



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:** Orange Corporate Yard

**Responsible Entity:** OC Housing & Community Development

**Grant Recipient**  
(if different than Responsible Entity):

**State/Local Identifier:** CA/059

**Preparer:** Suzan Ehdaie, Community Development  
Department

**Certifying Officer Name and Title:** Rick Otto, City Manager

**Grant Recipient**  
(if different than Responsible Entity):

**Consultant (if applicable):** Jonathan Rigg, Dudek  
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**Direct Comments to:** sehdaie@cityoforange.org

**Project Location:**

The Orange Corporate Yard (referred to throughout this Environmental Assessment as the Multifamily Residential Project or proposed project) is located at 637 West Struck Avenue in the City of Orange, Orange County, California (refer to Attachment 1, Project Location). The 2.75-acre project site is located near the eastern terminus of West Struck Avenue. North Batavia Street lies west of the project site and West Katella Ave is located to the north. The subject site is situated on the east end of a larger 17.23-acre parcel that comprises the City of Orange Corporate Yard and Police Department building. The project site is located on Assessor's Parcel Number 375-291-14, an area zoned for Public Institution (P-I). This designation encompasses public, quasi-public, and institutional land uses, such as schools, City and County facilities, hospitals, major utility easements and properties, and service organizations. Housing related to an institutional use, including dormitories, employee housing, assisted living, nursing facilities, and convalescent homes, is also permitted. Supportive, transitional, and institution-related housing is allowed as an accessory use under this zoning designation. Currently, the project site consists of vacant land.

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

The proposed affordable housing project by C&C Development and Orange Housing Development Corporation would be managed by Advanced Property Services Management, Inc. (APS). APS is a subsidiary owned by C&C Development and has been actively involved in the management of affordable apartment communities throughout Southern California for the past 30 years. The proposed project involves transforming a currently vacant lot into a 62-unit affordable housing community consisting of 18 two-bedroom units and 44 three-bedroom units. Two-bedroom units are 863 square feet and three-bedroom units are 1,123 square feet. Of the 62 family units, 20 would be reserved as Permanent Supportive Housing (PSH) units for formerly homeless families sourced with 12 units through the Family Care Center of Orange and eight units utilizing Orange County Housing Authority (OCHA) Project-Based Vouchers that will be using the County's Coordinated Entry System. In addition to the residential units, the proposed project includes a leasing office space for professional on-site management, community room, computer room, , barbeque pavilion for residents, tot lot, a fitness and teen area, turf areas and, a meandering central walkway in the active and passive green open space for families. The new parking lot would contain 127 parking spaces for residents (2.05:1 parking stall to housing unit ratio). Leadership in Energy and Environmental Design (LEED) Standards, which aim to create environmentally and socially responsible, healthy, and prosperous communities through building design, would be used to guide the proposed project's design and orientation.

The buildings are 38 feet tall. Total building area is 71,358 square feet. The dwelling unit per acre ratio rounds to 22. The site perimeter is defined by eight-foot-high masonry walls and tree rows in four-foot-wide planters. An automatic vehicular gate and a pedestrian gate is located at the Struck Avenue entrance and provides the sole entry and exit to the site. A vehicle turnaround is provided in front of the gate. A 451 square foot maintenance garage is located in

the northeast corner of the site. 133 trees are provided with the project, particularly adjacent to property lines for screening purposes. The project includes a tentative parcel map to subdivide the City's corporation yard property to accommodate the project. Two concessions are used for the project to accommodate greater building height and stories, and for extra perimeter wall height.

The Orange Corporate Yard would consist of two, three-story garden-style walkup buildings that feature a contemporary mission revival style of architecture popular in Southern California building design. Interconnected pedestrian walkways would facilitate easy access to the proposed project's numerous amenities, and a gated entrance with turnaround would provide easy access from West Struck Ave while providing a secure community for residents. The proposed project complies with the General Plan Land Use Designation of Public Facilities Max. 0.5 FAR (floor area ratio) and Institutions Max. 2.0 FAR (PFI) and a zoning designation of Public Institution.

Families Forward Affordable Housing Services, a social services organization founded in 1984, would provide a part-time on-site Supportive Service Coordinator for all 62 units of the Orange Corporate Yard development project. Social services ranging from education workshops, community counseling and career coaching, to Veteran Coordinated Services (for eligible residents) would be provided to residents for a minimum of 15 hours per week. Additional social services include Food Pantry seasonal programs and after-school programs for children. Residents of the PSH units would also receive these social services. Converting this vacant lot into an affordable housing community supports housing priorities outlined in the City of Orange's 2020-2024 Consolidated Plan by increasing housing for very low and moderate income families.

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

As demand increases for Orange County services, and the County's population increases, the need for additional housing and access to government services has also increased.

The proposed project's objectives are as follows:

- Create new affordable, safe, attractive, and service-enriched residences for low-income individuals and families.
- Create a community that fits into and improves the existing neighborhood in style, texture, scale, and relation to the street.
- Provide housing for low-income individuals and families.

**Existing Conditions and Trends [24 CFR 58.40(a)]:**

According to the Environmental Information Form completed by C&C Development and Orange Housing Development Corporation as well as the Phase 1 Environmental Site Assessment (ESA) completed by LOR Geotechnical Group Inc. in February 2020, the proposed project site is currently vacant and undeveloped though it is partially used for municipal storage (materials, vehicles, trailers, equipment, etc.). Historical photographs of the project area dating back to

1938 (provided in the ESA) reveal that the site has remained vacant since the 1930s when the land was used for agriculture. Construction has occurred adjacent to the project area but not on the actual site. Currently, the areas adjacent to the project site have commercial, industrial, and multifamily residential uses.

