



U.S. Department of Housing and Urban
Development

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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Placentia Veteran's Village Project

Responsible Entity: Mercy Housing California

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: CA/059

Preparer: Cindy Wolfe

Certifying Officer Name and Title: John Viafora, HCD/HP Manager

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable):

Direct Comments to: Cindy Wolfe, Administrative Manager I

Project Location:

The proposed project consists of a 3.65 gross acre, 2.78 net acre (minus the flood control channel facility site, which will be development as Veteran's Village, is located in the southwestern portion of the City of Placentia, California. The site is located just off of Orangethorpe Avenue near Lakeview Avenue. The approximately 2.78-acre site where the Veteran's Village will be developed is bound to the north by the BNSF railroad track, Fee Ana Street to the west, the Atwood Flood Control Channel to the south, and industrial and commercial uses to the east extending to, and beyond, Lakeview Avenue.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed development will be new construction of a 50-unit apartment building consisting of 45 one-bedroom units of approximately 600 square feet (Sq. ft.) each, and 5 two-bedroom units of approximately 800 sq. ft. each. The units will be contained within a single three-story building situated on the 2.78-acre parcel. The building will include a common area and amenities such as outdoor patios, site landscaping, a community garden, recreation room, shared laundry room, and offices for property management, maintenance, and social service staff. Surface parking for 65 vehicles (1 per unit, plus 15 guest spaces) will be conveniently located adjacent to the apartments. An 8-foot wall will be constructed between the structure and the BNSF Railway tracks. Additionally, the site will be gated with security access to parking areas and the apartment building. The proposed project will utilize HOME Investment Partnerships (HOME) and/or Housing Successor funds and Veterans Affairs Supportive Housing Project-Based Vouchers and/or Project-Based Housing Choice Vouchers.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The objective of the proposed proposal is to develop a 50-unit apartment building that will provide service-enriched affordable rental housing for U.S. Veterans who are homeless and/or disabled. Mercy plans to partner with a specialized veteran service organization to provide ongoing supportive services to future residents of the property, including coordination with the US Department of Veteran Affairs medical clinic system.

Existing Conditions and Trends [24 CFR 58.40(a)]: The project site is comprised of two legal parcels situated at the western terminus of Orangethorpe Avenue. The current General Plan Land Use Designation is Industrial, and the current zoning classification is C-M (Commercial Manufacturing). The City of Placentia supports the proposed development, in that it furthers the purpose of the City of Placentia General Plan Housing Element goals by providing below market rate housing to veterans as well as supplemental support through VASH and/or Project Based Vouchers. Development of the Veteran's Village will require a change in the existing General Plan Land Use designation and a zone change from C-M to R-3 (High Density Residential). The surrounding area is an industrial and commercial corridor with no immediately adjacent residential uses east, west, or south of the site; however, there are single family homes to the

north of Orangethorpe Avenue. A large portion of the site is owned by the Orange County Flood Control District (OCFCD) and will be leased to the developer in order to accommodate development of the proposed project. The property upon which the Veteran's Village will be constructed is currently vacant, although it was recently used for commercial equipment storage. The property is irregularly shaped but is generally level due to past site grading and compaction and it constrains not unusual topographic features.

Funding Information

Grant Number	HUD Program	Funding Amount
	Veterans Affairs Supportive Housing Project-Based Vouchers and/or Project-Based Housing Choice Vouchers	
M17-UC-06-0525	HOME	\$2,800,000.

Estimated Total HUD Funded Amount: \$2,800,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$24,000,000

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project is not located within the vicinity of an existing airport. As a result, project implementation would not result in any changes in air traffic patterns, either at Fullerton Airport, located approximately 10 miles to the west of the Project, or John Wayne Airport located approximately 15 miles to the south of the Project site. No impacts to

		aviation activity will occur as a result of project implementation.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not in a Coastal Barrier Resources Area (CBRA). California is not a State located in the Coastal Barrier Resources Area.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed site for the Veteran's Village is not located within an area subject to 100-year flood hazards. Therefore, the development of the Project will not be exposed to such hazards. No impacts will occur as a result of project implementation. FEMA Map 06059C0152J, 12/03/2009
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	<p>Per Initial Study prepared by the City of Placentia, dated November 2016, an Air Quality and GHG Impact Analysis was prepared by Giroux & Associates dated September 2, 2016. Peak daily construction activity emissions are estimated to be below South Coast Air Quality Management District (SCAQMD) CEQA thresholds without the need for added mitigation even if the most intensive construction activities for each individual construction phase were to overlap. However, because the South Coast Air Basin (SCAB) is in non-attainment for ozone and particulates, mitigation has been added to this project to reduce emissions to the lowest reasonable level.</p> <p>The following mitigation measures shall be implemented as Best Available Control Measures (BACMs) under SCAQMD Rule 403 during the construction phase of the project.</p> <p><u>Fugitive Dust Control: The following measures shall be incorporated into Project plans and specifications for implementation:</u></p> <ul style="list-style-type: none"> • <i>Apply soil stabilizers or moisten inactive areas.</i> • <i>Water exposed surfaces as needed to avoid visible dust leaving the construction site (typically 2-3 times/day).</i> • <i>Cover all stock piles with tarps at the end of each day or as needed.</i> • <i>Provide water spray during loading and unloading of earthen materials.</i> • <i>Minimize in-out traffic from construction zone.</i>

