage of all existing public schools in La Habra is approximately 205 acres. The General Plan notes, as a rule of thumb, that "the average land area of City school sites devoted to open playground and athletic field areas is 52 percent. Thus, roughly 107 acres of existing public school sites are available as public open space and recreational facilities for residents of La Habra."

f. Parkland per 1,000 Population

Based on a 2015 citywide population of 61,905 and a total of 141.7 acres of parks and recreational areas (6.1 acres of mini-parks + 43.2 acres of neighborhood parks + 92.4 acres of

community parks), the City currently has 2.29 acres of park and recreational use land per 1,000 population. This estimate increases to 4.02 acres per 1,000 population if 107 acres of joint use public school sites are counted (see Section 3.16.3.e above).

3.16.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of recreation impacts. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect if it were to:

Threshold REC-1: 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; or

Threshold REC-2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.16.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold REC-1: 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.

Impact REC-1: The proposed Rancho La Habra Specific Plan provides for parks and recreational land in excess of La Habra Municipal Code requirements. Thus, the proposed Project would not 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. The Project would include closure of the Westridge Golf Club, resulting in the loss of a major recreational resource; however, this closure would not cause or accelerate physical deterioration of other golf courses, which are available within a 5-mile radius of the Project site. The impact would therefore be *less than significant*.

Methodology

The analysis below considers whether development under the proposed Specific Plan would increase the use of existing parks and recreation facilities, and if so, whether these parks and recreation facilities could accommodate the increased use.

A significant impact would result if (1) the proposed Project would result in a shortfall in the provision of parks or recreation facilities that would (2) cause deterioration of these existing facilities. The amount of land proposed to be improved for parks and recreational use within the Specific Plan area is compared to adopted City standards. Should the Specific Plan result in a shortfall in the provision of on-site parks and recreational use areas, the proposed Project would be presumed to increase use of existing parks and recreational facilities and cause deterioration of these existing facilities, resulting in a significant impact.

As noted above, the La Habra General Plan and Municipal Code set forth different park standards, as follows:

- General Plan Policy OS 2.1 states "Provide, maintain, and support open space resources including parks, recreational facilities, and open space at a ratio of 2.5 acres per 1,000 residents for active and passive recreational purposes to allow residents opportunities to enjoy physical and mental health."
- Municipal Code Section 15.48.060 acknowledges that "there is an existing shortage of adequate parklands in the city, and that future residential subdivision development will exacerbate this condition." Chapter 15.48 thus sets a requirement for dedication or payment of fees in lieu based on a standard of 3 acres per 1,000 population to "mitigate the impacts and cumulative impacts of residential subdivision development on the availability of parklands within the city."

While the General Plan standard of 2.5 acres per 1,000 residents for active and passive recreational purposes sets a citywide standard, Municipal Code Chapter 15.48 specifically addresses the impacts of new residential development, setting a standard of 3 acres of parkland per 1,000 population along with a requirement for new residential development to dedicate parkland or pay fees equivalent to 3 acres per 1,000 population as a means of mitigating impacts on existing park facilities. Thus, in determining whether a shortfall of parkland would occur from the proposed Project, the Municipal Code standard of 3 acres per 1,000 population is used.

While closure of the Westridge Golf Club as the result of the proposed Project would increase use of other area golf courses, because there are a finite number of tee times available at a golf course, increased demand for golf courses would not necessarily result in deterioration of golf course facilities. Thus, analysis of impacts on recreational resources related to the loss of the existing golf course facility is analyzed based on the availability of other golf courses within a 5-mile radius of the existing Westridge Golf Club. A lack of existing golf courses within a 5-mile radius of the Project site would constitute a significant impact related to loss of the existing Westridge Golf Club.

Impact Assessment

The Project's proposed 277 single-family detached and 125 multi-family dwelling units would result in a need for ~~3.78~~ 4.13 acres of parkland based on the formula of 3 acres per 1,000 persons specified in Municipal Code Section 15.48.063.[1] Should Planning Area 5 be developed for residential use, the additional 46 multi-family dwelling units would increase the need for parkland from ~~3.78~~ 4.13 acres to ~~4.12~~ 4.18 acres. By comparison, the proposed Project would provide ~~25.1~~ 28.86 acres of public parkland as follows:

- Public Community Center ~~and Park~~: 3.30 acres
  - ~~A 22,500-square-foot structure providing an indoor banquet hall, kitchen, meeting, and office facilities in the existing Westridge Golf Club clubhouse~~ Approximately 22,500 square feet of building area providing indoor banquet, dining, kitchen, meeting, and office facilities in the existing Westridge Golf Club clubhouse, which is proposed to be converted to a public community center
  - Outdoor banquet, dining, and gathering space ~~on patios adjacent to an existing open water pond~~
  - ~~Kids water play, adventure play~~ Play area~~,~~ and open turf
  - Parking for daily use and special events
- Public Park and Picnic Area: ~~10.4~~ 12.79 acres
  - An extension of the Community Center and park to the south
  - Terraced multi-purpose play areas
  - Picnic areas, including benches and tables, with shade trees and views of the San Gabriel Mountains
  - ~~Picnic areas, shade trees~~
  - ~~Natural drainage channel, oak woodland, and native grasslands~~
- Public Linear Park: ~~10.6~~ 12.77 acres
  - 2.6 miles of trails proposed to traverse throughout the community, with connections to Idaho Street and Beach Boulevard
  - Benches, shade trees, viewing overlooks, exercise equipment
  - ~~Gardens~~

[1] Municipal Code Section 15.48.063 specifies the use of 3.41 persons per household for single-family detached homes, 3.26 persons per household for structures with two dwelling units, 3.32 persons per household for structures with 3-4 dwelling units, and 2.51 persons per household for multi-family homes with 5 to 9 units per building.

In addition to these public park and recreational facilities, ~~25.6~~ 28.07 acres of private recreational facilities are proposed, including the following:

- Planning Area 1:
  - Pool and spa
  - Restrooms and showers
  - Barbeque and picnic facility
  - Shade structure
- Planning Area 2:
  - Pool, wading pool, and spa
  - Restrooms and showers
  - Barbeque and picnic facility
  - Shade structure
- Planning Areas 3/4:
  - Lap pool and spa
  - Restrooms and showers
  - Shade structure
- Multiple Planning Areas:
  - Passive turf play areas
  - Shade trees
  - Bench seating
  - Children's play structures
  - Trail connections

Closure of the existing Westridge Golf Club to make way for proposed residential and commercial development would result in the loss of a major recreational resource in La Habra. As noted above, the La Habra General Plan identifies the 18-hole Westridge Golf Club as the "major recreational facility in the City," and states that facility is "privately owned but restrictions have been placed by the City to assure it remains recreational open space."

While proposed golf course closure for residential and commercial development would result in the loss of 63.6 acres of open space previously approved for the La Habra Hills Specific Plan,[2]

[2] The 63.6 acres of open space loss is based on the acreage within the Rancho La Habra Specific Plan proposed for residential and commercial use, as well as roadways.

golf course closure and development would not affect the 29.5-acre community park and 2.6 acres of non-golf course open space approved for the La Habra Hills Specific Plan.

With the proposed closure of the Westridge Golf Club, the following golf courses would be available within a 5-mile radius of the Project site:

- La Mirada Golf Course: 1.25 miles west of the Project site.
- Fullerton Golf Course: 2.1 miles southeast of the Project site.
- Brea Creek Golf Course: 2.67 miles east of the Project site; nine-hole executive course.
- Coyote Hills Golf Course: 3.1 miles southeast of the Project site; semi-private with traditional memberships.
- Los Coyotes Country Club: 1.1 miles south of the Project site; members-only.
- Candlewood Country Club: 3.4 miles northwest of the Project site; members-only.

Significance Conclusion for Impact REC-1

Because the proposed Project would provide ~~25.1~~ 28.86 acres of public parkland, which is well in excess of Municipal Code requirements (~~3.78~~ 4.13 acres), along with ~~25.6~~ 28.07 acres of private recreational facilities, new residents within the Project site would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.

By closing the Westridge Golf Club, the proposed Project would result in a substantial loss of open space originally approved for the La Habra Hills Specific Plan. However, the project would not affect the 29.5 acres of community parkland, and this acreage is substantially greater than La Habra Municipal Code requirements for parkland for the 556 single-family dwelling units constructed within the La Habra Hills Specific Plan (5.79 acres). Thus, loss of the Westridge Golf Club would not increase the use of existing neighborhood and regional parks or other recreational facilities by Westridge residents such that substantial physical deterioration of the facility would occur or be accelerated.

Finally, a number of golf course facilities would remain available to the public and for membership following closure of the Westridge Golf Club. Closure of the Westridge Golf Club as the result of the proposed Project would increase use of these facilities; however, because there are a finite number of tee times available at a golf course, increased demand for golf courses would not necessarily result in deterioration of golf course facilities.

Thus, impacts related to increased use of existing parks and recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated would be less than significant.

Threshold REC-2: **Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

Impact REC-2: **Construction and operation of proposed parks and recreation facilities would contribute to impacts addressed throughout this EIR, except for those impacts specifically related to population growth or to the project's proposed residential and commercial areas and their operations. The significance of these impacts would be as identified in other EIR sections.**

Methodology

The analysis of impacts associated with the development of parks and recreational facilities starts with the identification of whether the proposed Project would involve or result in new park or recreation facilities. Should the project include or require the construction or expansion of park and recreational facilities, the analysis identifies whether construction or operation of these facilities could result in adverse physical effects on the environment. The analysis of the potential adverse physical effects is considered as part of the overall project and draws on conclusions in other sections of this EIR, such as biological resources, cultural resources, transportation and traffic, air quality, greenhouse gas emissions, noise, hazards and hazardous materials, geology and soils, hydrology and water quality, public services and facilities, and utilities and service systems.

Impact Assessment

The proposed Specific Plan would involve construction of new parks and recreational facilities as described above in **Impact REC-1**. Physical environmental effects from activities such as excavation, grading, landscaping, and construction of recreational facilities, as well as operations of proposed park and recreational areas, have been analyzed as part of overall project impacts throughout this EIR.

Significance Conclusion for Impact REC-2

Construction and operation of proposed parks and recreation facilities would contribute to impacts addressed throughout this EIR, except for those impacts specifically related to population growth or to the project's proposed residential and commercial areas and their operations. The significance of these impacts would be as identified in other EIR sections.

Mitigation Measures

All mitigation measures set forth in this EIR not specifically directed to residential and commercial areas of the site and their operations would apply to the physical effects of proposed parks and recreational uses.

Significance Conclusion for Impact REC-2 with Implementation of Mitigation Measures

With implementation of mitigation measures, impacts from construction and operation of proposed parks and recreation facilities would have the same level of significance as identified for impacts throughout this EIR, except for those impacts specifically related to population growth or the proposed residential and commercial areas and their operations.

3.16.6 REFERENCES – RECREATIONAL RESOURCES

City of La Habra, *City of La Habra General Plan 2035,* adopted January 21, 2014. Accessed June 9, 2017: http://www.lahabracity.com/320/General-Plan-2035.

City of La Habra, *City of La Habra Final Environmental Impact Report for: General Plan 2035,* certified January 21, 2014. Accessed June 9, 2017: http://www.lahabracity.com/DocumentCenter/Home/View/196.

3.17 UTILITIES, SERVICE SYSTEMS, AND WATER SUPPLY

3.17.1 INTRODUCTION

a. Overview

This section of the EIR addresses the physical environmental effects of new or expanded facilities to maintain acceptable service levels in relation to utilities and service systems, including water and wastewater utilities, storm drainage, and solid waste management. Because CEQA focuses on physical environmental effects, this section analyzes whether increases in demand that would result from the proposed Rancho La Habra Specific Plan would result in significant adverse physical environmental effects.

For example, an increase in sewage generation, by itself, would not be considered a physical change in the environment; however, physical changes in the environment resulting from the construction of new facilities or an expansion of existing wastewater facilities could constitute a significant impact. This section also addresses water demand, supply, and reliability for the proposed Specific Plan. Flood management is addressed in Section 3.13, *Hydrology and Water Quality*. Energy, energy infrastructure, and renewable energy resources are discussed in Section 3.10, *Energy Resources*.

b. Definitions

- **100-Year Flood** is a flood that has a 1 percent statistical chance of occurring in any given year. The 100-year flood can, however, occur in consecutive years or multiple times within a year. Similarly, a 25-year flood has a 4 percent statistical chance of occurring in any given year, but could occur in consecutive years or multiple times within a year.
- **Acre-Foot** is the volume of water required to cover 1 acre of land (43,560 square feet) to a depth of 1 foot. It is equal to 43,560 cubic feet or 325,851 gallons.
- **Biofiltration** refers to the use of plants and landscaping to capture and biologically degrade pollutants. Capturing harmful chemicals or silt from surface runoff is a common form of biofiltration.
- **Flooded** refers to any condition in which the soil surface is temporarily covered with flowing water from any source, such as streams overflowing their banks, runoff from adjacent or surrounding slopes, inflow from high tides, or any combination of sources.
- **Frequency (Inundation)** refers to the average frequency of flooding by surface water or soil saturation. It is usually expressed as the number of years (e.g., 50 years) the soil is inundated or saturated at least once during a year.

- **Inundation** is the condition in which water from any source temporarily or permanently covers a land surface.
- **Recycled Water** is former wastewater (sewage) that is treated to remove solids and impurities to a level that is safe for beneficial uses, such as landscape irrigation. The purpose of water recycling using these processes is to conserve water, rather than simply discharging treated wastewater.
- **Stormwater** refers to discharges generated by runoff from land and impervious areas, such as paved streets, parking lots, and building rooftops, during rainfall and snow events that often contain pollutants in quantities that could adversely affect water quality. Most stormwater discharges are considered point sources and require coverage by a National Pollutant Discharge Elimination System (NPDES) permit.

3.17.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of proposed Rancho La Habra Specific Plan and related actions is subject to a range of federal, state, and local plans, policies, and regulations, which are described below.

a. Federal Plans, Policies, and Regulations

Safe Drinking Water Act

The United States Environmental Protection Agency (USEPA) administers the Safe Drinking Water Act, which is the primary federal law that regulates the quality of drinking water and establishes standards to protect public health and safety. The Department of Health Services (DHS) implements the requirements of the Act and oversees public water system quality state-wide. DHS establishes legal drinking water standards for contaminates that could threaten public health.

b. Clean Water Act

The Clean Water Act established the basic structure for regulating discharges of pollutants into "waters of the U.S." The Act specifies a variety of regulatory and non-regulatory tools to manage stormwater runoff. Clean Water Act Section 402 is relevant to drainage in the proposed Specific Plan area.

Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the Regional Water Quality Control Boards (RWQCBs). The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.

c. National Pollutant Discharge Elimination System

The NPDES permit program under the Clean Water Act controls point and nonpoint water sources that discharge into "waters of the U.S." California has an approved state NPDES program. USEPA has delegated authority for NPDES permitting to the SWRCB, which has nine regional boards. The Santa Ana Regional Water Quality Control Board (Santa Ana RWQCB or RWQCB) area includes the City of La Habra (City). Under this system, discharge of stormwater runoff from construction areas of 1 acre or more requires either an individual permit issued by the RWQCB or coverage under the statewide Construction General Stormwater Permit for stormwater discharges. In addition, operational water discharges from land use operations that have direct stormwater discharges to navigable waters are also required either to obtain an individual permit or to obtain coverage under the statewide General Industrial Stormwater Permit.

d. State Plans, Policies, and Regulations

California Urban Water Management Planning Act

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA), which requires urban water suppliers to initiate planning strategies to ensure an appropriate level of water service reliability. The CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet (AF) of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The CUWMPA describes the contents of Urban Water Management Plans as well as methods for urban water suppliers to adopt and implement the plans.

National Pollutant Discharge Elimination System Permits

The NPDES permit system was established in the federal Clean Water Act to regulate both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

Senate Bill 610

Senate Bill (SB) 610 requires public urban water suppliers with 3,000 or more service connections to identify existing and planned sources of water for planned developments of a

certain size. It further requires the public water system to prepare a specified Water Supply Assessment for the following types of projects:

a) A proposed residential development of more than 500 dwelling units;

b) A proposed shopping center employing more than 1,000 persons or having more than 500,000 square feet of floor space;

c) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;

d) A hotel or motel, or both, with more than 500 rooms;

e) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area; or

f) A mixed-use project that includes one or more of the projects above.

A Water Supply Assessment must address existing water demand and future water demand by the project, and must ensure that water is available for the project during normal years, a single dry year, and multiple dry years during a 20-year future projection period. The Water Supply Assessment must also describe whether the project's water demand is accounted for in the water supplier's Urban Water Management Plan. Supplies of water for future use must be documented in the Water Supply Assessment.

Senate Bill 221

SB 221 requires the local water provider to provide "written verification" of "sufficient water supplies" to serve the project. SB 221 applies only to residential projects of 500 units or more (infill or low-income or very-low-income housing subdivisions are exempt) and requires the land use planning agency to include as a condition of approval of a tentative map, parcel map, or development agreement a requirement that "sufficient water supply" be available. SB 221 differs from SB 610 in that "sufficiency" is determined by considering the availability of water over the past 20 years, the applicability of any urban water shortage contingency analysis prepared pursuant to Water Code Section 10632, the reduction in water supply allocated to a specific use by an adopted ordinance, and the amount of water that can be reasonably relied upon from other water supply projects, such as conjunctive use, reclaimed water, water conservation, and water transfer. In most cases, the Water Supply Assessment prepared under SB 610 meets the requirement for proof of water supply under SB 221.

California Green Building Standards Code

California Code of Regulations Title 24, Part 11, establishes the California Green Building Standards Code or CALGreen Code. The CALGreen Code was updated in ~~2013~~ 2019 and went

into effect January 1, ~~2014~~ 2020. The CALGreen Code sets forth water efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures.

Governor Brown's Executive Order B-29-15

On April 1, 2015, Governor Brown issued Executive Order B-29-15, finding that, among other things, "…conditions of extreme peril to the safety of persons and property continue to exist in California due to water shortage and drought conditions…" and ordering that, among other things, the "State Water Resources Control Board shall impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage through February 28, 2016. These restrictions will require water suppliers to California's cities and towns to reduce usage as compared to the amount used in 2013. These restrictions should consider the relative per capita water usage of each water suppliers' service area, and require that those areas with high per capita use achieve proportionally greater reductions than those with low use." On July 15, 2015, the SWRCB released the water-use-reduction targets that were imposed on each individual urban water supplier. Then, based on rainfall, the reduction targets were revised, and the new targets became effective March 1, 2016. The City's reduction target reflects the state-wide standard.

State Water Resources Control Board Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems

The Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SWRCB Order No 2006-0003-DWQ) applies to sanitary sewer systems that are greater than 1 mile long and collect or convey untreated or partially treated wastewater to a publicly owned treatment facility. The goal of Order No. 2006-0003 is to provide a consistent state-wide approach for reducing Sanitary Sewer Overflows (SSOs), accidental releases of untreated or partially treated wastewater from sanitary sewer systems, by requiring that:

1. In the event of an SSO, all feasible steps must be taken to control the released volume and prevent untreated wastewater from entering storm drains, creeks, etc.
2. If an SSO occurs, it must be reported to the SWRCB using an online reporting system developed by the SWRCB.
3. All publicly owned collection system agencies with more than 1 mile of sewer pipe in the state must develop a Sewer System Management Plan (SSMP), which must be updated every 5 years.

e. Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The last Construction General Permit amendment

became effective on February 16, 2012. The Construction General Permit regulates construction site storm water management. Dischargers whose projects disturb 1 or more acres of soil, or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents. The SWPPP is required to identify specific Best Management Practices (BMPs) that would be implemented to control drainage from project sites.

State Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development (LID) Policy which, at its core, promotes the idea of "sustainability" as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage storm water. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed Phase I municipal storm water NPDES permits.

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. The Act was adopted in an effort to reduce the volume and toxicity of solid waste that is landfilled and incinerated by requiring local governments to prepare and implement plans to improve the management of waste resources. AB 939 required each of the cities and unincorporated portions of the counties to divert a minimum of 25 percent of the solid waste sent to landfills by 1995, and 50 percent by the year 2000. To attain goals for reductions in disposal, AB 939 established a planning hierarchy using new integrated solid waste management practices. These practices include source reduction, recycling and composting, and environmentally safe landfill disposal and transformation.

Other state statutes pertaining to solid waste include compliance with the California Solid Waste Reuse and Recycling Act of 1991 (AB 1327), which requires adequate areas for collecting and loading recyclable materials within a project site.

Assembly Bill 341

On October 6, 2011, Governor Brown signed AB 341 establishing a state policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring the California Department of Resources Recycling and Recovery (CalRecycle) to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012.

f. Local Plans, Policies, and Regulations

La Habra General Plan

City of La Habra General Plan policies relevant to utilities, service systems, and water supply include the following.

Chapter 2, Community Development

LU 17.9 Stormwater Facilities. Work with the Orange County Flood Control District to ensure that structures channeling or retaining water be designed and constructed of materials and colors so as to blend with the natural environment.

Chapter 4, Infrastructure

WS 1.1 Urban Water Management Plan. Implement the City's Urban Water Management Plan to ensure adequate water supply.

WS 1.3 Adequate Water Infrastructure. Ensure that the City's potable water infrastructure is sized adequately for storage capacity and treatment to serve existing and future projected demands.

WS 1.7 New Water Facility Design. Ensure that water utility facilities are designed to be safe, aesthetically pleasing, and compatible with adjacent uses.

WS 2.1 Water Conservation Standards and Programs. Implement water conservation standards and programs during non-shortage conditions that reduce water consumption through conservation, reasonable and beneficial use of water, and prevention of water waste and implement water supply shortage actions during declared water shortage, including reducing water use during times of emergency.

WS 2.3 Water Efficient Landscaping. Encourage the use of water efficient landscaping (e.g., drought and fire-resistant landscaping and native vegetation) in new construction and rehabilitation projects.

WS 2.4 Water Conservation Irrigation. Require water conservation irrigation methods such as drip irrigation, soil moisture sensors, and automatic irrigation systems in new construction and rehabilitation projects.

WS 2.5 Water Conservation Devices. Require compliance with state laws for water conservation devices such as low flush toilets, self-closing faucets, and pressure reducing valves in all new and major renovated structures.

SS 1.2 Peak Flow Service. Provide sufficient wastewater conveyance, pumping, and treatment capacity for peak sewer flows and infiltration.

SS 1.4 Adequate Wastewater Facilities. Coordinate with the Orange County Sanitation District (OCSD) to provide adequate collection, supply, treatment, and disposal of wastewater to meet the demands of existing and future development.

SS 1.6 Wastewater Best Practices. Work with OCSD to identify and implement, as feasible, best practices and technologies for wastewater collection and treatment including those that reduce the amount of wastewater requiring treatment, avoid sewage spills affecting stream courses and reservoirs, maintain the highest possible energy efficiency, and reduce costs and greenhouse gas emissions.

SS 1.7 New Development. Ensure that new development constructs, dedicates, and/or pays its fair share contribution to the wastewater treatment and collection system necessary to serve the demands created by the development.

SD 1.1 Storm Drain Master Plan. Implement the City's Storm Drain Master Plan to ensure an adequate storm drainage system.

SD 1.3 Adequate Storm Drainage Infrastructure. Ensure that the City's storm drainage culverts, channels, and facilities are adequately sized, maintained, and upgraded to adequately convey stormwater runoff and prevent flooding for existing and new development.

SD 1.4 Facility Design. Design stormwater drainage systems to be environmentally sustainable, appear natural in character, and to be compatible with surrounding uses.

SD 1.7 Drainage Channels. Maintain storm drainage channels to adequately convey stormwater.

SD 1.9 No Net Increase. Require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.

WR 1.2 AB 939 and 50 Percent Diversion. Continue to partner, plan for, and document compliance with AB 939 source reduction and recycling requirements of 50 percent diversion of solid waste from landfills.

WR 1.4 Waste Diversion. Require recycling, composting, and waste separation to reduce the volume and toxicity of solid wastes sent to landfill facilities, with the objective of diverting non-hazardous waste through source reduction, reuse, and recycling.

WR 1.6 New Construction and Recycled Materials Use. Encourage the use of recycled materials in new construction through the continued enforcement of the California Green Building Standards Code.

WR 1.7 Adaptive Reuse of Existing Buildings. Promote the adaptive re-use and integration of existing buildings in new development projects in lieu of demolition unless they are structurally deficient, inconsistent with the spatial needs and functions of the new use, consume excessive energy and water, and/or financially infeasible.

WR 4.1 Recycling and Reuse of Construction Waste. Continue to enforce the waste management plan for certain construction and demolition projects to reduce landfill waste by diverting a minimum of 50 percent of the construction and demolition debris (e.g., concrete, asphalt paving, asphalt roofing, lumber, gypsum board, rock, and soil).

Chapter 6, Conservation/Natural Resources

W 1.1 Protection of Water Resources. Work with Orange County Public Works, private property owners, neighboring jurisdictions, and others as necessary to conserve undeveloped open space areas and natural drainage channels for the purpose of protecting water quality, groundwater recharges, and stormwater management in the City's watershed and waterbodies including Coyote Creek and La Mirada Creek.

W 1.5 New Development and Post-Development Stormwater Runoff. Require new development and post-development stormwater runoff to control sources of pollutants and improve and maintain urban runoff water quality through site design, stormwater treatment and protection measures, and best management practices (BMPs) consistent with the City's National Pollutant Discharge Elimination System (NPDES) Permit.

Chapter 7, Community Safety

NH 3.5 City Storm Drains. Design and construct storm drains per Orange County Public Works' standards and ensure that City-owned storm drains are operated and maintained to allow for maximum capacity of the system.

La Habra Municipal Code

Chapter 15.78 of the La Habra Municipal Code, Waste Management Plan for Certain Construction and Demolition Projects within the City, aims to reduce landfill waste from construction and demolition projects by requiring a minimum of 50 percent of construction and demolition debris be diverted from landfills in compliance with state and local statutory goals and policies. Covered projects include residential additions, tenant improvements, new structures of 1,000 square feet or more, demolition of 1,000 square feet or more, all City and public works, and City public construction projects. All covered projects are required to complete and submit a waste management plan. Compliance with provisions of Chapter 15.78 is a condition of approval on all building or demolition permits issued for a covered project.

Municipal Code Chapter 13.10 defines responsibility for maintenance, repair and upkeep of main sewer, house sewer and connecting sewer lines; parameters for sewer design; and establishes restrictions of what materials may be deposited to sewer systems.

3.17.3 ENVIRONMENTAL SETTING

a. Wastewater/Sewer Treatment and Service

City of La Habra and Regional Sewage Collection and Treatment Facilities

Wastewater collection and treatment service to the project site is provided by the City (local sewer lines, trunk sewer line) and the Orange County Sanitation District (OCSD) for trunk sewers and wastewater treatment.

The City's existing sewer system is a network of gravity sewers consisting of approximately 125 miles of pipe. The majority of the local sewers, including sewers serving the project site, tie into the OCSD trunk system in Imperial Highway and Beach Boulevard. The sewage is transported southwestward out of the city.

The City of La Habra service area is at the northern end of OCSD's Revenue District 3. The OCSD sewer system collects wastewater through an extensive system of gravity flow sewers, pump stations, and pressurized sewers (i.e., force mains). The sewer system consists of a series of trunk lines ranging from 12 to 96 inches in diameter. The majority of the sewage generated in the City is conveyed to one of two OCSD trunk sewers: (1) the Imperial Relief Interceptor in Imperial Highway, or (2) the Miller Holder Trunk Sewer in Beach Boulevard. The City currently does not have the infrastructure or capacity to use recycled water from the sewer collection system.

Sewage from the project site is treated at OCSD's Reclamation Plant No. 2, located adjacent to the Santa Ana River approximately 1,500 feet from the Pacific Ocean in Huntington Beach. This

plant provides a mix of advanced primary and secondary treatment. Approximately 33 percent of the influent receives secondary treatment through an activated sludge system, and all of the effluent is discharged into the ocean disposal system. OCSD's treated wastewater is discharged through a 120-inch outfall at 200 feet below sea level and nearly 5 miles off-shore. Current capacity for Reclamation Plant No. 2 is 168 million gallons per day (mgd) of primary treated wastewater and 90 mgd of secondary treated wastewater. The current average flow is 151 mgd; thus, remaining capacity at this plant is approximately 17 mgd. Expansion plans by OCSD are ongoing and designed to address the incremental increase in sewage generation as a result of new development. The secondary treatment capacity at this plant is currently being increased by 60 mgd for a future total secondary treatment capacity of 150 mgd.

Existing Sewer Lines Serving Project Site

Sewer lines serving the project site (Westridge Golf Club) include a 39-inch OCSD trunk line within Beach Boulevard near Hillsborourgh Park Apartment Homes, a 36-inch OCSD trunk line in Imperial Highway at the intersection of Imperial Highway and La Habra Hills Drive, and an 8-inch City sewer line in Idaho Street. The existing 8-inch sewer line in Idaho Street joins the OCSD trunk line in Imperial Highway. Existing Westridge residential Tracts 15030 and 15031, located south of the project site, tie into the local sewer system through the project site.

b. Water Facilities and Supply

Existing Water Facilities

Several different water pressure zones surround the project site. The existing system within Beach Boulevard, Imperial Highway, La Habra Hills Drive, and Idaho Street is within Zone 1 (548 hydraulic grade line [HGL][1]), which serves the golf course. Zone 1 is served by two reservoirs: Puente Hills (5.9 million gallons) and Sev Byerrum (9.3 million gallons).

Water Supply

The City's water supply currently consists of (1) imported groundwater from the Main San Gabriel Basin, supplied through the California Domestic Water Company (CDWC); (2) local groundwater from the La Habra Basin; and (3) imported water from the Metropolitan Water District of Southern California (Metropolitan), supplied through the Municipal Water District of Orange County (MWDOC).

The imported groundwater supply from CDWC provides approximately 60 percent of the City's water supply. CDWC is a mutual water company and wholesale provider that supplies groundwater from the Main San Gabriel Basin to each of its member agencies that own and/or

[1] Hydraulic grade line (HGL) is the level that water would rise to in a small, vertical tube connected to the pipe.

lease stock in the company. Local groundwater comprises 38 percent of the City's water supply. Local groundwater is pumped from the La Habra Basin by the City-owned Idaho Street Well. The remainder of the City's water supply (2 percent) is imported from Metropolitan via MWDOC. The imported water from Metropolitan is a blend of (1) Colorado River water from Lake Mathews, and (2) State Water Project water, which flows through the Yorba Linda Feeder and is then treated at the Robert B. Diemer Filtration Plant located north of Yorba Linda.

The City is committed to reducing dependency on imported water from Metropolitan by implementing upgrades to the local groundwater extraction system and the CDWC supply system. Through the upgrades, the City has increased imported CDWC supply from 57 percent to 60 percent and local groundwater production from 23 percent to 38 percent. This has decreased the City's dependence on Metropolitan water by 18 percent of the City's water supply.

Existing Golf Course Water Use

Golf courses typically require a large supply of water to maintain the substantial amount of turf. The Westridge Golf Club property consists of approximately 151 acres, of which approximately 50 percent is turf area associated with the 18-hole golf course. Another 13 percent (20 acres) of the property consists of slopes that are irrigated by the homeowners' association for the residential neighborhoods immediately south of the project site.

The Water Supply Assessment prepared for the proposed Project used water meter data from the Westridge Golf Club from November 2010 through March 2015 to establish a baseline of existing water demand at the project site. During this period, the golf course had four water meters: a golf course irrigation meter, a clubhouse meter, a maintenance building meter, and a fire flow meter. All four meters use potable water from the City's potable water supply. The water used for irrigation was found to be 94 to 97 percent of the golf course's total water usage in winter months and typically over 99 percent of the total water usage during the summer months, when water usage was greatest. The water usage of the four meters was combined to determine the total usage by the golf club. Yearly water usage is summarized in **Table 3.17-1**. As indicated in the table, the annual golf course water demand increased from 257 AF in 2011 to 302 AF in 2014, or approximately 17.5 percent over the three-year period. Using the four years of data provided, the average yearly water usage of the golf course was calculated to be 276 acre-feet per year (AFY) from 2011 through 2014.

Table 3.17-1
Existing Westridge Golf Club Water Use

Year	Minimum Monthly Demand (AF)	Maximum Monthly Demand (AF)	Total Annual Demand (AF)
2011	3.3	41.3	257
2012	1.0	51.2	262
2013	6.2	63.1	283
2014	3.0	58.8	302
Average	-	-	276

Note: AF = acre feet
Source: Rancho La Habra Water Supply Assessment, 2016.

c. Drainage Facilities

Runoff from the project site is conveyed as sheet flow northerly and westerly, where it is collected by an underground storm drain system that outlets into the various water features throughout the golf course before discharging to the City's existing 48-inch storm drain system within Imperial Highway and its 60-inch storm drain system within Beach Boulevard. Runoff is then conveyed southwesterly in these systems and discharged into Coyote Creek, which is located approximately 400 feet to the west of the site on the west side of Beach Boulevard, before discharging to the San Gabriel River, Alamitos Bay, San Pedro Bay, and the Pacific Ocean.