North: West Katella Avenue, Commercial (service uses, restaurants, retail)

South: West Collins Avenue, Industrial (auto repair, service uses)

East: Glassell Street, Active Railroad Right-of-Way followed by Multifamily Residential owned by the applicant (apartments)

West: North Batavia Street, Industrial (police department, industrial)

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
	HOME	\$479,520 <sup>1</sup>
	8 Project Based Vouchers	\$2,461,440 <sup>1</sup> (estimated 20-year amount)
	HOME	\$1,600,000 <sup>2</sup>
<sup>1</sup> County of Orange <sup>2</sup> City of Orange		

**Estimated Total HUD Funded Amount: \$4,540,960**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$28,432,574**

## 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.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes   No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is not located within close proximity to a military or municipal airport. The nearest airport is John Wayne Airport, which is 8.42 miles south of the project area (see Attachment 2; see Environmental Review Record [ERR] 1).
<b>Coastal Barrier Resources</b>  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 Coastal Barrier Resources Act does not apply to this project since no coastal barrier resources protected under this policy occur in California (see Attachment 3). In addition, since the proposed residential project is located approximately 13.33 miles from the coast, it is unlikely to affect coastal resources.
<b>Flood Insurance</b>  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 Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) indicates that the project site does not occur on a flood plain. An area with reduced flood risk due to a levee occurs west of the project area (see Attachment 4).  Firm Panel 06059 C0161J Effective December 2009 (see ERR 2).
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  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"/>	The proposed project falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) within the South Coast Air Basin. The SCAQMD, according to the U.S. Environmental Protection Agency is currently in a nonattainment zone for federal ozone (8-hour ozone) and particulate matter from greenhouse

		<p>gasses (PM<sub>2.5</sub>). Federal ozone in Orange County has been classified as extreme, while PM<sub>2.5</sub> has been classified as moderate. In order to meet HUD air quality guidelines, the proposed project must follow the State Implementation Plan (SIP), which describes how an area will meet national and ambient air quality standards. SIP guidelines require the proposed project to keep its criteria pollutant emissions below SCAQMD's significance thresholds.</p> <p>The project site's location close to public transportation is consistent with regional efforts to improve transit availability and would reduce the amount of emissions (PM<sub>2.5</sub>) associated with motor vehicle travel. By developing affordable housing consistent with the growth anticipated by the General Plan and existing zoning and land use designations, the proposed project is in compliance with Regional Air Quality Strategy, the SIP, and the Air Quality Management Plan for this locality.</p> <p>Air quality at the project site could be negatively impacted by fugitive dust (PM<sub>10</sub>) and other particulate air pollutants (PM<sub>2.5</sub>) released during construction-related activities, such as land clearing or grading. Exhaust emissions (oxides of nitrogen [NO<sub>x</sub>] and carbon monoxide [CO]) released by heavy construction vehicles could also temporarily impact air quality. Adverse impacts to air quality during construction would be managed by implementing mitigation measures for fugitive dust control in compliance with SCQAMD Rule 403. This guideline identifies measures to reduce fugitive dust that are required to be implemented at all construction sites within the South Coast Air Basin (<b>Mitigation Measure 1</b>).</p> <p>The California Emissions Estimator Model (CalEEMod) was used to estimate annual criteria air pollutant emissions during the construction and operational phases for the proposed project. Pollutants including PM<sub>2.5</sub>, PM<sub>10</sub>, NO<sub>x</sub>, and CO levels all fell below de minimis</p>
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		<p>thresholds during the construction and operational phases. Daily emissions from the proposed project would not exceed the SCAQMD's regional construction or operation emissions thresholds (see Attachment 5).</p>
<p><b>Coastal Zone Management</b></p> <p>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>No adverse impacts to California's designated coastal zones would occur as a result of the proposed development. The project site is located 13.33 miles from the Pacific Ocean and does not exist within a Coastal Zone, as defined by the California Coastal Act (Public Resources Code, Division 20, Section 3000 et seq.)(see Attachments 6 and 7; see ERR 4).</p>
<p><b>Contamination and Toxic Substances</b></p> <p>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes    No</p> <p><input checked="" type="checkbox"/>    <input type="checkbox"/></p>	<p>A Phase 1 ESA conducted by LOR Geotechnical Group Inc. in February 2020 found no recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs) on the proposed project site. Over 200 plastic 5-gallon buckets containing insecticide (Zone Defense®, orthoboric acid) were stored at the project site and should be removed prior to construction. No hazardous materials or wastes were observed at the subject property during the on-site evaluation. De minimis hydrocarbon-stained soils were observed across the proposed project area.</p> <p>Vapor encroachment conditions, tested in the Phase 1 ESA using Tier 1 and 2 Vapor Encroachment Screening, were not found at the proposed project site. Review of environmental regulatory records for the properties surrounding the project location did not show history of hazardous substances or petroleum products that could migrate to or affect the proposed project.</p> <p>Given the project site's agricultural history, organochlorine pesticides (OCPs) and arsenic might be present in on-site soils. Historic and current storage of vehicles, trailers, and equipment on the project site has resulted in the deposit of shallow fill materials across the</p>



project site. Soil testing for these substances, in accordance with the Department of Toxic Substances Control (DTSC) 2008 Interim Guidance for Sampling Agricultural Properties (Third Revision), was conducted by LOR Geotechnical Group Inc. in a Phase II ESA in October 2020. A total of 7 soil borings were advanced for soil sample collection and soil vapor probe installation up to a maximum depth of 13 feet below ground surface. Soil samples were analyzed for petroleum hydrocarbon chain, volatile organic compounds (VOCs), heavy metals, boron, and/or organochlorine pesticides. Soil vapor samples were analyzed for total petroleum hydrocarbons as gasoline (TPH-G) and VOCs.

