



**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:** Villa St. Joseph

**Responsible Entity:** City of Orange

**Grant Recipient** (if different than Responsible Entity): Mercy Housing California

**State/Local Identifier:** CA/B-22-MC-06-0507

**Preparer:** Brent Schleck, Senior Environmental Planner

**Certifying Officer Name and Title:** Rob Houston, City Manager, City of Orange

**Grant Recipient** (if different than Responsible Entity): Mercy Housing California

**Consultant** (if applicable): Michael Baker International, Inc.

### **Direct Comments to:**

Chad Ortlieb, Acting Principal Planner  
City of Orange Community Development Department  
300 East Chapman Avenue  
Orange, CA 92866

## **Project Location:**

The proposed Villa St. Joseph affordable housing project (referred to throughout this Environmental Assessment as the proposed project or proposed development) is located at 480 South Batavia Street, City of Orange, California 92868 (refer to **Figure 1**, Project Location, provided as **Attachment 1**). The proposed project is located within the outer edge of the St. Joseph Hospital Orange campus, near a low-density residential neighborhood located to the northwest. The proposed project site and the existing structure are owned by St. Joseph College of Orange (SJCO), which also includes the St. Joseph Hospital, organization and ministry offices for SJCO, a SJCO retirement home, host facilities for retreats and meetings, a chapel, and a Masters of Public Health college program operated by the university of San Francisco. Specifically, the project site is surrounded by the Reginal Place residences to the north, a medical office uses to the east across South Batavia Street, the Children's Hospital of Orange County to the south across West La Veta Street, and existing structures associated with the SJCO and the St. Joseph Hospital to the west. The project site is currently occupied by a three-story Catholic convent, approximately 47,355 square feet in size, situated at the southeast corner of the SJCO area in a mixed commercial and residential neighborhood to the west of downtown Orange. The project is located on Assessor's Parcel Number 041-080-44, which is located at the northwest corner of the intersection of South Batavia Street and West La Veta Avenue.

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

Mercy Housing California (MHC) is the developer of the proposed project, Villa St. Joseph, which involves the renovation and conversion of an existing Catholic convent on the SJCO campus. The renovation would result in a 50-unit affordable senior housing development consisting of 43 one-bedroom units, 6 studio units, and 1 two-bedroom unit reserved for the building manager. Of the 49 available units, 18 would be supportive housing reserved for individuals that are homeless or at-risk of homelessness who are Mental Health Services Act eligible earning at or below 30% Area Median Income (AMI). The remaining 31 units would be reserved for low-income seniors earning at or below 60% AMI. All units would serve seniors aged 62 and older and would be fully accessible in accordance with the California Building Code section 1134A.2 option 1. Modifications include ensuring all units have elevator access and installing a ramp at the building entrance. All units would be designed with specific in-unit accessibility features that would provide tenants with more space to maneuver and would ensure outlets/switches would be easier to reach, thus assisting residents in living more independent lifestyles. Two units would be outfitted with communication features for residents with audio/video impairments. The above-mentioned rehabilitation activities would take place within the southern wing of the ground floor, and on the second and third floors. The northern wing of the ground floor of the existing structure and the basement would be retained by the Sisters of St. Joseph for general administration offices, meeting rooms, and guest housing (for visiting clergy). The only exterior improvements planned as part of the project include connecting to existing utilities in adjacent rights-of-way, which may require limited utility trenching. If such utility trenching is to occur, it is expected to be minor in scope and scale.

As the 18 supportive housing units would be funded with Special Needs Housing Program (SNHP) funds administered by the California Housing Finance Agency (CalHFA), MHC Resident

Services, in partnership with the County of Orange Health Care Agency (HCA), would coordinate and provide social services for these tenants free of cost. Social services provided to residents would include mental health services, physical health services (including prevention plans), employment/vocational services, educational opportunities and linkages, substance use services, budget and financial training, assistance in obtaining and maintaining benefits/entitlements, and linkage to community-based services and resources among others.