		<ul style="list-style-type: none"> • <i>Cover all trucks hauling dirt, sand, or loose material and require all trucks to maintain at least two feet of freeboard.</i> • <i>Sweep streets daily if visible soil material is carried out from the construction site.</i> <p>Similarly, ozone precursor emissions (ROG and NOx) are calculated to be below SCAQMD CEQA thresholds. However, because of the regional non-attainment for photochemical smog, the use of reasonably available control measures for diesel exhaust during grading and construction will also be required. The following mitigation, therefore, shall be implemented:</p> <p><u><i>Exhaust Emissions Control: The following measures shall be incorporated into Project plans and specifications for implementation:</i></u></p> <ul style="list-style-type: none"> • <i>Utilize well-tuned off-road construction equipment.</i> • <i>Establish a preference for contractors using Tier 3 or better heavy equipment.</i> • <i>Enforce 5-minute idling limits for both on-road trucks and off-road equipment.</i>
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Project site is not within a coastal zone. The site is approximately 16 miles from the coast.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	<p>The Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or water because the proposed development is residential in nature. No existing or proposed schools are located within a one-quarter miles distance of the project area. No adverse impacts are anticipated to occur as a result of project implementation.</p> <p>The proposed residential Project is not associated with the routine transport, use, or disposal of hazardous materials because residential uses do not utilize large quantities of hazardous materials and therefore do not require the transport of large quantities of hazardous materials that could be discharged into the environment; but it may create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction. During construction there is a potential for accidental release of petroleum products</p>

		<p>in sufficient quantity to pose a significant hazard to people or the environment. The following mitigation measure will be incorporated into the Storm Water Pollution Prevention Plans (SWPPP) prepared for the Project and it can reduce such a hazard to a less than significant level.</p> <p><i>All spills or leakage of petroleum products during construction activities shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. Any contaminated waste will be collected and disposed of at an appropriately licensed disposal or treatment facility. This measure will be incorporated into the SWPPP prepared for the Project development.</i></p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The site and environs are completely urbanized; no large areas of open space exist in the immediate project area that would facilitate wildlife movement. Furthermore, wildlife movement would be constrained by the existing arterial roadway system in the project area as well as the intensive development. Therefore, with no native habitat, and no wildlife corridors that traverse the project site, implementation of the proposed project has not potential to interfere with the movement of native animals of any kind, or to impede the use of any native wildlife nursery sites. The project area does not contain any native plants, including trees. Random trees occur on the outskirts of the property, but these non-native species are not covered by local policies or ordinances. No impacts would occur as a result of project implementation.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Per Initial Study prepared by the City of Placentia, dated November 2016, according to the California State Water Board's GeoTracker website, which provides information regarding Leaking Underground Storage Tanks (LUST), there are several LUST cleanup sites within a 2,500 foot radius of the Project site; however, there are no open cases of LUST sites as all of them have been remediated. Though there are several remediated cases of LUST Cleanup sites, the proposed Project will not be located in an area affected by any of these sites; further, the areas of contamination that were affected by these LUST Cleanup sites are well below the ground surface, while the Veteran's Village will be constructed at surface level. Thus, based on the available data, there is no evidence that supports the presence of hazardous wastes, contamination, or the potential to encounter hazardous waste or contaminated material on the project site. Therefore, any potential impacts are</p>

		considered less than significant. No mitigation is required.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No prime farmland, unique farmland, or farmland of statewide importance exists within the vicinity of the proposed project. There is no farmland conversion involved with the proposed project, due to its nature either as prime, unique or Statewide importance. The scope of project is such that its location or nature would not involve other changes in the existing environment that could result in the conversion of Farmland, to non-agricultural use. No adverse impact to any agricultural resources would occur from implementing the proposed project.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed site for the Veteran's Village is not located within an area subject to 100-year flood hazards. Therefore, the development of the Project will not be exposed to such hazards. No impacts will occur as a result of project implementation. FEMA Map 06059C0152J, 12/03/2009
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No historical resources within or adjacent to the Project area have any potential to be disturbed as they are not within the proposed area in which the facilities will be constructed and developed, and thus, the Project as it is currently proposed will not cause a substantial adverse change to any known historical resources. State Office of Historical Preservation (SHPO) concurred with a finding of no historic properties would be affected by the undertaking. Per Initial Study completed by the City of Placentia, a record search was conducted on July 25, 2016 by CRM TECH archeologist Nina Gallardo, B.A. at the South Central Coastal Information Center (SCCIC), California State University, Fullerton. Through tribal consultation, the Juaneno Band of Mission Indians, Acjachemen Nation request that proper monitors are onsite during excavation and ground disturbance and that the tribe be considered for monitoring. The Gabrieleno Band of Mission Indians – Kizh Nation requested that one of their certified Native American Monitor be on site during any and all ground disturbance (including but not limited to pavement removal, post holing, auguring, boring, grading, excavation and trenching) to protect any cultural resources which may be effected during construction or development. If buried cultural materials are discovered during any earth-moving operations associated with the Project, the following mitigation measure shall be implemented:

		<p><i>Should any cultural resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist and representatives from affected Indian tribes should be contacted. Responsibility for making this determination shall be with the City onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures.</i></p> <p>With the above contingency mitigation incorporation, potential for impact to cultural resources will be reduced to a less than significant level. No additional mitigation is required.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>There is a potential for conflicts between the proposed Veteran's Village project and the surrounding land uses. These conflicts include higher than normal background noise at the site (rail, Orangethorpe Avenue traffic, and adjacent industrial uses). If this development is to proceed, it will require substantial mitigation to reduce interior noise and make the proposed development compatible with surrounding existing land uses.</p> <p>However, in order to mitigate the overall noise impacts within the structure to a 45 dBA interior value at the Veteran's Village, the following mitigation shall be implemented:</p> <p><i>The developer shall require the installation side windows (east and west facing) on the Veteran's Village building in living or sleeping areas should be premium dual-paned windows with a minimum sound transmission class (STC) rating of 33 or higher. In addition the 8-foot tall block wall shall be installed prior to construction to minimize noise exposure for construction employees during construction.</i></p> <p><i>The developer shall require the installation of a mechanical ventilation system affording comfort under closed window conditions.</i></p> <p>(See Section XII. Noise of the Initial Study for Placentia Veteran's Village Project for further Noise-related information, Prepared by Tom Dodson & Associates for City of Placentia, November 2016)</p>

Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not located within a U.S. EPA-designated sole source aquifer watershed area per EPA Ground Water Office.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	According to the IPaC Trust Resources Report referenced in the Initial Study prepared by the City of Placentia dated November 2016, the project site does not contain any wetland as defined by Section 404 of the Clean Water Act, or any other sensitive natural community resource. Though the IPaC Trust Resources Report states that wetland do occur in the area, in the form of riverine habitat, this is due to the Atwood Flood Control Channel to the south of the project site. No impacts to this channel would occur with the implementation of the proposed project.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not located within one mile of a listed Wild and Scenic River.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed site is suitable for its proposed use and will NOT be adversely impacted by adverse environmental conditions. The project is not likely to raise environmental justice issues.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>The current General Plan Land Use Designation is Industrial, and the current zoning classification is C-M (Commercial Manufacturing). The proposed Veteran's Village project will require approval of an amendment to the Land Use Element of the Placentia General Plan and a zone change by the Placentia City Council. The current General Plan Land Use Designation is Industrial, and the current zoning classification is C-M (Commercial-Manufacturing). Surrounding the site to the east, west, and south is a commercial and industrial corridor with minimal residential housing within a quarter mile radius. Residential housing exists to the north of the site, across Orangethorpe Avenue and the railroad tracks. The proposed project will not divide an established community, but instead will establish a new residential use with accompanying services for homeless and/or disabled veterans within this existing commercial and industrial corridor. The purpose and need for this development is to provide low-income housing for an underserved community (homeless and or/disabled veterans) within the City of Placentia. Lakeview Avenue, to the east of the Project site, is being extended by bridge from the residential community to the commercial/ industrial corridor, which will facilitate movement between the two communities. The City of Placentia supports the proposed development as discussed in the Project Description, and therefore, the location of the Veteran's Village will serve the needs of the community as deemed appropriate by City goals and policies. Any impacts to this issue from implementation the proposed project, after approval of the land use designation changes, are considered less than significant.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	<p><u>Soil Suitability</u></p> <p>The project site is an infill site, relatively flat and surrounded by commercial and industrial development. As discussed in the <u>General Plan</u>, expansive soils within the City appear "to pose no significant development constraint or land use planning impact so long as adequate pre-development and designs are utilized" (Safety Element 1-13 to 1-14). These pre-development and design requirements are addressed in the City's building code, and are therefore mandatory. Additionally, according to the United States Department of Agriculture Web Soil Survey, the project Area of Potential Effect (APE) is underlain by an alluvial fan composed of loamy sand and stratified sand to fine sandy loam. These soils have a low shrink-swell potential. Therefore, development of the Veteran's Village has no potential to expose life or property to substantial risks due to the presence of expansive soils. No mitigation is required.</p> <p><u>Slope</u></p> <p>The project area does not have substantial slopes or hills located within its boundaries. The majority of the City, including the proposed Veteran's Village site, is not identified as having a significant landslide hazard. The project area is not located within</p>

an earthquake induced landslide zone. Therefore, with no potential for landslides, the proposed project will not expose future residential structures to such hazards.