Results of soil testing revealed no adverse environmental impacts to on-site soils as a result of any past site uses. Reported concentrations of petroleum hydrocarbons, heavy metals, OCPs, and boron were less than DTSC screening levels for residential soils. Soil vapor concentrations of TPH-G and VOCs, such as benzene and ethylbenzene, exceed DTSC screening levels for residential indoor air with an attenuation factor of 0.03 applied. While a Health Risk Assessment might determine that mitigation measures are not required, presently the following mitigation measures to reduce vapor concentrations should be applied: geotechnical removal and recompaction of the upper approximate 5 feet of on-site soils and the placement of a vapor barrier beneath all planned on-grade buildings (see Attachment 8 and **Mitigation Measure 2**).

A regulatory records review conducted as part of the Phase 1 ESA did not show any history of underground storage tanks (USTs) or environmental activity use limits where the residential development is to be built. While surrounding properties were found to have USTs and prior reports of leaking underground storage tank (LUST) sites, these sites should have no adverse impact on the project site due

		to their distances away and/or closed LUST regulatory case status. The Orange Corporate Yard includes other City departments, including the City Public Works and Fire Department, among others. Containers with hazardous materials and wastes, such as materials related to asphalt and paint, were found on areas of the Orange Corporate Yard outside of the project site (see ERR 5).
<p><b>Endangered Species</b></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>No federally listed special-status plant or wildlife species are expected to be present within the project site due to the urban and industrial setting surrounding the project site.</p> <p>Three species classified as Endangered or Threatened by the U.S. Fish and Wildlife Service (USFWS) were identified as possibly occurring on the proposed project site. These species include the coastal California gnatcatcher, least Bell's vireo, and Santa Ana sucker. According to USFWS's IPaC database, while the general habitat ranges of these three species overlap with the proposed project location, their critical habitat areas do not intersect with the project area (see Attachment 9).</p> <p>Therefore, the proposed project would not have any negative impacts on wildlife movement, migration, or nursery sites (see ERR 6).</p>
<p><b>Explosive and Flammable Hazards</b></p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Explosive or flammable hazardous materials would not be present at the proposed project site, which would be developed into affordable housing. The Phase 1 ESA conducted by LOR Geotechnical Group Inc. did not find explosive or flammable materials at the project site, which is currently an undeveloped area with storage of equipment and insecticide. Additional According to the ESA, observations of the properties adjoining the proposed project site did not contain any potential aboveground sources of contamination that could potentially impact the project site. Therefore, the proposed development would not expose residents or the surrounding community to dangerous explosive or flammable hazards.</p>
<p><b>Farmlands Protection</b></p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The proposed project site is located on land classified as "urban and built-up" by the</p>

<p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>		<p>California Department of Conservation (see Attachment 10). The project area is designated as PFI and zoned as P-I, which lists supportive, transitional, and institution-related housing (dormitories, employee housing, assisted living, convalescent homes, etc.) as accessory uses. According to the Land Use Element of the Orange General Plan, the PFI designation, “provides for several types of public, quasi-public and institutional land uses, including schools, colleges and universities, City and County facilities, hospitals, and major utility easements and properties.” As suggested by zoning laws in the project area, the land surrounding the proposed project site is primarily industrial, commercial, and residential (see Attachment 11).</p> <p>Conversion of the vacant lot currently occupying the project site would not affect protected farmlands or include activities that would result in the transition of existing farmland to non-agricultural uses. Therefore, the proposed project complies with the Farmland Protection Policy Act.</p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes    No  <input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Floodplain management would not be adversely impacted by the proposed project as the project area does not occur on a floodplain or floodway. According to FEMA FIRM panel 06059 C0161J, the project would be in an Area of Minimal Flood Hazard and adjacent to an Area with Reduced Flood Risk due to Levee (see Attachment 4).</p>
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes    No  <input checked="" type="checkbox"/>    <input type="checkbox"/></p>	<p>The California State Historic Preservation Office (SHPO) was consulted in September 2020 to identify the presence of any known historical or cultural resources on the proposed project site. Pursuant to 36 CFR 800.4(d), SHPO did not find evidence that any historic resources would be impacted by the proposed development. As described in <b>Mitigation Measure 4</b>, construction activities would cease and an archaeologist would be contacted in the event that historic or cultural resources were discovered on the project site.</p>

		<p>Pursuant to Public Resources Code section 21080.3.1 (c), tribes that are traditionally and culturally affiliated with the proposed project site, such as the Kizh Nation, were consulted. Included as <b>Mitigation Measure 5</b>, the Kizh Nation requested that a Native American monitor be present during ground-disturbing activities (see Attachment 12 and ERR 7).</p>
<p><b>Noise Abatement and Control</b></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><b>Construction Noise.</b> A temporary increase in noise levels would be expected during the construction phase of the proposed project. Noise would be generated by construction equipment and the delivery of materials among other activities. Increases in ambient noise levels would be restricted to daytime hours and remain within applicable thresholds.</p> <p><b>Operational Noise</b> The proposed project is not expected to have a negative impact on ambient noise levels during the operational phase. Sources of ambient noise produced by the proposed development during the operational phase would be related to residential land uses. These noise sources may stem from people and children, car doors slamming, garage doors, trash collection, and outdoor common areas, among others.</p> <p>Using the HUD noise model, it was preliminarily found that the project site (prior to development of the proposed project) would exceed the acceptable day-night average sound level (<math>L_{dn}/DNL</math>) of below 65 decibels for proposed HUD-assisted projects, due to the proposed project's close proximity to the active Metrolink Inland Empire-Orange County rail lines. A more detailed noise study was conducted by Urban Crossroads, Inc., in March 2020 to determine noise exposure and necessary noise mitigation measures for the proposed project. The Federal Transit Administration rail noise prediction model was used to calculate the worst-case future exterior rail noise levels at the project location. Based upon the results of the Urban Crossroads noise report, noise levels would be below 65 dBA</p>