As discussed in Section 3.13, *Hydrology and Water Quality*, the existing storm drain under Beach Boulevard is substandard in size. Under existing conditions, in the 25-year storm, 254 cubic feet per second (cfs) of runoff pass through the golf course in a 48-inch pipe from the Westridge community. Another 140 cfs are conveyed through an existing 48-inch pipe from off-site areas to the south. The design capacity of the existing 48-inch pipe under Beach Boulevard is approximately 101 cfs and the 25-year peak storm event is approximately 320 cfs.

Existing topography divides the project site into seven distinct drainage areas—'A', 'B', 'C', 'D', 'E', 'F', and 'G'—with Coyote Creek flowing from northeast to southwest behind the existing commercial/industrial and residential properties located west of Beach Boulevard (see **Figure 3.13-1** in Section 3.13, *Hydrology and Water Quality*).

In 1999, when the project site was graded and the Westridge Golf Club was constructed, it was designed to accept storm water drainage from the residential neighborhoods to the south. Two residential tracts (Westridge Tracts 15030 and 15031) were developed south of the golf course and their off-site storm drain system was integrated into the golf course design. A portion of the runoff from both of these tracts co-mingles with existing water features along the golf course fairways. The water features were intended to act as retarding basins, ultimately mitigating the increase in storm water runoff associated with the development of both the residential tracts and the golf course.

d. Solid Waste Management

Municipal Solid Waste Collection

Currently, CR&R Incorporated has a contract with the City to provide solid waste hauling services in La Habra. CR&R provides weekly pickup for customers throughout the City. The City of La Habra Refuse and Recycling Division oversees the waste collection services, as well as the many recycling programs the City offers. CR&R operates a transfer and materials recovery facility, as well as a public buy-back facility in the City of Stanton. These facilities handle and sort trash, recyclables, construction and demolition materials, and green waste.

Solid Waste Disposal Sites

OC Waste & Recycling operates Orange County's three active landfills and manages other solid waste activities for the County, including four regional household hazardous waste collection centers. The landfills are the Frank R. Bowerman Landfill near Irvine, the Olinda Alpha Landfill near Brea, and the Prima Deshecha Landfill in San Juan Capistrano. All three landfills are designated as Class III landfills and have combined permitted throughput of 23,500 tons per day (OCWR, 2017). Class III landfills accept only non-hazardous municipal solid waste for disposal; no hazardous or liquid waste can be accepted. The City is served by the Olinda Alpha Landfill. **Table 3.17-2** shows the anticipated closure date, daily permitted capacity, and available daily amount of waste accepted for all three local landfills.

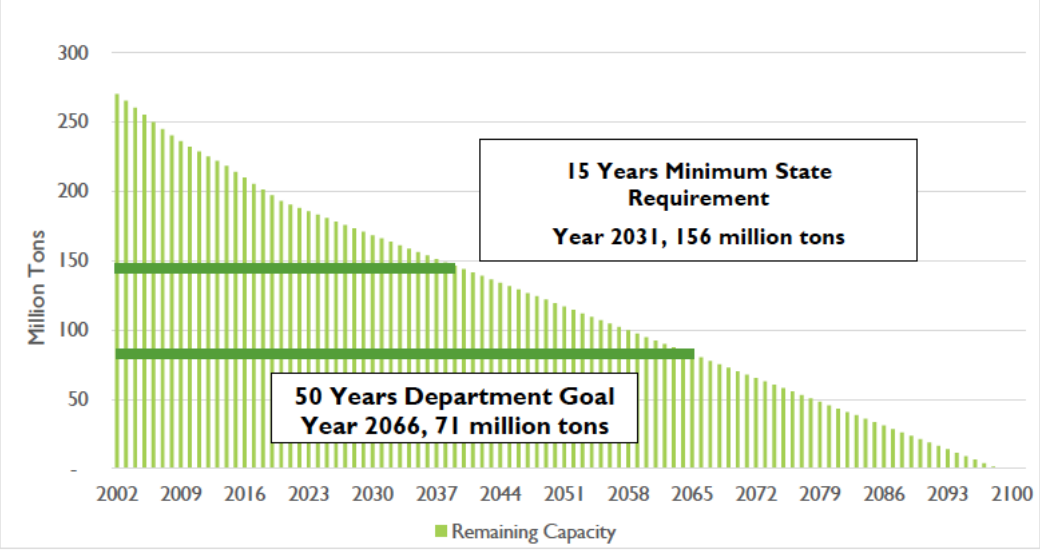
Table 3.17-2
Existing Landfill Conditions

Landfill	Location	Scheduled Closure Year	Permitted Maximum (tons/day)	Average Accepted (tons/day)	Remaining Capacity (tons/day)
Olinda Alpha[a]	Brea	2030	8,000	7,000	1,000
Frank R. Bowerman	Irvine	2053	11,500	6,300-6,700	4,800-5,300
Prima Deshecha	San Juan Capistrano	2067	4,000	1,500-2,000	2,000-2,500

[a] Most likely to serve the project site.
Sources OC Waste & Recycling Strategic Plan, 2016.

At the end of fiscal year 2015-16, the disposal system had approximately 212 million tons of remaining capacity. In 15 years (2031), the disposal system is projected to have 156 million tons of remaining disposal capacity. OC Waste & Recycling's current goal is to maintain 50 years of system life so that, by 2066, the disposal system is expected to have 71 million tons of remaining capacity. **Figure 3.17-1** shows the projected capacity through the life of the disposal system.

Figure 3.17-1 Projected Orange County Landfill Capacity



3.17.4 SIGNIFICANCE CRITERIA

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of utilities, service systems, and water supply impacts. Based on Appendix G of the CEQA Guidelines the proposed Project would have a significant effect if it were to:

Threshold UTI-1: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;

Threshold UTI-2: Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;

Threshold UTI-3: Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;

Threshold UTI-4: Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements;

Threshold UTI-5: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

Threshold UTI-6: Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs; or

Threshold UTI-7 Fail to comply with federal, state, and local statutes and regulations related to solid waste.

3.17.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold UTI-1: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board

Impact UTI-1: Because proposed land uses would not discharge wastewater that contains harmful levels of chemicals and would not exceed the capacity of Orange County Sanitation District (OCSD) Reclamation Plant No. 2, implementation of the proposed Specific Plan would not exceed applicable wastewater treatment requirements, and the impact would be *less than significant*.

Methodology

The analysis related to wastewater treatment requirements identifies the types of wastewater that are anticipated to be generated by implementation of the proposed Specific Plan, and regulations related to wastewater. Impacts would be considered significant if implementation of the proposed Specific Plan would not comply with, would be in conflict with, or would exceed regulations related to wastewater, such that a substantial adverse physical effect on the environment would result.

Impact Assessment

The proposed Specific Plan would replace the existing Westridge Golf Club with 402 residential dwelling units, 20,000 square feet of commercial building area, and parks and open space uses, including conversion of the existing golf course clubhouse to a Community Center. Proposed project site development would result in increased generation of wastewater. Wastewater generated by proposed Specific Plan development would be treated at OCSD's Reclamation Plant No. 2, for which wastewater treatment requirements have been established by the Santa Ana RWQCB. Waste discharge requirements for the facility are based on all applicable state and federal regulations, policies, and guidelines, and include limitations on effluent discharge and receiving water. In general, waste effluent discharge requirements include specifications for adequate disinfection treatment and limitations on radioactivity, pollutant concentrations, sediments, pH, temperature, and toxicity. Receiving water requirements include limitations related to temperature, sediments, pH, dissolved oxygen, fecal coliform and other pollutant concentrations, water clarity and color, turbidity, and toxicity. Additionally, the City has established sewer discharge standards (pursuant to Municipal Code Section 13.10.050).

The land uses proposed by the Specific Plan, which include residential, retail, and open space, would not discharge wastewater that contains harmful levels of toxins that are regulated by the Santa Ana RWQCB (such as large quantities of pesticides, herbicides, oil, grease, or other chemicals that are more typical in agricultural and industrial uses), and all effluent would comply with the wastewater treatment standards of the RWQCB and the City's Municipal Code and permitting process. Furthermore, as discussed in **Impact UTI-5** below, wastewater generated by the Specific Plan would not exceed the existing capacity of OCSD's Reclamation Plant No. 2.

Significance Conclusion for Impact UTI-1

Because proposed land uses would not discharge wastewater that contains harmful levels of chemicals and would not exceed the capacity of OCSD's Reclamation Plant No. 2, implementation of the proposed Specific Plan would not exceed applicable wastewater treatment requirements, and the impact would be less than significant.

Threshold UTI-2: **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

Impact UTI-2.1: **Construction of needed water infrastructure would not result in any on-site physical effects on the environment other than those that are analyzed as part of development of proposed residential and commercial uses (e.g., site grading). In addition, off-site improvements, other than connections to existing water lines adjacent to the project site, would not be needed. The off-site connections to existing water lines would occur exclusively within existing road rights-of-way. While such connections would require roadway lane closures during construction, such closures would be temporary and subject to standard City and Caltrans requirements to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of water facilities would be *less than significant*.**

Methodology

An evaluation of the physical environmental effects of proposed water improvements was undertaken to determine whether those effects would be considered significant in relation to the physical environmental effects analyzed throughout this EIR.

Impact Assessment

The Water System Hydraulic Analysis (Hunsaker Associates 2016) prepared for the proposed Specific Plan identifies existing water infrastructure in the Specific Plan area, as well as proposed water system improvements. Other than the on-site water lines to serve proposed dwellings and commercial uses, the only physical water system improvements determined to be required for the proposed Project were two connections to the existing 8-inch water main in Beach Boulevard, one connection to the existing 8-inch water main in La Habra Hills Drive, and one connection to the existing 8-inch water main in Idaho Street. Each of these connections would be made within existing roadway rights-of-way adjacent to the project site. Temporary roadway lane closures would be required during construction.

Based on discussion with Brian Jones, City of La Habra Sewer and Water Manager, and modeling prepared for the proposed Project, the Water System Hydraulic Analysis concluded that there is sufficient capacity in the City's Zone 1 water system to provide adequate service to the proposed Project. While the existing system has capacity to serve the proposed Project, the

zone break valve at Junction 34, which has been closed by the City, would need to be opened and the existing valve at Junction 56 would need to be closed.

Significance Conclusion for Impact UTI-2.1

Construction of needed water infrastructure would not result in any physical effects on the environment other than those that would occur as the result of development of proposed residential and commercial uses (e.g., site grading). In addition, off-site improvements, other than connections to existing water lines adjacent to the project site, would not be needed. While the connections to existing water lines would require roadway lane closures during construction, such closures would be temporary and subject to standard City and Caltrans (for Beach Boulevard) requirements for utility work within road rights-of-way to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of water facilities would be less than significant.

Threshold UTI-2:	**Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**
Impact UTI-2.2:	**Construction of needed sewer infrastructure would not result in any on-site physical effects on the environment other than those analyzed as part of development of proposed residential and commercial uses (e.g., site grading). In addition, the necessary off-site sewer improvements would occur exclusively within existing road rights-of-way. While such connections would require roadway lane closures during construction, the closures would be temporary and subject to standard City and Caltrans requirements to ensure public safety and minimal disruption of roadway operations. As a result, impacts related to construction of sewer facilities would be *less than significant*.**

Methodology

An evaluation of the physical environmental effects of proposed sewer improvements was undertaken to determine whether those effects would be considered significant in relation to the physical environmental effects analyzed throughout this EIR.

Impact Assessment

The Sewer System Hydraulic Analysis (Hunsaker Associations 2016) prepared for the proposed Specific Plan identifies existing sewer infrastructure in the Specific Plan area, as well as proposed sewer system improvements. Other than on-site sewer lines to serve proposed

dwellings and commercial uses, the only physical sewer system improvements required for the proposed Project were two connections to the existing 39-inch OCSD sewer trunk line in Beach Boulevard, extension of a 10-inch sewer line in La Habra Hills Drive from the northern boundary of the project site to connect to the existing 36-inch OCSD sewer trunk line in Imperial Highway, and one connection to the existing 8-inch City sewer line in Idaho Street. Each of these connections, including extension of the sewer line along La Habra Hills Drive, would be made within existing road rights-of-way. Temporary roadway lane closures would be required during construction.

Modeling of the proposed sewer system for the Specific Plan was undertaken and was reviewed by OCSD, which confirmed that the OCSD collection system has the capacity to accept flows from the proposed Project by analyzing projected peak wet weather flows using a 10-year storm event, while also considering infiltration and inflow.

The sewer system's ability to serve the proposed Project was confirmed in email correspondence from OCSD Planning on January 4, 2016. The correspondence is included as an appendix to the Sewer System Hydraulic Analysis.

Significance Conclusion for Impact UTI-2.2

Construction of needed sewer infrastructure would not result in any on-site physical effects on the environment other than those that would occur as the result of development of proposed residential and commercial uses (e.g., site grading). In addition, off-site connections to existing sewer lines would occur exclusively within existing road rights-of-way. While such connections would require roadway lane closures during construction, such closures would be temporary and subject to standard City and Caltrans (for Beach Boulevard and Imperial Highway) requirements for utility work within road rights-of-way to ensure public safety and minimal disruption to roadway operations. As a result, impacts related to construction of sewer facilities would be less than significant.

Threshold UTI-3:	**Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**
Impact UTI-3:	**Construction of needed drainage infrastructure would not result in any on-site physical effects on the environment other than those that would occur as the result of development of proposed residential and commercial uses (e.g., site grading). In addition, the off-site construction of a 48-inch storm drain connection under Beach Boulevard would occur exclusively within existing rights-of-way. By using jack and bore, this construction would**

not cause lane closures or traffic interruptions. Boring for the storm drain would occur within an existing right-of-way in ground that was largely previously disturbed for construction of an adjacent storm drain. The equipment used in the jack and bore operation would generate less noise than the on-site grading operations analyzed in Section 3.11, Noise and Vibration. As a result, impacts related to construction of drainage facilities would be *less than significant*.

Methodology

An evaluation of the physical environmental effects of proposed drainage improvements was undertaken to determine whether those effects would be considered significant in relation to the physical environmental effects analyzed throughout this EIR.

Impact Assessment

To handle increased runoff from the project site resulting from increased impervious surface area to be constructed as part of the proposed Project, a series of proposed water quality basins and detention basins would be provided to ensure that flow rates would be reduced to be equal to or less than the existing flow rates.

Since the proposed Project would increase the amount of impervious surface, and therefore increase peak runoff, the project would include construction of on-site detention facilities consisting of two open detention basins, a re-constructed pond that provides stormwater detention, and subsurface treatment facilities that provide detention. As discussed in Section 3.13, *Hydrology and Water Quality*, and the project hydrology study (see Appendix N), proposed drainage facilities would attenuate peak storm flows equal to or below existing conditions in all but two locations. The existing 42-inch storm drain line that serves Drainage Areas 'D' and 'E' has additional capacity available to accommodate the increase of 3.7 cfs in this location. The downstream receiving water body in this location is an engineered and maintained channel that is not susceptible to hydraulic conditions of concern. Therefore, increased flows would be accommodated in Drainage Areas 'D' and 'E' without creating flooding conditions. The second location is Drainage Area 'A', adjacent to Beach Boulevard, where the existing 48-inch storm drain is not sufficiently sized to accommodate proposed Project development. In this location, a detention basin and underground storage detain the majority of the peak flows; however, the project hydrology analysis recommends construction of a second 48-inch storm drain across Beach Boulevard to accommodate peak flows.

Construction of a new 48-inch storm drain would be accomplished by "jack and bore" under Beach Boulevard. Two pits would be dug on either side of Beach Boulevard and the new 48-inch pipe would be pushed underneath the roadway. Once across, the pipe would be

connected to an existing 60-inch storm drain on the west side of Beach Boulevard. On the project side, the new storm drain pipe would connect to the outlet of the detention basin. The new storm drain pipe would be located at the same elevation and next to the existing pipe to avoid conflicts with other utilities in Beach Boulevard. By using jack and bore, the construction would not require lane closure. The equipment used to push the pipe underneath the street would be located within the project site and within a pit, shielded from line of sight to sensitive receptors on the west side of Beach Boulevard. Similarly, the jack and bore activity would include a horizontal drilling machine to auger under the street. This machine is smaller in size and horsepower than most grading equipment. This activity would occur as part of utility trenching.

Significance Conclusion for Impact UTI-3

Construction of needed drainage infrastructure would not result in any on-site physical effects on the environment other than those that would occur as the result of development of proposed residential and commercial uses (e.g., site grading). In addition, the off-site construction of a 48-inch storm drain connection under Beach Boulevard would occur exclusively within existing rights-of-way.

By using jack and bore, the construction would not cause lane closures or traffic interruptions. Boring for the storm drain would occur within an existing right-of-way in ground that was largely previously disturbed for construction of an adjacent storm drain. The equipment used to push the pipe underneath the street would be located within the project site and within a pit, shielded from line of sight to sensitive receptors on the west side of Beach Boulevard, and a horizontal drilling machine that is smaller in size and horsepower than most grading equipment would be used to auger under the street, thereby reducing noise impacts to below those of the on-site grading operations analyzed in Section 3.11, *Noise and Vibration*. As a result, impacts related to construction of drainage facilities would be less than significant.

Threshold UTI-4:	**Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.**
Impact UTI-4:	**Development under the proposed Specific Plan would require approximately 101 acre-feet (AF) less water annually than the existing golf course use. In addition, because La Habra's water supplies are adequate to meet projected demands in normal, dry, and multiple dry years through 2040 even without the proposed Project, new or expanded entitlements would not be needed. Therefore, *no impact* would result.**

Methodology

The analysis in this section focuses on the nature and magnitude of the change in levels of water use resulting from build-out of the proposed Specific Plan. To determine whether a significant impact would result, existing golf course water use was compared to the projected water demand over the 20-year horizon of the proposed Specific Plan. Projected water demand for the proposed Specific Plan was then compared to future available supplies from existing entitlements and resources, including projected availability of groundwater supplies and imported water supply. If the projected water demand that would result from build-out of the Specific Plan would exceed existing water entitlements and resources, new or expanded water supply entitlements would be required, and a significant impact would result.

Impact Assessment

Water Demand

As shown in **Table 3.17-3** below, estimated water demand for the proposed Project would be 175.2 AF annually. By comparison, water demand for the existing golf course has averaged 276 AF annually.

Reliability of Water Supply

The City of La Habra's 2015 Urban Water Management Plan identifies three sources of water for the City: (1) imported groundwater from CDWC, (2) imported water from Metropolitan, and (3) local groundwater from the La Habra Basin. Through the Urban Water Management Plan, the City has determined that a sufficient supply of water would be available to serve its customers through 2040. **Table 3.17-4** provides a comparison of projected demand to projected supply through 2040 for a normal year, including the reduction in demand from the proposed Project. **Table 3.17-5** for dry and multiple dry years, including the reduction in demand from the proposed Project.

Since the proposed development would reduce the demand on potable water in the City by approximately 101 AFY, the Water Supply Assessment determined that the 20-year supply, which was found sufficient to meet the City's demand estimated in the 2015 Urban Water Management Plan, would remain sufficient for the City with implementation of the proposed project. Thus, there are sufficient water supplies for the next 20 years to meet the water demand city-wide in consideration of the project's proposed demand and discontinuation of water use at the Westridge Golf Club.

Table 3.17-3
Estimated Project Water Use

Per Capita Water Use	Number of Units	People/ Unit	Population	Per Capita Daily Water Use (Gallons)	Daily Water Use (Gallons)	Annual Water Use (AF)
Indoor Water Use						
Single-Family – Indoor Use	277	3.25	900	45	40,511	45
Multi Family – Indoor Use	145[2]	3.25	471	45	28,373	18
Community Center – Indoor Use	-	-	150	15	2,250	3
Subtotal, Indoor Water Use	-	-	-	-	-	66
Outdoor Water Use						
Land Use	**Number of Units**	**Area (Square Feet per Unit)**	**Area (Acres)**	**% Irrigated**	**Water Demand (AFY per Acre)**	**Yearly Usage (AFY)**
Single-Family Yard	277	900	5.7	100	0.49	11.8
Multi-Family Yard	145[2]	250	1.1	100	0.49	2.3
Private Open Space (Show)	-	-	6.6	100	0.53	14.6
Private Open Space (Trans)	-	-	19.7	100	0.27	22.0
Public Community Center and Park	-	-	7.6	75	0.49	11.7
Public Park and Picnic Area (shrubs)	-	-	4.5	100	0.53	10.0
Public Park and Picnic Area (turf)	-	-	4.5	100	0.93	17.5
Public Linear Park	-	-	11.6	75	0.27	9.7
Private Park	-	-	0.2	100	0.53	0.5
Subtotal, Outdoor Water Use	-	-	-	-	-	100.0
Commercial Water Use						
		Employees		**Per Capita Water Use (Gallons)**	**Total Daily Water Use (Gallons)**	**Yearly Water Use (AF)**
Commercial		100		83	8,300	9.2
TOTAL WATER USE						**175.2**

Notes: AF = acre feet; AFY = acre feet per year
Source: PACE, 2016. *Water Supply Assessment*.

[2] Following preparation of the Rancho La Habra Water Supply Assessment, the proposed project was reduced from 145 to 125 multi-family dwelling units. Thus, the Water Supply Assessment presents a worst case analysis.

Table 3.17-4
Projected Annual City of La Habra Normal Year Water Supply and Demand, 2020-2040

Fiscal Year	Total Annual Demand (AF)	Reduced Demand from Elimination of Golf Course (AF)	Annual Demand: Rancho La Habra (AF)	Total Annual Demand (AF)	Projected Annual Supply (AF)
2020	8,606	276	175	8,505	8,606
2025	9,152	276	175	9,051	9,152
2030	9,165	276	175	9,064	9,165
2035	9,182	276	175	9,081	9,182
2040	9,158	276	175	9,057	9,158

Note: AF = acre feet
Source: Rancho La Habra Water Supply Assessment, 2016.

Table 3.17-5
Projected Annual City of La Habra Multiple Dry Years Water Supply and Demand, 2020-2040

Fiscal Year	Total Annual Demand (AF)	Reduced Demand from Elimination of Golf Course (AF)	Annual Demand: Rancho La Habra (AF)	Total Annual Demand (AF)	Projected Annual Supply (AF)
2020	9,122	292	186	9,016	9,122
2025	9,701	292	186	9,595	9,701
2030	9,715	292	186	9,609	9,715
2035	9,733	292	186	9,627	9,733
2040	9,707	292	186	9,601	9,707

Note: AF = acre feet
Source: Rancho La Habra Water Supply Assessment, 2016.

The City's Urban Water Management Plan evaluated the reliability of La Habra's water supplies through 2040 and concluded that water supplies are adequate to meet projected demands in normal, dry, and multiple dry years through 2040.

Significance Conclusion for Impact UTI-4

Because proposed residential, commercial, and open space uses would consume approximately 101 AF less water annually than the existing golf course use, and the City's 2015 Urban Water Management Plan demonstrates that water supplies are adequate to meet projected demands in normal, dry, and multiple dry years through 2040 even without the proposed Project, no impact would result, and no mitigation is required.

Threshold UTI-5: **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.**

Impact: UTI-5: **Adequate treatment capacity is available at Orange County Sanitation District (OCSD) Reclamation Plant No. 2 to treat wastewater generated by the proposed Project in addition to OCSD's existing commitments. The Project's impact would therefore be *less than significant*.**

Methodology

The analysis of the proposed Specific Plan's impact on wastewater treatment capacity identifies the increased amount of wastewater that would be generated by the Specific Plan and the capacity of the existing wastewater treatment plant serving the Specific Plan area. Impacts would be significant if the proposed Specific Plan would result in inadequate capacity to serve increased project-related wastewater service demands in addition to existing service commitments.

Impact Assessment

As shown in **Table 3.17-6**, the proposed Project is expected to generate approximately 141,502 gallons per day (gpd) average daily flow of wastewater. The addition of 141,502 gpd of wastewater is within the available capacity of OCSD's Reclamation Plant No. 2. As noted in the La Habra General Plan EIR (City of La Habra 2014), "since General Plan buildout would generate approximately 1.098 mgd and there is approximately 17 mgd remaining capacity, there is adequate existing wastewater treatment capacity. Implementation of the General Plan would not require construction of new or expanded wastewater treatment facilities. In addition, OCSD's wastewater treatment expansion plans will provide ample capacity for the City." Thus, adequate wastewater capacity exists (17 mgd) for conversion of the existing golf course to residential and commercial use (addition of 0.141 mgd) even in light of projected buildout of the La Habra General Plan (1.998 mgd).

Table 3.17-6
Estimated Project Wastewater Generation

Proposed Land Use	Acreage	Average Daily Flows (CFS)	Average Daily Flows (GPD)	Peak Flow (CFS)
Single-Family Residential	46.1	0.11	68,597	0.27
Multi-Family Residential	7.3	0.09	54,867	0.21
Commercial	2.4	0.03	18,038	0.07
Total Wastewater Flows		**0.23**	**141,502**	**0.55**

Note: cfs = cubic feet per second; GPD - gallons per day
Source: Sewer System Hydraulic Analysis, 2016.

Significance Conclusion for Impact UTI-5

Implementation of the proposed Specific Plan would generate additional wastewater. However, adequate treatment capacity is available at OCSD Reclamation Plant No. 2 to treat wastewater generated by the proposed Project in addition to OCSD's existing commitments. The Project's impact would therefore be less than significant.

Threshold UTI-6: **Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.**

Impact UTI-6: **Because the Olinda Alpha Landfill and the Orange County landfill system have adequate daily capacity, the addition of 1.42 tons of solid waste per day from project operations would not exceed the permitted daily capacity of area landfills. Adequate daily landfill capacity also exists at area landfills to accept waste from project construction activities, which will be required to implement waste reduction programs. In addition, OC Waste & Recycling projects that, by 2066, Orange County's disposal system would have 71 million tons of remaining capacity, which is more than sufficient to accommodate the 51,900 tons of solid waste that would be generated by the project operations over this 50-year period. Thus, the proposed Project would not exceed the total capacity of area landfills, and impacts would be *less than significant*.**

Methodology

The analysis of the proposed Specific Plan's impact on landfill facilities identifies changes in the amount of solid waste that would be generated during construction and operation of the proposed Project. The analysis identifies the anticipated amount of non-hazardous construction debris and operational solid waste that would be generated from implementation of the Specific Plan and the amount that would be disposed of in landfills after compliance with applicable recycling/diversion requirements.

Solid waste generation after recycling/diversion was compared with the available capacity of the landfills serving the Specific Plan area to assess the significance of the Specific Plan's solid waste generation during construction and at build-out. Impacts were considered significant if development within the Specific Plan area would result in a substantial increase in solid waste that would exceed available landfill capacity.

Impact Assessment

Construction Waste

Project implementation would require demolition of both surface and subsurface materials that could result in disposal of solid waste at a landfill. On the surface, existing structures such as the driving range building, maintenance building, cart paths, streets, and parking lot would be demolished. These structures mostly consist of concrete, masonry, and asphalt but also include metal, driving range netting, wood, and other materials. Demolition of surface materials would also include vegetation removal.

Subsurface materials not suitable for reuse as part of project construction include buried concrete rubble and total petroleum hydrocarbon (TPH)-contaminated soils. According to old golf course plans, approximately 170,000 cubic yards of concrete rubble from oil operations were buried under the golf course. The majority of the material is concrete, but metal may also be present. As described in Section 3.12, *Hazards and Hazardous Materials*, approximately 430,000 cubic yards of soil contaminated with TPH (from previous oil operations) were also buried below the golf course.

Lastly, construction of the new residential and commercial structures could also generate construction waste. This waste may consist of materials not fully used during construction, such as wood, metal, and plastic; packaging material; and surplus pipe, rebar, wire, and roofing material.

La Habra Municipal Code Chapter 15.78 requires preparation and implementation of a Waste Management Plan for demolition and construction of the proposed Project. Municipal Code Section 15.78.040 mandates that a minimum of 50 percent of construction waste be diverted from landfills. Thus, to minimize the amount of construction debris and waste hauled to landfills, the applicant has committed to the following management strategies that would be required as conditions of project approval:

- TPH-contaminated soils would be buried deeper below the ground surface in accordance with the Soil Management Plan approved by the Orange County Health Care Agency, rather than being transported to a Class I landfill.
- All concrete, asphalt, and other masonry material from demolished buildings, roadways, or structures, or from buried stockpiles below the golf course, would be crushed on-site and reused as backfill or road base.
- Vegetation cleared from the site would be collected and taken to a green waste recycling facility for composting or mulch.

- Trash receptacles would be provided to separate recyclable materials (green waste, wood, metal, cardboard, etc.,) from non-recyclable material. Only non-recyclable materials would be taken to landfills.

The 50 percent of construction waste that is not recycled would be transported to the Olinda Alpha Landfill.

Operations Waste

As shown in **Table 3.17-7**, approximately 2.76 tons of solid waste would be generated daily by the proposed development, 1.38 tons of which would be hauled to a landfill.[3] On-site solid waste storage and handling would be required to comply with the City's Municipal Code and applicable state and federal regulations cited in Section 3.17.2, above.

Table 3.17-7
Proposed Project Solid Waste Generation

Land Use	No. of Dwelling Units or Employees	Solid Waste Generation Rate (Pounds Per Unit or Per Employee)	Pounds per Day	Tons per Day	Tons per Year
Single-Family Residential	277	12.23	3,387.7	1.69	618
Multi-Family Residential	125	8.60	1,075.0	0.54	197
Commercial (Retail and Restaurant)[a]	100	10.53	1,053.0	0.53	192
Total	**-**	**-**	**5,515.7**	**2.76**	**1,007**

[a] Should Planning Area 5 be developed with 46 dwelling units, rather than 20,000 square feet of commercial, Planning Area 5 would generate 396.6 pounds of solid waste daily, representing a reduction of 656.4 pounds of solid waste per day.
Source: Generation rates used are from the California Integrated Waste Management Board, Estimated Solid Waste https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates (July 21, 2017).

Waste generated within the Specific Plan area would continue to be hauled by CR&R to a transfer and materials recovery facility and then transported to the Olinda Alpha Landfill for disposal. As described in Section 3.17.3 above, the Orange County disposal system had approximately 212 million tons of remaining capacity as of the end of fiscal year 2015-16. OC Waste & Recycling's current goal is to maintain 50 years of system life so that, by 2066, the disposal system is expected to have 71 million tons of remaining capacity.

Significance Conclusion for Impact UTI-6

Because the Olinda Alpha Landfill currently has 1,000 tons of excess capacity per day to accept solid waste, and the Orange County landfill system has an additional 6,800 tons of daily capacity, the addition of 1.38 tons of solid waste per day from the project site would not exceed

[3] As required by current state law, a minimum of 50 percent of the solid waste generated within the project site would be diverted from being deposited in a landfill.

the permitted daily capacity of area landfills. Adequate daily landfill capacity also exists at area landfills to accept waste from project construction activities, which will be required to implement waste reduction programs to divert 50 percent of construction waste from landfills. As noted above, OC Waste & Recycling's goal is to maintain 50 years of capacity. Over the next 50 years, the proposed Project would generate 50,350 tons of solid waste, at least half of which would be recycled. As noted above, OC Waste & Recycling projects that, by 2066, Orange County's disposal system would have 71 million tons of remaining capacity. Thus, the proposed Project would not exceed the total capacity of area landfills, and impacts would be less than significant.

Threshold UTI-7	**Fail to comply with federal, state, and local statutes and regulations related to solid waste.**
Impact UTI-7:	**Implementation of the proposed Specific Plan would comply with federal, state, and local statutes and regulations related to solid waste. *No impact* would occur.**

Methodology

The analysis related to solid waste regulations identifies the non-hazardous solid waste that is anticipated to be generated during both construction and operation of the project, and the ways in which the project would implement regulations related to disposal of that solid waste.

Impacts would be considered significant if implementation of the Specific Plan would fail to comply or would be in conflict with federal, state, or local statutes or regulations related to solid waste, such that an adverse physical effect on the environment could result.

Impact Assessment

The proposed Specific Plan would result in new site-specific development that would generate an increased amount of solid waste. All solid waste-generating activities within the city are subject to the requirements set forth in AB 939, as managed by the La Habra Public Works Department, Refuse and Recycling Division and its waste hauler, CR&R Incorporated. In addition, after 2020, development would be required to divert 75 percent of solid waste pursuant to AB 341. Implementation of the proposed Specific Plan would be consistent with all state regulations as well as La Habra Municipal Code construction and demolition waste diversion requirements. All projects in the City undergo development review, which includes an analysis of project compliance with these programs. Therefore, as a result of this development review, future development under the proposed Specific Plan would comply with all solid waste policies and objectives.

Significance Conclusion for Impact UTI-7

Implementation of the proposed Specific Plan would be required to comply with City waste diversion programs and would not conflict with federal, state, or local statutes or regulations related to solid waste. Therefore, no adverse physical environmental effects would result, and no impacts related to solid waste regulations would occur.