Erosion

Due to the existing graded and disturbed nature of the project site, and the type of project being proposed, a potential for soil erosion, loss of topsoil, and/or placing structures on unstable soils is generally considered less than significant. The project site currently consists of a mix of asphalt/pavement, compacted dirt, and scattered weeds. However, during Project construction when soils are exposed, temporary soil erosion may occur even on a relatively flat, compacted surface, which could be exacerbated by rainfall. Project grading would be managed through the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), and a Water Quality Management Plan will be required to meet best management practices to achieve concurrent water quality controls after construction is completed and the Veteran's Village is in operation. The following mitigation measures shall be implemented to address these issues:

Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. If covering is not feasible, then measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the Project site for future cleanup.

All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the Veteran's Village is being constructed.

The Water Quality Management Plan (WQMP) shall incorporate Low Impact Development designs to manage storm water runoff post development. The WQMP shall incorporate an appropriate hydrology evaluation to demonstrate no downstream discharges meet both water quality and drainage system requirements.

Drainage/Storm Water Runoff

Though the Atwood Flood Control Channel lies to the south of the project site, development of the Veteran's Village will not directly impact this channel, and there are not any other streams or channels within the vicinity of the project site. Thus, the proposed project will not substantially alter the actual drainage system, but it will alter onsite flows. The project area is already compacted and it is assumed that almost 100% of the rainfall leaves the project area through the existing drainage system as storm water runoff. The volume of runoff is not forecast to be substantially increased onsite, but the occupied site may generate urban pollutants that will need to be managed through implementation of a WQMP. Mitigation measure VI-3 requires a Low Impact Development WQMP to be implemented for the proposed project. Therefore, with mitigation the proposed project will not substantially alter this existing

		drainage system and therefore has no potential to cause substantial erosion or siltation on- or offsite.
Hazards and Nuisances including Site Safety and Noise	3	<p>According to the Draft General Plan Safety Element, the City of Placentia does not have any active faults located within its boundary. Based on the information in the Placentia General Plan, the potential ground rupture is considered to be low; therefore, future residents and employees of the Veteran's Village will not be subject to rupture from a known earthquake fault. And potential impacts are deemed to be less than significant; no mitigation measures are required.</p> <p>Because of the location of the Project, the construction of a multi-family residential complex at this site would expose persons working and residing at the Veteran's Village to noise levels in excess of standards established in the City General Plan/Placentia Municipal Code without the implementation of several mitigation measures. Exterior and Interior noise at the ground level would be mitigated through the construction of an 8-foot wall, which is part of the overall site design, along the shared property line with the railroad tracks; however, the upper levels of the 3-story structure will not benefit from the implementation of this 8-foot wall and will have to achieve noise attenuation with additional measures in the structure itself.</p> <p>The balconies and patios will not be exposed to excess noise because they face the opposite direction of the railroad (on the south side of the structure) and Orangethorpe Avenue. They will be protected by the new building itself and would be expected to achieve a conditionally acceptable noise level of 65 dB CNEL with no further mitigation at the balconies and patios.</p> <p>In order to mitigate the overall noise impacts within the structure to a 45 dBA interior value at the Veteran's Village, the following mitigation shall be implemented:</p> <p><i>The developer shall require the installation side windows (east and west facing) on the Veteran's Village building in living or sleeping areas should be premium dual-paned windows with a minimum sound transmission class (STC) rating of 33 or higher. In addition the 8-foot tall block wall shall be installed prior to construction to minimize noise exposure for construction employees during construction.</i></p> <p><i>The developer shall require the installation of a mechanical ventilation system affording comfort under closed window conditions.</i></p> <p>With implementation of the above mitigation measure, any impacts under this issue would be considered less than significant.</p>
Energy Consumption	2	Per the City of Placentia Housing Element General Plan 2013-2021, published on January 7, 2014, in order to reduce the consumption of water in a landscaped area the City of Placentia has adopted a xeriscape ordinance within the

		<p>Zoning Code. Primary techniques to reduce water consumption are the use of water conserving plants, minimizing the amount of grass area, grouping plants in accordance to their watering needs, and providing an irrigation system designed to meet the needs of the plants in the landscape. All new developments are required to submit plans that comply with the ordinance.</p> <p>In 1982, the City adopted an ordinance that encourages the development of energy efficient residential dwellings in order to reduce the reliance of the City's residents in commercial energy sources.</p> <p>Southern California Edison, which provides electricity service in Placentia, also offers public information and technical assistance to developers and homeowners regarding energy conservation. Southern California Edison also provides incentives for energy efficient new construction and home improvements. Through the California Energy Star New Homes program, builders can receive up to \$700 per single family unit or \$275 per multi-family unit for constructing homes that are 15-20 percent more energy efficient than the Title 24 requirements. Builders also have the option of installing efficient appliances, insulation, and/or tight ducts to receive similar monetary incentives. Owners of existing homes can receive monetary incentives for purchasing Energy-star qualified appliances or making other energy-saving improvements such as installing a whole-house fan in the attic.</p> <p>One of the more recent strategies in building energy-efficient homes is following the U.S. Green Building Council's guidelines for LEED Certification. LEED-certified buildings demonstrate energy and water savings, reduced maintenance costs and improved occupant satisfaction. The LEED for New Construction program has been applied to numerous multi-family residential projects nationwide. The LEED for Homes pilot program was launched in 2005 and includes standards for new single family and multi-family home construction.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	Construction of the proposed Veteran's Village Project is anticipated to begin in December of 2017 and extend over a period of approximately 15 months which would create temporary jobs. Property management, maintenance, and social service staff jobs are anticipated as part of the proposed project but will have no significant impact on employment and income within the project area.