		<p>L<sub>dn</sub>/DNL (the HUD exterior noise threshold) at the building façade closest to the railroad due to distance from the railroad and at outdoor living facilities (e.g. tot lots and patios) due to screening from the positioning of the proposed buildings as well as the proposed solid masonry boundary wall. In addition, ambient noise levels in the interior of the proposed residences would be reduced to below 45 dBA L<sub>dn</sub>/DNL (the HUD interior noise threshold) with the implementation of the following mitigation measures (see Attachment 13 and <b>Mitigation Measure 3</b>):</p> <ul style="list-style-type: none"> <li>• Windows and glass doors that are well fitted, have weather stripping, and have a minimum sound transmission class rating of 27 will be used.</li> <li>• Exterior non-glass doors will be outfitted with weather stripping.</li> <li>• The space between the outdoor walls and any pipes, ducts, or conduits will be caulked or filled with mortar to form an airtight seal.</li> <li>• Roof sheathing made of wood shall be per the manufacturer’s specification or caulked plywood of at least 0.5 inches thick. Ceilings will also be per the manufacturer’s specification or well-sealed gypsum board of at least 0.5 inches thick.</li> <li>• Insulation with a minimum rating of R-19 will be used in attic space.</li> <li>• Interior rooms will still receive circulated air even when exterior doors and windows remain closed. A forced air circulation system or active ventilation system will be provided to satisfy the requirements of the Uniform Building Code.</li> </ul> <p>With the inclusion of these mitigation measures, the proposed project is not expected to exceed allowable noise thresholds required by HUD (see ERR 8).</p>
<p><b>Sole Source Aquifers</b></p>	<p>Yes    No  <input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The project site is not located on or adjacent to any sole-source aquifers. There are no sole-</p>

Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149		source aquifers designated in Orange County (see Attachment 14).
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes   No <input type="checkbox"/> <input checked="" type="checkbox"/>	The National Wetlands Inventory map regulated by USFWS was used to determine the presence of wetlands on the proposed project site. No wetlands were found in the project area. The closest wetland is the Collins Channel, nearly 0.25 miles northwest of the project site (see Attachment 15 and ERR 9).
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes   No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project site does not contain any rivers protected under the Wild and Scenic Rivers Act. Bautista Creek, located approximately 67 miles east of the proposed project area, is the closest Wild and Scenic waterway to the project area (see Attachment 16; see ERR 10).
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>  Executive Order 12898	Yes   No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project would have a beneficial impact to populations protected by environmental justice by providing affordable housing and social services, such as career coaching, skill building, and a Food Pantry, to residents and the homeless. Negative impacts to the project environment were not found outside of those discussed above, which would be avoided, reduced, or mitigated through incorporation of design features, compliance with applicable regulations and policies, and implementation of mitigation measures. Since the project does not expose residents or community members to adverse environmental impacts or negatively impact social welfare, it would not violate Executive Order 12898 (see ERR 11).

**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
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project site encompasses 2.75 acres of the Orange Corporate Yard. In the City’s General Plan Land Use Element, the proposed area is designated as Public Facilities Max 0.5 FAR and Institutions Max 2.0 FAR. The project site is zoned as a Public Institution (P-I). The City has interpreted these designations to allow for construction of affordable workforce housing in the PFI General Plan Land Use District.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	<p><b>Soil Suitability.</b> The surface of the project site is primarily dirt covered in gravel or asphalt grindings, with some bare dirt exposed. Analysis of soil composition at the project site revealed that surface soils were comprised of course-grained soils with gravel and asphalt debris while underlying soils included lean clay and sand. Soils at 41 feet were composed of course-grained materials such as gravels and cobbles. Soil stability would not be adversely impacted by the proposed project as the project site is in an area with low potential for liquefaction, landslides, or seismically induced settlement. Successful building development on adjacent parcels indicate that the soils on the site are suitable for the proposed project.</p> <p><b>Slope and Drainage.</b> Slopes that would impact the proposed project were not found on the project site. The proposed project site is generally flat, though the surface slightly slopes west. The northeast corner of the project area has the highest elevation. Ground surface elevation at the site ranges from approximately 179 to 186 feet above mean sea level. The project does not include any substantial alterations to drainage conditions.</p> <p><b>Erosion and Storm Water Runoff.</b> There is minimal chance of erosion at the project site due to the flat topography of the area. In addition, the proposed project would comply with erosion control measures during the construction phase to minimize</p>

		<p>erosion and stormwater pollution. Best management practices (BMPs) adopted from the Stormwater Quality Management Plan would be incorporated during and after the construction phase of the project (<b>Mitigation Measure 6</b>). Other low-impact drainage BMPs include maintaining existing drainage pathways and impervious areas and retaining natural areas where possible. Runoff from the project site is not anticipated to exceed the capacity of stormwater drainage systems or contribute to stormwater pollution.</p>
<p>Hazards and Nuisances including Site Safety and Noise</p>	<p>3</p>	<p><b>Hazardous Materials.</b> The Phase I ESA conducted by LOR Geotechnical Group Inc. did not find evidence of any RECs, HRECs, or CRECs on the project site. No containers of hazardous materials were observed during the site reconnaissance, with the exception of insecticide (Zone Defense, orthoboric acid) stored in buckets on site. Additional soil testing for potentially hazardous agricultural chemicals was recommended given the project site’s historical use as agricultural land and storage. A Phase II ESA also conducted by LOR Geotechnical Group Inc. concluded that there are no adverse environmental impacts to on-site soils as a result of past land uses. In addition, there were no obvious signs of impacts, including soil staining or chemical odor that were noted during soil boring advancement and sampling. Since vapor encroachment levels on site exceeded DTSC thresholds for residential soils, mitigation measures to minimize potential vapor encroachment shall be implemented (<b>see Mitigation Measure 2</b>).</p> <p><b>Site Safety.</b> The project would be constructed consistent with the current Orange County requirements for fencing, lighting, and other features related to site safety. No impacts related to hazards, nuisance, or site safety would occur.</p> <p><b>Noise.</b> A temporary increase in noise would occur during the construction phase of the project as a result of materials being transported to the site and heavy machinery use. Noise levels would adhere to standards set by Orange County for construction impacts on noise-sensitive land uses. Increased noise would be limited to daylight hours. Adverse impacts to the surrounding community as a result of increased noise are not foreseen.</p> <p>Sources of noise during the operational phase include project-generated traffic, recreational spaces associated with the project, car door slamming, garage doors closing, and similar sounds associated with people and children. Adverse impacts from operational phase noise are not expected due to the relatively small size of the development. Operational noise</p>