3.17.5 REFERENCES – UTILITIES, SERVICE SYSTEMS, AND WATER SUPPLY

Arcadis U.S., Inc., *2015 Urban Water Management Plan, City of La Habra*, May 2016.

City of La Habra, *City of La Habra General Plan 2035*, adopted January 21, 2014.

City of La Habra, *City of La Habra, Final Environmental Impact Report for: General Plan 2035*, certified January 21, 2014.

Hunsaker Associates, *Sewer System Hydraulic Analysis*, September 2016.

Hunsaker Associates, *Water System Hydraulic Analysis*, September 2016.

Orange County Waste & Recycling, *Strategic Plan*, November 22, 2016.

Pacific Advanced Civil Engineering (PACE), *Water Supply Analysis, Rancho La Habra*, October 2016.

CHAPTER 4 IRREVERSIBLE ENVIRONMENTAL EFFECTS

Pursuant to Section 15126.2(c) of the California Environmental Quality Act (CEQA) Guidelines, this chapter evaluates the potential for significant irreversible environmental changes to result from the proposed Project. Section 15126.2(c) reads as follows:

> (c) Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

As discussed in Section 3.3, *Population and Housing*, and Chapter 5, *Growth Inducement*, the proposed Project would not remove obstacles to growth on other properties, and thereby induce growth outside of the Specific Plan area. Thus, the discussion of irreversible environmental effects focuses on irreversible environmental effects related to proposed on-site development.

4.1 IRREVERSIBLE COMMITMENT OF RESOURCES

Nonrenewable resources, such as natural gas, petroleum products and fossil fuels, asphalt, petrochemical-based construction materials, steel, copper, other metals, and sand and gravel, are commodities with a finite supply. To varying degrees, these materials are readily available and some, such as asphalt and sand and gravel, are abundant. Future development that would be accommodated by the Rancho La Habra Specific Plan would entail the commitment of such nonrenewable resources along with water and other, slowly renewable resources such as lumber and other forest products during Project construction. The Project would also consume natural gas and electricity, as well as consumer products manufactured from nonrenewable sources, during ongoing operations. Evaluation of the nonrenewable energy resources that would be committed to Rancho La Habra is provided in Section 3.10, *Energy Resources*. As discussed in Section 3.17, *Utilities, Service Systems, and Water Supply*, the proposed Rancho La Habra Specific Plan would consume less water during operations than the current golf course use.

4.2 IRREVERSIBLE ENVIRONMENTAL CHANGES

Future development in accordance with the proposed Specific Plan would involve an irreversible commitment of an existing recreational resource, the Westridge Golf Club, for development of additional housing and commercial space within La Habra. The significant change to the visual character of the site, as discussed in Section 3.4, *Aesthetic Resources*, would also be irreversible.

Additional irreversible environmental changes include the following:

- The increased population that would result from proposed development of the Project site is analyzed in Section 3.3, *Population and Housing*. The proposed Specific Plan would result in 402 dwelling units and 20,000 square feet of commercial space with a resident population of 1,206 and an employee population of less than 100. Should Planning Area 5 be developed for residential rather than commercial use, the Project would result in 448 dwelling units with a resident population of 1,304 and no employee population.
- The increase in local and regional vehicular traffic that would result from implementation of the Specific Plan is documented in Section 3.7, *Traffic and Circulation*. The proposed Project would generate 4,398 daily two-way trips with 404 trips in the AM peak hour and 407 trips in the PM peak hour.
- The Specific Plan would result in increased air pollutant and GHG emissions as documented in Section 3.8, *Air Quality*, and Section 3.9, *Greenhouse Gas Emissions*, respectively.
- Increased noise resulting from implementation of the Specific Plan is documented in Section 3.10, *Noise and Vibration*.
- Increased commitment of public services (e.g., police, fire, schools, libraries) and utilities (e.g., water and sewer systems) would also be required for implementation of the Specific Plan, as discussed in Section 3.15, *Public Services*, and Section 3.17, *Utilities, Service Systems, and Water Supply*, respectively.

4.3 POTENTIAL ENVIRONMENTAL DAMAGE FROM ACCIDENTS

Section 3.12, *Hazards and Hazardous Materials*, addresses the potential for environmental damage related to management of soils containing petroleum hydrocarbons within the Project site that were previously buried pursuant to regulatory approvals granted by the Orange County Health Care Agency as part of the original construction of the La Habra Hills Specific Plan and the Westridge Golf Club. These on-site soils, which were contaminated as a result of previous oil field operations, were buried at depths appropriate for the golf course use during its construction. The depths at which soils were placed, while appropriate for the existing golf course use, do not meet requirements for the residential uses proposed in the Rancho La Habra

Specific Plan. Therefore, soils containing petroleum hydrocarbons need to be placed deeper below the ground surface than is the current condition. Section 3.12, *Hazards and Hazardous Materials*, also evaluates types of hazardous materials that are likely to be routinely present within the proposed residential community, and the potential for upset and accident conditions in which hazardous materials could be released during site construction and operations.

As discussed in Section 3.14, *Geology, Soils, and Seismicity*, the Project site is located within a seismically active region, and development under the Specific Plan would increase the number of structures and people in La Habra that would be exposed to groundshaking during a seismic event.

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CHAPTER 5 GROWTH INDUCEMENT

5.1 INTRODUCTION

This section analyzes the growth inducement potential of the proposed Rancho La Habra Specific Plan and the associated secondary effects of growth the Specific Plan might facilitate. As required by California Environmental Quality Act (CEQA) Guidelines Section 15126.2(d), an environmental impact report (EIR) must:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a recycled water plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can have a direct effect on population growth, for example, if it would involve construction of substantial new housing. A project could also have indirect growth-inducement potential if it would do any of the following:

- Establish substantial new permanent employment opportunities (e.g., commercial, industrial, governmental, or other employment-generating enterprises) or otherwise stimulate economic activity.
- Remove a physical or regulatory obstacle to additional growth and development, such as by removing a constraint to or increasing the capacity of a required public service (physical obstacle). For example, an increase in the capacity of utility or road infrastructure could allow either new or additional development in the surrounding area. A project could also include growth by removing a regulatory obstacle, such as by increasing allowable development intensity.
- Stimulate economic activity within an area such that additional housing, businesses, or services would be needed to support the new economic activity.

Thus, the discussion of growth inducement draws largely on the evaluations set forth in Section 3.3, *Population, Housing, and Employment*, of this EIR.

The CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this EIR, the conclusion that the Project is growth-inducing as defined by CEQA requires that the Project would foster (i.e., promote or encourage) additional growth in economic activity, population, or housing, regardless of whether the growth is consistent with local plans or is beyond the level of growth that is anticipated by local plans. Consistent with CEQA Guidelines Section 15126.2(d), the conclusions set forth in this EIR regarding growth inducement do not address or imply whether such induced growth is beneficial or detrimental.

If the analysis contained in this chapter determines that the Specific Plan would have growth-inducing effects, the next question is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth (i.e., growth-induced effects) fit the CEQA definition of "indirect" effects in Section 15358(a)(2) of the CEQA Guidelines. These indirect or secondary effects of growth may result in significant environmental impacts.

While the CEQA Guidelines require an EIR to "discuss the ways" in which a project could induce growth, and to discuss project characteristics that may "encourage… activities that could significantly affect the environment," the CEQA Guidelines do not require an EIR to attempt to predict where, when, or in what form induced growth might occur. The answers to such questions require substantial speculation, which CEQA discourages (CEQA Guidelines Section 15145).

Thus, any decision whether to allow projects that might result from induced growth is the subject of separate decision-making by the lead agency responsible for considering such projects. Because the decision to allow growth is subject to separate discretionary decision-making, and such decision-making is itself subject to CEQA, the analysis of growth-inducing effects is not intended to determine site-specific environmental impacts or mitigation for the potentially induced growth. Rather, the discussion is intended to disclose the potential for environmental effects to occur more generally, such that decision-makers are aware that additional environmental effects are a possibility if growth-inducing projects are approved. The decision about whether impacts do occur, their extent, and the ability to mitigate them is appropriately left to consideration by the agency responsible for approving such projects at such times as complete applications for development are submitted.

5.2 POTENTIAL FOR GROWTH INDUCEMENT

5.2.1 DIRECT POPULATION AND EMPLOYMENT GROWTH

Direct growth would result if a project, for example, involves construction of new housing or commercial development that would result in additional residents and jobs.

a. Population Growth

The proposed Rancho La Habra Specific Plan proposes the development of 402 new dwelling units, which would result in a population increase of 1,206 persons based on the City of La Habra's (City) current average household size of 3.0 persons per dwelling unit. If Planning Area 5 is developed with 46 multi-family dwelling units rather than for commercial use, the Project would contain 448 dwelling units and have an estimated population of 1,344. Buildout of the proposed Specific Plan is equivalent to 16.3 percent of the City's population increase as projected by the Southern California Association of Governments (SCAG) (or 18.1 percent if Planning Area 5 is developed for residential use).

SCAG also estimates that by 2040, La Habra would have a total of 21,700 households, representing an increase of 2,700 households from 2012. Assuming the City's 2015 vacancy rate remains at 4.7 percent, this projected increase in households corresponds to an increase of approximately 2,827 dwelling units. The proposed Rancho La Habra Specific Plan represents 14.2 percent of this projected growth in housing (15.8 percent if Planning Area 5 is developed for residential, rather than commercial use).

The adopted La Habra General Plan provides for an increase of 4,213 units above January 2011 existing development. By comparison, SCAG projections set forth in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) indicate an increase of 2,700 households from 2012, which would represent an increase of approximately 2,827 dwelling units assuming the City's 2015 vacancy rate remains at 4.7 percent. However, the City's adopted Housing Element indicates La Habra's vacant land inventory for the development of housing would accommodate 356 new dwelling units. Thus, the General Plan anticipated that future housing development would consist of "new infill development on residentially zoned vacant land and through the densification of residential land uses."

The proposed would increase the City's overall General Plan development capacity and provide for substantial growth beyond the General Plan's current anticipated build-out. As noted in Section 3.8, *Air Quality*, this increase in overall development capacity would also be above the growth projections used in preparation of the current South Coast Air Quality Management Plan (AQMP), and would therefore be inconsistent with the AQMP.

b. Employment Growth

Development of Planning Area 5 as a 20,000-square-foot commercial center would generate long-term on-site employment. The number of people who would be employed at such a commercial center is highly dependent upon the mix of specific businesses that would ultimately locate within the center, which cannot be known at this time. Typically, a full-time equivalent of fewer than 100 people would be employed within a 20,000-square-foot commercial center. Given the large amount of retail development existing to the north of the

Project site, including the 695,000-square-foot Westridge Plaza Shopping Center, the substantial number of part-time jobs in the retail sector, and the small size of the proposed commercial center, it is unlikely any workers within the commercial site would relocate their households as a consequence of the job opportunities presented by the proposed Project.

Implementation of the proposed Specific Plan would also include a temporary need for construction labor. As discussed in Section 3.3, *Population, Housing, and Employment*, due to the ready availability of construction workers in Southern California, it is unlikely that construction workers would relocate their households as a consequence of the job opportunities presented by the proposed Project.

5.2.2 REMOVAL OF OBSTACLES TO GROWTH

The elimination of a physical obstacle to growth is considered to be a growth-inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The proposed Rancho La Habra Specific Plan would thus induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable.

a. ~~Release and Relocation~~ Vacation of the Existing Deed Restriction

~~Release and relocation~~ Vacation of the existing deed restriction would remove state-imposed restrictions that stipulate conservation of sensitive natural habitat as the only permitted use of currently deed restricted areas within the Project site. Thus, a new final subdivision map cannot be approved by the City nor could the proposed Rancho La Habra development project proceed in the absence of an agreement between the applicant and the California Department of Fish and Wildlife to ~~release and relocate~~ approve a new streambed alteration agreement and vacate the existing deed restriction within the Project site.

Removing existing land use restrictions placed on the existing conservation area by the deed restriction, would (1) eliminate a constraint to approval of the proposed Rancho La Habra Specific Plan and Vesting Tentative Tract Map 17845, development of which would (2) physically remove vegetation within the 11.43-acre conservation area provided as mitigation in perpetuity for construction of the golf course and housing within the La Habra Hills Specific Plan, and result in (3) all of the impacts associated with the proposed Rancho La Habra Specific Plan described in Sections 3.2 through 3.17, as well as Chapter 4 of ~~this~~ the EIR. ~~Release and relocation~~ Vacation of the existing deed restriction would also indirectly lead to Rancho La Habra's contribution to each of the cumulative impacts described in Chapter 6 of ~~this~~ the EIR.

b. Provision of Infrastructure

Water, sewer, drainage, and roadway infrastructure proposed for the Rancho La Habra Specific Plan would be sized to serve only Project site development. As can be seen in **Figure 2-1** in Chapter 2, *Project Description*, lands surrounding the Rancho La Habra Specific Plan area have been previous developed. Development of the proposed Specific Plan would not therefore remove any impediments to development of other properties, and would not indirectly induce substantial population increases.

5.2.3 SUPPORT ECONOMIC GROWTH

Induced growth can occur outside of a Project site as the result of direct and indirect investment and spending by residents, employees, and businesses. Such growth stems from the "induced" employment generated by a project's economic activity. Indirect employment growth generated by a direct increase in economic activity can be due to the increases in spending that would occur on the part of the businesses, employees, and employee households. It could also be due to the additional spending that would occur on the part of suppliers of goods and services demanded by a project's direct economic activity (households, businesses, and employees).

Implementation of the proposed Rancho La Habra Specific Plan would encourage and facilitate economic growth. During Project construction, a number of design, engineering, and construction-related jobs would be created. These jobs would be available until Project construction is completed. This would be a direct but temporary growth-inducing effect of the proposed Project. In addition, the Project would generate approximately 100 full-time equivalent jobs if Planning Area 5 is developed for a 20,000-square-foot commercial use (rather than residential).

The Project's employees and residents would represent an increased demand for economic goods and services, but they would not likely spur new economic investment, the creation of new businesses, or the expansion of existing businesses outside of the Project site, given the large amount of commercial development that already exists to the north.

5.3 ENVIRONMENTAL IMPACTS OF INDUCED GROWTH

As described above, implementation of the proposed Specific Plan would result in development of 402 dwelling units along with either 20,000 square feet of commercial space or an additional 46 dwelling units. Additional off-site growth would not be generated by the proposed Project. The direct and indirect physical environmental effects that would result from the proposed Specific Plan are analyzed throughout Chapter 3, *Environmental Setting, Impacts, and Mitigation*.

5.4 REFERENCES – GROWTH INDUCEMENT

City of La Habra, *City of La Habra General Plan 2035,* adopted January 21, 2014. Accessed June 2, 2017: http://www.lahabracity.com/320/General-Plan-2035.

SCAG, *SCAG Proposed Final RTP/SCS*, 2016. Accessed June 2, 2017: http://scagrtpscs.net/Documents/2016/proposed/pf2016RTPSCS.pdf.

State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties and the State — January 1, 2011- 2015*, May 2015. Accessed June 2, 2017: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

CHAPTER 6 CUMULATIVE IMPACTS

This chapter analyzes ways in which the impacts of the proposed Rancho La Habra Specific Plan might combine with the impacts of other past, present, and probable future projects causing related impacts to create significant "cumulative impacts." If the effects of the proposed Specific Plan, in combination with the effects of other past, present, and probable future projects, would be significant, the project's contribution to the combined cumulative significant impact is analyzed as required by the California Environmental Quality Act (CEQA) to determine if it is "cumulatively considerable." Cumulative impacts are organized by resource topic and analyzed below.

6.1 DEFINITIONS

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts… The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (CEQA Guidelines Section 15355).

Cumulatively considerable means that the incremental effects of an individual project would be significant when viewed in connection with the effects of past, current, and probable future projects (CEQA Guidelines Section 15065(a)(3)).

6.2 CEQA REQUIREMENTS AND APPROACH TO CUMULATIVE IMPACT ANALYSIS

In accordance with CEQA Guidelines Section 15130(b), the discussion of cumulative impacts provided in this chapter is intended to "reflect the severity of the impacts and their likelihood of occurrence." CEQA Guidelines Section 15130(b) states that the discussion of cumulative impacts "need not provide as great [a level of] detail as is provided for the effects attributable to the project alone." The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness, and focus on the cumulative impacts that would result from the combination of the proposed project and other projects, rather than the attributes of other projects that do not contribute to cumulative impacts.

Pursuant to CEQA Guidelines Section 15130(a)(1), this environmental impact report (EIR) discusses only those cumulative impacts that would result at least in part from the proposed Rancho La Habra Specific Plan that is being evaluated in this EIR. Thus, cumulative impact

analysis is not provided for any environmental issue where the proposed Specific Plan would have no environmental impact. Analysis of cumulative impacts is, however, provided for all project impacts, whether they were determined to be significant and unavoidable, significant but mitigable, or less than significant.

When incorporating the impacts of past and present projects into the cumulative analysis set forth below, the currently developed portions of ongoing phased projects as they existed in the 2015 baseline year are incorporated in the environmental setting/baseline described in the individual resource sections. The portions of ongoing phased development projects that were yet to be built as of the 2015 baseline year are included as part of the analysis of cumulative impacts.

The CEQA Guidelines provide two approaches to analyzing cumulative impacts (CEQA Guidelines Section 15130(b)(1)). The first is the "list approach," which requires a listing of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, projects outside the control of the lead agency. The second approach relies upon projections contained in an adopted local, regional, or statewide plan or related planning document as the basis of the cumulative analysis. A reasonable combination of the two approaches may also be used.

The cumulative analysis for air quality, greenhouse gas emissions, and traffic relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as the Southern California Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and relevant regional plans developed by the Southern California Association of Governments (SCAG). The analysis of cumulative transportation impacts (and transportation-related traffic and air quality) also relies on regional traffic model travel demand estimates, which were also used to evaluate the impacts of proposed area development. The land use and socioeconomic database, as well as growth forecasts for Southern California that were described in the 2016 RTP/SCS, were also used in the traffic analysis. The cumulative analyses for other environmental issues use the list of projects approach. The list of probable future projects within the geographic scope of the impact analyses is based upon information provided by the cities of Brea, Buena Park, Fullerton, La Habra Heights, La Mirada, and Whittier.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of aesthetic resources, for which cumulative impacts are limited to specific viewsheds. Thus, in assessing aesthetic resources impacts, only development within and immediately adjacent to the Rancho La Habra Specific Plan area that would contribute to a cumulative visual effect is analyzed, whereas cumulative air quality impacts are based upon all development within the South Coast Air Basin. Because the geographic scope and other parameters of each cumulative analysis

discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic.

A total of 128 projects were identified within the vicinity of the project site as of December 2016 (correlating with preparation of the Draft EIR's Traffic Impact Analysis whose physical environmental effects might combine with those of the proposed project to create one or more cumulative impacts. These cumulative projects are identified in **Table 6-1** and illustrated in **Figure 6-1**.

Table 6-1
Cumulative Projects List

No.	Location	Land Use
1	6161 W. Centinela Boulevard	281,209 s.f. office
2	12712-12718 Washington Boulevard	New 4-story mixed-use building with 5 for lease residential units, 3,414 s.f. retail, and subterranean parking. Approximately 2,340 s.f. existing/previous commercial uses.
3	6002 Centinela Avenue	27,568 sq. ft. addition consisting of 29 service bays and 12,900 sq. ft. of parts and service on vacant land
4	6201 Bristol Parkway	New mixed-use project, including 16,000 sq. ft. of commercial retail/restaurant space, 775 residential dwelling units, and 850 parking spaces on a six (6) acre site. Existing shopping center (approximately 60,000 sq. ft. of commercial floor area) to be demolished.
5	888, 892 and 898 N. Sepulveda Boulevard	5-story 190-room, 107,090 g.s.f. hotel on vacant parcel and operate Airport Park and Ride facility on existing 840-space parking structure.
6	2100 El Segundo Boulevard	2,089,000 s.f. existing with 2,142,457 s.f. Office Park expansion for total or 4,231,547 s.f. proposed
7	199 Continental Boulevard	152 Room Hotel, 71,000 s.f. (Existing parking lot)
8	2265 E. El Segundo Boulevard	Convert 3,050 s.f. existing warehouse to office use.
9	400 Duley Road	73,000 s.f. Office on vacant parcel
10	2275 Mariposa Avenue	120,380 s.f. Total New - 52,000 s.f. Corp. Office plus 68,380 s.f. Athletic Training Facility
11	201 N. Douglas	335,000 s.f. Total for new High School after demo of 90k - 170,000 s.f.. New H.S. to contain 180,000 to 240,000 s.f. of building area and an enrollment of 1,200 students.
12	2125 Campus Drive	121,450 s.f. Hotel and 63,550 s.f. office replacing vacant land
13	535 Indiana Street	4-unit condominium to replace 1 single-family unit

Table 6-1
Cumulative Projects List

No.	Location	Land Use
14	1700 E. Imperial Avenue	Addition of 96.898 s.f. to existing 169,390 s.f. Building
15	710 N. Nash Street	611,545 s.f. Office Plus 13,660 s.f. Retail on currently vacant parcel.
16	1950 E. Grand Avenue	93.569 ksf office.
17	445 N Douglas Street	223,000 s.f. (106,000 s.f. Office and 117,000 s.f. Warehouse Industrial Data Center
18	2350 E El Segundo Boulevard	1740 ksf office, 75 ksf retail, 7 ksf child care center, 7 ksf medical/dental office, 19 ksf health club, 75 ksf restaurant, 100 room hotel, 25 ksf light industrial, 75 ksf research & development, 65 ksf technology/telecommunications.
19	101 Continental Boulevard	167 room hotel.
20	444 N. Nash Street	Demo: 11,769 New Construction: 75,435 SF New Total: 180,422 SF Data Center
21	SE Aviation Boulevard	525 unit condominium, remove existing 835 ksf office.
22	425-429 Indiana Street	8 residential units.
23	NE Sepulveda Boulevard	425 ksf retail shopping center.
24	455 Continental Boulevard and 1955 E. Grand Avenue	New 14-story 300,000 s.f. R&D office tower and 810-space parking structure (+55,000 s.f.) 355,000 s.f. Total
25	1960 E. Grand Avenue	150 room hotel.
26	525 N. Sepulveda Boulevard	1029 space 328.532 ksf parking structure.
27	900, 950 Sepulveda Boulevard & 960, 901 - 915 Selby Street	20.819 ksf warehouse, 139.558 ksf office, 14.025 ksf manufacturing; from existing 80.165 ksf warehouse, 72.084 ksf office, 2.554 ksf manufacturing.
28	600-630 N. Sepulveda Boulevard	Existing Sizzler (sit-down dining) to become 3.714 ksf fast-food restaurant with drive-thru.
29	2130 E. Maple Avenue	20.955 ksf general office
30	555 N. Nash Street	17.315 ksf indoor ice rink.
31	14321 Van Ness Ave.	40 Townhomes/Live-Work
32	1720 West 135th Street	100,438 sf industrial building
33	13919 Normandie Ave.	Single Room Occupancy
34	SE corner of Aviation Boulevard and El Segundo Boulevard	610 Condominiums
35	4500 West 116th Street	116 condominium units
36	13806 Hawthorne Boulevard	171 units and 32,500 sq. ft of office space

Table 6-1
Cumulative Projects List

No.	Location	Land Use
37	SE corner of Crenshaw Boulevard and Jack Northop Avenue	230 d.u. apartments and 3,700 sq.ft. of restaurant
38	14000 Yukon Avenue	6 units
39	4427 El Segundo Blvd.	350 rooms and full-service restaurant
40	11519 Acacia Ave.	119 rooms
41	664 E. Manchester Terrace	Four (4) new residential condominiums
42	844 N. Centinela Avenue	Four (4) new residential apartment units
43	501 E. 99th Street	SPR for 12 new condominiums
44	921 N. Edgewood Street	38-Unit Apartment
45	222 W Spruce Avenue	10 Unit Multi Family Buidling
46	961 E 68th Street	3 Unit detached Condominium Development
47	417 N Market Street	Two 6 Unit Condominium Buildings
48	819 E La Palma Drive	5 Unit Multi Family Building
49	814 N Market Street	18-Bed Congregate Living Facility
50	411 E Hazel Street	18 Unit Multi Family Building
51	329 E. Hazel Street	To allow the development of 4-unit Condo with 10 parking spaces per SP-1229
52	11111 S. Prairie Avenue	120-Room Hotel
53	3920 W 108th Street	3 Unit Apartment Building
54	125 E. Spruce Avenue	Seven (7) new apartment units with semi-subterranean parking.
55	704 N. Market Street	12 new residential apartment units
56	408 E. Warren Lane	New 2 story 2,542 s.f. commercial building
57	508 S. Eucalyptus Avenue	40-unit senior affordable housing development.
58	417-433 Centinela Avenue	116-Unit Apartment Project
59	721 N. La Brea Avenue	To demolish 1,210 s.f. and add 1,312 s.f. to an existing commercial building
60	101,125,139,140,150 Market Street	40,000 s.f. retail and 150 parking spaces
61	113-133 Plymouth Street	20-Unit Townhome Development
62	333 N. Prairie Avenue	PAD to allow the 310 townhome units at the former Daniel Freeman site.
63	705-715 N. Centinela Avenue	81,613 s.f. , approx. 400-unit, 5 Story Self-Storage
64	3660 W. 107th Street	New 3 Dwelling Units with 6 car garage

Table 6-1
Cumulative Projects List

No.	Location	Land Use
65	614 E. Hyde Park Boulevard	18-Bed Congregate Living Facility
66	1050 S. Prairie Avenue	80,000-seat sport stadium; 6,000-seat performance venue; 2,500 du; 890,000 s.f. retail; 780,000 s.f. office; 120,000 s.f. casino, 300-room hotel; 25 acres open space; 4 acre civic site.
67	401 W. Arbor Vitae Street	Addition of four new offices in office complex and one new bathroom, demolish existing bathroom and existing office space, and add 4 new parking spaces.
68	316 Hardy Street	5-Unit Condominium Development
69	943-959 W Hyde Park Boulevard	5 Story Self Storage Facility
70	8911 Aviation Boulevard	General Plan Amendment for Rental Car Facility
71	5206 W. Thornburn Street	New 50-Student Private School (Grades 3-12).
72	9800 S. Sepulveda Boulevard	Change of Use from 118,490 sf Office (9-Story Bldg.) to 178-Guest Room Hotel with Restaurant & Spa (The "O" Hotel).
73	10701 S. La Cienega Boulevard	MTA bus facility at LAX parking lot B (on 23.1 acre parcel).
74	7407 S. La Tijera Boulevard	New 140-Unit Apartment & 2,600 sf Retail.
75	8740 S. La Tijera Boulevard	New 137-Unit Apartment building to replace existing 215-student Westchester Secondary Charter School.
76	8521 S. Sepulveda Boulevard	New 3,999 sf Chick-fil-A Fast Food with Drive Through Restaurant.
77	6801 Center Drive	600-unit apartment and 488,659 s.f. remaining development potential
78	1 World Way	-
79	8721 S Broadway	62 sr. affordable & 46 affordable family units & 4k sf office
80	5975 S Western Avenue	225,000 sf
81	1636 W Manchester Avenue	68,250 sf
82	8540 S. La Tijera Boulevard	525 students
83	8705 S Western Avenue	Middle school, 616 students
84	8400 S Vermont Avenue	740,000 sf shopping center or 104,000 sf shopping center
85	9402 S Broadway	Total Units: 49 Senior Housing, Sf Gross Area: 25,000
86	8415 S Hoover Street	Mixed Use
87	5816 S Western Avenue	Fueling positions: 12; add 4 fueling positions and 1835 sf convenience store

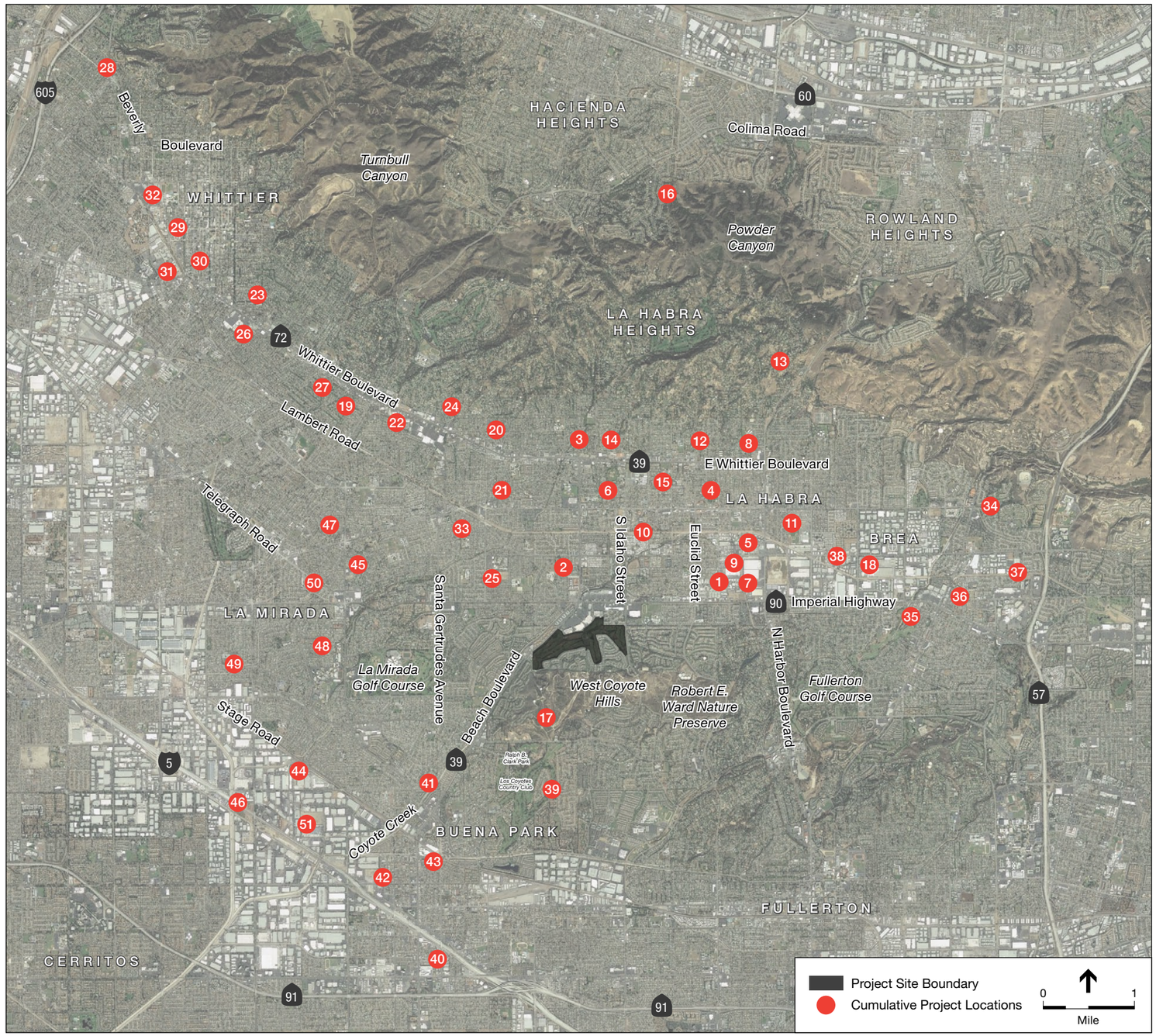
Table 6-1
Cumulative Projects List

No.	Location	Land Use
88	505 W Century Boulevard	Fueling positions: 6
89	6733 Sepulveda Boulevard	176 Units
90	5208 W Centinela Avenue	Sf gross area: 4,642
91	6711 S Sepulveda Boulevard	180 Units
92	6855 S La Cienega Boulevard	Sf gross area: 22,590; construction on vacant parking lot
93	11604 Aviation Boulevard	Lot 1: 281-Unit Condo/Townhomes, 5 ksf Retail/Commercial; Lot 2: 112-Unit Apartment & 21.5 ksf Retail/Commercial.
94	1248 W 105th Street	74-unit apartment
95	3816 W 54th Street	New 2nd floor office space 1,196 s.f.
96	1252 W 105th Street	74 Unit, 100% affordable senior housing in the R-2 Zone
97	11814 Aviation Boulevard	128-room hotel
98	11034 S Western Avenue	new use laundromat for a total 4,983 s.f.
99	5550 S La Brea Avenue	32-unit apartment
100	12000 S Western Avenue	44-room hotel
101	1743 Imperial Highway	39-unit apartment
102	10601 S Vermont Street	4,500 s.f. coin laundry and self-service car wash
103	1423 W 120th Street	57 condominiums
104	1509 W 102nd Street	12-unit apartment
105	1539 102nd Street	10-unit apartment
106	10501 S Buford Avenue	11 attached townhouse units, with 2 units set aside for low-income tenancy
107	11824 Aviation Boulevard	36-unit apartment (20 three-bedroom units, 4 two-bedroom units, 12 one-bedroom units), 58 parking spaces, 28 bicycle parking spaces; 5-story
108	10505 Hawthorne Boulevard	32-unit apartment complex, with 5 units set aide for low-income tenancy
109	10609 S Inglewood Avenue	9-units with 20% set aside for low-income tenancy
110	10907 S Inglewood Avenue	Convert commercial strucuture into 4-residential units with 10 parking spaces
111	8910 S Normandie Avenue	6-unit apartment
112	10136 Felton Avenue	Restore an existing nonconforming apartment building to 19 units and 22 covered parking spaces (total unit count: 12 studio, 6 one-bedroom ,1 three-bedroom)

Table 6-1
Cumulative Projects List

No.	Location	Land Use
113	5053 E 109 Street	17-unit condo conversion of exisiting apartments, including 2 units for low-income households
114	9223 S Vermont Avenue	2,858 s.f. auto mechanic shop
115	5301 W Centinela Avenue	1640 s.f restaurant ("The Flame Broiler")
116	3838 W Slauson Avenue	Convert commercial building into Dollar Tree Store; approved for a 1,060 sf addition to an existing commercial building; 9,877 sf total
117	5101 Overhill Drive	To create one multi-family residence lot developed with 88 attached single-family residence condominium units on 1.875 acres
118	1240 W 105 St	42-unit apartment building
119	6109 Overhill Drive	New 3,382 sf, 2-story duplex with an 882 sf four-car detatched garage
120	1034 W 109 Place	9-unit apartment building
121	11408 - 11412 S New Hampshire Avenue	Construction of new Arco gas station with 2,900 sf convenience store
122	10335 S Vermont Avenue	Existing building into church; total 21 vehicle parking spaces are required; 1,324 sf total landscaping provided
123	10401 S Vermont Avenue	New mixed-use residential and commercial development consisting of one two-story building, containing 250 sf of commericial space on the ground floor and 1,983 sf of residential space (one four bedroom apartment) on the upper floor,
124	1023 W 107 Street	Two 8-unit apartment
125	Westchester Parkway b/t Pershing Drive and Sepulveda Boulevard	2.32 million s.f. of development including office, research & development, community/civic uses, recreation and open space.
126	7280 W Manchester Avenue	126-unit apartment in-lieu of 24 ksf retail space of the previously approved/entitled Decron mixed-use development.
127	D3 SITE (La Brea Avenue/Florence Avenue)	241 Units; 40,000 s.f. retail
128	14135 Cersie Avenue	127 d.u. apartments

Source: City of Inglewood.