Demographic Character Changes, Displacement	2	<p>According to the Southern California Association of Government's (SCAG) profile for the City of Placentia (May 2013), the City had a population of 51,084 persons and an average household size of 3.1 persons per unit, slightly higher than the 3.0 average household size for Orange County. The proposed development of a Veteran's Village is assumed to house approximately 55 persons (45 one-bedroom units, and 5 two-bedroom units). This equates to an estimated 0.1% increase in the City's overall population (55 persons/51,084 persons = 0.001077). This increase in population is not considered a substantial direct increase and the City of Placentia General Plan Housing Element 2013-2021 projects a need for 231 low to very low-income housing units through the year 2021. Therefore, this project is generally considered growth accommodating, not growth inducing as it will fulfill a need within the City for low to very low-income housing. The area of the City within which the project site is located has sufficient existing infrastructure to serve a project of this scale. Additionally, the area surrounding the Project site is being improved to increase efficiency in traffic circulation. Therefore, implementation of the project will have a less than significant impact on induced growth. No mitigation is required.</p> <p>The proposed project will occur on a currently vacant site and, consequently, will not displace any existing housing or displace a substantial number of people that would necessitate the construction of replacement housing elsewhere. As indicated in the Project Description, the project itself will create needed housing for homeless and/or disabled veterans. No impacts will occur as a result of project implementation.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>The Project will result in the creation of 50 new multiple-family residential dwelling units. The type of development proposed—housing for homeless and disabled veterans—is not anticipated to generate a substantial number of new students because the size of the units are not intended to, nor will they support families. The state has mandated (SB 50) that requires the payment of fees established for each new residential unit is sufficient to offset potential impacts to the affected school system(s). Based on this finding and the mandatory requirements to pay the mandatory fees for residential development, the proposed project will not cause a significant adverse impact due to generation of new students. Thus, school impacts are considered less than significant.</p>
Commercial Facilities	2	<p>A commercial/retail center is located within walking distance from the property site, approximately 0.2 miles northeast, with multiple dining places, medical clinic and automated teller machine. Another commercial/retail center within the vicinity of the property is located approximately 0.6 miles northwest, with a gasoline station, convenient store, dining place, pet spa and beauty salon.</p>

		(See attached Retail Services Map)
Health Care and Social Services	2	<p>Through this customized program, veterans will also be provided access to Veterans' Affairs (VA) medical and social assistance programs.</p> <p>The building will include a common area and amenities such as outdoor patios, site landscaping, a community garden, recreation room, shared laundry room, and offices for property management, maintenance, and social service staff.</p>
Solid Waste Disposal / Recycling	2	<p>The City of Placentia is served by the Olinda Landfill, operated by OC Waste & Recycling, and located in Brea, California. This facility is permitted to operate through 2030. Based on a solid waste generation rate of 12.23 pounds per day per dwelling unit (OC Waste & Recycling), the project would generate 611.5 pounds of solid waste per day. The Orange County landfill system, which also includes Prima Deshecha and Frank R. Bowerman Landfills, currently has adequate landfill capacity to accommodate the development of a small residential multi-family apartment complex on the site. Further, due to the large available daily and long-term capacity at the County's landfill system, the proposed project is not expected to cause any adverse impact on the continued operation because it has sufficient permitted capacity to accept the project's solid waste disposal needs.</p>
Waste Water / Sanitary Sewers	2	<p>The proposed project will deliver wastewater generated from the residences to the regional treatment plant operated by Orange County. Residential and commercial wastewater rarely contains constituents that would cause a wastewater treatment plant to exceed Regional Board requirements as established in a wastewater discharge requirement. The raw sewage generated by the proposed project would not include constituents that would require treatment beyond that provided at the existing wastewater treatment plants operated by the Orange County Sanitation Districts. No adverse impact from generation of wastewater onsite is expected to result from implementation of the proposed project.</p> <p>The proposed project is subject to Assembly Bill 1327, Chapter 18, Solid Waste Reuse and Recycling Access Act of 1991 (Act). The Act requires that adequate areas be provided for collecting and loading recyclable materials such as paper products, glass, and other recyclables. The project must conform to the City's requirements to ensure compliance with the Act. Based on these factors, it is anticipated that the project will have a less than significant impact related to compliance with statutes and regulations. The proposed project will implement storm water quality controls that will meet requirements of the Regional Board. All drainage from the site will leave through existing or project designed drainage systems as stormwater runoff. Implementation of the proposed project will neither exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, nor require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant</p>