		<p>generated by the proposed project would similarly comply with HUD noise thresholds.</p> <p>Urban Crossroads Inc. completed a noise impact analysis to determine whether existing ambient noise generated by surrounding land uses would have negative effects on the proposed project. According to the noise impact analysis, with the implementation of mitigation measures to reduce the impact of outdoor noise sources on indoor noise levels, the proposed project would meet HUD's 45 dBA threshold for maximum interior noise levels. (see Attachment 13 and <b>Mitigation Measure 3</b>). In addition, HUD's 65 dBA noise threshold for exterior facilities would also be met at outdoor living facilities (e.g. tot lots).</p>
Energy Consumption	2	To obtain building permits, this project would be required to meet energy consumption standards as outlined in the California Building Code, Title 24, 2001 Energy Efficiency Standards. This project would be designed to be LEED certified.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	1	<p>The proposed project has the potential for temporary job creation during the construction phase. Income patterns in the community would benefit from the 62-unit development, which includes 20 PSH units reserved for formerly homeless families sources through the Family Care Center of Orange.</p> <p>The proposed affordable housing project includes a partnership with Families Forward, Mary's Kitchen, HomeAid OC, and other social service providers in the area to provide residents with employment, counseling, and family resources. Specifically, Families Forward would provide home ownership workshops, parenting education, a life skills workshop series, a course in credit counseling and financial literacy, stress management workshops, social services enrollment, a mobile medical and dental clinic, legal aid, domestic violence services, and child care. These services would be provided to residents on-site and funded through the property's operating budget. A Support Services Coordinator would be present for a minimum of 15 hours a week to assist residents with organization and implementation of Families Forward programs.</p>
Demographic Character Changes, Displacement	1	<p>Since the proposed project would be built in an area already occupied by industrial, and public institutional land uses, the development would not adversely affect community character. The project involves transforming an underutilized lot to improve the quality of housing and add to the affordable</p>

		housing stock within Northern and Central Orange County. Therefore, the project would not result in the displacement of existing businesses or residences in the area. Increasing affordable housing units supports the housing priorities detailed in the Orange County Consolidated Plan by building accommodations for families with very low to moderate income levels. Consistent with the city's design guidelines, the proposed project would feature contemporary mission revival architecture and elevations. The proposed project would have a positive impact on community character while remaining compliant with existing land use designations and design.
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Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	<p>While the project would potentially increase enrollment at schools nearby, negative impacts on educational facilities is not foreseen due to the availability of schools in the area and relatively small size of the development (42 of 60 units at the proposed project would house families). Impact fees paid by the developer as part of the local government approval process would offset any potential impacts to community facilities and services.</p> <p>The project site is located near multiple educational facilities, including:</p> <ul style="list-style-type: none"> <li>• Orange High School, approximately 1.4 miles from the project site</li> <li>• Richland High School, approximately 0.9 miles from the project site</li> <li>• Chapman University, approximately 1.3 miles from the project area</li> <li>• Sycamore Elementary, approximately 1.4 miles from the project area</li> <li>• Yorba Middle School, approximately 1.3 miles from the project site</li> </ul>
Commercial Facilities	2	No adverse impacts to surrounding commercial facilities are anticipated. The project site is bordered by active railroad right-of-way, public institution and industrial uses.
Health Care and Social Services	2	<p>Increases in the local population could increase demand for health care and social services in the community.</p> <p>The project site is situated near numerous health care facilities, including:</p>

		<ul style="list-style-type: none"> <li>• Satellite Healthcare Orange, approximately 2.3 miles from the project site at 1518 West La Veta Avenue, Orange, CA 92868</li> <li>• CHOC Children’s Hospital, about 2.5 miles from the project area at 505 South Main Street, Orange, CA 92868</li> <li>• St. Joseph Hospital, about 2.3 miles from the proposed project site at 1100 West Stewart Drive, Orange, CA 92868</li> <li>• UCI Medical Center, approximately 3.5 miles from the project area at 101 The City Drive South, Orange, CA 92868</li> <li>• Concentra Urgent Care, approximately 2.2 miles from the project site at 1045 North Tustin Street, Orange, CA 92867</li> </ul> <p>Adverse impacts on healthcare and social services are not anticipated due to the relatively small size of the project and availability of service providers near the proposed development.</p>
Solid Waste Disposal / Recycling	2	<p>CR&amp;R Incorporated, an environmental services organization that serves Orange, Los Angeles, San Bernardino, Imperial, and Riverside Counties, would collect solid waste generated by the proposed project. CR&amp;R manages an extensive network of processing facilities that properly dispose of solid waste, recyclables, green waste, food waste, construction and demolition waste, and electronic waste among other materials.</p> <p>Since the proposed project site is a vacant, undeveloped plot of land, there would not be any solid waste generated from demolition of an existing structure. The amount of solid waste generated by the proposed project during the operational phase would be a fraction of the throughput taken to Orange County landfills daily. As a result, adverse impacts from solid waste disposal associated with the proposed project are not anticipated.</p>
Waste Water / Sanitary Sewers	2	<p>The Orange County Sanitation District (OCSD) would treat wastewater generated by the proposed project. OCSD provides wastewater collection, treatment, and disposal services for nearly 2.6 million people in a 479-square-mile area covering central and northwest Orange County. The proposed project would not require the construction of additional sewage infrastructure. Negative impacts to wastewater systems and sanitary sewers servicing the proposed project site are not anticipated.</p>
Water Supply	2	<p>The Orange County Water District (OCWD), which services north and central Orange County, would supply water to the proposed project. OCWD replenishes water within the Orange County</p>