1 Kaiser Permanente MOB
2 951 S. Beach Boulevard Residential
3 Whittier Boulevard / Hacienda Road Commercial
4 City Hall Relocation / Residential
5 Self Storage
6 Urban Village
7 701 E. Imperial Highway Mixed-Use Development
8 Cervetto Village Project
9 Aldi Grocery Store
10 Condominiums
11 G&M Oil
12 La Habra Memory Care
13 Pinnacle Residential
14 La Habra Towne Center Modernization
15 Condominiums
16 Sempra Oil Field Phase 3
17 West Coyote Hills
18 Beckman Business Center
19 Starbucks
20 16050 Whittier Boulevard Condos
21 Morningstar Christian Chapel
22 Condominiums
23 Assisted Living Facility
24 Training School
25 Candlelight Residential
26 LA Fitness
27 Condominiums
28 Starbucks
29 Warmington Condos
30 S. Chen Condos Project
31 Popeyes Project
32 Lincoln Specific Plan (Former Fred C. Nelles Youth Correctional Facility)
33 Self-Storage Project
34 Central Park Village
35 South Brea Lofts
36 Townhomes
37 Banfield Pet Hospital
38 Albertsons Warehouse & Distribution Center
39 Los Coyotes Country Club Development Plan
40 The Source, Beach / Orangethorpe Mixed-Use Development
41 Village Circle
42 7301 Artesia Boulevard / Nabisco Site
43 OnBeach Mixed-Use
44 Alondra Boulevard Business Center
45 Condominiums
46 Industrial
47 Apartments
48 Single-Family Homes
49 Industrial
50 McDonald's
51 Commercial

Figure 6-1: Cumulative Project Locations

Source: Google Earth Pro; Carlson SLS

6.3 ANALYSIS OF CUMULATIVE IMPACTS

The following sections analyze cumulative impacts, as well as the proposed project's contribution to any significant cumulative impacts for the following subjects:

- Land Use and Planning
- Population and Housing
- Aesthetic Resources
- ~~Biological Resources~~ (See Chapter 6 of Final EIR – Volume 2)
- Cultural Resources
- ~~Traffic and Circulation~~ (See Chapter 6 of Final EIR – Volume 2)
- ~~Air Quality~~ (See Chapter 6 of Final EIR – Volume 2)
- ~~Greenhouse Gas Emissions~~ (See Chapter 6 of Final EIR – Volume 2)
- ~~Energy Resources~~ (See Chapter 6 of Final EIR – Volume 2)
- ~~Noise and Vibration~~ (See Chapter 6 of Final EIR – Volume 2)
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Geology, Soils, and Seismicity
- Public Services and Facilities, including separate discussions of police services, fire protection services, public schools, and public libraries
- Recreational Resources
- Utilities and Service Systems, including discussions of water facilities, water supply, sewer facilities, drainage facilities, and solid waste

In two cases subject—Public Services and Facilities and Utilities and Service Systems—separate discussions are provided for a single subject. This occurs since the cumulative analyses for the identified services and utilities are sufficiently different and independent from each other, including different cumulative impact areas, to warrant such separate subsections.

6.3.1 LAND USE AND PLANNING

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative land use impacts? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

The geographic area for analysis of land use impacts includes the City of La Habra and adjacent cities (Cumulative Projects 1-38, 44-51).

The only impact of the proposed project in relation to physical division of a community would result from the temporary closure of La Habra Hills Drive during site grading, which would reduce connectivity between the Westridge residential community and the Westridge Plaza Shopping Center. Because none of the cumulative projects identified in **Table 6-1** are located such that they could combine with the project's impact, no significant cumulative impact would result.

Future cumulative development of the projects identified in **Table 6-1** would modify the existing land use pattern of the cities within which these cumulative projects are located through conversion of vacant land to developed uses, as well as through conversion of existing land uses to higher development intensities. Development of cumulative projects would be subject to both environmental and planning review by the cities identified in **Table 6-1** that would address each of the significance criteria for land use and planning impacts set forth in CEQA Guidelines Appendix G. It is anticipated that each cumulative project would be required to demonstrate consistency with applicable plans and programs adopted within the individual jurisdiction.

The cumulative projects as a whole would result in a different built environment from what currently exists. However, because each community's General Plan sets forth policies to protect the character of existing development and maintain connectivity between the various parts of the community, it is anticipated that cumulative projects adopted in a manner consistent with applicable General Plan policies would avoid any significant cumulative impact to which project site development could contribute.

b. Contribution of Proposed Project to Significant Cumulative Impacts

As noted above, cumulative projects, including project site development, would be subject to General Plan consistency determinations and environmental assessment, including mitigation measures as necessary to address policy conflicts that may result in physical environmental impacts. Consistency with General Plan policies aimed at ensuring land use compatibility would result in a less-than-significant cumulative impact. Therefore, analysis of the proposed project's contribution to a significant cumulative impact is unnecessary.

6.3.2 POPULATION AND HOUSING

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative population and housing impacts?

Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

The geographic area for analysis of population and housing is the City of La Habra, and the analysis of cumulative impacts is based on projections contained in the adopted La Habra General Plan. As described in Section 3.3, *Population and Housing*, La Habra General Plan Policy LU 1.2 notes that the General Plan land use diagram provides for development of 4,213 additional dwelling units above January 2011 existing development. Thus, the cumulative effect of the proposed Rancho La Habra Specific Plan (402 dwelling units) in addition to currently anticipated General Plan build-out would allow 4,615 new dwelling units within the City of La Habra (or 4,661 dwelling units if Planning Area 5 were developed with 46 multi-family dwelling units instead of commercial use).

The proposed project would thus combine with past, present, and probable future (as identified in the General Plan) projects to exceed projected General Plan build-out specified in Policy LU 1.2. Exceeding the General Plan build-out capacity is reflected in significant physical effects on the environment, such as inconsistency with the regional Air Quality Management Plan (AQMP). As noted in the General Plan EIR, a significant unavoidable air quality impact would result from implementation of the General Plan, even with application of all feasible mitigation. Thus, with addition of project-related air pollutant emissions to General Plan buildout, a significant cumulative impact would result.

b. Contribution of Proposed Project to Significant Cumulative Impacts

Because the proposed project would result in a significant unavoidable population and housing impact that directly causes a significant cumulative impact, the proposed project's contribution to that significant cumulative impact would be cumulatively considerable.

6.3.3 AESTHETIC RESOURCES

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative aesthetics impacts? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

As shown in **Figure 6-1**, cumulative projects are located a sufficient distance to the north so that they would not combine with the proposed project to affect scenic vistas to the north. Cumulative projects to the south are located below the ridge on which the Westridge residential

community has been developed, and would thus not combine with the proposed project to affect scenic vistas to the south. Therefore, the proposed project would not combine with past, present, and probable future projects to cause a significant cumulative impact related to a scenic vista or scenic resource.

Because the project site is not generally visible from surrounding properties, with the exception of the most northerly portions of the Westridge residential community, and the area immediately surrounding the site has been previously developed with urban uses similar in development intensity, even though the proposed project was determined to have a significant unavoidable impact in relation to the visual character of the site, this impact would not combine with past, present, and probable future projects to cause a significant cumulative impact related to the visual character of the area.

None of the cumulative projects identified in **Table 6-1** are close enough to the proposed project site for nighttime lighting or daytime glare to combine with lighting or glare from the proposed project to form a cumulative impact. However, all of the cumulative projects identified in **Table 6-1** would contribute to a continued loss of dark night sky in the area. Because the area encompassing the cumulative projects identified in **Table 6-1** is highly urbanized, the effects of existing development have already created a significant loss of dark night sky, so much so that the past, present, and probable future projects identified in **Table 6-1** would not have a significant cumulative impact beyond that of existing development.

b. Contribution of Proposed Project to Significant Cumulative Impacts

As identified above, cumulative aesthetics impacts would be less than significant. Thus, discussion of the proposed project's contributions to significant cumulative impacts is unnecessary.

6.3.4 BIOLOGICAL RESOURCES

See Final EIR – Volume 2, Section 6.3.4.

6.3.5 CULTURAL RESOURCES

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative cultural resources impacts? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

Cumulative effects involving cultural resources occur as the result of multiple projects affecting cultural resources involving a resource type or theme, such as historic or prehistoric ethnic sites or an industry (e.g., oil), that occur within a larger geographic context than a single project site. Thus, this analysis considers cumulative development projects that are located immediately adjacent to the project site and elsewhere in La Habra and adjacent communities. These include each of the cumulative projects depicted in **Table 6-1** and **Figure 6-1** in addition to all past projects in this area, which are evident in the area's existing physical setting.

No historic structures exist on the project site; therefore, development of the proposed project would have no impacts on historic resources and would not contribute to any cumulative impacts on those resources.

The project site has been substantially altered from historic oil operations and the grading of the Westridge community and golf course. In addition, no tribal cultural resources have been identified as being within the project site. The likelihood of discovering archaeological, tribal cultural, or paleontological resources on the site is low, and would be limited to currently unknown subsurface locations. Many of the cumulative projects identified in **Table 6-1** consist of redeveloping existing development sites and would similarly have a very low potential for affecting archaeological, tribal cultural, or paleontological resources. Other projects, such as Cumulative Project 17, are proposed on lands that have not been developed for urban use in the past, and thus have varying degrees of potential for affecting archaeological, tribal cultural, or paleontological resources. Each of the cumulative projects identified in **Table 6-1** would be required to mitigate any impacts on archaeological, tribal cultural, or paleontological resources. Because of such mitigation requirements and distances between cumulative project sites, the cumulative projects described in **Table 6-1** would not result in significant cumulative effects on archaeological, tribal cultural, or paleontological resources or human remains through accidental discovery and damage.

b. Contribution of Proposed Project to Significant Cumulative Impacts

Because no significant cumulative impacts would occur, discussion of the project's contribution to cumulative impacts is unnecessary.

6.3.6 TRAFFIC AND CIRCULATION

See Final EIR – Volume 2, Section 6.3.6.

6.3.7 AIR QUALITY

See Final EIR – Volume 2, Section 6.3.7.

6.3.8 GREENHOUSE GAS EMISSIONS

See Final EIR – Volume 2, Section 6.3.8.

6.3.9 ENERGY RESOURCES

See Final EIR – Volume 2, Section 6.3.9.

6.3.10 NOISE AND VIBRATION

See Final EIR – Volume 2, Section 6.3.10.

6.3.11 HAZARDS AND HAZARDOUS MATERIALS

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative hazards and hazardous materials impacts? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

Hazards and hazardous materials impacts are generally localized and site-specific, with the exception of those resulting from transportation of hazardous materials, from upset conditions, or from contamination of groundwater. As a result, the cumulative context for this analysis varies, depending on the threshold being analyzed. For example, cumulative impacts associated with the transportation of hazardous materials would be analyzed for projects along area transportation routes, while the context for the use of hazardous materials would be limited to the area immediately surrounding the project site. Cumulative impacts associated with the accidental release of hazardous materials into the environment would also be limited to the project site and the immediately surrounding properties. Cumulative impacts associated with emergency response would be limited to development in the vicinity of emergency access routes.

Each of the cumulative projects could involve the routine need for use and disposal of hazardous materials. While there would be a substantial cumulative increase in the transportation, use, and disposal of hazardous materials, the resulting cumulative impact would be less than significant as described below.

The proposed project and cumulative projects would use hazardous chemicals common in other residential, medical, commercial/retail, and warehouse settings. These common consumer products would be used for the same purposes as in any residential commercial/retail, or medical setting. Because general commercial/retail, household, and medical hazardous

materials are typically handled and transported in small quantities, and because the health effects associated with them are generally not as serious as large-scale industrial processing uses, adverse cumulative effects on the environment with respect to the routine transport, use, or disposal of general office and household hazardous materials would not result.

Implementation of remedial actions is proposed for the project site, as well as would be the case for the sites of Cumulative Project 16 (Sempra Oil Field Phase 3), Cumulative Project 17 (West Coyote Hills), and Cumulative Project 33 (Lincoln Specific Plan, former site of Fred C. Nelles Youth Correctional Center). As described in Section 3.12, *Hazards and Hazardous Materials*, of this EIR, project site remediation would occur under the oversight of the appropriate regulatory agency. Other cumulative projects that might excavate soils as part of routine construction would also be required to adhere to applicable regulatory requirements. Adherence to regulatory requirements would reduce cumulative impacts related to the release of hazardous materials to a less-than-significant level.

The geographic context for emergency response is the City of La Habra, including the project site and cumulative projects within the City (Cumulative Projects 1-15). The City of La Habra has an emergency response plan that was developed to ensure allocation and coordination of resources in the event of an emergency. Future development within La Habra would result in a cumulative increase in the demand for hazardous materials emergency response capabilities. However, as demonstrated in the La Habra General Plan EIR, the City's emergency response capabilities are able to address General Plan build-out. While both fire and police protection services would need to be expanded over time to address increased demand for services from new development, such needs would be reviewed and addressed on an annual basis as part of the City's budget process. The General Plan EIR also notes that the residential and commercial uses permitted under the General Plan "would involve the use of hazardous materials including solvents, cleaning agents, paints, and pesticides. However, these would generally be materials that, when used correctly, would not result in a significant hazard to residents." In addition, the Initial Study prepared for the General Plan EIR notes that the City's roadway system is largely built out, and that new development would not interfere with emergency response.

Any development involving increased hazardous materials use has the potential to increase the demand for emergency response capabilities in the area. Because the combination of project site and cumulative development (General Plan build-out with the addition of the proposed project) would increase La Habra's population and its commercial development inventory, an increased demand for first response capabilities and hazardous materials emergency response capabilities would result from build-out of the cumulative projects. However, the types of uses proposed within La Habra do not involve high levels of risk and would not substantially add to demands on City emergency services.

b. Contribution of Proposed Project to Significant Cumulative Impacts

As discussed above, cumulative impacts related to hazards and hazardous materials would be less than significant. Discussion of the proposed project's contribution to cumulative impacts is therefore unnecessary.

6.3.12 HYDROLOGY AND WATER QUALITY

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative hydrology and water quality impacts? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

The cumulative analysis area for hydrology and water quality is the watershed of Coyote Creek, including Cumulative Projects 1 through 51. Because current requirements call for either detaining stormwater flows such that pre-development peak flows are not exceeded during a major storm event, or constructing sufficient downstream drainage facilities to avoid flooding, cumulative impacts would be less than significant. In addition, current water quality requirements for new development projects and ongoing operations have been designed to avoid degradation of downstream water quality. Therefore, compliance with such standards and requirements, as would be expected of each of the cumulative projects, would avoid significant cumulative impacts.

b. Contribution of Proposed Project to Significant Cumulative Impacts

Because cumulative hydrology and water quality impacts would be less than significant, discussion of the proposed project's contribution to those impacts is unnecessary.

6.3.13 GEOLOGY, SOILS, AND SEISMICITY

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative geology, soils, and seismicity impacts? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

Southern California is within a seismically active region with a wide range of geologic and soil conditions. Due to widely varying conditions and the types of local impacts that result from seismic and soils hazards, the geographic scope for considering cumulative impacts includes the

project site and adjacent areas. Thus, the geographic area for analysis of cumulative geology and soils impacts includes La Habra and adjacent cities (Cumulative Projects 1-38, 44-51).

Project site development, combined with the above-referenced cumulative development, would result in increased population in an area subject to substantial seismic risks and hazards. However, any new project, including proposed project site development, would be required to meet building code requirements that address the various seismic and geologic hazards present in the Southern California region, and would thereby reduce cumulative impacts related to geology and soils. Development projects are required to meet the most recent geologic and seismic standards, which are more stringent that older codes and practices, making new structures likely to perform better than older structures in the event of a significant seismic event. Generally, compliance with applicable building and other codes, as would be required for all present and future cumulative projects, would reduce cumulative impacts to a less-than-significant level.

b. Contribution of Proposed Project to Significant Cumulative Impacts

Because compliance with applicable building and other codes, as would be required for all present and future cumulative projects, would reduce cumulative impacts to a less-than-significant level, discussion of the proposed project's contribution to significant cumulative effects is unnecessary.

6.3.14 PUBLIC SERVICES AND FACILITIES

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in substantial adverse physical impacts associated with the provision of new or physically altered public service facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

La Habra General Plan Policy LU 1.2 notes that the General Plan land use diagram provides for development of 4,213 additional dwelling units above January 2011 existing development. The proposed project (402 dwelling units) would increase this development capacity to 4,615 new dwelling units (or 4,661 dwelling units if Planning Area 5 were developed with 46 multi-family dwelling units instead of commercial use). This projected increase in City population through General Plan build-out would result in increased demands for public services. The proposed Rancho La Habra Specific Plan would increase the City's build-out by 9.5 percent (or 10.6 percent if Planning Area 5 were developed for residential use).

The following discussion reviews potential cumulative impacts on police service, fire protection service, public schools, and public libraries.

Police Services

The geographic scope for the analysis of cumulative impacts associated with police service is the service area of the La Habra Police Department, which is the area within the La Habra city limits.

As noted in the La Habra General Plan EIR, "additional police equipment, facilities, and personnel would be required to provide adequate response times, acceptable public service ratios, and other performance objectives for law enforcement services within the City" through build-out of the General Plan. Addition of the proposed Rancho La Habra Specific Plan to General Plan build-out would add to that need over time. Should the La Habra Police Department maintain its current sworn officer-to-resident ratio (1.1 officers per 1,000 residents) through General Plan build-out, the result would be an additional 17 sworn officers at General Plan build-out (or 19 sworn officers with the addition of the proposed project).

However, the City does not have an established standard for providing police services based on population size and does not base service needs strictly on population ratios because such ratios often do not properly reflect the need for police services. Indicators of need for additional resources and staffing include response times, incident loads, request for service, resident and transient population, and square footage of improvements. Thus, appropriate staff levels are determined on a yearly basis with a recommendation by the Police Chief to the City Manager, who then proposes the appropriate staffing level to the City Council.

As described in the General Plan EIR, future increases in City population "may require the hiring of new staff and could potentially require the building of new facilities." The General Plan EIR concluded that the physical impacts associated with construction noise, emissions, and traffic from the operation of a new police facility were part of the overall General Plan update project addressed in the General Plan EIR. Thus, impacts of potential future expansion of police facilities are included in the analyses set forth in the General Plan EIR, which concludes that General Plan build-out would have a less-than-significant effect in relation to police services.

The proposed project, when added to General Plan build-out, would not result in a significant cumulative impact in relation to police services, because (1) the General Plan EIR has already addressed at a programmatic level expansion of police facilities and concluded impacts would be less than significant, and (2) the proposed project would implement a safety program, including surveillance cameras and license plate readers.

Fire Protection Services

The geographic scope for the analysis of cumulative impacts associated with fire protection service is the area within the La Habra city limits.

Currently, there are no plans for additional staffing, equipment, or facility expansion in La Habra. As noted in the General Plan EIR, to account for additional service demands in the City, the Los Angeles County Fire Department (LACoFD), pursuant to its contract with the City of La Habra, may increase its annual fee charged to the City to account for the increase in demand. This determination process, made by LACoFD based on the actual increase in demand compared to existing conditions, would be continued into the future.

The City collects development impact fees, including fees for fire protection, pursuant to Chapter 15.48, Residential Building Fees, and 15.52, Development Fee, of its Municipal Code (City Ordinance Nos. 850, 1053, 1209, and 1213). Revenue from these fees, as well as property and sales taxes, would grow in rough proportion to the increase in residential units and/or businesses approved within the City, including the proposed project and General Plan build-out.

The General Plan EIR further notes that as the City's population increases, "additional fire stations may be required, and localized environmental impacts would result from the construction of those facilities." The General Plan EIR concluded that the physical impacts associated with construction noise, emissions, and traffic from the operation of a new fire stations were part of the overall General Plan update project addressed in the General Plan EIR. Thus, impacts of potential future expansion of fire protection facilities are included in the analyses set forth in the General Plan EIR, which concludes that General Plan build-out would have a less-than-significant effect in relation to fire protection services.

The proposed project, when added to General Plan build-out, would not result in a significant cumulative impact in relation to fire protection services, because (1) the General Plan EIR has already addressed at a programmatic level expansion of fire protection facilities and concluded impacts would be less than significant, (2) two existing LACoFD fire stations are located within one-quarter mile of the project site, and (3) the proposed project would pay required development impact fees for fire protection facilities.

Public Schools

The geographic context for cumulative school services is the area served by the La Habra City School District (LHCSD) and Lowell Joint School District (LJSD), which serve students in grades Kindergarten (K)-8, and the Fullerton Joint Union High School District (FJUHSD), which serves students in grades 9-12.

According to the La Habra General Plan EIR, future residential development and population growth in La Habra alone would exceed the capacity of school districts serving the City and could cause overcrowding to occur at schools within the LHCSD, LJSD, and FJUHSD. Adding the proposed project to General Plan build-out and development elsewhere within the LHCSD, LJSD, and FJUHSD would increase future student loads and increase the potential for overcrowding in area schools. As a result, expansion of existing schools or construction of new schools may be needed in order to accommodate the estimated number of students.

However, since the location and size of future school facilities improvements cannot be known at this time, it would be speculative to analyze whether site-specific school facilities expansions and/or construction of new schools would result in significant or less-than-significant environmental impacts. The LHCSD, LJSD, and FJUHSD would each have the responsibility under CEQA to analyze and mitigate environmental impacts associated with future expansion of school facilities and any construction of new schools.

All new residential and non-residential development will be required to pay statutory impact fees to the LHCSD, LJSD, and FJUHSD in accordance with Government Code Section 65995(b) to help fund construction of additional classrooms and offset any additional increases in education demand at schools, including costs for mitigation of impacts related to school facilities construction and operations. Because these fees are required by law for mitigation of impacts on schools under CEQA and presumed under the law to constitute full mitigation for impacts, the cumulative impact of cumulative development on public schools would be less than significant.

Public Libraries

The geographic scope for cumulative library services is the City of La Habra, which is the area served by the existing La Habra branch library operated by the Orange County Public Libraries system.

Future increases in population will generate increases in demand for library services citywide. Although technology and the information available on the Internet are anticipated to increase over time, which would act to limit increased demands on library services, cumulative development within the City through General Plan build-out could result in the need for new or expanded library facilities.

The General Plan EIR concluded that the physical impacts associated with construction noise, emissions, and traffic from the operation of expanded library facilities were part of the overall General Plan update project addressed in the General Plan EIR. Thus, impacts of potential future expansion of library facilities are included in the analyses set forth in the General Plan EIR, which concludes that General Plan build-out would have a less-than-significant effect in relation to library services.

The proposed project, when added to General Plan build-out, would not result in a significant cumulative impact in relation to library services, because (1) the General Plan EIR has already addressed at a programmatic level expansion of library facilities and concluded impacts would be less than significant, and (2) technology and information available on the Internet are anticipated to increase over time, providing an alternative to library use.

b. Contribution of Proposed Project to Significant Cumulative Impacts

Because cumulative public services impacts would be less than significant, discussion of the proposed project's contribution to such impacts is unnecessary.

6.3.15 RECREATIONAL RESOURCES

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative recreation impacts? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

The geographic scope for cumulative recreational resources is the area within the La Habra city limits.

Future increases in population will generate increases in demand for recreational facilities citywide. In accordance with California Government Code Section 66477 (Quimby Act), La Habra Municipal Code Chapter 15.48 (Residential Building Fees) provides a mechanism for the payment of fees or dedication of land, or combination thereof, for developing or rehabilitating existing neighborhood or community parks or recreational facilities to serve proposed subdivisions. Requirements for dedication of land or payment of fee in lieu of dedication[1] are based on 3.0 acres of parkland per 1,000 population in the proposed subdivision. All residential development within La Habra, including the proposed project, would be required to comply with the requirements of Municipal Code Chapter 15.48 and provide for adequate park facilities so as to avoid significant impacts on existing parks. In addition, the proposed project will provide parkland in excess of Municipal Code requirements. The cumulative effect of required dedications and fee payments would be to reduce cumulative recreational impacts to less than significant.

[1] The fees collected under this ordinance are solely for the purpose of producing revenue for the acquisition, development, and maintenance of public parks.

In addition, because the existing Westridge Golf Club is the only golf course in the La Habra city limits, and none of the cumulative projects identified in **Table 6-1** involves conversion of a golf course to another use, loss of the existing golf course on the project site would not combine with any past, present, or reasonably anticipated future project to create a cumulative impact.

b. Contribution of Proposed Project to Significant Cumulative Impacts

Because cumulative public services impacts would be less than significant, discussion of the proposed project's contribution to such impacts is unnecessary.

6.3.16 UTILITIES AND SERVICE SYSTEMS

Would the proposed Rancho La Habra Specific Plan, in conjunction with past, present, and probable future projects, result in significant cumulative utilities and service systems impacts? Would the proposed project's contribution to significant cumulative impacts that would occur be cumulatively considerable?

a. Cumulative Impacts

Water Facilities

The area of analysis for water facilities is the area within the La Habra city limits.

As discussed in Section 3.17, *Utilities, Services Systems, and Water Supply*, the City's existing water facilities are capable of serving the proposed project and other projected development. Modeling prepared for the proposed project concluded that there is sufficient capacity in the City's Zone 1 water system to provide adequate service if the zone break valve at Junction 34, which has been closed by the City of La Habra, would be opened and the existing valve at Junction 56 would be closed. Thus, cumulative impacts would be less than significant.

Water Supply

The area of analysis for water supply is the area within the La Habra city limits.

The City's 2015 Urban Water Management Plan identifies three sources of water: (1) imported groundwater from the California Domestic Water Company (CDWC), (2) imported water from the Metropolitan Water District of Southern California (Metropolitan), and (3) local groundwater from the La Habra Basin. As discussed in Section 3.17, *Utilities, Services Systems, and Water Supply*, through the Urban Water Management Plan, the City has determined that a sufficient supply of water would be available to serve its customers through 2040. Table 3.17-4 in Section 3.17, *Utilities, Services Systems, and Water Supply*, provides a comparison of projected cumulative water demand to projected supply through 2040, including the reduction in demand from the proposed project, and indicates that the cumulative effect of the proposed project in

combination with past, present, and probable future projects (as determined by citywide projections prepared for the 2015 Urban Water Management Plan) would be a 101 acre-foot annual surplus of water supply in relation to water demand. Thus, cumulative impacts in relation to water supply would be less than significant.

Sewer Facilities

The area of analysis for sewer facilities is the Orange County Sanitation District (OCSD) service area.

Build-out of the La Habra General Plan may require local expansions of sewer mains to accommodate wastewater generated by future site-specific development projects. However, the La Habra Public Works Department and OCSD address changes in demand for wastewater conveyance infrastructure through implementation of their capital improvement programs (CIPs), which function as long-range planning tools for sewer infrastructure improvements and their financing. The CIPs ensure that wastewater infrastructure is repaired and expanded in an orderly manner. Furthermore, policies in the Infrastructure chapter of the La Habra General Plan address adequacy of wastewater facilities in the planning area. These include policies that require implementation of the sewer master plan (Policies SS 1.1 and 1.3), promote collaboration between the City and OCSD in providing wastewater facilities (Policies SS 1.4 and 1.6), and require that new development "constructs, dedicates, and/or pays its fair share contribution" to the wastewater treatment and collection system (Policy SS 1.7). Compliance with these policies and existing City plans and regulations would ensure that cumulative development within the City would be adequately served by wastewater facilities. Therefore, no significant cumulative impacts related to wastewater conveyance facilities would result.

As noted in the La Habra General Plan EIR, "since General Plan buildout would generate approximately 1.098 mgd and there is approximately 17 mgd remaining capacity, there is adequate existing wastewater treatment capacity. Implementation of the General Plan would not require construction of new or expanded wastewater treatment facilities. In addition, OCSD's wastewater treatment expansion plans will provide ample capacity for the City." Thus, adequate wastewater capacity exists for development of the proposed project (which would generate 0.141 million gallons per day [mgd] of wastewater). In combination with past, present, and probable future projects included in General Plan build-out (17 mgd), cumulative impacts would be less than significant.

Drainage Facilities

The area of analysis for water supply is the area within the La Habra city limits and its downstream drainage area.

As stated in the General Plan EIR, post-construction measures under the Orange County Drainage Area Management Plan (DAMP) require co-permittees such as the City of La Habra to require new development to implement structural and non-structural Best Management Practices (BMPs) that would mimic pre-development quantity and quality runoff conditions. Thus, the proposed project in combination with past, present, and probable future projects in the City (i.e., General Plan build-out) would be required to install and maintain on-site storm drainage improvements pursuant to DAMP requirements. Thus, no large net increases in storm drainage rates or volumes would result, and widespread off-site storm drainage improvements are not anticipated. In addition, existing stormwater drainage quality would be improved as the result of requirements for implementation of BMPs as discussed in the "Applicable Plans, Policies, and Regulations" portion (Section 3.13.2) of EIR Section 3.13, *Hydrology and Water Quality*.

The La Habra General Plan addresses adequacy of stormwater drainage systems with policies in the Infrastructure chapter of the General Plan. These include policies that require implementation of the City's Storm Drain Master Plan (Policy SD 1.1), require new development to comply with the City's National Pollutant Discharge Elimination System (NPDES) permit (Policy SD 1.2), and ensure that stormwater drainage infrastructure is adequately sized to meet local needs (Policies SD 1.3, SD 1.7, and SD 1.8). Compliance with these policies and existing State Water Resources Control Board (SWRCB) regulations would ensure that cumulative development throughout the City would be adequately served by storm drainage systems. Therefore, no significant cumulative impacts related to storm drainage would occur.

Solid Waste

The area of analysis for cumulative solid waste impacts is the County of Orange, which operates a countywide system of landfills.

As discussed in Section 3.17, *Utilities, Service Systems, and Water Quality*, the Olinda Alpha Landfill (which serves La Habra) and the Orange County landfill system have adequate daily capacity for existing and future development, including the addition of 1.42 tons of solid waste per day from the proposed project operations. In addition, OC Waste & Recycling, which operates Orange County's three active landfills and manages other solid waste activities for the County, determined that, by 2066, Orange County's disposal system would have 71 million tons of remaining capacity after accepting solid waste from existing development and projected growth in the County over a 50-year period (see **Figure 3.17-2**). Over this 50-year period, the proposed project would generate an additional 51,900 tons of solid waste which, in combination with waste from past, present, and probable future projects (as determined by OC Waste & Recycling solid waste generation projections), would still leave more than 70 million tons of remaining capacity in Orange. County's landfills in 2066. In addition, each municipal agency

within the County will be responsible for implementing the waste diversion requirements of AB 939. Thus, cumulative solid waste impacts would be less than significant.

b. Contribution of Proposed Project to Significant Cumulative Impacts

Because cumulative impacts would be less than significant, discussion of the project's contribution to utilities, service systems, and water supply impacts is unnecessary.