		environmental effects. Thus, impacts to this issue from implementing the proposed project are considered less than significant.
Water Supply	2	<p>The Golden State Water Company serves the City through three water systems within the Placentia Customer Service Area. Water delivered to customers in the Cowen Heights, Placentia, and Yorba Linda systems is a blend of groundwater from the Orange County Groundwater Basin, and imported water from the Colorado River Aqueduct and the State Water Project (imported and distributed by Metropolitan Water District of Southern California). The average monthly residential water usage in Golden State Water's Region 3 Service Area is approximately 1,200 cubic feet (8,976 gallons), which equates to approximately 300 gallons per day per dwelling unit¹. Based on the average demand, the proposed project would create a new demand for approximately 15,000 gallons per day, though the actual amount is forecast to be less than this figure because water usage within the Placentia Service Area is driven to a higher average because of larger homes with high outdoor water use. A Project of this type—higher density, low-income housing—does not use as much water per dwelling unit as a tract of large homes with large outdoor spaces. Based on the preceding analysis, it is anticipated that this additional demand for additional domestic water would be less than significant. Therefore, implementation of the proposed project will not result in the need to construct new or expand existing water facilities. Additionally, sufficient water supplies are available to serve the project from existing entitlements, therefore potential project-related impacts to domestic water supplies are anticipated to be less than significant and no mitigation is required.</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The Orange County Fire Authority (OCFA) provides fire service to the City of Placentia. Fire services are provided at two fire stations in the City, both are a similar distance from the Project site. Fire Station 34 is located 1530 North Valencia Avenue, Placentia, 92870 and Fire Station 35 is located at 120 South Bradford Avenue, Placentia, 92870. Battalion 2 provides firefighting services at these locations. The Project site is located in a completely urbanized commercial/industrial corridor of Placentia. The Project proposes the construction of the 50-unit Veteran's Village, multiple-family residential development that will provide housing for homeless and/or disabled veterans. The OCFA response goal is for the first engine to reach the emergency scene from the time we receive the call within 7 minutes 20 seconds 80% of the time and a paramedic to reach the scene from the time we receive the call within 10 minutes 80% of the time. Because the proposed project is not forecast to generate a greater population within the City and therefore would not create a substantial increase in demand for Fire Protection services than that which already occurs. The proposed Veteran's Village must incorporate all current fire protection measures included in the current building code. This requirement and the size and nature of the project, along with the increased value of the developed land is considered sufficient to control impacts on</p>

¹ <http://www.gswater.com/placentia/>

		<p>the fire protection system to a less than significant impact level. No substantial changes in existing fire protection facilities are anticipated and potential impacts would be less than significant as a result of the proposed project.</p> <p>As noted in the preceding discussion regarding fire protection, the area surrounding the Project site is located in a completely urbanized commercial/industrial corridor. The proposed project would result in the construction of a 50-unit Veteran's Village with services designed to support the homeless and/or disabled veterans who will reside at this complex. The City of Placentia Police Department provides police protection to the project area. The proposed low to extremely low income housing units that will be developed on the site if the Veteran's Village is approved would add approximately 55 new City residents. Based on current staffing levels at the City, between 50 and 60 sworn officers, the addition of these potential residents would be adequately served by the existing police services, based solely on the small population this housing development will support. It is assumed that the 55 residents of the Veteran's Village are current residents of the City of Placentia, but lack a permanent home, thus even if the 55 residents of the Veteran's Village were all new residents of the City, the increase in potential incidents per resident would only increase by 0.0069 (2,738 incidents/51,139 residents = 0.0069), which is not considered a substantial increase in demand for police protection. Additionally, the Project site is currently fenced, and will be fenced during construction. The proposed Project will not include a use that would likely attract criminal activity, except for random trespass and theft; however, any random trespass is unlikely given that the site will be fenced from public access during construction. Therefore, impacts to police protection resources from implementation of the proposed project are considered less than significant; no mitigation measures are required.</p>
Parks, Open Space and Recreation	2	<p>The proposed project may generate up to 55 new residents in the City of Placentia. However, the Project is intended to house homeless and disabled veterans who currently reside in the City, but are without a physical residence. Additionally, because the homeless and veterans to be served are those in the City of Placentia, it is assumed that they already utilize parks and open space for their living quarters, and by providing housing to this community it is anticipated that use of parks would be reduced. Therefore, these new residents will not create a substantial increase in demand for City parks and recreation facilities. In addition, the proposed project includes amenities within the development, including patios, landscaped areas, and a recreation room, which would offset to some degree the demand for park and recreation facilities by future residents. Lastly, the Project may be required to pay City Quimby fees, which are established for a residential development's fair share of park facilities. Consequently, project impacts relative to new or physically altered park facilities would be less than significant.</p>
Transportation and Accessibility	2	<p>Implementation of the proposed 50-unit multiple-family Veterans' Village project will not conflict with an applicable plan, ordinance,</p>