		Groundwater Basin using water from the Santa Ana River, local rainfall, and water imported from the Colorado River and Northern California. The City of Orange obtains approximately 75% of its water from 12 active wells that draw from the Orange County Groundwater Basin. Existing infrastructure would be used to supply water to the proposed project site. Since the proposed development would not strain water resources, adverse impacts to the City's water supply are not foreseen.
Public Safety - Police, Fire and Emergency Medical	2	<p>The project site is in close proximity to public safety providers, including:</p> <ul style="list-style-type: none"> <li>• Orange Police Department, only 0.1 miles from the project site at 1107 North Batavia Street, Orange, CA 92867</li> <li>• Anaheim Police Department 425 South Harbor Boulevard, approximately 6 miles from the project site at Anaheim, CA 92805</li> <li>• Orange City Fire Department Station #2, about 2.4 miles from the project site at 2900 East Collins Avenue, Orange, CA 92867</li> <li>• Orange City Fire Department Station #5, approximately 1.6 miles from the project site at 1345 West Maple Avenue, Orange, CA 92868</li> <li>• Orange City Fire Dept. Station #3, approximately 1.8 miles from the project site at 1910 North Shaffer Street, Orange, CA 92865</li> </ul> <p>Since existing police and fire departments sufficiently serve the proposed project area, the development is not expected to increase demand for public safety services in the community. In addition, impact fees paid by the developer as part of the local government approval process would offset any potential impacts to community facilities and services.</p>
Parks, Open Space and Recreation	2	<p>Recreational spaces in close proximity to the project site include:</p> <ul style="list-style-type: none"> <li>• Eisenhower Park, approximately 3.5 miles from the project site at 2864 North Tustin Street, Orange, CA 92865</li> <li>• Santiago Oaks Regional Park, approximately 6 miles east of the project site at 2145 Windes Drive, Orange, CA 92869</li> <li>• El Camino Real Park, about 1.4 miles southwest of the project site at 400 North Main Street, Orange, CA 92868</li> <li>• Handy Park, approximately 2.6 miles east of the proposed project at 2143 East Oakmont Avenue, Orange, CA 92867</li> <li>• Hart Park, approximately 2.7 miles southeast of the project site at 701 South Glassell St., Orange, CA 92866</li> </ul>

		Given the relatively small size of the proposed project, an adverse impact to parks, open spaces, and recreational areas is not anticipated. In addition, impact fees paid by the developer as part of the local government approval process would offset any potential impacts to community facilities and services.
Transportation and Accessibility	2	<p>The proposed project is within walking distance of several bus stops. The nearest bus stop is located at the corner of West Katella Avenue and North Batavia Street, only 0.4 miles from the project site.</p> <p>The proposed project includes the construction of a parking lot that would accommodate 127 parking spaces. Pre-existing urban development and readily available public transit near the proposed project site would reduce transportation and accessibility issues, such as limited parking and traffic. Considering the small size of the development and the parking lot ratio of 2.15 stalls for every 1 apartment unit, the proposed project is not expected to adversely impact transportation or accessibility in the area.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	3	<p>The project site does not encompass any unique natural features. Federally protected natural resources, such as rivers, wetlands, coastal zones, and endangered species, are not present on the project site or adjacent properties. Therefore, the proposed project would not result in the alteration of water resources that could potentially result in substantial erosion or siltation on or off site, or result in downstream flooding. Because the project involves building on currently vacant land, groundwater recharge at the project site could be reduced. Recharge would still occur in vegetated green spaces on the project site.</p> <p>Mitigation measures employing BMPs would be required during and post-construction to minimize potential adverse contributions to stormwater pollution (<b>Mitigation Measures 6 and 7</b>).</p>
Vegetation, Wildlife	2	While the proposed project is located within the ranges of three endangered or threatened species of birds and fish, none of these species are found on the project site as it is developed and in an urbanized area. According to the USFWS IPaC database, the project site is situated outside of critical habitat areas for the endangered or threatened species that have these areas defined (see ERR 5).

		The project area is largely absent of vegetation though plant life, such as bushes, trees, grasses, and weeds, can be found on the borders of the site.
Other Factors		

**Additional Studies Performed:**

- *Phase I Environmental Assessment*, Prepared by LOR Geotechnical Group Inc., February 2020
- *Phase II Environmental Assessment*, Prepared by LOR Geotechnical Group Inc., October 2020
- *Orange Corporate Yard Affordable Housing Noise Study*, Prepared by Urban Crossroads, March 2020

**Field Inspection** (Date and completed by):

- *Phase I Environmental Assessment*, Prepared by LOR Geotechnical Group, Inc., February 2020
- *Phase II Environmental Assessment*, Prepared by LOR Geotechnical Group, Inc., October 2020
- *Orange Corporate Yard Affordable Housing Noise Study*, Prepared by Urban Crossroads, March 2020

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

CCC (California Coastal Commission). 2019. "Maps – Coastal Zone Boundary: Orange County." <https://coastal.ca.gov/maps/czb/>.

City of Orange. 2010. *Orange General Plan*. March 2010. <https://www.cityoforange.org/391/General-Plan>.

City of Orange. 2020-2024 Consolidated Plan. May 2020 <https://www.cityoforange.org/1925/The-2020-2024-Consolidated-Plan>.

DOC (California Department of Conservation). 2016. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

EPA (U.S. Environmental Protection Agency). 2020. "Current Nonattainment Counties for all Criteria Pollutants." July 31, 2020. Accessed August 2020. <https://www3.epa.gov/airquality/greenbook/ancl.html>.

EPA. 2020. "Sole Source Aquifers for Drinking Water." Last updated January 14, 2020. Accessed August 2020. <https://www.epa.gov/dwssa>.