6.4 REFERENCES – CUMULATIVE IMPACTS

City of La Habra, *City of La Habra Final Environmental Impact Report for: General Plan 2035,* certified January 21, 2014. Accessed June 2, 2017: http://www.lahabracity.com/DocumentCenter/Home/View/196.

Goss, Tracy A. and Kroeger, Amy, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, South Coast Air Quality Management District, 2003. Accessed June 1, 2017: http://www.aqmd.gov/rules/ciwg/final_white_paper.pdf.

Southern California Association of Governments (SCAG), *Final Program Environmental Impact Report for the 2012-2035 RTP/SCS*, March 12, 2012. Accessed June 1, 2017: http://rtpscs.scag.ca.gov/Pages/Final-2012-PEIR.aspx.

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CHAPTER 7 ALTERNATIVES

7.1 INTRODUCTION

Under the California Environmental Quality Act (CEQA), the identification and analysis of alternatives to a project are a fundamental part of the environmental review process. CEQA (Public Resources Code Section 21002.1(a)) establishes the need to address alternatives in an EIR by stating that, in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is . . . to identify alternatives to the project" that would avoid or lessen the project's significant effects.

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed Project or to the project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed Project's objectives. CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives must be based primarily on the ability to reduce impacts relative to the proposed Project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation (CEQA Guidelines Section 15126.6(a)).

This chapter of the EIR describes and evaluates alternatives to the proposed Project. Included in the identification and evaluation of project alternatives is identification of the "environmentally superior alternative" as required by CEQA Guidelines Section 15126.6(e)(2).

Pursuant to CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this chapter is intended "to allow meaningful evaluation, analysis, and comparison with the Proposed Project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

7.2 RATIONALE FOR SELECTION OF ALTERNATIVES

The specific reasons for selection of each alternative addressed in this EIR or rejection of an alternative from further analysis are discussed below as part of the summary of alternatives (see Section 7.3, *Description of Alternatives*). Consistent with CEQA Guidelines Section 15126.6, the alternatives analyzed in this chapter were selected based on the following general factors:

- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the proposed Specific Plan. (See Section 7.2.1 below for a listing of significant unavoidable impacts.)
- The ability of the alternative to meet the overarching project objective and purpose of the Specific Plan, along with the extent to which the alternative would accomplish other project objectives. (See Section 7.2.2 below for a listing of the project objectives used to evaluate project alternatives.) Only alternatives that could achieve the overarching project objective and the majority of other project objectives were selected for further evaluation.
- The potential feasibility[1] of the alternative, taking into account site suitability, economic viability, availability of infrastructure, property control (ownership), and consistency with applicable plans and regulatory limitations.
- The extent to which the alternative contributes to a "reasonable range" of alternatives necessary to permit a reasoned choice between the proposed Project and alternatives.
- The extent to which the environmental effects of an alternative could be reasonably identified.
- The extent to which implementation of the alternative would not be remote or speculative.
- The requirement to consider a "no project" alternative, including an alternative that provides for the likely outcome should the proposed Project not be approved.

Neither the CEQA statute, the CEQA Guidelines, nor recent court cases, indicate a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines Section 15126(f)).

7.2.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the project being evaluated. In order to identify alternatives that would avoid or substantially lessen any of the identified significant environmental effects of the proposed Specific Plan, significant unavoidable impacts must be considered. It is recognized that alternatives aimed at reducing the significant unavoidable impacts of the Specific Plan would also avoid or reduce impacts that could be reduced to a less-

[1] CEQA Guidelines Section 15364 defines feasible as "capable of being accomplished within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." CEQA Guidelines Section 15126.6(f)(1) states that "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…"

than-significant level. The analysis in Chapter 3 (Sections 3.2 through 3.17) of this EIR determined that development of the proposed Project would result in the following significant unavoidable impacts.

a. Land Use and Planning

Impact LUP-2.1: The proposed Specific Plan would be inconsistent with a goal and several policies of the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Since these inconsistencies are reflected in significant unavoidable air quality, greenhouse gas (GHG), and traffic impacts, impacts related to inconsistencies with the 2016 RTP/SCS would be significant even with implementation of all feasible mitigation measures. Impacts would therefore be *significant and unavoidable*.

b. Population and Housing

Impact POP-1: Implementation of the proposed Rancho La Habra Specific Plan would generate population growth as the direct result of the housing proposed by the Specific Plan. While the proposed Project would not necessarily increase the City's projected growth rate through 2040, it would substantially increase La Habra's inventory of land for the development of housing, and therefore result in substantial population growth. The resulting impact would be *significant and unavoidable*.

c. Aesthetic Resources

Impact AES-3: Implementation of the proposed Rancho La Habra Specific Plan would result in the loss of a major open space resource. While the proposed Project would be well planned and designed, the substantial loss of open space that would result from project development would degrade the existing visual character of the site. Even with implementation of project design features and compliance with existing regulations, this impact would remain *significant and unavoidable*.

d. Traffic and Circulation

Impact TRA-1: With respect to mitigation at intersections under the jurisdiction of the cities of Fullerton, Buena Park, and La Mirada, and Caltrans, under CEQA, a fair share monetary contribution is considered to be adequate mitigation if the fee is tied to a reasonable plan that the relevant agency is

committed to implementing. However, these cities and Caltrans do not have mitigation fund programs in place for improvements to which the proposed Project can contribute. Therefore, because the City has no authority to implement the recommended traffic improvements, impacts remain *significant and unavoidable*. See **Table 7-1** for a summary of traffic impacts at specific intersections.

Table 7-1[2]
Summary of Traffic Impacts

		Jurisdiction	Significant Impact?	Included in Fee Program?	Can La Habra Implement Mitigation?	Included in Fair Share?	Level of Significance
Intersections							
1.	Beach Boulevard at Rosecrans Avenue	La Mirada/Caltrans	Yes	No	No	Yes	SU
~~2.~~	~~Gilbert Street at Rosecrans Avenue~~	~~Fullerton~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~3.~~	~~Euclid Street at Rosecrans Avenue~~	~~Fullerton~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~4.~~	~~Beach Boulevard at Hillsborough Drive~~	~~La Mirada/Caltrans~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~5.~~	~~Beach Boulevard at Hillsborough Park Apt.~~	~~La Habra/Caltrans~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~6.~~	~~Idaho Street at Sandlewood Avenue~~	~~La Habra~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~7.~~	~~Euclid Street at Sandlewood Avenue~~	~~La Habra~~	~~Yes~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~8.~~	~~Santa Gertrudes Avenue at Imperial Highway~~	~~La Mirada~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~9.~~	~~1st Avenue at Imperial Highway~~	~~La Mirada~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
10.	Beach Boulevard at Imperial Highway	La Habra/Caltrans	Yes	No	No	Yes	SU
~~11.~~	~~La Habra Hills Drive at Imperial Highway~~	~~La Habra/Caltrans~~	~~Yes~~	~~No~~	~~No~~	~~Yes~~	~~SU~~
~~12.~~	~~Idaho Street at Imperial Highway~~	~~La Habra/Caltrans~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
13.	Euclid Street at Imperial Highway	La Habra/Caltrans	Yes	No	No	Yes	SU
14.	Harbor Boulevard at Imperial Highway	La Habra/Fullerton/ Caltrans	Yes	No	No	Yes	SU

[2] Revisions to Table 7-1 are taken from the Partially Recirculated Draft EIR and do not reflect new information.

Table 7-1[2]
Summary of Traffic Impacts

		Jurisdiction	Significant Impact?	Included in Fee Program?	Can La Habra Implement Mitigation?	Included in Fair Share?	Level of Significance
15.	Beach Boulevard at Lambert Road	La Habra/Caltrans	Yes	No	No	Yes	SU
~~16.~~	~~Idaho Street at Lambert Road~~	~~La Habra~~	~~Yes~~	~~Yes~~	~~Yes~~	~~No~~	~~SM~~
~~17.~~	~~Euclid Street at Lambert Road~~	~~La Habra~~	~~Yes~~	~~Yes~~	~~Yes~~	~~No~~	~~SM~~
~~18.~~	~~Harbor Boulevard at Lambert Road~~	~~La Habra~~	~~Yes~~	~~Yes~~	~~Yes~~	~~No~~	~~SM~~
~~19.~~	~~La Mirada Boulevard at Imperial Highway~~	~~La Mirada~~	~~Yes~~	~~Yes~~	~~Yes~~	~~No~~	~~SM~~
20.	Beach Blvd at La Mirada Blvd/Malvern Ave	Buena Park/Caltrans	Yes	No	No	Yes	SU
21.	Beach Boulevard at La Habra Boulevard	La Habra/Caltrans	No	--	--	--	LTS
22.	Valley View Avenue at Imperial Highway	La Mirada	Yes	No	No	Yes	SU
23.	Beach Boulevard at Artesia Boulevard	Buena Park/Caltrans	Yes	No	No	Yes	SU
~~24.~~	~~Beach Boulevard at Commonwealth Avenue~~	~~Buena Park/Caltrans~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~25.~~	~~I-5 NB Ramps at Auto Center Drive~~	~~Buena Park/Caltrans~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~26.~~	~~Beach Boulevard at Auto Center Drive~~	~~Buena Park/Caltrans~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
~~27.~~	~~Beach Boulevard at I-5 SB Ramps~~	~~Buena Park/Caltrans~~	~~Yes~~	~~No~~	~~No~~	~~Yes~~	~~SU~~
~~28.~~	~~Beach Boulevard at Whittier Boulevard~~	~~La Habra/Caltrans~~	~~No~~	~~--~~	~~--~~	~~--~~	~~LTS~~
29.	Hacienda Road at Whittier Boulevard	La Habra/Caltrans	Yes	No	No	Yes	SU
~~30.~~	~~Walnut Street at Imperial Highway~~	~~La Habra/Caltrans~~	~~Yes~~	~~No~~	~~No~~	~~Yes~~	~~SU~~
~~31.~~	~~Gilbert Street at Malvern Avenue~~	~~Fullerton~~	~~Yes~~	~~No~~	~~No~~	~~Yes~~	~~SU~~
~~32.~~	~~Euclid Street at Malvern Avenue~~	~~Fullerton~~	~~Yes~~	~~No~~	~~No~~	~~Yes~~	~~SU~~

Table 7-1[2]
Summary of Traffic Impacts

		Jurisdiction	Significant Impact?	Included in Fee Program?	Can La Habra Implement Mitigation?	Included in Fair Share?	Level of Significance
Roadway Segments							
M.	Imperial Highway between Euclid Street and Harbor Boulevard	La Habra/Caltrans	Yes	No	No	No	SU
X.	Beach Boulevard between Rosecrans Ave and La Mirada Blvd	Buena Park/Caltrans	Yes	No	No	No	SU
Freeway Mainline Segments							
	SR-57 southbound north of Imperial Hwy	Caltrans	Yes	No	No	No	SU
Freeway Merge-Diverge Movements							
	SR-57 southbound on-ramp (EB) from Imperial Hwy	Caltrans	Yes	No	No	No	SU
Left Turn Queueing							
10.	Beach Boulevard at Imperial Highway	La Habra/Caltrans	Yes	No	No	Yes	SU

Notes: LTS = Less than Significant; SM = Significant but Mitigable; SU = Significant and Unavoidable

e. Air Quality

Impact AQ-1: Although the proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, proposed housing and population growth would be inconsistent with the Air Quality Management Plan for the South Coast Air Basin. The resulting impact would be *significant and unavoidable*.

f. Greenhouse Gas Emissions

Impact GHG-1:[3] Implementation of the proposed Rancho La Habra Specific Plan would result in a net increase in greenhouse gas (GHG) emissions of ~~6,037.55~~ 7,554.69 metric tons of carbon dioxide equivalents ($MTCO_2e$) per year, which would exceed the South Coast Air Quality Management District (SCAQMD) screening threshold of 3,000 $MTCO_2e$ per year even with implementation of Mitigation Measures GHG-1a, GHG-1b, GHG-1c,

[3] Revisions to this conclusion are taken from the Partially Recirculated Draft EIR and do not reflect new information.

GHG-1d, GHG-1g, and GHG-1h, and GHG-1i. In addition, because the Project would introduce increased housing in an area without major transit and increase reliance on the use of automobile travel and therefore be inconsistent with three goals and one policy of the regional RTP/SCS. The impact would be *significant and unavoidable*.

Impact GHG-2:[4] Although Mitigation Measures GHG-1a, GHG-1b, GHG-1c, GHG-1d, GHG-1g, GHG-1h, and GHG-1i would achieve consistency with the City's Climate Action Plan and the CARB 2017 Scoping Plan, the Project would introduce increased housing in an area without major transit and increase reliance on the use of automobile travel and therefore be inconsistent with three goals and one policy of the regional RTP/SCS.

g. Noise

Impact NOI-4: Project-related demolition and crushing, site grading, and infrastructure and building construction would temporarily expose persons to noise levels substantially in excess of existing conditions. Even with implementation of all feasible mitigation measures, construction noise levels would remain substantially above ambient conditions and would be clearly audible to area residents. The resulting impact would be *significant and unavoidable*.

7.2.2 PROJECT OBJECTIVES

The following identifies the objectives of the proposed Project, including the underlying purpose of the project, pursuant to CEQA Guidelines Section 15124(b), which requires an EIR to include a "statement of objectives sought by the proposed project." As noted in CEQA Guidelines Section 15124(b), a "clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings."

The following subsections identify project objectives that have been identified by the Lead Agency, the City of La Habra, as well as those identified by the Specific Plan applicant, CalAtlantic Homes.

a. City of La Habra Project Objectives

The City's overarching objectives in reviewing the proposed Rancho La Habra Specific Plan and related requests are to:

[4] Revisions to this conclusion are taken from the Partially Recirculated Draft EIR and do not reflect new information.

- Ensure that the long-term planned use of the Project site is consistent with the goals, objectives, and other provisions of the City's General Plan, recognizing that state law grants the City the authority to amend the General Plan and approve a specific plan consistent with the *amended* General Plan; and
- Meet the requirements of state law and local ordinances to provide the public and decision-makers with a thorough and objective evaluation of the physical and environmental effects that would result from the proposed Rancho La Habra Specific Plan and related actions, implement all feasible mitigation measures and consider a reasonable range of alternatives to the proposed Project that would avoid or reduce any significant environmental effects, and otherwise comply with the provisions of the CEQA and local practices to implement CEQA.

b. Applicant's Project Objectives

The applicant, CalAtlantic Homes, has identified the following project objectives for the proposed Rancho La Habra development:

- Implement the City's Housing Element by providing a range of new development that provides a range of new housing types, sizes, and prices for existing and future residents of the city;
- Provide new housing opportunities for city residents that provide fiscal benefit to the City, whereby revenues from the new development exceed public expenditures needed to serve and maintain the development;
- Provide a range of public park and recreational facilities, such as a Community Center, open turf, playground areas, picnicking and quiet enjoyment space, trail systems with fitness facilities and view overlooks, and nature trails with educational signage, that exceed the City's local park code requirements for the proposed Project;
- Create a network of trails throughout the residential neighborhoods that provide connections to existing City and regional trails east and west of the Project site and to the Westridge Plaza Shopping Center located north of the Project site;
- Improve the aesthetic character of the Beach Boulevard and Idaho Street frontages through landscape design consistent with the City's goals and objectives;
- Preserve, restore, and conserve natural habitat on the Project site to the extent practicable considering the other competing project objectives;
- Reduce the demand for potable water compared to the existing golf course water demand; and

- Redevelop the golf course property for a "higher and better use."[5]

7.3 DESCRIPTION OF ALTERNATIVES

7.3.1 ALTERNATIVES CARRIED FORWARD FOR ANALYSIS

CEQA Guidelines Section 15126.6(c) states:

> The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic Project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

In accordance with the general alternatives selection criteria discussed above, the following alternatives were selected for analysis in this EIR because either they are required under CEQA (e.g., no project alternative) or they would reduce or avoid significant effects of the proposed Project while attaining most of its objectives. The alternatives carried forward for analysis are as follows:

- **Alternative 1: No Project – No Development**. The No Project – No Development Alternative assumes that the proposed Specific Plan would not be adopted, and the existing Westridge Golf Club would continue to be open to the public for golf and related activities, including use of the driving range, pro shop, restaurant, and banquet facilities. No additional improvements or use of the site are included in this alternative. This alternative is intended to comply with CEQA Guidelines Section 15126.6(e), which requires the analysis of a "no project" alternative to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project.
- **Alternative 2: No Project – General Plan Build-Out**. The No Project – General Plan Build-Out Alternative assumes that the proposed Specific Plan would not be adopted and the existing Westridge Golf Club would be redeveloped with other uses that are permitted by the La Habra General Plan, which allows for recreational uses on the Project site. Whereas the No Project – No Development Alternative analyzes the potential impacts associated with the continuation of the existing golf course use, the No Project – General Plan Build-Out Alternative includes redevelopment of the Westridge Golf Club with public recreation. At

[5] The Appraisal Institute defines "highest and best use" as the "reasonably probable and legal use of vacant land or an improved property that is physically possible, appropriately supported, financially feasible, and that results in the highest value."

its least intensive use, this alternative would provide for a nine-hole golf course, continued use of the clubhouse, trails, passive recreational areas, and a small number of ballfields along Beach Boulevard. At its most intensive, this alternative would allow redevelopment of the existing golf course into a commercial recreation complex with multiple athletic fields, primarily for soccer, lacrosse, and/or football. The facility would also include several outdoor tennis courts and basketball courts, as well as a gymnasium for indoor basketball and other indoor sports.

This alternative is intended to provide for evaluation of potential development consistent with the site's current General Plan designation. This alternative is also intended to comply with CEQA Guidelines Section 15126.6(e), which provides for an EIR's no project alternative to analyze the impacts of what might reasonably be expected to occur in the foreseeable future, based on current plans and consistent with available infrastructure and community services, if the project were not approved.

- **Alternative 3: Golf Course and Hotel**. This alternative would include expanding the existing Westridge Golf Club to include a 114-room hotel north of the existing clubhouse and adjacent to the existing lower level parking lot to facilitate the creation of a "destination" golf course. Access to the hotel would be via La Habra Hills Drive. The five-level hotel would include a parking level that has 9 rooms, a basement level and garden level with 10 rooms each, a lobby level with 23 rooms, and two floors above the lobby with 31 rooms on each level. In addition to the 114 guest rooms, the hotel would also include three meeting/banquet rooms, a pool, and a small wedding pavilion. This alternative assumes that a General Plan Amendment and Change of Zone (La Habra Hills Specific Plan Amendment) would be approved to permit hotel development within the existing golf course, but that the proposed Rancho La Habra Specific Plan would not be approved to allow residential development within the Project site. The intent of this alternative is to reduce significant unavoidable aesthetics impacts by preserving the existing golf course, and to reduce significant unavoidable traffic, air quality, greenhouse gas (GHG), and noise impacts by eliminating proposed new residential development.
- **Alternative 4: Residential/Nine-Hole Golf Course**. This alternative would result in the redevelopment of Project site to include 314 dwelling units and a nine -hole golf course. This alternative would develop the portion of the existing golf course in the western part of the Project site to include up to 120 single-family-detached dwelling units and 194 townhomes/condominiums located east of Beach Boulevard. No new commercial uses would be provided along Beach Boulevard. The lot sizes of single-family detached dwelling units in this alternative would be a minimum of 4,000 square feet (i.e., 50 feet by 80 feet). The density of the townhomes/condominiums would be 18-24 dwelling units per acre. The existing nine golf holes on the eastern portion of the golf course would remain as a nine-hole golf course. The golf course clubhouse and parking lot would remain in their current use and location. The driving range would be eliminated.

This alternative assumes that a General Plan Amendment, amendment to the La Habra Hills Specific Plan, and a Change of Zone would be approved to allow residential development within the Project site, and to increase the development yield of both the General Plan and the La Habra Hills Specific Plan[6]. The intent of this alternative is to reduce significant unavoidable aesthetics impacts by preserving a portion of the existing golf course, and to reduce significant unavoidable traffic, air quality, GHG, and noise impacts by reducing the number of new residential units and eliminating commercial development.

- **Alternative 5: Reduced Density Residential/Nine-Hole Golf Course**. This reduced density alternative would result in the redevelopment of Project site to include 144 dwelling units and a nine -hole golf course. This alternative would develop the portion of the existing golf course in the western part of the Project site to include up to 144 townhomes/ condominiums located east of Beach Boulevard. No new commercial uses would be provided along Beach Boulevard. The density of the townhomes/condominiums would be 18 to24 dwelling units per acre. The existing nine holes on the eastern portion of the golf course would remain as a nine-hole golf course. The golf course clubhouse and parking lot would remain in their current location. The driving range would be eliminated. This alternative would further reduce the project's significant unavoidable impacts in comparison to Alternative 4. The Reduced Density Residential/Nine-Hole Golf Course Alternative would require a General Plan Amendment to modify the land use map, modify policies, and increase the overall development yield of the General Plan[7]. In addition, an amendment to the La Habra Hills Specific Plan would be required to modify the land use plan, increase development yield and discussion of the golf course to reflect a nine-hole facility, descriptions of the location of residential neighborhoods, and modify development statistics to reduce the amount of open space within the Specific Plan area.
- **Alternative 6: Reduced Density Single-Family Residential**. This reduced density alternative provides for redevelopment of the existing golf course into 269 single family residential lots covering the same development footprint as the proposed Project. No

[6] The La Habra General Plan recognizes that the La Habra Hills Specific Plan is built out, and does not provide for any additional residential development beyond the 556 dwelling units that were constructed. Thus, Alternative 4 would require an amendment to increase the General Plan's development yield by 314 dwelling units. As discussed in the Project Description, the La Habra Hills Specific Plan was originally approved for 700 dwelling units, was built out with a total of 556 units, and subsequently amended to reflect 556 dwelling units as the maximum allowable build-out. Thus, the addition of 314 dwelling units to the La Habra Hills Specific Plan to accommodate Alternative 4 would require a Specific Plan amendment to allow for 870 dwelling units, reflecting the proposed 314 dwelling units to be constructed within the western portion of the golf course in this alternative.

[7] The La Habra General Plan recognizes that the La Habra Hills Specific Plan is built out, and does not provide for any additional residential development beyond the 556 dwelling units that were constructed. Thus, Alternative 5 would require an amendment to increase the General Plan's development yield by 144 dwelling units. As discussed in the Project Description, the La Habra Hills Specific Plan was originally approved for 700 dwelling units, was built out with a total of 556 units, and subsequently amended to reflect 556 dwelling units as the maximum allowable build-out. Thus, the addition of 144 dwelling units to the La Habra Hills Specific Plan to accommodate Alternative 5 would require a Specific Plan amendment to allow for 700 dwelling units, reflecting the proposed 144 dwelling units to be constructed within the western portion of the golf course in this alternative.

attached housing or commercial uses would be provided. This alternative assumes approval of a General Plan Amendment and Change of Zone (La Habra Hills Specific Plan Amendment), along with the Rancho La Habra Specific Plan to allow development of 269 dwelling units and related recreational facilities within the Project site.

This alternative is intended to reduce traffic impacts. Therefore, the existing clubhouse would be closed along with the golf course, and on-site recreational amenities would be scaled to meet the needs of the on-site population. The intersection with the largest percentage decrease in performance due to traffic from the proposed Rancho La Habra Specific Plan would be Beach Boulevard at Rosecrans Avenue. At this intersection, the intersection capacity utilization (ICU) is projected to increase by 0.053, which exceeds the City of La Habra's significance threshold increase of 0.02. Therefore, this intersection was used to determine how many dwelling units could be constructed while achieving an ICU increase less than the City's threshold of 0.02. The result of this calculation was 269 dwelling units, which is the number included in this alternative.

7.3.2 ALTERNATIVES CONSIDERED BUT REJECTED

The following alternatives were considered, but rejected from further analysis for the reasons described below.

a. Off-Site Alternative

The purpose of the Off-Site Alternative is to evaluate whether moving the proposed Project to an alternate location would minimize or avoid impacts. In certain cases, a proposed Project is location-dependent. For example, a dam needs to be located next to a river. Therefore, an alternative location must remain along the river. In other cases, a proposed Project is size-dependent. A project may require a certain amount of space to accomplish its objectives. Other projects are neither location- nor size-dependent.

In this case, the proposed Project is size-dependent. To provide a range of housing types and sizes as well as extensive public park space and a new Community Center facility, the proposed Project requires a property similar in size to the 151-acre Project site. A search of the Multiple Listing Service (MLS) revealed that the largest property for sale in La Habra and within a 10-mile radius around La Habra is a 22-acre site in La Habra Heights, which is in a different city and is only a fraction of the size of the Project site. In addition, the project applicant does not control any other property within a 10-mile radius around La Habra that could be developed as a residential planned community and meet the applicant's objectives for the project. Therefore, an off-site alternative has been eliminated from further evaluation.

b. Residential Development with Expanded Commercial Area

An alternative was considered that would include conversion of the existing golf course to 277 single-family detached dwelling units and up to 220,000 square feet of retail/commercial uses along Beach Boulevard and adjacent to the Westridge Plaza Shopping Center to the north. This alternative would also include recreation-related components, including conversion of the golf course clubhouse to a community center, a high turn-over restaurant, and 42.1 acres of passive park land.

While this alternative would result in fewer dwelling units and reduce significant unavoidable impacts related to population growth, significant unavoidable traffic, air quality, and GHG emissions would be greater than for the proposed Project. This alternative was, therefore, eliminated from further evaluation.

7.4 ANALYSIS OF ALTERNATIVES

The following discussion evaluates and compares the impacts of each alternative considered by the Lead Agency with the impacts of the proposed Rancho La Habra Plan detailed in Chapter 3, *Environmental Setting, Impacts, and Mitigation*. The discussion also addresses the ability of each alternative to achieve the project objectives.

7.4.1 ALTERNATIVE 1: NO PROJECT – NO DEVELOPMENT

a. Impacts

Land Use and Planning

The existing golf course use is consistent with the La Habra General Plan and regional planning programs, and therefore the No Project – No Development Alternative would avoid several inconsistencies noted for the proposed Project. The site in its current condition does not divide a community.

Population and Housing

The No Project – No Development Alternative would maintain the General Plan's existing projected build-out population and would thereby result in no impacts, avoiding the proposed Project's significant unavoidable impact.

Aesthetic Resources

The No Project – No Development Alternative would retain the existing visual characteristics of the site and would result in no impacts, eliminating the proposed Project's significant unavoidable visual character impact.

Biological Resources

By retaining existing conditions, the No Project – No Development Alternative would avoid ground-disturbing activities and retain biological resources in their current configuration, resulting in less impact than the proposed Project.

Cultural Resources

Since the No Project – No Development Alternative would avoid earth movement, there would be no chance of discovering or disturbing buried cultural resources. Therefore, no impacts would result.

Traffic and Circulation

By retaining the existing golf course use, this alternative would not result in any traffic increases and thus would avoid the proposed Project's significant unavoidable effects.

The No Project – No Development Alternative would generate less traffic than the proposed Project would, as shown in **Table 7-2**. On a daily basis, the No Project – No Development Alternative would generate approximately 4,398 fewer daily vehicle trips than the proposed Project. This alternative would generate fewer daily vehicle trips than the Reduced Density Single-Family Residential Alternative (Alternative 5), which was designed to avoid significant traffic impacts.

Air Quality

Since no earth movement or grading would occur, the No Project – No Development Alternative would avoid the construction emissions associated with the proposed Project. Similarly, this alternative would have fewer long-term operational emissions than the proposed Project, and would eliminate the proposed Project's significant unavoidable air quality impact by maintaining consistency with the existing General Plan's build-out projection.

Table 7-2[8]
Trip Generation Comparison: Proposed Project vs. No Project – No Development Alternative

Land Use	Peak Hour						Daily
	AM			PM			
	In	Out	Total	In	Out	Total	
No Project – No Development Alternative (Existing Golf Course)	58	33	91	104	134	238	2,530
Proposed Project							
Residential (422[9] dwelling units)	~~64~~ 66	~~209~~ 206	~~273~~ 272	~~226~~ 224	~~127~~ 131	~~353~~ 355	~~3,479~~ 3,676
Retail (20,000 square feet)	72	~~55~~ 54	~~127~~ 126	105	~~88~~ 84	~~193~~ 189	~~2,244~~ 2,178
Recreation (Community Center and park)	~~55~~ 39	~~40~~ 28	~~95~~ 67	~~52~~ 34	~~47~~ 37	~~99~~ 71	~~1,205~~ 615
Total Proposed Project	~~191~~ 177	~~304~~ 288	~~495~~ 465	~~383~~ 363	~~262~~ 252	~~645~~ 615	~~6,928~~ 6,713
Trip Reduction Provided by Alternative, Compared to Proposed Project	~~133~~ **119**	~~271~~ **255**	~~404~~ **374**	~~279~~ **259**	~~128~~ **118**	~~407~~ **377**	~~4,398~~ **4,183**

Source: Rancho La Habra Traffic Impact Analysis, ~~2017~~ 2019.

Greenhouse Gas Emissions

Since no earth movement or grading would occur, the No Project – No Development Alternative would avoid the construction emissions associated with the proposed Project. Similarly, this alternative would generate less traffic and less energy demand and have fewer long-term operational GHG emissions than the proposed Project, eliminating the project's significant unavoidable GHG emissions impact.

Energy Resources

Since the No Project – No Development Alternative represents the existing condition, continued operation of the Westridge Golf Club under this alternative would have no impact on energy resources. This alternative would consume less energy than the proposed Project.

Noise and Vibration

Since no earth movement or grading would occur, the No Project – No Development Alternative would avoid the construction noise associated with the proposed Project and eliminate its significant unavoidable short-term noise impact. The No Project – No

[8] Revisions to Project traffic generation are taken from the Partially Recirculated Draft EIR and do not reflect new information.

[9] Subsequent to completion of the Rancho La Habra Traffic Impact Analysis (TIA), the proposed project was reduced in size from 422 to 402 dwelling units. The TIA therefore presents a worst case analysis of project impacts.

Development Alternative would also generate less traffic and less long-term operational noise than the proposed Project.

Hazards and Hazardous Materials

The Project site has approximately 430,000 cubic yards of total petroleum hydrocarbon (TPH)-contaminated soil that were buried as part of golf course construction consistent with regulations of the Orange County Health Care Agency. Because the existing placement of these soils meets applicable safety standards for the existing golf course use, the No Project – No Development Alternative would not move or disturb the TPH-contaminated soil. The proposed Project would, however, be required to uncover the contaminated soils and place them in deep fills pursuant to the requirements of the Orange County Health Care Agency.

Hydrology and Water Quality

Runoff from the golf course currently flows off-site to storm drain facilities without treatment. Given the nature of the golf course use, the potential exists for stormwater runoff to contain pesticides, nutrients from fertilizer, and oils/grease from the roadways, parking lot, and maintenance area. The proposed Project would construct a parallel storm drain connection across Beach Boulevard by adding a second 48-inch pipe to prevent stormwater from collecting on the golf course. The proposed Project would also provide water treatment facilities consistent with current regulations, which are more restrictive than those in place when the golf course was constructed. Therefore, compared to the proposed Project, the No Project – No Development Alternative would have greater hydrology and water quality impacts.

Geology, Soils, and Seismicity

The No Project – No Development Alternative would not require any earth movement, unlike the proposed Project, which would require grading of the majority of the site and the installation of several retaining walls. The No Project – No Development Alternative also would not place additional people in a seismically active region. This alternative would therefore result in reduced impacts compared to the proposed Project, although no significant geotechnical impacts were identified for the project.

Public Services

The No Project – No Development Alternative would not add housing or additional population, avoiding the increased demand on public services such as police, fire protection, and other services that would occur with the proposed Project.

Recreational Resources

The No Project – No Development Alternative would retain the existing golf course, which represents a recreation amenity for the City. By comparison, the proposed Project would remove the existing golf course and provide a greater level of recreational amenities than would be required by the City's General Plan and Municipal Code, including conversion of the existing clubhouse to a public Community Center.

Utilities, Service Systems, and Water Supply

The No Project – No Development Alternative would continue the existing golf course use, including its average annual consumption of approximately 276 acre-feet (AF) of potable water. This water consumption is approximately 35 percent higher than expected for the proposed Project (175.2 acre-feet per year (AFY)). The No Project – No Development Alternative would place less demand on other utilities, such as electricity and natural gas, and would generate less sewage than would the proposed Project; for these utilities, this alternative would therefore result in reduced impacts compared to the proposed Project, although no significant impacts were identified for the project.

b. Ability to Achieve Project Objectives

City Objectives

By retaining the existing golf course use of the Project site, the No Project – No Development Alternative would be consistent with the City's General Plan and would therefore achieve the City's project objective regarding General Plan consistency. The No Project – No Development Alternative would also achieve the City's project objectives in that it would minimize impacts related to future use of the Project site.