or policy establishing measures of effectiveness for the performance of the circulation system, especially when considering that the Lakeview Avenue bridge, which is designed to increase efficiency in traffic flow within the area adjacent to the Project site, will be completed before construction of the proposed project commences. However, the proposed project could create some traffic conflicts, such as minor delays to traffic flow in the immediate vicinity of the site, due to greater trip generation during construction, as well as greater trip generation due to an increase in population within the area of approximately 55 future residents. Because the site is currently vacant, the baseline trip generation is 0. However, according to the data gathered by Urban Crossroads, if the property was developed as it is currently zoned for as an Industrial use, approximately 211 weekday daily trips would be generated. Under the proposed project, as a Veteran's Village, with the proposed zone change, 135 expected weekday daily trips will be generated by the proposed project which is a net difference of 76 fewer trip ends per day. Construction equipment, material, and resident access will be provided from a newly constructed street that intersects with Lakeview Avenue to the southeast of the property—a street in which a low amount of traffic is anticipated, and will not be severely impacted by traffic generated from construction of the project. Following completion and occupancy of the project, the 50-unit Veteran's Village is expected to generate a total of 7 AM peak hour and 5 PM peak hour trips based on the number of units and forecast income of the future residents. Based on the capacities of the roadways providing access to and from the site, and the improvements being made to those roadways, which will be completed before the proposed project commences construction activities, the traffic generated by the proposed project would not cause a significant direct impact or a cumulatively significant effect on the local and regional circulation system.

The proposed project will occur entirely within the project site boundaries. Construction activities will not occur within the adjacent roadways to the project site. Large trucks delivering equipment or removing small quantities of excavated dirt or debris can enter the site without major conflicts with the flow of traffic on the roadways used to access the site. As previously stated, primary access to the site will be provided by a new road—to be completed before project construction commences—that will intersect with Lakeview Avenue. Access to the site must comply with all City design standards, and would be reviewed by the City to ensure that inadequate design features or incompatible uses do not occur. Additionally, the proposed development would be required to comply with all applicable fire code and ordinance requirements for construction and access to the site. Emergency response and evacuation procedures would be coordinated with the City, as well as the police and fire departments, resulting in less than significant impacts; no mitigation measures are required.

It will not be necessary for the contractor to implement a traffic management plan, including flag-persons or other features to control the interaction of the truck traffic and the flow of traffic on these roadways. This is because the access is through a cul-de-sac, which provides ample room for access to the site, and minimal

		<p>traffic conflicts. Implementation of the proposed project would not result in significant impacts involving inadequate design features or incompatible uses, or result in inadequate emergency access.</p> <p>The project site is located across the railroad tracks from Orangethorpe Avenue, which is an arterial roadway in Placentia. The City of Placentia is served by local and regional bus service provided by Orange County Transportation Authority (OCTA). The proposed project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. OCTA is currently making improvements to circulation within the vicinity of the Project through the construction of a major railroad grade separation that will route Lakeview Avenue on a bridge over the railroad tracks and Orangethorpe Avenue. OCTA also manages the bus system throughout the City of Placentia; the nearest bus stops are local route stop 30 on Orangethorpe Avenue and Stationlink Metrolink Rail Feeder Route stop 411, both of which link to OCTA's regional routes (http://www.octa.net/pdf/OCTASystemMap.pdf). Project-related impacts to public transit as well as bicycle and pedestrian facilities would be less than significant. No mitigation is required.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The site has been significantly altered as a result to development. It is located in an urbanized are of Placentia and does not support any unique natural features and/or water resources.
Vegetation, Wildlife	2	The Veteran's Village project site and surrounding area are urbanized, and the site itself contains no natural habitat and no potential to support any species identified as a candidate, sensitive or special status species. With no habitat or species of concern located within the project area, the implementation of the Veteran's Village Project has no potential for impact to any native biological resources. No impacts are anticipated.
Other Factors	2	The proposed Veteran's Village site is in an urbanized area of Orange County within the City of Placentia. Although undeveloped, the site is covered by asphalt, compacted dirt, and scattered weeds. There are no known mineral resources within the Project area, and it is not designated for mineral resource exploitation either by the City of Placentia or the County of Orange. The development of the Veteran's Village on the Project site will not cause any loss of mineral resource values to the region or residents of the state. No impacts will occur to mineral resources with the implementation of the proposed project.

Additional Studies Performed:

- Initial Study for Placentia Veteran's Village Project, Prepared by Tom Dodson & Associates for City of Placentia, November 2016
- Giroux & Associates, "Air Quality and GHG Impact Analysis, Veteran's Village, City of Placentia, California," September 2, 2016
- Giroux & Associates, "Noise Impact Analysis, Veteran's Village, City of Placentia, California," November 8, 2016
- CRM TECH, "Historical/Archaeological Resources Records Check, Veteran's Village Project, City of Placentia, Orange County, California," September 8, 2016
- U.S. Fish and Wildlife Services, Veteran's Village, Placentia "IPaC Trust Resources Report," generated July 6, 2016

Field Inspection (Date and completed by):

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

List of Permits Obtained:

Public Outreach [24 CFR 50.23 & 58.43]:

The City of Placentia's Initial Study and a Notice of Intent of Intent to Adopt a Mitigated Negative Declaration were circulated for 20 days for public comment. Multiple City Council meetings were conducted throughout the CEQA Environmental Review process and zone change.