FEMA (Federal Emergency Management Agency). 2012. "FEMA Flood Map Service Center: Flood Insurance Rate Map for Irvine, California." <https://msc.fema.gov/portal/search#searchresultsanchor>.

SCAQMD (South Coast Air Quality Management District). 2005. "Rule 403: Fugitive Dust." As amended through June 3, 2005. <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>.

SCAQMD. 2019. "South Coast AQMD Air Quality Significance Thresholds." April 2019. Accessed August 2020. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

USFWS (U.S. Fish & Wildlife Service). 2019. "Coastal Barrier Resources System Mapper." Updated July 31, 2019. Accessed October 2020. <https://www.fws.gov/cbra/maps/Mapper.html>.

USFWS. 2020. "Information for Planning and Consultation (IPaC)." Accessed August 2020. <https://ecos.fws.gov/ipac/location/JACZBM6PXJE25B3BXOS33AMDBE/resources#endangered-species>.

USFWS. 2020. "National Wetlands Inventory, Surface Waters and Wetlands Map." Accessed October 2020. <https://www.fws.gov/wetlands/data/mapper.html>.

U.S. National Park Service. 2019. "Interactive map of NPS Wild and Scenic Rivers." Accessed October 2020. <https://nps.maps.arcgis.com/apps/View/index.html?appid=ff42a57d0aae43c49a88daee0e353142>.

#### **List of Permits Obtained:**

#### **Public Outreach [24 CFR 50.23 & 58.43]:**

The City of Orange conducted public outreach in 2020 during the preparation of the 2020-2024 Consolidated Plan.

The Draft Environmental Assessment will be made available for public review and comment beginning on November 30, 2020 and concluding on December 15, 2020.

#### **Cumulative Impact Analysis [24 CFR 58.32]:**

The proposed project is not expected to contribute to a significant cumulative impact under the National Environmental Policy Act because it would consist of an urban development project consistent with the site's General Plan land use and zoning designations and would be located near existing transit services. State and local planning guidelines encourage the development of urban multifamily housing in areas served by transit and near commercial and cultural amenities because this type of development contributes less to cumulative effects on the environment in comparison to development of previously undisturbed sites in more remote locations with fewer transit connections, many of which contain native vegetation and wildlife species.



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

Site identification has proven to be a major obstacle in providing affordable housing units. Multifamily residential sites available at reasonable cost are extremely limited, and sites that do not meet cost and land use criteria are generally eliminated as alternatives. This project site was chosen because the land is being provided by the City of Orange. No other build alternatives are analyzed or included in this environmental document.

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

The No Action Alternative would not build any additional housing at the project site. There are no benefits to the physical or human environment by not taking the federal action associated with this project. Physical impacts to the environment would occur in urban areas whether units are subsidized with federal funds or built at market rates. If an affordable project were not constructed on this site, the social benefits of providing new affordable housing opportunities on an urban infill parcel would not occur.

The proposed project must acquire all required permits and approvals prior to construction; therefore, the proposed project would be consistent with all land use plans, policies, and regulations for the project site. Not building on this site could potentially result in more housing constructed outside of the urban area in agricultural and undeveloped areas, contributing to urban sprawl, regional traffic congestion, and regional air quality issues.

**Summary of Findings and Conclusions:**

C&C Development and Orange Housing Development Corporation is proposing to develop the Orange Corporate Yard affordable housing project. The project consists of 62 affordable housing units with 20 permanent PSH units. OCHA is providing PBV and the Orange County Housing & Community Development and the City of Orange are providing HOME funds. The proposed project would contribute to the increased density and availability of mix-used development in an area that would encourage multi-modal activity. The proximity of existing transit options to the project site would reduce long-term air emissions and energy use associated with motor vehicle travel.

Because the project is located within a developed urban area, the project would be adequately served by utilities and public services. The project would conform to all applicable federal, state, and regional regulations associated with land use compatibility, air emissions, water quality, geologic hazards, and related environmental resources addressed herein. Based on the analyses of environmental issues contained in this document, the proposed project is not expected to have significant environmental impacts.

**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.

#### *Air Quality – Fugitive Dust*

**Mitigation Measure 1:** The project shall implement the following from the list below, as applicable to the project:

- **Backfilling:** Stabilize backfill material when not actively handling, stabilize backfill material during handling, and stabilize soil at completion of activity.
- **Clearing and Grubbing:** Maintain stability of soil through pre-watering of site prior to clearing and grubbing, stabilize soil during clearing and grubbing activities, and stabilize soil immediately after clearing and grubbing activities.
- **Clearing Forms:** Use water spray, sweeping and water spray, or a vacuum system to clear forms.
- **Crushing:** Stabilize surface soils prior to operation of support equipment and stabilize material after crushing.
- **Cut and Fill:** Pre-water soils prior to cut and fill activities, and stabilize soil during and after cut and fill activities.
- **Demolition – Mechanical/Manual:** Stabilize wind erodible surfaces to reduce dust, stabilize surface soil where support equipment and vehicles will operate, stabilize loose soil and demolition debris, and comply with Air Quality Management District Rule 1403.
- **Disturbed Soil:** Stabilize disturbed soil throughout the construction site, and stabilize disturbed soil between structures.
- **Earth-Moving Activities:** Pre-apply water to depth of proposed cuts, re-apply water as necessary to maintain soil in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction, and stabilize soil once earth-moving activities are complete.
- **Importing/Exporting of Bulk Materials:** Stabilize material while loading to reduce fugitive dust emissions, maintain at least 6 inches of freeboard on haul vehicles, stabilize material while transporting and unloading to reduce fugitive dust emissions, and comply with Vehicle Code Section 23114.
- **Landscaping:** Stabilize soils, materials, slopes.
- **Road Shoulder Maintenance:** Apply water to unpaved shoulders prior to clearing, and apply chemical dust suppressants and/or washed gravel to maintain a stabilized surface after completing road shoulder maintenance.
- **Screening:** Pre-water material prior to screening, limit fugitive dust emissions to opacity and plume length standards, and stabilize material immediately after screening.
- **Staging Areas:** Stabilize staging areas during use, and stabilize staging area soils at project completion.
- **Stockpiles/Bulk Material Handling:** Stabilize stockpiled materials. Stockpiles within 100 yards of off-site occupied buildings must not be greater than 8 feet in height, or must

have a road bladed to the top to allow water truck access, or must have an operational water irrigation system that is capable of complete stockpile coverage.