Applicant Objectives

By retaining the existing golf course use, the No Project – No Development Alternative would not meet the applicant's objectives for the proposed Project. Because the applicant's objectives emphasize providing a range of housing types and recreational opportunities as part of a residential project, reducing water consumption, and redeveloping the golf course for a "higher and better use," the applicant's objectives are achievable only through conversion of the existing golf course to residential use.

c. Ability to Reduce or Avoid Significant Impacts of Proposed Project

The No Project – No Development Alternative would eliminate the significant unavoidable impacts associated with the proposed Project in the following seven categories:

- Land Use and Planning (inconsistency with the RTP/SCS and the La Habra General Plan).
- Population and Housing (generation of population growth above existing General Plan build-out, reflected in significant traffic, air quality, and GHG impacts).
- Aesthetic Resources (loss of a major open space resource resulting in a change in the character of the site).
- Traffic and Circulation (increased traffic exceeding established significance thresholds).
- Air Quality (housing and population growth inconsistent with the current regional Air Quality Management Plan).
- GHG Emissions (annual emissions exceeding established significance thresholds).
- Noise (construction noise).

7.4.2 ALTERNATIVE 2: NO PROJECT – GENERAL PLAN BUILD-OUT

a. Impacts

Land Use and Planning

The No Project – General Plan Build-Out Alternative would be consistent with existing land use regulations, including the La Habra General Plan, the La Habra Hills Specific Plan, and the RTP/SCS, eliminating significant unavoidable impacts of the proposed Project. As noted in Section 3.2, *Land Use and Planning*, the proposed Project would be inconsistent with the RTP/SCS and the City's General Plan and would require a General Plan Amendment.

Population and Housing

The No Project – General Plan Build-Out Alternative would not add housing or additional population, avoiding the significant unavoidable population and housing impacts of the proposed Project.

Aesthetic Resources

With the No Project – General Plan Build-Out Alternative, the Project site would generally remain in open space without structures. This alternative would therefore eliminate the proposed Project's significant unavoidable impact related to the change in character of the site resulting from loss of the golf course, which is a major open space amenity. The ball fields that would be developed in this alternative would likely have night lighting. Such night lighting would replace the existing night-lighted golf course driving range and not constitute a significant impact, unless a substantially greater area than the existing driving range is provided with night lighting. Lighting from ball fields would be required to be directed

downward, but could result in a halo effect similar to the existing driving range. However, the ball fields developed in the No Project – General Plan Build-Out Alternative would generally have a greater level of night-time lighting than would the proposed Project.

Biological Resources

Depending on the ultimate configuration of recreational facilities, grading of the site for the No Project – General Plan Build-Out Alternative could encompass a similar area as that of the proposed Project, resulting in similar biological resources impacts and mitigation measures.

Cultural Resources

Depending on the ultimate configuration of recreational facilities, grading of the site for the No Project – General Plan Build-Out Alternative could encompass a similar area as that of the proposed Project, resulting in similar cultural resources impacts and mitigation measures.

Traffic and Circulation

Because site grading would be required, construction traffic impacts would be similar to those of the proposed Project on a daily basis. The length of time for grading would be reduced due to a reduction in the amount of grading required. In addition, the length of time for post-grading construction of recreational amenities would be shorter than for the construction of residential dwelling units and commercial development for the proposed Project.

The No Project – General Plan Build-Out Alternative would generate less traffic than would the proposed Project. **Table 7-3** provides a trip generation comparison with the proposed Project. The No Project – General Plan Build-Out Alternative would generate 5,049 fewer daily trips than the proposed Project. (The alternative would also generate 651 fewer daily trips than the existing golf course.) As such, this alternative would eliminate the significant unavoidable traffic impacts associated with the proposed Project.

Should the ball fields proposed in the No Project – General Plan Build-Out Alternative be used for organized youth or adult sports tournaments, traffic generation could be higher for this alternative on event days. However, event day traffic would not likely exceed the daily traffic of the proposed Project. In addition, tournaments, if held, would generally occur on weekends, when background traffic volumes are less than for weekday peak hour traffic.

Table 7-3[10]
Trip Generation Comparison: Proposed Project vs. No Project – General Plan Build-Out Alternative

Land Use	Peak Hour						Daily
	AM			PM			
	In	Out	Total	In	Out	Total	
No Project – General Plan Build-Out Alternative	23	19	42	281	221	428	1,879
Proposed Project							
Residential (422[11] dwelling units)	~~64~~ 66	~~209~~ 206	~~273~~ 272	~~226~~ 224	~~127~~ 131	~~353~~ 355	~~3,479~~ 3,676
Retail (20,000 square feet)	72	~~55~~ 54	~~127~~ 126	105	~~88~~ 84	~~193~~ 189	~~2,244~~ 2,178
Recreation (Community Center and park)	~~55~~ 39	~~40~~ 28	~~95~~ 67	~~52~~ 34	~~47~~ 37	~~99~~ 71	~~1,205~~ 615
Total Proposed Project	~~191~~ 177	~~304~~ 288	~~495~~ 465	~~383~~ 363	~~262~~ 252	~~645~~ 615	~~6,928~~ 6,713
Trip Reduction Provided by Alternative, Compared to Proposed Project	**~~168~~ 154**	**~~285~~ 269**	**~~453~~ 423**	**~~102~~ 82**	**~~41~~ 31**	**~~217~~ 187**	**~~5,049~~ 4,834**

Source: Rancho La Habra Traffic Impact Analysis, ~~2017~~ 2019.

Air Quality

Because the No Project – General Plan Build-Out Alternative would not increase population or housing, it would eliminate the proposed Project's significant unavoidable air quality impact by retaining consistency with the existing General Plan build-out projection. The No Project - General Plan Build-Out Alternative would require earth movement to create flat pads large enough to accommodate sports fields. The amount of earthwork would likely be less than for the proposed Project, however, because the TPH-contaminated soil would not likely need to be relocated, and no structures for human occupancy would be constructed, reducing the amount of over-excavation necessary to prepare the site to accommodate structures. The reduced amount of earthwork would reduce the number of construction days creating air pollutant emissions compared to the proposed Project, although the amount of soil materials moved and criteria air pollutant emissions on a daily basis would not likely be reduced as compared to the proposed Project.

The No Project – General Plan Build-Out Alternative would generate less traffic than the existing golf course and substantially less than the proposed Project, reducing air pollutant emissions compared to the existing golf course use and the proposed Project. This alternative

[10] Revisions to Project traffic generation are taken from the Partially Recirculated Draft EIR and do not reflect new information.

[11] Subsequent to completion of the Rancho La Habra Traffic Impact Analysis (TIA), the proposed project was reduced in size from 422 to 402 dwelling units. The TIA therefore presents a worst case analysis of project impacts.

would also eliminate air pollutant emissions associated with energy use from dwelling units included in the proposed Project.

Greenhouse Gas Emissions

The No Project – General Plan Build-Out Alternative would require earth movement to create flat pads large enough to accommodate sports fields. The amount of earthwork would likely be less than for the proposed Project, however, because the TPH-contaminated soil would not likely need to be relocated, and no structures for human occupancy would be constructed, reducing the amount of over-excavation necessary to prepare the site to accommodate structures. The reduced amount of earthwork would reduce the number of construction days creating GHG emissions, thus reducing total GHG emissions during construction compared to the proposed Project, although the amount of soil materials moved and GHG emissions on a daily basis would not likely be reduced as compared to the proposed Project.

The No Project – General Plan Build-Out Alternative would also generate less traffic than existing conditions and substantially less than the proposed Project, which would result in fewer long-term emissions. Because the General Plan Built-Out Alternative would generate less traffic than existing conditions, less traffic than the proposed Project, and would eliminate GHG emissions associated with energy use from proposed dwelling units, the No Project – General Plan Build-Out Alternative would eliminate the proposed Project's significant unavoidable GHG impact.

Energy Resources

The No Project – General Plan Build-Out Alternative would consume less energy than the proposed Project, since it would (1) generate substantially less traffic than the proposed Project, and (2) not require energy for dwelling units or commercial uses, as would the proposed Project.

Noise and Vibration

The No Project – General Plan Build-Out Alternative would require earth movement to create flat pads large enough to accommodate sports fields. The amount of earthwork would likely be less than for the proposed Project, however, because the TPH-contaminated soil would not likely need to be relocated. The reduced amount of earthwork would reduce the number of construction days generating noise, although the amount of soil materials moved and noise levels on a daily basis would not likely be reduced as compared to the proposed Project.

The No Project – General Plan Build-Out Alternative would also generate less traffic than the proposed Project, which would result in less long-term noise impact along area roadways. However, should the Project site be used as a tournament venue, operational noise levels from

large active crowds on tournament days (e.g., cheering from spectators, whistles from referees, horns to signal the end of the half or game, parking lot noise) would be greater than the on-site noise generation of the proposed Project.

Hazards and Hazardous Materials

The Project site has approximately 430,000 cubic yards of TPH-contaminated soil that were buried as part of golf course construction consistent with regulations of the Orange County Health Care Agency. Because the existing placement of these soils meets applicable safety standards for recreational use, the No Project – General Plan Build-Out Alternative would not move or disturb the TPH-contaminated soil. The proposed Project would, however, be required to uncover the contaminated soils, and place them in deep fills pursuant to the requirements of the Orange County Health Care Agency.

Hydrology and Water Quality

Runoff from the golf course currently flows off-site to storm drain facilities without treatment. Given the nature of the golf course use, the potential exists for stormwater runoff to contain pesticides, nutrients from fertilizer, and oils/grease from the roadways, parking lot, and maintenance area.

Even though the Project site would retain pervious surfaces, under the No Project – General Plan Build-Out Alternative site grading would trigger the need for water quality treatment Best Management Practices (BMPs). This alternative would also provide stormwater treatment facilities consistent with current regulations, which are more restrictive than those in place when the golf course was constructed. Because similar stormwater treatment facilities would be required for the proposed Project, water quality impacts of the No Project – General Plan Build-Out Alternative would be similar to those of the proposed Project. Also, since a parallel 48-inch storm drain would not be constructed under this alternative as it would be with the proposed Project, ponding of water within the Project site would continue during large storm events, which would not occur with the proposed Project. Since the Project site would be maintained in open space use, such ponding under the No Project – General Plan Build-Out Alternative would not result in a significant impact.

Geology, Soils, and Seismicity

The No Project – General Plan Build-Out Alternative would require earth movement to create flat pads large enough to accommodate sports fields. The total amount of earthwork would likely be less than for the proposed Project, however, because the TPH-contaminated soil would not likely need to be relocated, and over-excavation to create build pads for structures would not be required. The proposed recreational uses under this alternative would be subject to the same seismic and geologic hazards as the proposed Project. However, because no structures for

human occupancy would be included, impacts would be less under the No Project – General Plan Build-Out Alternative than they would be under the proposed Project.

Public Services

The No Project – General Plan Build-Out Alternative would not result in an increase in permanent population on-site and would generate a similar amount of activity within the Project site as does the existing golf course on a daily basis. Thus, this alternative would not generate a substantial need for increased public services on a daily basis, and there would be no need to expand existing public facilities as a result of the No Project – General Plan Build-Out Alternative. Should tournaments occur within the Project site under this alternative, there could be an increased demand for police and fire protection services (crowd control and medical aid) as compared to the existing golf course use. Depending on the size and nature of such tournaments, the City would require that on-site security and medical personnel be present. Thus, should tournaments be held under this alternative, significant impacts on public services would not occur, and there would be no need to expand existing public facilities. Thus, similar to the proposed Project, this alternative would not result in public services impacts.

Recreational Resources

While the No Project – General Plan Build-Out Alternative would result in loss of the existing golf course, the golf course would be replaced with another major recreational amenity providing recreational opportunities. At its least intense potential use, this alternative would provide a more limited nine-hole golf course, trails, passive recreational areas, and a small number of ballfields along Beach Boulevard. At its most intensive, this alternative would replace the existing golf course with multiple athletic fields, outdoor tennis courts and basketball courts, and a gymnasium for indoor basketball and other sports activities. Thus, a broader array of recreational uses would be available to the public. While golfers would be less likely to use a nine-hole golf course compared to the existing traditional 18-hole course, other members of the public might be more likely to use the site's increased recreational amenities, passive parks, and trails.

Utilities, Service Systems, and Water Supply

The No Project – General Plan Build-Out Alternative would replace the existing golf course with largely outdoor recreational uses and some indoor recreational uses, depending on the final design of facilities. This alternative would therefore likely consume less water than the existing golf course does, since there would be an increase in area not requiring as intense irrigation as needed for an 18-hole golf course. However, because it is not likely that the land area devoted to uses that do not require irrigation would be large enough for this alternative to consume less water than the proposed Project, this alternative would consume more water than the proposed Project.

Because landscape (turf) irrigation would be the primary use of water under the No Project – General Plan Build-Out Alternative, sewage generation would likely be less than for the proposed Project. In addition, solid waste generation would likely be less than for the proposed Project, because this alternative would not involve residential or commercial use and would not have large crowds present on a daily basis.

b. Ability to Achieve Project Objectives

City Objectives

By retaining the recreational use of the Project site, the No Project – General Plan Build-Out Alternative would be consistent with the City's General Plan and achieve the project objective regarding General Plan consistency. The No Project – General Plan Build-Out Alternative would also achieve the City's project objectives in that it would minimize impacts related to future use of the Project site.

Applicant Objectives

By retaining recreational use of the Project site, the No Project – General Plan Build-Out Alternative would not meet the applicant's objectives for the proposed Project. Because the applicant's objectives emphasize providing a range of housing types and recreational opportunities as part of a residential project and redeveloping the golf course for a "higher and better use," the applicant's objectives are achievable only through conversion of the existing golf course to residential use.

c. Ability to Reduce or Avoid Significant Impacts of Proposed Project

The No Project – General Plan Build-Out Alternative would eliminate the following significant unavoidable impacts associated with the proposed Project:

- Land Use and Planning (inconsistency with the RTP/SCS and the La Habra General Plan).
- Population and Housing (generation of population growth above existing General Plan buildout, reflected in significant traffic, air quality, and GHG impacts).
- Aesthetic Resources (loss of a major open space resource resulting in a change in the character of the site).
- Traffic and Circulation (increased traffic exceeding established significance thresholds).
- Air Quality (housing and population growth inconsistent with the current regional Air Quality Management Plan).
- GHG Emissions (annual emissions exceeding established significance thresholds).

By reducing the number of days required for site grading, the No Project – General Plan Build-Out Alternative would reduce the severity of, but not eliminate, the following significant unavoidable impact associated with the proposed Project:

- Noise (construction noise).

7.4.3 ALTERNATIVE 3: GOLF COURSE AND HOTEL

a. Impacts

Land Use and Planning

Addition of a hotel as part of the Westridge Golf Club would not require a General Plan Amendment, since the hotel would be considered a part of the approved golf course operation consistent with the site's recreational "Open Space" designation. Thus, the Golf Course and Hotel Alternative would be consistent with the La Habra General Plan and the RTP/SCS, eliminating the significant unavoidable land use and planning impact of the proposed Project.

Population and Housing

The Golf Course and Hotel Alternative would not add housing or a permanent resident population to the site. The hotel would add approximately 65 employees and a new transient population to the Project site. This alternative would thus increase the number of employees within the site by less than the commercial center in the proposed Project; the transient population at the hotel would be less than the permanent resident population in the proposed Project. Because the Golf Course and Hotel Alternative would be consistent with the General Plan, it would eliminate the significant unavoidable population and housing impact of the proposed Project.

Aesthetic Resources

The Project site would primarily remain as a golf course; however, a new five-story structure would be located in the middle of the property, north of the clubhouse. At five stories, it would be the tallest building in the surrounding area and widely visible from surrounding properties and streets. Because public viewpoints to the south are at a higher elevation that the Project site, the single hotel structure would not substantially block views of scenic vistas. While a five-story hotel would change the visual character of the central portion of the Project site, views of the Project site would remain primarily open space in character. The Golf Course and Hotel Alternative would therefore not cause a significant aesthetics impact, unlike the proposed Project, which would convert an extensive area to residential use, resulting in residential development becoming the predominant visual feature of the site. The Golf Course and Hotel

Alternative would therefore eliminate the significant unavoidable impact of the proposed Project.

Biological Resources

The addition of a hotel as part of the Golf Course and Hotel Alternative would avoid impacts on the most sensitive biological resources in the central and western portions of the project site, as would the proposed project. The Golf Course and Hotel Alternative would affect less habitat than the proposed project because it would require grading of a substantially smaller area.

This alternative would eliminate the grading footprint indicated in Figure 3.5-2 (Vegetation Alliances), with the exception of the existing clubhouse area and an approximately 5- to 10-acre area immediately to the north. Because the existing golf course and existing vegetative alliances within the balance of the Project site would remain in place, the Golf Course and Hotel Alternative would permit the existing deed restrictions to remain in place, and the loss of vegetative alliances within the site would be to a small area of Mixed Scrub Shrubland Alliance north of the existing clubhouse.

Cultural Resources

The Project site has been highly disturbed, and the likelihood of uncovering cultural resources, either archaeological or paleontological, is low where the hotel would be located. Since the Golf Course and Hotel Alternative would require less earth movement than would the proposed Project, the potential for discovering buried cultural resources would be less than for the proposed Project, and impacts would be reduced.

Traffic and Circulation

Because site grading would be required for the proposed hotel, construction traffic impacts would be similar to those of the proposed Project on a daily basis. The length of time for grading and building construction, would however, be shortened due to a smaller area requiring grading, and the requirement for construction of a single hotel facility, which would occur at a single time as compared to the phased construction of residential dwelling units and elimination of commercial development as would occur for the proposed Project.

As shown in **Table 7-4**, the Golf Course and Hotel Alternative would generate 3,381 fewer daily trips than the proposed Project. (The alternative would generate 1,017 more trips than the existing golf course, however.)

Table 7-4[12]
Trip Generation Comparison: Proposed Project vs. Golf Course and Hotel Alternative

Land Use	Peak Hour						Daily
	AM			PM			
	In	Out	Total	In	Out	Total	
Golf Course and Hotel Alternative	102	65	167	143	175	318	3,547
Proposed Project							
Residential (422[13] dwelling units)	~~64~~ 66	~~209~~ 206	~~273~~ 272	~~226~~ 224	~~127~~ 131	~~353~~ 355	~~3,479~~ 3,676
Retail (20,000 square feet)	72	~~55~~ 54	~~127~~ 126	105	~~88~~ 84	~~193~~ 189	~~2,244~~ 2,178
Recreation (Community Center and park)	~~55~~ 39	~~40~~ 28	~~95~~ 67	~~52~~ 34	~~47~~ 37	~~99~~ 71	~~1,205~~ 615
Total Proposed Project	~~191~~ 177	~~304~~ 288	~~495~~ 465	~~383~~ 363	~~262~~ 252	~~645~~ 615	~~6,928~~ 6,713
Trip Reduction Provided by Alternative, Compared to Proposed Project	~~89~~ **75**	~~**239**~~ **223**	~~**328**~~ **298**	~~**240**~~ **220**	~~87~~ **77**	~~**327**~~ **297**	~~**3,381**~~ **3,166**

Source: Rancho La Habra Traffic Impact Analysis, ~~2017~~ 2019.

Air Quality

The amount of earthwork under this alternative would be less than under the proposed Project, because site grading would be limited to creating pads for the hotel and adjacent parking area and the TPH-contaminated soil would not need to be relocated, Because of the small area required to be graded under this alternative, both the number of construction days and the amount of daily air pollutant emissions would be reduced compared to the proposed Project. There would, however, be a slight increase in construction-related traffic during site demolition activities since construction debris would be hauled off-site to a landfill, rather than being crushed for reuse within the Project site.

The addition of a hotel would increase the amount of traffic generated within the Project site compared to the existing golf course; however, the traffic volumes would be less than those of the proposed Project. Therefore, the Golf Course and Hotel Alternative would have fewer long-term operational emissions than the proposed Project.

Because the Golf Course and Hotel Alternative would be consistent with General Plan growth projections (and therefore the applicable Air Quality Management Plan whose growth

[12] Revisions to Project traffic generation are taken from the Partially Recirculated Draft EIR and do not reflect new information.

[13] Subsequent to completion of the Rancho La Habra Traffic Impact Analysis (TIA), the proposed project was reduced in size from 422 to 402 dwelling units. The TIA therefore presents a worst case analysis of project impacts.

projections are based on the General Plan), it would eliminate the significant unavoidable air quality impact of the proposed Project.

Greenhouse Gas Emissions

Compared to the proposed Project, the Golf Course and Hotel Alternative would reduce construction emissions associated with grading the Project site and building construction. There would, however, be a slight increase in construction-related traffic during site demolition activities, since construction debris would be hauled off-site to a landfill rather than being crushed for reuse within the Project site.

The addition of a hotel would increase the amount of traffic generated within the Project site compared to the existing golf course use; however, traffic volumes generated by this alternative would be less than those generated by the proposed Project. Thus, the Golf Course and Hotel Alternative would have fewer long-term operational GHG emissions than the proposed Project.

Energy Resources

The Golf Course and Hotel Alternative would consume less energy than the proposed Project since it would (1) generate less traffic than the proposed Project, and (2) not require energy for dwelling units, as the proposed Project would.

Noise and Vibration

Construction noise under the Golf Course and Hotel Alternative would be limited to grading of pads for a new hotel and parking area north of the existing clubhouse. As such, the extent of daily activities and number of days required for site grading would be reduced compared to the proposed Project. Because there would be substantially less construction debris created under this alternative, debris that is not recycled would be hauled to a local landfill, increasing traffic-related noise during construction in comparison to the proposed Project. However, because construction debris would be hauled off-site, there would be no crushing operation included in this alternative, reducing on-site noise generation during demolition activities. The Golf Course and Hotel Alternative would also generate less operational traffic than the proposed Project, which would result in less long-term noise impact along area roadways.

Hazards and Hazardous Materials

According to the Soil Management Plan approved by the Orange County Health Care Agency, the TPH-contaminated soils that were previously buried pursuant to the requirements of the Health Care Agency during construction of the golf course are located in the western portion of the Project site. It is therefore unlikely that TPH-contaminated soils would be encountered during grading and construction for a hotel north of the existing clubhouse as part of the Golf Course and Hotel Alternative. Because new development would be limited to a hotel and

parking area, long-term impacts related to hazards and hazardous materials would be similar to, but less than, those of the proposed Project.

Hydrology and Water Quality

Runoff from the golf course currently flows off-site to storm drain facilities without treatment. Given the nature of the golf course use, the potential exists for stormwater runoff to contain pesticides, nutrients from fertilizer, and oils/grease from the roadways, parking lot, and maintenance area. Under the Golf Course and Hotel Alternative, the new hotel and parking area would be provided with water treatment BMPs to address runoff from the hotel and associated parking area; however, runoff from the existing golf course could continue in its current condition. The Golf Course and Hotel Alternative would therefore have more impact on water quality than the proposed Project, which would be required to provide water quality BMPs for runoff from the entire Project site.

Also, since a parallel 48-inch storm drain would not be constructed under this alternative as it would be with the proposed Project, ponding of water within the golf course would continue during large storm events, which would not occur with the proposed Project. Since the golf course use would remain, such ponding under the Golf Course and Hotel Alternative would not result in a significant impact.

Geology, Soils, and Seismicity

The Golf Course and Hotel Alternative would require earth movement to create pads for a new hotel and parking area on the north side of the existing clubhouse. Construction of a five-story hotel under this alternative would require site preparation, including geotechnical stabilization, similar to the proposed Project. In some instances, stabilizing a small site can be challenging. For example, because over-excavation and re-compaction over large areas would not occur, shoring or caissons for the hotel might be necessary depending on the structural foundation requirements. Geotechnical requirements would be similar for the Golf Course and Hotel Alternative and for the proposed Project; however, site preparation and construction of the hotel could require additional shoring or caissons to meet site specific foundation requirements for the proposed five-story structure. While impacts related to the proposed hotel would be greater than for other structures within the Project site, the alternative would have similar geotechnical impacts compared to the proposed Project, since the impacts of the proposed hotel (which would be less than significant due to compliance with the California Building Code) would be offset since fewer structures for human occupancy would be constructed.

Public Services

The Golf Course and Hotel Alternative would not add housing or resident population to the site but would increase on-site employment with approximately 65 new jobs, which would be less

than the commercial component of the proposed Project. While the proposed Project would not cause significant impacts, the Golf Course and Hotel Alternative would place less demand on public services such as police, fire protection, and other services than would the project.

Recreational Resources

The Golf Course and Hotel Alternative would retain the existing Westridge Golf Club, which represents an important open space and recreation amenity for the city. Addition of a hotel within the golf course site would not result in any adverse effects on recreational resources. However, this alternative would not provide other recreational amenities that are included in the proposed Project. Although the proposed Project would result in the loss of the existing golf course as an open space and recreation amenity for the City, it would provide 27.9 acres of public parks, 14.3 acres of open space in habitat conservation areas, trails, conversion of the existing clubhouse to a Community Center. While neither this alternative nor the proposed Project would have any adverse effects on recreational resources pursuant to established CEQA thresholds, both would result in loss of the existing 18-hole golf course. While the Golf Course and Hotel Alternative would retain a nine-hole golf course, the project proposes to offset the loss of on-site golf activities with public park and open space areas.

Utilities, Service Systems, and Water Supply

The Golf Course and Hotel Alternative would retain the existing Westridge Golf Club, which currently uses approximately 276 AF of water annually. The addition of a hotel use would increase the amount of water use by approximately 13.9 AFY for guest rooms, dining facilities, laundry service, landscaping, and pool facilities, an *increase* of approximately 5 percent. By comparison, the proposed Project would reduce annual water consumption by approximately 96 AF, a *reduction* of approximately 35 percent.

As indicated in Table 3.17-4 in Section 3.17, *Utilities, Service Systems, and Water Supply*, projected annual city-wide water demand for 2040 is 9,057 AF, and projected water supply for 2040 is 9,158 AFY. Thus, the City currently has adequate water supply for addition of a hotel to the existing golf course use of the Project site, and water supply impacts would be less than significant. Impacts on other utilities (e.g., wastewater and solid waste) would be less for this alternative than for the proposed Project.

b. Ability to Achieve Project Objectives

City Objectives

By retaining the existing golf course and adding a complementary use, the Golf Course and Hotel Alternative would be consistent with the City's General Plan and achieve the City's project objective regarding General Plan consistency. The Golf Course and Hotel Alternative

would also achieve the City's project objectives in that it would minimize impacts related to future use of the Project site.

Applicant Objectives

By retaining the existing golf course use of the Project site, the Golf Course and Hotel Alternative would not meet the applicant's objectives for the proposed Project. Because the applicant's objectives emphasize providing a range of housing types and recreational opportunities as part of a residential project, reducing water consumption, and redeveloping the golf course for a "higher and better use," the applicant's objectives are achievable only through conversion of the existing golf course to residential use.

c. Ability to Reduce or Avoid Significant Impacts of Proposed Project

The Golf Course and Hotel Alternative would eliminate the following significant unavoidable impacts associated with the proposed Project:

- Land Use and Planning (inconsistency with the RTP/SCS and the La Habra General Plan).
- Population and Housing (generation of population growth above existing General Plan buildout, reflected in significant traffic, air quality, and GHG impacts).
- Aesthetic Resources (loss of a major open space resource resulting in a change in the character of the site).

The Golf Course and Hotel Alternative would reduce the severity of, but not eliminate, the following significant unavoidable impacts associated with the proposed Project by reducing the extent of required site grading and reducing the amount of site development:

- Traffic and Circulation (increased traffic exceeding established significance thresholds).
- Air Quality (housing and population growth inconsistent with the current regional Air Quality Management Plan).
- GHG Emissions (annual emissions exceeding established significance thresholds).
- Noise (construction noise).

7.4.4 ALTERNATIVE 4: RESIDENTIAL/NINE-HOLE GOLF COURSE

a. Impacts

Land Use and Planning

By retaining a golf course use within the eastern portion of the Project site and allowing for residential development in the western portion of the site, the Residential/Nine-Hole Golf

Course Alternative would require a General Plan Amendment and an amendment to the La Habra Hills Specific Plan to achieve the City's objective for General Plan consistency. This alternative would thus require similar discretionary land use approvals as the proposed Project, including a General Plan Amendment (policies, land use map and increased General Plan buildout), Specific Plan Amendment (modify description of the golf course and open space and increase development yield), and Change of Zone. As noted above, this alternative would reduce the golf course approved in the La Habra Hills Specific Plan from an 18-hole to a 9-hole facility, and increase the overall build-out of the General Plan and the La Habra Hills Specific Plan.

At 314 dwelling units, this alternative would be inconsistent with the same RTP/SCS and La Habra General Plan policies as the proposed Project, even if the alternative would retain a portion of the golf course and propose fewer dwelling units.

Population and Housing

The development of 314 dwelling units associated with the Reduced Density Residential/Nine-Hole Golf Course Alternative would generate less population than the proposed Project (402 dwelling units). This alternative would cause housing and population to exceed the existing General Plan's build-out projection, thereby resulting in a significant unavoidable impact. By reducing the project's proposed residential build-out, however, this alternative would reduce the population and housing impacts of the proposed Project.

Aesthetic Resources

By retaining the eastern portion of the golf course for continued use, the amount of land converted from open space to residential use would be reduced in comparison to the proposed Project. Although nine golf holes would be retained, with 314 dwelling units, housing would be the dominant visual feature over a large portion of the Project site. By retaining a nine-hole golf course, the Residential/Nine-Hole Golf Course Alternative would therefore reduce but not eliminate the significant unavoidable aesthetics impacts of the proposed Project.

Biological Resources

The limits of grading associated with the Residential/Nine-Hole Golf Course Alternative within the western portion of the site would be similar to the proposed project, resulting in similar impacts on sensitive biological resources within that area, such as coastal sage scrub. Both this alternative and the proposed project would avoid impacts on the central riparian drainage. This alternative would also avoid impacts on existing biological resources ~~within~~ throughout the eastern portion of the project site (area east of the existing clubhouse), resulting in reduced impacts compared to the proposed project. The Residential/Nine-Hole Golf Course Alternative would also permit the majority of deed-restricted areas identified in Figure 2-11 (Deed Restriction Boundaries) to remain in place. Only the two westernmost deed-restricted areas

shown in Figure 2-11 would need to be vacated for the Residential/Nine-Hole Golf Course Alternative.

Cultural Resources

The Project site has been highly disturbed, and the likelihood of uncovering cultural resources, either archaeological or paleontological, is low. Since the Residential/Nine-Hole Golf Course Alternative would avoid earth movement on the eastern portion of the site, there would be less chance of discovering buried cultural resources compared to the proposed Project.

Traffic and Circulation

Although site grading and building construction would be the same as for the proposed Project on a daily basis, because of the need to export contaminated soils, construction traffic impacts would be slightly greater those of the proposed Project on a daily basis. The length of time for grading and building construction, would however, be shortened due to a small area to be graded, a reduced number of residential dwelling units, and elimination of commercial development.

The Residential/Nine-Hole Golf Course Alternative would generate 2,571 fewer daily trips than the proposed Project, as shown in **Table 7-5**. To reduce traffic, this alternative would not include commercial development or public use of on-site parks or a Community Center with its associated banquet and meeting facilities. This alternative would generate 1,827 more daily trips than the existing golf course, however.

As shown in **Table 7-5**, the Residential/Nine-Hole Golf Course Alternative would represent an approximately 47 percent reduction in trip generation during the PM peak hour and an approximately 55 percent reduction in trip generation during the AM peak hour. While this would substantially reduce the project's traffic impacts, it would not be sufficient to reduce impacts to less than significant at all intersections, including intersections outside of the City of La Habra's jurisdiction. Impacts would, therefore, remain significant and unavoidable under the Residential/Nine-Hole Golf Course Alternative.

Table 7-5[14]
Trip Generation Comparison: Proposed Project vs. Residential/Nine-Hole Golf Course Alternative

Land Use	Peak Hour						Daily
	AM			PM			
	In	Out	Total	In	Out	Total	
Residential/Nine-Hole Golf Course Alternative (314 dwelling units)	66	156	222	196	144	340	4,357
Proposed Project							
Residential (422[15] dwelling units)	~~64~~ 66	~~209~~ 206	~~273~~ 272	~~226~~ 224	~~127~~ 131	~~353~~ 355	~~3,479~~ 3,676
Retail (20,000 square feet)	72	~~55~~ 54	~~127~~ 126	105	~~88~~ 84	~~193~~ 189	~~2,244~~ 2,178
Recreation (Community Center and park)	~~55~~ 39	~~40~~ 28	~~95~~ 67	~~52~~ 34	~~47~~ 37	~~99~~ 71	~~1,205~~ 615
Total Proposed Project	~~191~~ 177	~~304~~ 288	~~495~~ 465	~~383~~ 363	~~262~~ 252	~~645~~ 615	~~6,928~~ 6,713
Trip Reduction Provided by Alternative, Compared to Proposed Project	**~~125~~ 111**	**~~148~~ 132**	**~~273~~ 243**	**~~187~~ 167**	**~~118~~ 108**	**~~305~~ 275**	**~~2,571~~ 2,356**

Source: Rancho La Habra Traffic Impact Analysis, ~~2017~~ 2019.