The County of Orange published a Notice of Finding of No Significant Impact and Notice of Intent to Request Release of Funds for a 15-day public review.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project is not part of a series of activities. The project would not result in additional cumulative impacts from future related actions.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Moving forward with this project allows to provide service-enriched affordable rental housing for U.S. Veterans who are homeless and/or disabled. The process of identifying a potential vacant site could be limited.

By implementing the proposed project, the potential cumulative environmental effects have been determined to have less than significant impacts with the implementation of the mitigation measures.

No Action Alternative [24 CFR 58.40(e)]:

The proposed project reflects the City and applicant's objective of providing affordable housing for the homeless and homeless veterans. The provision of such housing meets a societal goal of assisting the homeless to get off the streets and reduce difficult health and safety environmental issues associated with living on the streets of Placentia. Thus, based on the project's objectives and the lack of any significant adverse environmental impacts, this project meets both the short- and long-term environmental goals of the City of Placentia, with no identifiable disadvantage for either circumstance.

Summary of Findings and Conclusions:

An Initial Study was prepared for the City of Placentia by Tom Dodson & Associates in November 2016. The evaluation from the Initial Study determined that either no impact or less than significant impacts would be associated with the issues of agricultural and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population/housing, public services, recreation, and utilities/service systems. The issues of Aesthetics, Air Quality, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, and Noise require the implementation of mitigation measures to reduce impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these issues to a less than significant impact.

Based on the findings in this Initial Study, the City of Placentia is proposing to adopt a Mitigated Negative Declaration (MND) for the Veteran's Village Project, including the proposed general plan amendment, zone change, and development agreement. A Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) will be issued for this project by the City of Placentia.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

1. Aesthetics

Prior to approval of the Final Design, an analysis of potential glare from sunlight or exterior lighting to impact vehicles traveling on adjacent roadways shall be submitted to the City for review and approval. This analysis shall demonstrate that due to building orientation or exterior treatment, no significant glare may be caused that could negatively impact drivers on the local roadways or impact adjacent land uses. If potential glare impacts are identified, the building orientation, use of non-glare reflective materials or other design solutions acceptable to the City of Placentia shall be implemented to eliminate glare impacts.

2. Air Quality

a. Fugitive Dust Control: The following measures shall be incorporated into Project plans and specifications for implementation:

- Apply soil stabilizers or moisten inactive areas.
- Water exposed surfaces as needed to avoid visible dust leaving the construction site (typically 2-3 times/day).
- Cover all stock piles with tarps at the end of each day or as needed.
- Provide water spray during loading and unloading of earthen materials.
- Minimize in-out traffic from construction zone.
- Cover all trucks hauling dirt, sand, or loose material and require all trucks to maintain at least two feet of freeboard.
- Sweep streets daily if visible soil material is carried out from the construction site.

- b. Exhaust Emissions Control: The following measures shall be incorporated into Project plans and specifications for implementation:

- Utilize well-tuned off-road construction equipment.
- Establish a preference for contractors using Tier 3 or better heavy equipment.
- Enforce 5-minute idling limits for both on-road trucks and off-road equipment.

- c. Occupancy Emissions

Operational emissions are not anticipated to exceed their respective SCAQMD significance thresholds with application of the following measure:

- Utilize SCAQMD approved Rule 445 devices rather than wood burning fireplaces for any residential use.
- All residential living areas shall be equipped with air filtration systems operating under positive pressure rated at MERV 13 or higher.
- Replacement filters shall be made available through the apartment management for the project.

3. Cultural Resources

- a. Should any cultural resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist and representatives from affected Indian tribes should be contacted. Responsibility for making this determination shall be with the City onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures.
- b. Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City onsite inspector. The paleontological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures.

4. Geology and Soils

- a. Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. If covering is not feasible, then measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the Project site for future cleanup.
- b. All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the Veteran's Village is being constructed.
- c. The WQMP shall incorporate Low Impact Development designs to manage storm water runoff post development. The WQMP shall incorporate an appropriate hydrology evaluation to demonstrate no downstream discharges meet both water quality and drainage system requirements.

5. Hazards and Hazardous Materials

All spills or leakage of petroleum products during construction activities shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. Any contaminated waste will be collected and disposed of at an appropriately licensed disposal or treatment facility. This measure will be incorporated into the SWPPP prepared for the Project development.

6. Noise

- a. The developer shall require the installation side windows (east and west facing) on the Veteran's Village building in living or sleeping areas should be premium dual-paned windows with a minimum sound transmission class (STC) rating of 33 or higher. In addition the 8-foot tall block wall shall be installed prior to construction to minimize noise exposure for construction employees during construction.
- b. The developer shall require the installation of a mechanical ventilation system affording comfort under closed window conditions.

Law, Authority, or Factor	Mitigation Measure

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature: Cindy Wolfe Date: 4/20/17

Name/Title/Organization: Cindy Wolfe, Admin. Manager I, County of Orange/HCD&HP

Certifying Officer Signature: John Viafora Date: 4/20/17

Name/Title: John Viafora, HCD/HP Manager

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).