- **Traffic Areas for Construction Activities:** Stabilize all off-road traffic and parking areas, stabilize all haul routes, and direct construction traffic over established haul routes.
- **Trenching:** Stabilize surface soils where trencher or excavator and support equipment will operate, and stabilize soils at the completion of trenching activities.
- **Truck Loading:** Pre-water material prior to loading and ensure that freeboard exceeds 6 inches (CVC 23114).
- **Turf Overseeding:** Apply sufficient water immediately prior to conducting turf vacuuming activities to meet opacity and plume length standards, and cover haul vehicles prior to exiting the site.
- **Unpaved Roads/Parking Lots:** Stabilize soils to meet the applicable performance standards and limit vehicular travel to established unpaved roads (haul routes) and parking lots.
- **Vacant Land:** In instances where vacant lots are 0.10 acres or larger and have a cumulative area of 500 square feet or more that are driven over and/or used by motor vehicles and/or off-road vehicles, prevent motor vehicle and off-road-vehicle trespassing, parking, and access by installing barriers, curbs, fences, gates, posts, signs, shrubs, trees, or other effective control measures.

### *Contamination and Toxic Substances*

**Mitigation Measure 2:** Results of soil sampling conducted during the Phase II Environmental Site Assessment revealed that soil vapor concentrations of total petroleum hydrocarbons as gasoline (TPH-G) and volatile organic compounds, including benzene and ethylbenzene, exceed Department of Toxic Substances Control screening levels for residential indoor air with an attenuation factor of 0.03 applied. To reduce potential adverse impacts related to soil vapor the following mitigation measures would be implemented:

- Geotechnical removal and re-compaction of the upper approximate 5 feet of on-site soils (i.e., engineered fill), which are relatively fine-grained and will provide a somewhat effective barrier at reducing soil vapor intrusion into the planned on-site buildings
- Placement of a vapor barrier, such as a membrane with sealing material like Liquid Boot®, beneath all planned on-grade buildings

### *Noise Abatement and Control*

**Mitigation Measure 3:** To reduce adverse impacts of existing ambient noise to be below HUD's 45 dBA  $L_{dn}/DNL$  threshold for interior spaces in the proposed development, the following mitigation measures would be implemented:

- **Windows and Glass Doors:** All windows and glass doors shall be well fitted, well weather-stripped assemblies, and shall have a minimum sound transmission class (STC) rating of 27.
- **Exterior Doors (Non-Glass):** All exterior doors shall be well weather-stripped and have minimum STC ratings of 27. Well-sealed perimeter gaps around the doors are essential to achieve the optimal STC rating.
- **Walls:** At any penetrations of exterior walls by pipes, ducts, or conduits, the space between the wall and pipes, ducts, or conduits shall be caulked or filled with mortar to form an airtight seal.
- **Roof:** Roof sheathing of wood construction shall be per manufacturer's specification or caulked plywood of at least 0.5 inches thick. Ceilings shall be per manufacturer's specification or well-sealed gypsum board of at least 0.5 inches thick. Insulation with at least a rating of R-19 shall be used in the attic space.
- **Ventilation:** Arrangements for any habitable room shall be such that any exterior door or window can be kept closed when the room is in use and still receive circulated air. A forced-air circulation system (e.g., air conditioning) or active ventilation system (e.g., fresh air supply) shall be provided that satisfies the requirements of the Uniform Building Code.

*Historic Preservation (Cultural Resources)*

**Mitigation Measure 4:** In the event that previously unidentified cultural resources are encountered during ground-disturbing activities associated with project construction, work in the immediate area must halt, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology shall be contacted immediately to evaluate the find. If the discovery proves to be significant under the National Environmental Policy Act, additional work such as data recovery excavation may be warranted to mitigate potential adverse effects.

**Mitigation Measure 5:** The developer shall be required to retain the services of a qualified Native American monitor(s) during construction-related ground-disturbing activities. The tribal representative from the Gabrieleño Band

of Mission Indians – Kizh Nation defines ground disturbance to include, but not limited to, pavement removal, potholing, grubbing, weed abatement, boring, grading, excavation, or trenching within the project area. The monitor must be approved by the tribal representative and shall be present on site during the construction phases that involve ground-disturbance activities. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archaeological resources. If archaeological or cultural resources are encountered, they shall be documented by the Native American monitor and collected for preservation.

*Unique Natural Features, Water Resources*

**Mitigation Measure 6:** The proposed project shall include best management practices (BMPs) designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and for Industrial and Commercial (or other similar source as approved by Orange County). Construction (temporary) BMPs for the proposed project shall include hydroseeding, straw mulch, velocity dissipation devices, silt fencing, fiber rolls, storm drain inlet protection, wind erosion control, and stabilized construction entrances.

**Mitigation Measure 7:** Prior to construction commencing, the applicant shall provide evidence to Orange County of a Waste Discharge Identification number generated from the State Regional Water Quality Control Board’s Stormwater Multiple Application & Reports Tracking System. This serves as the Regional Water Quality Control Board’s approval or permit under the National Pollutant Discharge Elimination System construction stormwater quality permit.

**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:  Date: 12/3/2020

Name/Title/Organization: Suzan Emdaie, Housing Analyst

Community Development Department, City of Orange

Certifying Officer Signature:  Date: 12/3/2020

Name/Title: Rick Otto, City 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).