Air Quality

The Residential/Nine-Hole Golf Course Alternative would require grading only the western half of the Project site. This portion of the Project site contains the TPH-contaminated soil from past oil operations that was buried pursuant to the requirements of the Orange County Health Care Agency as part of golf course construction. The TPH-contaminated soil would need to be removed; however, without grading the eastern portion of the site, there would be insufficient deep fills to place the contaminated soil. Therefore, unless the golf course was temporarily closed to allow for burying TPH-contaminated soil in the eastern portion of the site as was approved by the Orange County Health Care Agency for the proposed Project, export of a portion of the TPH-contaminated soil would be necessary. Grading in the western portion of the site would also encounter the buried concrete debris from prior oil operations. The debris would either need to be crushed on-site or exported to a suitable landfill. If additional crushing or off-site expert of earth materials would be necessary, air quality impacts would be greater on a daily basis during grading activities than the proposed Project. However, the amount of time required for grading would be reduced, reducing total emissions during construction.

[14] Revisions to Project traffic generation are taken from the Partially Recirculated Draft EIR and do not reflect new information.

[15] Subsequent to completion of the Rancho La Habra Traffic Impact Analysis (TIA), the proposed project was reduced in size from 422 to 402 dwelling units. The TIA therefore presents a worst case analysis of project impacts.

Therefore, the Residential/Nine-Hole Golf Course Alternative would result in construction-related air quality impacts similar to those of the proposed Project.

The development of 314 dwelling units and a nine-hole golf course would generate less traffic than the proposed Project and would also consume less energy due to the reduced number of dwelling units compared to the proposed Project. Therefore, long-term air emissions would be less for this alternative than for the proposed Project.

Because development of 314 dwelling units would exceed the General Plan land use assumptions used in the South Coast Air Quality Management Plan, the Reduced Density Residential/Nine-Hole Golf Course Alternative would result in a significant unavoidable air quality impact. By reducing the number of dwelling units compared to the project, however, this alternative would reduce on-site population, and the significant unavoidable air quality impact would not be as great as with the proposed Project.

Greenhouse Gas Emissions

The Residential/Nine-Hole Golf Course Alternative would require grading only the western half of the Project site. This portion of the Project site contains the TPH-contaminated soil from past oil operations that was buried pursuant to the requirements of the Orange County Health Care Agency as part of golf course construction. The TPH-contaminated soil would need to be removed; however, without grading the eastern portion of the site, there would be insufficient deep fills to place the contaminated soil. Therefore, unless the golf course was temporarily closed to allow for burying TPH-contaminated soil in the eastern portion of the site as was approved by the Orange County Health Care Agency for the proposed Project, export of a portion of the TPH-contaminated soil would be necessary. Grading in the western portion of the site would also encounter the buried concrete debris from prior oil operations. The debris would either need to be crushed on-site or exported to a suitable landfill. If additional crushing or off-site expert of earth materials would be necessary, air quality impacts would be greater on a daily basis during grading activities than the proposed Project. However, the amount of time required for grading would be reduced, reducing total emissions during construction. Therefore, the Residential/Nine-Hole Golf Course Alternative would result in GHG construction impacts similar to those of the proposed Project.

The development of 314 dwelling units and a nine-hole golf course would generate less traffic than the proposed Project, and would also consume less energy due to a reduced number of dwelling units as compared to the proposed Project. Therefore, long-term air emissions would be less for this alternative than for the proposed Project.

Energy Resources

The Residential/Nine-Hole Golf Course Alternative would consume less energy than the proposed Project since it would (1) generate less traffic than the proposed Project, (2) require less energy for dwelling units, and (3) eliminate energy demands of the commercial uses included in the proposed Project. Energy consumption could be further reduced by reducing the residential build-out of this alternative to 144 dwelling units and amending the La Habra Hills Specific Plan to reduce the golf course from an 18-hole to a 9-hole facility.

Noise and Vibration

The Residential/Nine-Hole Golf Course Alternative would require grading only the western half of the Project site. This portion of the Project site contains the TPH-contaminated soil from past oil operations that was buried pursuant to the requirements of the Orange County Health Care Agency as part of golf course construction. The TPH-contaminated soil would need to be removed; however, without grading the eastern portion of the site, there would be insufficient deep fills to place the contaminated soil. Therefore, unless the golf course was temporarily closed to allow for burying TPH-contaminated soil in the eastern portion of the site as was approved by the Orange County Health Care Agency for the proposed Project, export of a portion of the TPH-contaminated soil would be necessary. Grading in the western portion of the site would also encounter the buried concrete debris from prior oil operations. The debris would either need to be crushed on-site or exported to a suitable landfill. As a result, construction noise generated in the western portion of the Project site would be similar to the proposed Project, construction noise generated in the eastern portion of the Project site would be substantially reduced, and on-road noise during construction would be increased with this alternative in comparison to the proposed Project.

The development of 314 housing units and a nine-hole golf course would generate less traffic than the proposed Project during project operations. Therefore, long-term noise impacts would be less under this alternative than under the proposed Project.

Hazards and Hazardous Materials

The Residential/Nine-Hole Golf Course Alternative would require grading only the western half of the Project site. This portion of the Project site contains the TPH-contaminated soil from past oil operations that was buried pursuant to the requirements of the Orange County Health Care Agency as part of golf course construction. The TPH-contaminated soil would need to be removed; however, without grading the eastern portion of the site, there would be insufficient deep fills to place the contaminated soil. Therefore, unless the golf course was temporarily closed to allow for burying TPH-contaminated soil in the eastern portion of the site as was approved by the Orange County Health Care Agency for the proposed Project, export of a portion of the TPH-contaminated soil would be necessary. Therefore, the Residential/Nine-

Hole Golf Course Alternative would result in an increase in hazards impacts related to the transport of hazardous materials compared to the proposed Project. Because all such transport would be subject to local, state, and federal regulations designed to protect public health and safety, impacts of this alternative would be less than significant.

Hydrology and Water Quality

Runoff from the golf course currently flows off-site to storm drain facilities without treatment. Given the nature of the golf course use, the potential exists for storm water runoff to contain pesticides, nutrients from fertilizer, and oils/grease from the roadways, parking lot, and maintenance area.

Even though the Project site would retain pervious surfaces under the Residential/Nine-Hole Golf Course Alternative, site grading would trigger the need for water quality treatment BMPs. This alternative would also provide storm water treatment facilities consistent with current regulations, which are more restrictive than they were when the golf course was constructed. Because the required storm water treatment facilities would be similar to those required for the proposed Project, water quality impacts of the Residential/Nine-Hole Golf Course Alternative would be similar to those of the proposed Project. While this alternative would result in a smaller increase in pervious surfaces compared to the proposed Project, construction of a parallel 48-inch storm drain across Beach Boulevard would be needed to address ponding of water within the Project site during large storm events. Therefore, hydrology impacts of this alternative would be similar to those of the proposed Project.

Geology, Soils, and Seismicity

The western portion of the site is more complicated geotechnically than the eastern portion. The far eastern portion of the site is located adjacent to a fault setback zone. However, with the Residential/Nine-Hole Golf Course Alternative, the fault zone would not be a concern because no structures would be constructed in that area. Grading in the western portion of the site would be similar to grading for the proposed Project. Because there would be fewer dwelling units and people residing within the Project site, and no dwelling units would be constructed adjacent to a fault setback zone, geotechnical impacts of the Residential/Nine-Hole Golf Course Alternative would be less than those of the proposed Project.

Public Services

The development of 314 dwelling units associated with the Residential/Nine-Hole Golf Course Alternative would generate less population than the proposed Project. While both this alternative and the proposed Project would have less than significant impacts, public services impacts would be less for the Residential/Nine-Hole Golf Course Alternative than for the proposed Project.

Recreational Resources

The Residential/Nine-Hole Golf Course Alternative would provide a nine-hole golf course, which represents a substantially less important recreational and open space amenity than does the existing 18-hole golf course. Despite the U.S. Golf Association's "Play Nine" initiative, nine-hole golf courses are not as popular as 18-hole courses. Because the eastern portion of the Project site would remain in golf course use, trails and recreational amenities would be confined to the western portion of the Project site. In addition, the existing clubhouse would not be converted to a Community Center, and other recreational amenities would be scaled down to meet the needs created by the reduced amount of housing proposed in this alternative. Because recreational amenities would be scaled down to meet the recreational needs created by 314 dwelling units, the nine-hole golf course would be the primary recreational amenity available to the public under this alternative, and the result would be a less popular golf facility than the current 18-hole facility, but without the public parks and publicly accessible trails of the proposed Project.

Utilities, Service Systems, and Water Supply

The existing golf course currently uses approximately 276 AF of water annually. A nine-hole golf course would reduce that consumption by approximately half[16] (138 AFY). The addition of 314 dwelling units with indoor and outdoor water demands would to the water demands of the existing golf course would result in a water demand of approximately 256 AFY, which is substantially greater than the water demand of the existing proposed Project (175.2 AF). Because total water use for the Residential/Nine-Hole Golf Course Alternative would be slightly less than for the existing golf course, water supply impacts would be less than significant. This alternative would also reduce sewage and solid waste generation by approximately 35 percent compared to the proposed Project.

b. Ability to Achieve Project Objectives

City Objectives

By retaining a golf course use within the eastern portion of the Project site and allowing for development of 314 dwelling units in the western portion of the site, the Residential/Nine-Hole Golf Course Alternative would require a General Plan Amendment to achieve the City's objective for General Plan consistency. Because state law provides cities with the ability to amend their General Plans, and all feasible mitigation measures would be implemented for this alternative, the Residential/Nine-Hole Golf Course Alternative would meet City objectives.

[16] The nine-hole golf course proposed in this alternative would cover approximately half of the currently irrigated area of the current course. While the clubhouse would remain in operation and continue consuming water, landscaping associated with the existing driving range would be eliminated.

Applicant Objectives

By providing a mix of single- and multi-family housing, the Residential/Nine-Hole Golf Course Alternative would meet the applicant's objectives of providing housing, although not to the same degree as the proposed Project. This alternative would also meet the applicant's objective of providing public recreational amenities, although public recreational amenities in this alternative would consist of a nine-hole golf course rather than a community center along with public parks and trails. As a result, this alternative would achieve the applicant's recreation objectives to a lesser degree than the proposed Project. This alternative would also meet the applicant's objectives related to protection of on-site natural habitat areas since it would retain the golf course within the eastern portion of the site and minimize impacts on coastal sage scrub habitat in the western portion of the site. The Residential/Nine-Hole Golf Course Alternative would reduce on-site water demand to a far lesser degree than would the proposed Project, which would partially meet the applicant's objectives. Retaining a nine-hole golf course use within the Project site and reducing the residential units to 314 dwelling units would be inconsistent with the applicant's economic objectives, but could partially meet the applicant's objective for a "higher and better use"[17] of the site.

c. Ability to Reduce or Avoid Significant Impacts of Proposed Project

The Residential/Nine-Hole Golf Course Alternative would reduce but not eliminate the following significant unavoidable impacts associated with the proposed Project:

- Land Use and Planning (inconsistency with the RTP/SCS and the La Habra General Plan).
- Population and Housing (generation of population growth above existing General Plan build-out, reflected in significant traffic, air quality, and GHG impacts).
- Aesthetics (loss of a major open space resource resulting in a change in the character of the site).
- Traffic and Circulation (increased traffic exceeding established significance thresholds).
- Air Quality (housing and population growth inconsistent with the current regional Air Quality Management Plan).
- GHG Emissions (annual emissions exceeding established significance thresholds).
- Noise (construction noise).

[17] As previously noted, the Appraisal Institute defines "highest and best use" as the "reasonably probable and legal use of vacant land or an improved property that is physically possible, appropriately supported, financially feasible, and that results in the highest value."

7.4.5 ALTERNATIVE 5: REDUCED DENSITY RESIDENTIAL/NINE-HOLE GOLF COURSE

a. Impacts

Land Use and Planning

By retaining a golf course use within the eastern portion of the Project site and allowing for residential development in the western portion of the site, the Reduced Density Residential/ Nine-Hole Golf Course Alternative would require a General Plan Amendment and an amendment to the La Habra Hills Specific Plan to achieve the City's objective for General Plan consistency. This alternative would thus require similar discretionary land use approvals as the proposed Project, including a General Plan Amendment, Specific Plan Amendment, and Change of Zone. As noted above, this alternative would reduce the golf course approved in the La Habra Hills Specific Plan from an 18-hole to a 9-hole facility, and increase the overall build-out of the Specific Plan by 144 dwelling units.

At 144 dwelling units, although this alternative would be inconsistent with the same RTP/SCS and La Habra General Plan policies as the proposed Project, the severity of impacts related to these inconsistencies would be substantially reduced as compared to the proposed Project.

Population and Housing

The development of 144 dwelling units associated with the Reduced Density Residential/Nine-Hole Golf Course Alternative would generate less population than the 402-dwelling unit proposed Project, and would cause housing and population to exceed the existing General Plan's build-out projection, thereby resulting in a significant unavoidable impact. By reducing the proposed residential buildout to 144 residential dwelling units, and amending the La Hills Specific Plan to reduce the golf course from an 18-hole to a 9-hole facility, inconsistencies with the La Habra General Plan and the RTP/SCS would be substantially reduced in comparison to the proposed Project.

Aesthetic Resources

By retaining the eastern portion of the golf course for continued use, the amount of land converted from open space to residential use would be reduced in comparison to the proposed Project. Although nine golf holes would be retained, with 144 dwelling units, housing would be the dominant visual feature over a large portion of the Project site. By retaining a nine-hole golf course and reducing the number of dwelling units, the Reduced Density Residential/Nine-Hole Golf Course Alternative would reduce but not eliminate the significant unavoidable aesthetics impacts of the proposed Project.

Biological Resources

The limits of grading associated with the Reduced Density Residential/Nine-Hole Golf Course Alternative within the western portion of the site would be similar to the proposed Project, resulting in similar impacts on sensitive biological resources within that area, such as coastal sage scrub. Both this alternative and the proposed Project would avoid impacts on the central riparian drainage. This alternative would also avoid impacts on existing biological resources within the eastern portion of the Project site, resulting in reduced impacts compared to the proposed Project.

Cultural Resources

The Project site has been highly disturbed, and the likelihood of uncovering cultural resources, either archaeological or paleontological, is low. Since the Reduced Density Residential/Nine-Hole Golf Course Alternative would avoid earth movement on the eastern portion of the site, there would be less chance of discovering buried cultural resources compared to the proposed Project.

Traffic and Circulation

Although site grading and building construction would be the same as for the proposed Project on a daily basis, because of the need to export contaminated soils, construction traffic impacts would be slightly greater those of the proposed Project on a daily basis. The length of time for grading and building construction, would however, be shortened due to a small area to be graded, a reduced number of residential dwelling units, and elimination of commercial development.

The Reduced Density Residential/Nine-Hole Golf Course Alternative would generate 2,571 fewer daily trips than the proposed Project, as shown in **Table 7-6**. To reduce traffic, this alternative would not include commercial development or public use of on-site parks or a Community Center with its associated banquet and meeting facilities. This alternative would generate 1,827 more daily trips than the existing golf course, however.

As shown in **Table 7-6**, the Reduced Density Residential/Nine-Hole Golf Course Alternative would represent an approximately 72 percent reduction in trip generation during the PM peak hour and an approximately 76 percent reduction in trip generation during the AM peak hour. These reductions in peak hour traffic generation would reduce the proposed Project's contributions to increased intersection capacity utilization (ICU) to below the significance threshold increase of 0.02, and impacts would be less than significant.

Table 7-6[18]
Trip Generation Comparison: Proposed Project vs. Reduced Density Residential/ Nine-Hole Golf Course Alternative

Land Use	Peak Hour						Daily
	AM			PM			
	In	Out	Total	In	Out	Total	
Reduced Density Residential/Nine-Hole Golf Course Alternative (144 dwelling units)	37	82	119	97	82	179	2,578
Proposed Project							
Residential (422[19] dwelling units)	~~64~~ 66	~~209~~ 206	~~273~~ 272	~~226~~ 224	~~127~~ 131	~~353~~ 355	~~3,479~~ 3,676
Retail (20,000 square feet)	72	~~55~~ 54	~~127~~ 126	105	~~88~~ 84	~~193~~ 189	~~2,244~~ 2,178
Recreation (Community Center and park)	~~55~~ 39	~~40~~ 28	~~95~~ 67	~~52~~ 34	~~47~~ 37	~~99~~ 71	~~1,205~~ 615
Total Proposed Project	~~191~~ 177	~~304~~ 288	~~495~~ 465	~~383~~ 363	~~262~~ 252	~~645~~ 615	~~6,928~~ 6,713
Trip Reduction Provided by Alternative, Compared to Proposed Project	~~154~~ **140**	~~222~~ **206**	~~376~~ **346**	~~286~~ **266**	~~180~~ **170**	~~466~~ **436**	~~3,758~~ **4,135**

Source: Rancho La Habra Traffic Impact Analysis, ~~2017~~ 2019.

Air Quality

The Reduced Density Residential/Nine-Hole Golf Course Alternative would require grading only the western half of the Project site. This portion of the Project site contains the TPH-contaminated soil from past oil operations that was buried pursuant to the requirements of the Orange County Health Care Agency as part of golf course construction. The TPH-contaminated soil would need to be removed; however, without grading the eastern portion of the site, there would be insufficient deep fills to place the contaminated soil. Therefore, unless the golf course was temporarily closed to allow for burying TPH-contaminated soil in the eastern portion of the site as was approved by the Orange County Health Care Agency for the proposed Project, export of a portion of the TPH-contaminated soil would be necessary. Grading in the western portion of the site would also encounter buried concrete debris from prior oil operations. The debris would either need to be crushed on-site or exported to a suitable landfill. If additional crushing or off-site expert of earth materials would be necessary, air quality impacts would be greater on a daily basis during grading activities than for the proposed Project. However, the amount of time required for grading would be reduced, reducing total emissions during

[18] Revisions to Project traffic generation are taken from the Partially Recirculated Draft EIR and do not reflect new information.

[19] Subsequent to completion of the Rancho La Habra Traffic Impact Analysis (TIA), the proposed project was reduced in size from 422 to 402 dwelling units. The TIA therefore presents a worst case analysis of project impacts.

construction. Therefore, the Reduced Density Residential/ Nine-Hole Golf Course Alternative would result in construction-related air quality impacts similar to those of the proposed Project.

The development of 144 dwelling units and a nine-hole golf course would generate less traffic than the proposed Project and would also consume less energy due to the reduced number of dwelling units compared to the proposed Project. Therefore, long-term air emissions would be less for this alternative than for the proposed Project.

Because development of 144 dwelling units would exceed the General Plan land use assumptions used in the South Coast Air Quality Management Plan, the Reduced Density Residential/Nine-Hole Golf Course Alternative would result in a significant unavoidable air quality impact. By reducing the number of dwelling units compared to the project, however, this alternative would reduce on-site population, and the significant unavoidable air quality impact would not be as great as for the proposed Project.

Greenhouse Gas Emissions

The Reduced Density Residential/Nine-Hole Golf Course Alternative would require grading only the western half of the Project site. This portion of the Project site contains the TPH-contaminated soil from past oil operations that was buried pursuant to the requirements of the Orange County Health Care Agency as part of golf course construction. The TPH-contaminated soil would need to be removed; however, without grading the eastern portion of the site, there would be insufficient deep fills to place the contaminated soil. Therefore, unless the golf course was temporarily closed to allow for burying TPH-contaminated soil in the eastern portion of the site as was approved by the Orange County Health Care Agency for the proposed Project, export of a portion of the TPH-contaminated soil would be necessary. Grading in the western portion of the site would also encounter the buried concrete debris from prior oil operations. The debris would either need to be crushed on-site or exported to a suitable landfill. Grading in the western portion of the site would also encounter buried concrete debris from prior oil operations. The debris would either need to be crushed on-site or exported to a suitable landfill. If additional crushing or off-site expert of earth materials would be necessary, air quality impacts would be greater on a daily basis during grading activities than for the proposed Project. However, the amount of time required for grading would be reduced, reducing total emissions during construction. Therefore, the Reduced Density Residential/Nine-Hole Golf Course Alternative would result in construction-related GHG impacts similar to those of the proposed Project.

The development of 144 dwelling units and a nine-hole golf course would generate less traffic than the proposed Project and would also consume less energy due to the reduced number of dwelling units compared to the proposed Project. Therefore, long-term GHG would be less for this alternative than for the proposed Project. As shown in **Table 7-6**, this alternative would reduce daily traffic generation (and resulting transportation-based GHG emissions) by

approximately 57 percent. This reduction, along with a greater than 50 percent reduction in the number of proposed dwelling units, elimination of the project's proposed commercial use, and the reduced use of a nine-hole golf course as compared to an 18-hole facility, would avoid the significant GHG emissions impact of the proposed Project.

Because development of 144 dwelling units would be predicated on implementation of all feasible mitigation measures, the Reduced Density Residential/Nine-Hole Golf Course Alternative would be consistent with applicable policies, plans, and programs designed to reduce GHG emissions.

Energy Resources

The Reduced Density Residential/Nine-Hole Golf Course Alternative would consume less energy than the proposed Project since it would (1) generate less traffic than the proposed Project, (2) require less energy for dwelling units, and (3) eliminate energy demands of the commercial uses included in the proposed Project.

Noise and Vibration

The Reduced Density Residential/Nine-Hole Golf Course Alternative would require grading only the western half of the Project site. This portion of the Project site contains the TPH-contaminated soil from past oil operations that was buried pursuant to the requirements of the Orange County Health Care Agency as part of golf course construction. The TPH-contaminated soil would need to be removed; however, without grading the eastern portion of the site, there would be insufficient deep fills to place the contaminated soil. Therefore, unless the golf course was temporarily closed to allow for burying TPH-contaminated soil in the eastern portion of the site as was approved by the Orange County Health Care Agency for the proposed Project, export of a portion of the TPH-contaminated soil would be necessary. Grading in the western portion of the site would also encounter the buried concrete debris from prior oil operations. The debris would either need to be crushed on-site or exported to a suitable landfill. As a result, construction noise generated in the western portion of the Project site would be similar to the proposed Project, construction noise generated in the eastern portion of the Project site would be substantially reduced, and on-road noise during construction would be increased with this alternative in comparison to the proposed Project.

Hazards and Hazardous Materials

The Reduced Density Residential/Nine-Hole Golf Course Alternative would require grading only the western half of the Project site. This portion of the Project site contains the TPH-contaminated soil from past oil operations that was buried pursuant to the requirements of the Orange County Health Care Agency as part of golf course construction. The TPH-contaminated soil would need to be removed; however, without grading the eastern portion of the site, there

would be insufficient deep fills to place the contaminated soil. Therefore, unless the golf course was temporarily closed to allow for burying TPH-contaminated soil in the eastern portion of the site as was approved by the Orange County Health Care Agency for the proposed Project, export of a portion of the TPH-contaminated soil would be necessary. Therefore, the Reduced Density Residential/Nine-Hole Golf Course Alternative would result in an increase in hazards impacts related to the transport of hazardous materials compared to the proposed Project. Because all such transport would be subject to local, state, and federal regulations designed to protect public health and safety, the hazards and hazardous materials impacts of this alternative would be less than significant.

Hydrology and Water Quality

Runoff from the golf course currently flows off-site to storm drain facilities without treatment. Given the nature of the golf course use, the potential exists for storm water runoff to contain pesticides, nutrients from fertilizer, and oils/grease from the roadways, parking lot, and maintenance area.

Even though the Project site would retain pervious surfaces under the Reduced Density Residential/Nine-Hole Golf Course Alternative, site grading would trigger the need for water quality treatment BMPs. This alternative would also provide storm water treatment facilities consistent with current regulations, which are more restrictive than they were when the golf course was constructed. Because the required storm water treatment facilities would be similar to those required for the proposed Project, water quality impacts of the Reduced Density Residential/Nine-Hole Golf Course Alternative would be similar to those of the proposed Project. While this alternative would result in a smaller increase in pervious surfaces compared to the proposed Project, construction of a parallel 48-inch storm drain across Beach Boulevard would be needed to address ponding of water within the Project site during large storm events. Therefore, hydrology impacts of this alternative would be similar to those of the proposed Project.

Geology, Soils, and Seismicity

The western portion of the site is more complicated geotechnically than the eastern portion. The far eastern portion of the site is located adjacent to a fault setback zone. However, with the Reduced Density Residential/Nine-Hole Golf Course Alternative, the fault zone would not be a concern because no structures would be constructed in that area. Grading in the western portion of the site would be similar to grading for the proposed Project. Because there would be fewer dwelling units and people residing within the Project site, and no dwelling units would be constructed adjacent to a fault setback zone, geotechnical impacts of the Reduced Density Residential/Nine-Hole Golf Course Alternative would be less than those of the proposed Project.

Public Services

The development of 144 dwelling units associated with the Reduced Density Residential/Nine-Hole Golf Course Alternative would generate less population than the 402-dwelling unit proposed Project, resulting in reduced demand for public services. The less than significant impacts of the proposed Project would thus be reduced under this alternative.

Recreational Resources

The Reduced Density Residential/Nine-Hole Golf Course Alternative would provide a nine-hole golf course, which represents a substantially less important recreational and open space amenity than does the existing 18-hole golf course. Despite the U.S. Golf Association's "Play Nine" initiative, 9-hole golf courses are not as popular as 18-hole courses. Because the eastern portion of the Project site would remain in golf course use, trails and recreational amenities would be confined to the western portion of the Project site. In addition, the existing clubhouse would not be converted to a Community Center, and other recreational amenities would be scaled down to meet the needs created by the reduced amount of housing proposed in this alternative. Because recreational amenities would be scaled down to meet the recreational needs created by 144 dwelling units, the nine-hole golf course would be the primary recreational amenity available to the public under this alternative, and the result would be a less popular golf facility than the current 18-hole facility, but without the public parks and publicly accessible trails of the proposed Project. While the recreational impacts of this alternative would be less than significant, they would be greater than for the proposed Project.

Utilities, Service Systems, and Water Supply

The existing golf course currently uses approximately 276 AFY of water. A nine-hole golf course would reduce that consumption by approximately half. The addition of 314 dwelling units with indoor and outdoor water demands would proportionately reduce the water demands of the proposed Project (175.2 AFY), resulting in a water demand of approximately 256 AFY, slightly less than the water demand of the existing 18-hole golf course. The Reduced Density Residential/Nine-Hole Golf Course Alternative would also reduce sewage and solid waste generation by approximately 35 percent compared to the proposed Project.

The existing golf course currently uses approximately 276 AFY of water. A nine-hole golf course would reduce that consumption by approximately half[20] (138 AFY). The addition of 144 dwelling units with indoor and outdoor water demands would to the water demands of the existing golf course would result in a water demand of approximately 198 AFY, which is greater

[20] The 9-hole golf course proposed in this alternative would cover approximately half of the currently irrigated area of the current course. While the clubhouse would remain in operation and continue consuming water, landscaping associated with the existing driving range would be eliminated.

than the water demand of the existing proposed Project (175.2 AF). Because total water use for the Residential/Nine-Hole Golf Course Alternative would be less than for the existing golf course, water supply impacts would be less than significant. This alternative would also reduce sewage and solid waste generation by approximately 35 percent compared to the proposed Project

b. Ability to Achieve Project Objectives

City Objectives

By retaining a nine-hole golf course use within the eastern portion of the Project site and allowing for development of 144 dwelling units in the western portion of the site, the Reduced Density Residential/Nine-Hole Golf Course Alternative would require a General Plan Amendment to achieve the City's objective for General Plan consistency. Because state law provides cities with the ability to amend their General Plans, and all feasible mitigation measures would be implemented for this alternative, the Residential/Nine-Hole Golf Course Alternative would meet City objectives

Applicant Objectives

By providing a mix of single- and multi-family housing, the Reduced Density Residential/Nine-Hole Golf Course Alternative would meet the applicant's objective to provide housing, although to a far lesser degree than the proposed Project. This alternative would also meet the applicant's objective of providing public park and recreational amenities. However, because the eastern portion of the existing golf course would remain and a nine-hole course, the existing clubhouse would not be converted to a Community Center, there would be no trails provided in the eastern portion of the Project site, and public park area would be scaled down to meet the needs of a 144-dwelling unit community. As a result, this alternative would achieve the applicant's recreation objectives to a lesser degree than the proposed Project. This alternative would also meet the applicant's objectives related to protection of on-site natural habitat areas since it would retain the golf course within the eastern portion of the site and minimize impacts on coastal sage scrub habitat in the western portion of the site. The Reduced Density Residential/Nine-Hole Golf Course Alternative would reduce on-site water demand, although not to the same degree as the proposed Project, which would partially meet the applicant's objectives. Retaining a nine-hole golf course use within the Project site and reducing the residential units to 144 dwelling units would be inconsistent with the applicant's economic

objectives, but could partially meet the applicant's objective for a "higher and better use"[21] of the site.

c. Ability to Reduce or Avoid Significant Impacts of Proposed Project

The Reduced Density Residential/Nine-Hole Golf Course Alternative would eliminate these significant unavoidable impacts if developed with 144 dwelling units:

- Land Use and Planning (inconsistency with the RTP/SCS and the La Habra General Plan).
- Population and Housing (generation of population growth above existing General Plan build-out, reflected in significant traffic, air quality, and GHG impacts).
- Traffic and Circulation (increased traffic exceeding established significance thresholds).
- Air Quality (housing and population growth inconsistent with the current regional Air Quality Management Plan).
- GHG Emissions (annual emissions exceeding established significance thresholds).

The Reduced Density Residential/Nine-Hole Golf Course Alternative would reduce but not eliminate the following significant unavoidable impacts associated with the proposed Project:

- Aesthetics (loss of a major open space resource resulting in a change in the character of the site).
- Noise (construction noise).

7.4.6 ALTERNATIVE 6: REDUCED DENSITY SINGLE-FAMILY RESIDENTIAL

a. Impacts

Land Use and Planning

The Reduced Density Single-Family Residential Alternative would require the same land use entitlements as the proposed Project, including a General Plan Amendment, amendment of the La Habra Hills Specific Plan, and a Change of Zone (new Specific Plan). The alternative would place a substantial amount of single-family housing in excess of the current General Plan's build-out in the same location as the proposed Project, converting the existing Westridge Golf Club to a 269 single-family dwelling-unit residential community. This alternative would therefore result in similar inconsistencies with the RTP/SCS and the La Habra General Plan as

[21] As previously noted, the Appraisal Institute defines "highest and best use" as the "reasonably probable and legal use of vacant land or an improved property that is physically possible, appropriately supported, financially feasible, and that results in the highest value."

described for the proposed Project, although to a lesser degree due to a reduction in development intensity.

Population and Housing

The development of 269 dwelling units under the Reduced Density Single-Family Residential Alternative would generate less population than would the 402-dwelling unit proposed Project. This alternative would cause housing and population to exceed the existing General Plan's build-out projection, thereby resulting in a significant unavoidable impact. By reducing the project's proposed residential build-out, however, this alternative would reduce the population and housing impacts of the proposed Project.

Aesthetic Resources

The Reduced Density Single-Family Residential Alternative would convert the golf course to residential use and spread new housing over the same footprint as the proposed Project, so that housing rather than open space would become the predominant visual feature of the Project site. Existing scenic vistas would not be affected, but this alternative would result in 269 dwelling units, still spreading development over the same footprint as the proposed Project. Should this alternative reduce the amount of housing proposed for the Project site and cluster impact related to the visual character of the Project site associated with the proposed Project could be reduced. However, even with clustering of development, housing would remain the dominant visual feature on the Project site, and impacts would remain significant and unavoidable.

Biological Resources

By converting the golf course and spreading new housing over the same footprint as the proposed Project, this alternative would result in the same biological resources impacts and required mitigation as the proposed Project.

Cultural Resources

By converting the golf course and spreading new housing over the same footprint as the proposed Project, this alternative would result in the same cultural resources impacts and required mitigation as the proposed Project.

Traffic and Circulation

Because site grading and building construction would be the same as for the proposed Project on a daily basis, construction traffic impacts would be similar to those of the proposed Project on a daily basis. The length of time for building construction, would however, be shortened due to a reduced number of residential dwelling units and elimination of commercial development.

The Reduced Density Single-Family Residential Alternative would generate 4,367 fewer daily trips than the proposed Project, as shown in **Table 7-7**. To reduce traffic, this alternative would not include commercial development or public use of on-site parks or a Community Center with its associated banquet and meeting facilities.

As shown in **Table 7-7**, the Reduced Density Single-Family Residential Alternative would represent an approximately 58 percent reduction in trip generation during the PM peak hour and an approximately 50 percent reduction in trip generation during the AM peak hour.