The proposed rehabilitation project would also include a leasing office and two offices for services staff and shared common spaces such as centrally-located laundry rooms on each floor, a large community room, and outdoor recreation and sitting areas. Shared spaces have been designed to provide residents with a range of amenities as well as enhanced social interaction and community-building. The development would have 33 parking stalls in the adjoining parking lot, located on the east side of the structure. Numerous amenities can be found within a mile of the project site, such as grocery stores, pharmacies, healthcare, parks, and the Orange Public Library. The proposed project is also conveniently located near public transit provided by the QC transit authority. Bus lines 53/53X, 56, and 453 service stops within a half mile of the project site. The 53/53X line provides access to the Anaheim Regional Transportation Intermodal Center (ARTIC) transit hub where individuals can transfer to the Metrolink, Amtrak, Greyhound, and Megabus stations.

While the project would convert the existing structure to supportive and affordable housing, because the existing structure serves as a convent, the residential nature of the project site's use would not be changing. Regardless, the proposed project would be completed in an area zoned P-I for Public Institution, which permits housing as an accessory use, and would be designed to promote tranquility and security for residents. By converting the convent into affordable housing for seniors the proposed development supports the 2015-2020 City of Orange Consolidated Plan.

**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 to extremely low-income senior individuals and households.
- Create a community that fits into and improves the existing neighborhood in style, texture, scale, and relation to the street.

Further, the City of Orange's General Plan Housing Element (2021-2029) states that per state requirements in Section 65583 of the California Government Code, local governments and Councils of Governments (COGs) are required to determine existing and future housing need and the allocation of this need must be approved by the California Department of Housing and Community Development (HCD). Orange is located in the SCAG regional planning area (but is not a member of SCAG). SCAG is the COG responsible for preparing the Regional Housing Needs Assessment (RHNA) for all jurisdictions within the SCAG region in coordination with HCD. For the 2021-2029 planning period, the City's housing needs allocation is a total of 3,927 housing units, including 1,064 units affordable to very low-income households, 603 units affordable to

low-income, 676 units affordable to moderate income, and 1,584 units affordable to above-moderate income households.

Further, the City's General Plan Housing Element identifies Policy Action 6: provision of senior housing opportunities, which states that the City recognizes the unique needs of elderly residents (i.e., fixed incomes and physical limitations requiring accessibility features not typically available in market-rate housing). This project is consistent with this Policy Action.

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

The proposed development site occurs on the SJCO campus at the corner of S. Batavia Street and W. La Veta Avenue, one block north of the SR-22 freeway Main Street exit. The project site is currently occupied by a 3-story 47,355 square foot building used as a convent since the 1960s. The existing convent consists of 60 studio units. Historical photos of the project site project area dating back to 1946 reveal that the site used to be part of an orchard before construction of the current structure. Currently, the areas adjacent to the project site have mixed commercial (medical) and residential uses.

The existing convent is a rectangular, three-story structure, clad in red brick with stone accents. A shallow-pitched red tile rooftops the structure. The main entrance to the structure is located on the building's eastern elevation and is characterized by a semi-circle of white columns, flanked by decorative shrubs, with approximately four steps leading up to the entrance. On the east side of the project site is a parking area, as well as a U-shaped driveway connecting to South Batavia Street. The interior of the U-shaped driveway is a lawn with decorative landscaping. Mature palm trees and decorative shrubs are located on the project site's eastern boundary with South Batavia Street.