Table 7-7[22]
Trip Generation Comparison: Proposed Project vs. Reduced Density Single-Family Residential Alternative

Land Use	Peak Hour						Daily
	AM			PM			
	In	Out	Total	In	Out	Total	
Reduced Density Single-Family Residential Alternative	51	151	202	169	100	269	2,561
Proposed Project							
Residential (422[a] dwelling units)	~~64~~ 66	~~209~~ 206	~~273~~ 272	~~226~~ 224	~~127~~ 131	~~353~~ 355	~~3,479~~ 3,676
Retail (20,000 square feet)	72	~~55~~ 54	~~127~~ 126	105	~~88~~ 84	~~193~~ 189	~~2,244~~ 2,178
Recreation (Community Center and Park)	~~55~~ 39	~~40~~ 28	~~95~~ 67	~~52~~ 34	~~47~~ 37	~~99~~ 71	~~1,205~~ 615
Total Proposed Project	~~191~~ 177	~~304~~ 288	~~495~~ 465	~~383~~ 363	~~262~~ 252	~~645~~ 615	~~6,928~~ 6,713
Trip Reduction Provided by Alternative, Compared to Proposed Project	**~~140~~ 126**	**~~153~~ 137**	**~~293~~ 243**	**~~214~~ 194**	**~~162~~ 152**	**~~376~~ 346**	**~~4,367~~ 1,806**

[a] Subsequent to completion of the Rancho La Habra Traffic Impact Analysis (TIA), the proposed Project was reduced in size from 422 to 402 dwelling units. The TIA therefore presents a worst case analysis of project impacts.
Source: Rancho La Habra Traffic Impact Analysis, ~~2017~~ 2019.

As noted above, the Reduced Density Single-Family Residential Alternative was designed to reduce traffic impacts. By reducing the proposed Project's contribution of traffic at the intersection with the largest percentage decrease in performance due to project-related traffic (Beach Boulevard at Rosecrans Avenue), this alternative would reduce the proposed Project's contributions to increased intersection capacity utilization (ICU) to below the City's significance threshold increase of 0.02, and impacts would be less than significant.

[22] Revisions to Project traffic generation are taken from the Partially Recirculated Draft EIR and do not reflect new information.

Air Quality

Grading and earthwork would be the same for the Reduced Density Single-Family Residential Alternative as for the proposed Project, with the exception that since the clubhouse would be closed and recreational amenities would be scaled to meet the needs of on-site residents, the clubhouse and adjacent public space would be graded and developed for residential use. As a result, short-term construction emissions of criteria air pollutants would be greater on a daily basis than with the proposed Project since a larger area would be graded than would be the case for the proposed Project. Because this alternative would reduce the number of dwelling units, it would reduce project-related traffic and on-site energy use, thereby lessening long-term operational criteria air pollutant emissions compared to the proposed Project.

Greenhouse Gas Emissions

Grading and earthwork would be the same for the Reduced Density Single-Family Residential Alternative as for the proposed Project, with the exception that since the clubhouse would be closed and recreational amenities would be scaled to meet the needs of on-site residents, the clubhouse and adjacent public space could be graded and developed for residential use. As a result, short-term construction GHG emissions would be greater than with the proposed Project. Because this alternative would reduce the number of dwelling units, it would reduce project-related traffic and on-site energy use, thereby lessening long-term operational GHG emissions compared to the proposed Project.

b. Energy Resources

Grading and earthwork would be the same for the Reduced Density Single-Family Residential Alternative as for the proposed Project, with the exception that since the clubhouse would be closed and recreational amenities would be scaled to meet the needs of on-site residents, the clubhouse and adjacent public space would be graded and developed for residential use. As a result, energy consumption during construction would be greater (although still less than significant) than with the proposed Project. Because this alternative would reduce the number of dwelling units, it would reduce project-related traffic and on-site energy use, thereby reducing energy consumption compared to the proposed Project.

Noise and Vibration

Grading and earthwork would be the same for the Reduced Density Single-Family Alternative as for the proposed Project, with the exception that since the clubhouse would be closed and recreational amenities would be scaled to meet the needs of on-site residents, the clubhouse and adjacent public space would be graded and developed for residential use. While construction noise would be the same as with the proposed Project on a daily basis, demolition and grading of the existing clubhouse and adjacent public area could slightly extend the time required for

grading in that portion of the site. However, by reducing the number of dwelling units, once grading (which is the noisiest construction activity) has been completed, the time required for housing construction would be reduced. Because the Reduced Density Single-Family Residential Alternative would reduce the number of dwelling units and eliminate commercial uses, this alternative would reduce project-related traffic, thereby reducing long-term noise impacts compared to the proposed Project.

Hazards and Hazardous Materials

The Reduced Density Single-Family Residential Alternative would require similar site preparation and remedial grading as the proposed Project, including removal and crushing of the buried construction waste from prior oil operations. Site preparation would also include extraction and deep re-burial of the TPH-contaminated soil in accordance with Orange County Health Care Agency standards. Therefore, hazards and hazardous materials impacts would be the same as those of the proposed Project.

Hydrology and Water Quality

The Reduced Density Single-Family Residential Alternative would be required to implement similar storm drain and water quality improvements as the proposed Project, including construction of detention and water quality facilities. Because this alternative includes conversion of the golf course to residential use, there would be a substantial increase in on-site impervious surface area, requiring construction of detention basins and a new 48-inch storm drain across Beach Boulevard to address storm water runoff and existing ponding within the golf course. Thus, hydrology and water quality impacts would be the same as those of the proposed Project.

Geology, Soils, and Seismicity

Grading and earthwork would be the same for the Reduced Density Single-Family Residential Alternative as for the proposed Project, with the exception that since the clubhouse would be closed and recreational amenities would be scaled to meet the needs of on-site residents, the clubhouse and adjacent public space could be graded and developed for residential use. Although this alternative would result in some additional grading beyond that of the proposed Project, impacts would remain less than significant since development would comply with all applicable geotechnical requirements along with Building Code compliance. However, since there are fewer dwelling units in this alternative compared to the proposed Project, fewer people would be introduced at the site, and long-term geotechnical impacts related to the number of people exposed to potential hazards would be reduced in comparison to the proposed Project; impacts for both this alternative and the proposed Project would be less than significant.

Public Services

The development of 269 dwelling units associated with the Reduced Density Single-Family Residential Alternative would generate less population than the proposed Project, resulting in reduced demand for public services compared to the proposed Project.

Recreational Resources

The Reduced Density Single-Family Residential Alternative would result in the loss of the existing Westridge Golf Club as an open space and recreational resource for the community. While the provision of trails, as well as parks and recreation areas, would be scaled back to meet the needs of on-site residents, this alternative would also result in demolition of the existing clubhouse, rather than converting the clubhouse to a public Community Center. Thus, the Reduced Density Single-Family Residential Alternative would provide no net public recreational benefit together than meeting the needs of on-site residents, whereas the proposed Project would convert the existing golf course clubhouse into a public community center, and would provide trails and parks accessible to the general public. However, the applicable CEQA thresholds for recreation relate to (1) the potential for a proposed Project to result in deterioration of existing recreational facilities, which would not occur since both the Reduced Density Single-Family Residential Alternative and the proposed Project would meet the recreational needs of on-site residents, and (2) the physical effect of constructing recreational facilities, which would be less for this alternative than for the proposed Project since the Reduced Density Single-Family Residential Alternative would have fewer recreational amenities constructed.

Utilities, Service Systems, and Water Supply

The existing golf course currently uses approximately 276 AFY of water. Conversion of the golf course to residential use (269 single-family dwelling units with no commercial development) would proportionately reduce the water demands of the proposed Project (175.2 AFY), resulting in a water demand of approximately 100 AF. The Reduced Density Single-Family Residential Alternative would also reduce sewage and solid waste generation by approximately 45 percent compared to the proposed Project.

c. Ability to Achieve Project Objectives

City Objectives

The Reduced Density Single-Family Residential Alternative would require the same approvals as would the proposed Project: a General Plan Amendment, La Habra Hills Specific Plan Amendment, and a Change of Zone and new Specific Plan. Because state law provides cities with the ability to amend their General Plans, and all feasible mitigation measures would be

implemented for this alternative, the Reduced Density Single-Family Residential Alternative would meet City objectives.

Applicant Objectives

While the Reduced Density Single-Family Residential Alternative would produce housing, it includes only single-family detached dwelling units and would not achieve the applicant's objective of providing a range of housing types.

This alternative would also meet the applicant's objective of providing park and recreational amenities for the proposed development, but would not provide recreational amenities for the overall La Habra community. However, because the existing clubhouse would not be converted to a Community Center, and trails and public park area would be scaled down proportionately, this alternative would achieve the applicant's recreation objectives to a lesser degree than the proposed Project. This alternative would also meet the applicant's objectives related to protection of on-site natural habitat areas since it would implement the same habitat preservation and enhancement measures as the proposed Project. The Reduced Density Single-Family Residential Alternative would reduce on-site water demand to a greater degree than the proposed Project, thereby meeting the applicant's objectives. Reducing the number of dwelling units and providing only single-family residential use could partially meet the applicant's objective for a "higher and better use"[23] of the site.

d. Ability to Reduce or Avoid Significant Impacts of Proposed Project

The Reduced Density Single-Family Residential Alternative would eliminate the following significant unavoidable impacts associated with the proposed Project:

- Traffic and Circulation (increased traffic exceeding established significance thresholds).

The Reduced Density Single-Family Residential Alternative would reduce but not eliminate the following significant unavoidable impacts associated with the proposed Project:

- Land Use and Planning (inconsistency with the RTP/SCS and the La Habra General Plan).
- Population and Housing (generation of population growth above existing General Plan build-out, reflected in significant traffic, air quality, and GHG impacts).
- Air Quality (housing and population growth inconsistent with the current regional Air Quality Management Plan).
- GHG Emissions (annual emissions exceeding established significance thresholds).

[23] As previously noted, the Appraisal Institute defines "highest and best use" as the "reasonably probable and legal use of vacant land or an improved property that is physically possible, appropriately supported, financially feasible, and that results in the highest value."

The Reduced Density Single-Family Residential Alternative would neither eliminate nor reduce the following significant unavoidable impacts associated with the proposed Project:

- Aesthetic Resources (loss of a major open space resource resulting in a change in the character of the site).
- Noise (construction noise).

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an EIR identify an environmentally superior alternative. If the No Project Alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)).

The No Project – No Development Alternative would avoid all of the significant impacts of the proposed Project, including inconsistency with the La Habra General Plan, providing for the continued use of the existing Westridge Golf Club. This alternative would also reduce all other environmental effects of the proposed Specific Plan with the exception of water use.

Of the other alternatives evaluated in this EIR, Alternative 4, the Reduced Density Residential/Nine-Hole Golf Course Alternative with 144 dwelling units, would be the environmentally superior alternative since it would avoid the significant impacts of the proposed Project, reduce other impacts compared to the proposed Project, meet City project objectives, and partially meet most applicant objectives (although to a lesser degree than the proposed Project).

Table 7-8 compares the effects each of the six alternatives would have in relation to the six significant unavoidable impacts that would result from the proposed Project.

Table 7-8
Comparison of Alternatives in Relation to Significant Unavoidable Impacts of the Proposed Project

Significant Unavoidable Impact of Proposed Project	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6
Land Use and Planning (inconsistency with the Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS] and the La Habra General Plan)	Avoid	Avoid	Avoid	Reduce	Reduce	Reduce
Population and Housing (generation of population growth above existing General Plan build-out, reflected in significant traffic, air quality, and GHG impacts)	Avoid	Avoid	Avoid	Reduce	Reduce	Reduce
Aesthetic Resources (loss of a major open space resource resulting in a change in the character of the site)	Avoid	Avoid	Avoid	Reduce	Reduce	Reduce
Traffic and Circulation (increased traffic exceeding established significance thresholds)	Avoid	Avoid	Reduce	Reduce	Reduce	Reduce
Air Quality (housing and population growth inconsistent with the current regional Air Quality Management Plan)	Avoid	Avoid	Reduce	Avoid	Reduce	Avoid
GHG Emissions (annual emissions exceeding established significance thresholds)	Avoid	Avoid	Reduce	Avoid	Reduce	Avoid
Noise (construction noise)	Avoid	Reduce	Reduce	Reduce	Reduce	Reduce

CHAPTER 8 MITIGATION MONITORING & REPORTING PROGRAM

Section 21081.6 of the *California Public Resources Code* and Sections 15091(d) and 15097 of the *State CEQA Guidelines* require public agencies "to adopt a reporting or monitoring program for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment."

The following Mitigation Monitoring and Reporting Program (MMRP) is based on the mitigation measures presented in the Draft Environmental Impact Report (EIR) as modified by the Partially Recirculated Draft Environmental Impact Report prepared by the City of La Habra to analyze impacts of proposed development associated with the proposed Rancho La Habra Specific Plan (Project). As lead agency for the proposed development associated with the Rancho La Habra Specific Plan. As lead agency for the proposed Specific Plan, and pursuant to AB 3180, the City of La Habra is responsible for implementation of this MMRP.

Pursuant to the State CEQA Guidelines, a Mitigation Monitoring and Reporting Program must:

- Identify the entity that is responsible for each monitoring and reporting task, be it the City of La Habra (as lead agency), other agency (responsible or trustee agency), or a private entity (i.e., the project sponsor);
- Be based on the project description and the required mitigation measures presented in the environmental document prepared for the project by the lead agency (Rancho La Habra EIR); and
- Be approved by the lead agency at the same time as project entitlement action or approvals.

An Environmental Impact Report (EIR) has been prepared for the proposed Rancho La Habra Specific Plan that addresses the anticipated environmental impacts of development pursuant to that plan. Where significant impacts are identified, the EIR set forth measures to mitigate these impacts. It is the purpose of this MMRP to identify the implementation strategy for each mitigation measure to ensure that adopted mitigation measures are successfully implemented. Upon adoption of the MMRP by the La Habra City Council, the mitigation monitoring and reporting requirements set forth in this Chapter will become conditions of Project approvals and permits. Therefore, in accordance with the aforementioned requirements, this Chapter of the Draft EIR lists each mitigation measure, describes the methods for implementation and verification for each measure, and identifies the responsible party or parties as detailed below in the MMRP Implementation section.

As shown in the following pages, each required mitigation measure for the proposed Specific Plan is listed, with accompanying notation of:

- Implementation Actions, describing the specific actions that are required to be taken to implement the mitigation measure;
- ~~Monitoring Phase~~ Action is to be Taken, describing the timing of when the mitigation measure is to be implemented;
- ~~Implementation Party, identifying the party responsible for implementing the mitigation measure;~~
- ~~Enforcement~~ Agency/Entity Responsible to Verify Compliance, specifying the agency with the power to monitor and enforce implementation of the mitigation measure.~~; and~~
- ~~Monitoring Agency, identifying the agency with the power to monitor and enforce implementation of the mitigation measure, and agency responsible for determining compliance with specified mitigation measures.~~

The MMRP for the Rancho La Habra Specific Plan will be in place throughout all phases of the Plan's implementation. The City's existing planning, engineering, review and inspection processes will be used as the basic foundation for the MMRP procedures and will also serve to provide the documentation for the reporting program.

The substance and timing of each certification report that is submitted to the City shall be at the discretion of the City. Generally, each report will be submitted to the City in a timely manner following completion/implementation of the applicable mitigation measure and Project design feature, and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The City, in conjunction with the Project applicant, shall assure that Project construction occurs in accordance with the MMRP. The South Coast Air Quality Management District (SCAQMD) will be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation. Departments listed in the MMRP are all departments of the City of La Habra, unless otherwise noted.

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
Biological Resources			
See Table 8-1 of Final EIR Volume 2 for updated Biological Resources mitigation measures and mitigation monitoring and reporting requirements.			
Cultural Resources			
Mitigation Measure CUL-2a: A qualified archaeologist shall be retained to conduct spot-checking of site grading activities and to respond on an as-needed basis to address unanticipated archaeological discoveries. In addition, a qualified Native American Monitor shall be present on-site during construction-related ground disturbance activities, including but not limited to, pavement removal, pot-holing or auguring, boring, grading, excavation, trenching, and vegetation removal. In the event that archaeological materials, including stone tools, shells, bones, glass shards, ceramics, or other materials older than 50 years in age, are encountered during ground-disturbing activities, work in the immediate vicinity of the resource shall cease until a qualified archaeologist approved by the City and a qualified Native American Monitor have assessed the discovery and appropriate treatment pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5 is determined and implemented. If archaeological resources are found to be significant, the archaeologist and Native American Monitor shall determine, in consultation with the City and any local Native American groups expressing interest following notification by the City, appropriate avoidance measures or other appropriate mitigation. Pursuant to CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts on archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal	The applicant/developer shall retain a qualified archaeologist and a qualified Native American Monitor to implement the provisions of **Mitigation Measure CUL-2**, including conduct monitoring of site grading activities and responding on an as-needed basis to address unanticipated archaeological discoveries. In addition, any archaeological requirements established by the archaeologist or requirements established by the Native American Monitor evaluating the discovery shall be incorporated into development plans and included as conditions of approval.	Prior to the issuance of a grading permit and/or action that would permit site disturbance (whichever occurs first).	Director of Community and Economic Development or his/her designee.

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
resources. If an archaeological site does not qualify as a historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.			
Mitigation Measure CUL-2b: Prior to removal of any native vegetation from the Project site, Native American monitors or representatives of the Gabrieleño Band of Mission Indians-Kizh Nation shall be invited to the Project site to document and distinguish native vegetation that is preferred by the Tribe. All plants preferred by the Tribe that are proposed to be removed as part of site development shall be made available to the Tribe prior to their removal.	The applicant/developer shall provide written evidence of compliance with the provisions of **Mitigation Measure CUL-2b**.	Prior to the issuance of a grading permit and/or action that would permit site disturbance or removal of native vegetation (which-ever occurs first).	Director of Community and Economic Development or his/her designee.
Mitigation Measure CUL-4: The applicant/developer shall retain a County-certified paleontologist approved by the City to conduct full-time monitoring during all earth-moving activities involving previously undisturbed sediments of the La Habra and San Pedro Formations along with periodic paleontological spot checks within excavation areas mapped as Quaternary alluvium exceeding depths of 5 feet to determine if older, paleontologically sensitive sediments are present. If such older, paleontologically sensitive sediments are present, full-time monitoring shall be implemented. If paleontological resources are encountered during ground-disturbing activities, work in the immediate vicinity of the resource shall cease until a County-certified paleontologist has assessed the discovery and appropriate treatment is determined and implemented.	The applicant/developer shall retain a County-certified paleontologist to implement the provisions of **Mitigation Measure CUL-4**. In addition, a paleontological resource monitoring plan shall be prepared for City review and approval, to be implemented as a condition of approval of the grading permit. The plan shall define the specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the John D. Cooper Archaeology and Paleontology Center. A report is to be prepared and published noting any findings discovered on the property. Any artifacts discovered shall be deposited in a location approved by the Director of Community Development.	Prior to the issuance of a grading permit and/or action that would permit site disturbance in soils that were not disturbed by previous golf course construction.	Director of Community and Economic Development or his/her designee.

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
Traffic and Circulation			
See Table 8-1 of Final EIR Volume 2 for updated Traffic and Circulation mitigation measures and mitigation monitoring and reporting requirements.			
Air Quality			
See Table 8-1 of Final EIR Volume 2 for updated Air Quality mitigation measures and mitigation monitoring and reporting requirements.			
Greenhouse Gas Emissions			
See Table 8-1 of Final EIR Volume 2 for updated Greenhouse Gas mitigation measures and mitigation monitoring and reporting requirements.			
Noise and Vibration			
See Table 8-1 of Final EIR Volume 2 for updated Noise and Vibration mitigation measures and mitigation monitoring and reporting requirements.			
Hazards and Hazardous Materials			
Mitigation Measure HAZ-2.2: Excavation, handling, and placement of contaminated soils within the Project site shall be undertaken so as to achieve a residential cleanup standard of an acceptable excess cancer risk (ECR) of 1 x 10^{-5} for construction workers, residents and workers within proposed uses on-site, and residents of adjacent neighborhoods.	The applicant shall have a human health risk assessment prepared confirming that the performance standard set forth in **Mitigation Measure HAZ-2.2** to protect construction workers, residents and workers within proposed uses on-site, and residents of adjacent neighborhoods will be achieved. The City shall review the human health risk assessment to confirm that the specified performance standard will be achieved, and also ensure that the requirements of the approved Soils Management Plan will be implemented during site grading.	Prior to issuance of grading permits.	Director of Community and Economic Development or his/her designee.

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
Hydrology and Water Quality			
Mitigation Measure HWQ-3: The applicant shall construct a 48-inch storm drain underneath Beach Boulevard parallel to the existing storm drain pipe that connects the on-site detention basin with the existing storm drain pipe on the west side of Beach Boulevard. The applicant shall perform the work using a jack and bore method to avoid impacts on traffic on Beach Boulevard. The applicant shall also obtain (1) approval from Caltrans to jack and bore underneath Beach Boulevard and, (2) to the extent necessary, a temporary construction easement from the Hillsborough Apartment complex on the west side of Beach Boulevard. Furthermore, the applicant shall recalculate the size of the detention basin, and if additional storage is necessary, the Applicant shall show underground buried stormwater storage adjacent to the detention basin shown on the Vesting Tentative Tract Map. The final hydraulic calculations document that existing off-site storm flows and the additional on-site storm flows would not exceed the design capacity of the existing and new storm drain pipes under Beach Boulevard. All final calculations and design plans shall be approved by the City of La Habra.	Constructing the 48-inch storm drain, obtaining required easements and encroachment permits, and recalculating detention basin capacity and related improvements to detention basin capacity, if needed, shall be made a condition of approval of Vesting Tentative Tract Map 17845.	Prior to approval of Vesting Tentative Tract Map 17845. The required storm drain shall be constructed to the satisfaction of the City prior to issuance of the first certificate of occupancy for a structure that drain across Beach Boulevard through this pipe.	Director of Public Works or his/her designee.
Geology, Soils, and Seismicity			
Mitigation Measure GEO-1.1: A minimum 100-foot setback for all residential structures shall be maintained from any active fault or fault splay.	The setback requirement set forth in **Mitigation Measure GEO-1.1** shall be made a condition of approval of Vesting Tentative Tract Map 17845, and no permits for construction of a structure for human occupancy shall be granted, unless it is in compliance with this mitigation measure. To confirm compliance with **Mitigation Measure GEO-1.1**: • Prior to grading, the limits of the Earthquake Fault Zone shall be staked by the Project surveyor. • During grading, the Project geologist shall map	Prior to approval of Vesting Tentative Tract Map 17845 and prior to issuance of permits for structures for human occupancy.	Director of Community and Economic Development or his/her designee.

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
	exposed bedrock in all areas proposed for residential development to identify any potentially active faults and/or active fault splays. Additional grading below the planned 5- to 15-foot-deep cuts within this area shall be performed if required to expose bedrock for mapping purposes. • An assessment of fault activity shall be conducted on Lots 12, 28, and 29 at the appropriate time, that shall consist of both removals to expose the surrounding bedrock and the excavation of one backhoe trench per lot, generally perpendicular to the length of the Earthquake Fault Zone. Each trench shall be excavated to a minimum of 5 feet deep to ensure a vertical observation surface for detailed mapping. If a fault is observed, it shall be evaluated for potential age of movement; in the event that no supporting age dating information is available, then structural fault setbacks shall apply to the three lots as appropriate. • The City's geotechnical reviewer shall be notified by the grading contractor to observe site grading within the Earthquake Fault Zone and confirm the geologic mapping. • The applicant shall provide confirmation for City review that the requirements of **Mitigation Measure GEO-1.1** and these implementation provisions are included in grading.		
Mitigation Measure GEO-1.3: Stiffened and/or post-tensioned slab foundations shall be used to support all new proposed development within the Project site. Pre-soaking of the subgrade soils shall be required to	The Project geotechnical expert's recommendations, as approved by the City, shall be shown on final construction plans, and verified	Prior to issuance of a construction permit and verified by the	Director of Community and Economic

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
reduce the potential impact of expansive soils.	by the City as complete during field inspection.	City as complete during field inspection.	Development or his/her designee.
Mitigation Measure GEO-1.4a: Additional geogrid reinforcement length beyond local stability requirements to be determined by the MSE wall designer and approved by the City shall be required to provide adequate global stability factors of safety (greater than 1.5 and 1.1 for static and pseudo-static [seismic] loading conditions, respectively, for the MSE wall located below Lots 241 through 245 of Vesting Tentative Tract Map 17845. Preliminary slope stability analysis set forth in the Project geotechnical report indicates at least 6 layers of geogrid reinforcement lengths of 60 feet, with an allowable strength (after appropriate reduction factors are applied by the manufacturer) of approximately 3.5 kips per foot, spaced at a maximum vertical spacing of 2 feet, are required for adequate global factors of safety. Further refinement of the design for required global stability geogrid will occur during preparation of the 40-scale grading plan and with input from the MSE wall designer subject to approval of the City.	The grading permit application for Lots 241 through 245 shall provide sufficient calculation to confirm that the proposed MSE wall located below Lots 241 through 245 has been designed so as to provide an adequate factor of safety.	Prior to issuance of a grading permit	Director of Community and Economic Development or his/her designee.
Mitigation Measure GEO-1.4b: The planned landslide removal at Cross-Section 2-2'-2"shall be undertaken prior to excavation of the keyway back-cut slope north of the proposed landslide removal area as depicted in **Figure 3.14-3**, *Revised Portion of Cross-Section 2-2'-2"*. Additionally, the landslide removal shall be excavated in slots, or sections, where an area of landslide approximately 80 feet long (measured parallel to the slope face) is removed and replaced as compacted fill, prior to excavation of the adjacent 80-foot- wide section. A minimum of approximately 15 vertical feet of compacted fill shall be placed above the landslide rupture surface within each completed slot, prior to the next section of landslide removal. The landslide removal operation shall be performed so that no sections are left open (defined as lacking a minimum of 15 vertical feet in front of the landslide) over a weekend/holiday or when a significant rain event is predicted over the next three days. Full-time observation and testing shall be monitored by a qualified geotechnical expert during the landslide removal operation, and the expert shall provide supplemental recommendations based on observed field conditions.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-1.4b**.	Prior to issuance of a grading permit.	Director of Community and Economic Development or his/her designee.

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
Mitigation Measure GEO-3a: Removals of unsuitable fill material up to approximately 50 feet deep below existing grades shall be performed for the western portion of the Project site and within several isolated small canyon areas at the eastern portion of the site, in accordance with recommendations of the Geotechnical Report.	The applicant shall retain a qualified geotechnical consultant, as approved by the City, to identify the precise locations and depths for removals of unsuitable fill materials. Such precise locations and depths of removals shall be noted on the final approved grading plans. The City shall confirm these locations have been precisely identified and noted on the final approved grading plans.	Prior to issuance of grading permit.	Director of Community and Economic Development or his/her designee.
Mitigation Measure GEO-3b: As part of remedial grading, unsuitable soils shall be removed to competent soils, temporarily stockpiled (where necessary) and replaced as properly compacted fill. Prior to placement as compacted fill, significant organic materials or other unsuitable materials shall be removed and properly exported off-site.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3b**.	Prior to issuance of a grading permit.	Director of Community and Economic Development or his/her designee.
Mitigation Measure GEO-3c: Any concrete material from site demolition used in general fill shall be environmentally suitable and crushed such that it is no larger than 8 inches in maximum dimension and well blended (i.e., no nesting and voids) into site fills. Any concrete material placed in MSE wall backfill areas (refer to **Mitigation Measure GEO-3i**) shall be crushed to meet gradation requirements of aggregate base in accordance with the last edition of the Greenbook: Standard Specifications for Public Works Construction. The actual depths and lateral extents of grading shall be determined by the geotechnical consultant, based on subsurface conditions encountered during grading.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3c**.	Prior to issuance of a grading permit.	Director of Community and Economic Development or his/her designee.
Mitigation Measure GEO-3d: Stabilization fill keyways shall be constructed for design cut slopes that are not undercut by remedial grading. Locations of the stabilization fill keyways shall be constructed in accordance with recommendations made in the Geotechnical Report, with final locations and design specifications made by the Project's geotechnical consultant subject to review and approval by the City. Keyways shall be shown on the final grading plans. Design cut lots, or lots with less than 5 feet of design fill,	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3d**.	Prior to issuance of a grading permit.	Director of Community and Economic Development or his/her designee.

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
shall be overexcavated a minimum of 5 feet below respective pad grades.			
Mitigation Measure GEO-3e: Proposed fill slopes shall be constructed at a slope ratio of 2:1 (horizontal to vertical) or flatter so as to achieve the factors of safety recommended in the Geotechnical Report.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3e**.	Prior to issuance of a grading permit.	Director of Community and Economic Development or his/her designee.
Mitigation Measure GEO-3f: Fills placed deeper than 40 feet below proposed grade shall be compacted to an increased minimum relative compaction of 93 percent relative compaction. Fill shall be moisture-conditioned to be between optimum moisture content and 2 percent over optimum moisture content, pursuant to ASTM D1557.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3f**.	Prior to issuance of a grading permit.	Director of Community and Economic Development or his/her designee.
Mitigation Measure GEO-3g: Settlement monuments shall be installed within four weeks after completion of grading within fill areas greater than approximately 40 feet below finish grade and where significant amounts of fill are placed over left-in-place alluvium. Settlement monuments shall be read by a licensed surveyor with an off-site benchmark. The survey readings shall be obtained four times in the first two months, twice in the third month, and then once a month unless otherwise requested by the geotechnical consultant. Shallow footings and slab-on-grade foundations shall be constructed after settlement monitoring data indicate future total settlements are within tolerable limits. Tolerable limits shall include a determination by the Project's geotechnical engineer, subject to review and approval by the City, that the surveyed areas would maintain a predicted 3 inches or less of settlement for the next 50 years. If a determination is made that tolerable limits are not met, either impacted areas shall be surcharged with additional fill material and surveyed for an additional three months to determine that tolerable limits are met, or construction shall be delayed until additional settlement monitoring determines that tolerable limits are met.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3g**.	Prior to issuance of a grading permit.	Director of Community and Economic Development or his/her designee.
Mitigation Measure GEO-3h: Additional geogrid reinforcement length (beyond local stability requirements) shall be required for adequate global stability factors of safety of the MSE retaining wall located at various areas	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3h**.	Prior to issuance of a grading permit.	Director of Community and Economic

Table 8-1
Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Implementation Action(s)	Action is to be Completed	Agency/Entity Responsible to Verify Compliance
throughout the site, as determined during final design and as approved by the City. Final design requirements including geogrid reinforcement length shall be determined by the MSE wall designer during preparation of the 40-scale grading plan and approved by the City based on the recommendation made in the Geotechnical Report. Geogrid reinforcement length requirements shall be noted on the final approved construction plans.			Development or his/her designee.
Mitigation Measure GEO-3i: MSE walls and conventional retaining walls shall be backfilled with relatively sandy soils obtained from either on-site or off-site locations. Sandy soils shall comprise the geogrid zone required for local stability as determined by the MSE wall designer and approved by the City. For conventional retaining walls, the sandy import zone shall be a minimum of one-half the height of the retaining wall. These requirements shall be noted on the final approved construction plans.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3i**.	Prior to issuance of a grading permit.	Director of Community and Economic Development or his/her designee.
Mitigation Measure GEO-3j: Soil samples shall be collected and tested for presence of corrosive soils at the completion of rough grading. If corrosive soils are detected with (1) pH levels of 5.5 or less, (2) chloride concentration of 500 parts per million (ppm) or greater, or (3) sulfate concentration of 2,000 ppm or greater, specific remediation methods—such as increased compressive strength for structural concrete, decreased water-to-cement ratio for structural concrete and/or encapsulation of post-tensioned cables—shall be implemented as approved by the City. Specific remediation methods shall include one or more of the above-listed options as determined by the foundation design engineer and as approved by the City. If corrosive soils are not detected at levels described above, no mitigation shall be required.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-3j**. Recommendations as required shall be noted on grading plans and construction plans for underground utilities. If corrosive soils are not detected at levels described in **Mitigation Measure GEO-3j**, no mitigation shall be required.	Prior to issuance of a grading permit. Prior to issuance of permits for construction of underground utilities.	Director of Community and Economic Development or his/her designee. Director of Public Works or his/her designee.
Mitigation Measure GEO-4: Soil samples shall be collected and tested at the completion of rough grading to assess expansive soil conditions. Based on the test results, the Project shall incorporate specific recommendations set forth by the foundation design engineer, subject to review and approval by the City, such as the use of stiffened and/or post-tensioned slab foundations, pre-soaking of the subgrade soils, and establishment of minimum setbacks for structures located near slopes.	The City shall verify that the grading plan implements the provisions of **Mitigation Measure GEO-4**. Recommendations as required shall be noted on grading plans and building construction plans.	Prior to issuance of a grading permit. Prior to issuance of building permits.	Director of Community and Economic Development or his/her designee.

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CHAPTER 9 EIR PREPARERS

The Draft Environmental Impact Report (EIR) as modified by the Partially Recirculated Draft EIR (RDEIR) was prepared by the City of La Habra with assistance from a consulting team of environmental planners, engineers, and scientists.

9.1 LEAD AGENCY

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