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
B-22-MC-06-0507	HOME Investment Partnership	\$651,244

**Estimated Total HUD Funded Amount: \$651,244**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$36,843,622**



## 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"/>	John Wayne Airport located approximately 6.5 miles (approximately 34,500 feet) south of the project site, is the closest commercial air field to the proposed development. There are no military airports located near the project area. Therefore, because the project site is not located within 15,000 feet of a civilian or military airport, then, per HUD guidance, the project is in compliance with HUD regulations at 24 CFR Part 51 subpart D. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.  <b>(Attachment 2 and Environmental Review Record [ERR] 1).</b>
<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"/>	The Coastal Barrier Resources Act does not apply to this project since no coastal barrier resources protected under this policy occur in California (see <b>Attachment 3</b> ). Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.
<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"/>	The proposed project area does not occur on a flood plain. The project site is bifurcated by two Flood Insurance Rate Maps (FIRMs), according to the Federal Emergency Management Agency (FEMA) (FIRM 06059 C0161J and 06059 C0163J). According to

		<p>FEMA, the project site is located in an area of minimal flood hazard (Zone X) and is not located within a special flood hazard area. Therefore, per HUD guidance, because the Project is not located within a Special Flood Hazard Area, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>(Attachment 4 and ERR 2).</b></p>
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**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5**

<p><b>Clean Air</b></p> <p>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Federally funded projects must conform to Clean Air Act requirements if they may constitute a significant new source of air pollution. If a project does not involve new construction, or conversion of land use facilitating the development of public, commercial, or industrial facilities, or five or more dwelling units, it can be assumed that emissions are below the US Environmental Protection Agency's (USEPA) de minimis threshold levels.</p> <p>The project, which would rehabilitate an existing structure, does not involve new construction. Further, because the project site is currently characterized by an existing 60-room convent, the project would not involve a conversion of land use that would facilitate development of commercial, industrial, public, or residential land uses of five or more dwelling units. This is because the existing convent use and the proposed residential use are functionally very similar from an environmental impact standpoint, as they both involve non-owner-occupied residential units that share common spaces with some on-site care-taking/administrative staff. Because the project would combine several of the existing studio units into one-bedroom units, the Project would result in a reduction of residential densities (60 studio units would be reduced to 50 studio, one-bedroom, and two-bedroom units).</p>
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As noted in the project description, the majority of project-related impact would take place on the interior of the building. Some utility trenching may be required to connect to existing utilities in surrounding roadways; however, if this activity is required, it is anticipated to be limited in scale and duration. With such a small area of disturbance, impacts associated with fugitive dust are not anticipated to be substantial. Regardless, construction activities would be required to comply with the South Coast Metropolitan Air Quality Management District (SCAQMD)-required best available control technology and best management practices, which include SCAQMD Rule 403, a requirement that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. In short, any outdoor construction emissions generated by the project would be temporary in duration and minor in scale. Therefore, emissions of these pollutants during Project construction would be clearly below SMAQMD's thresholds of significance.

Because the proposed residential project would be functionally similar to the existing use of the project site as a convent, operational air quality impacts would be similar to the existing land uses on the project site.

Because the Project would not result in new construction or conversion of land use that would increase residential or commercial densities, it can be assumed that air quality pollutant emissions associated with the Project would be below USEPA de minimis threshold levels. Therefore, no adverse effect would result from the Proposed Project, the Proposed Project would be consistent with HUD's guidance on air quality, and no formal compliance steps or mitigation are required.

The proposed project falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) within the

South Coast Air Basin. According to the U.S. Environmental Protection Agency (EPA) Air Quality Green Book, the SCAQMD is in nonattainment for federal ozone (8-hour ozone) and particulate matter from greenhouse gasses (PM2.5). The EPA classified federal ozone in Orange County as extreme and PM2.5 as moderate. Since the project site is in a nonattainment zone for these pollutants, it must conform to the State Implementation Plan (SIP) to meet HUD air quality guidelines. To be compliant with the SIP, a comprehensive plan that describes how an area will meet national and ambient air quality standards, the proposed project must ensure its criteria pollutant emissions remain below the local air district's significance thresholds.

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 (PM2.5) 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 (RAQS), the SIP, and the Air Quality Management Plan for this locality.

Air quality at the project site could be negatively impacted by fugitive dust (PM10) and other particulate air pollutants (PM2.5) released during construction-related activities, such as land clearing or grading. Exhaust emissions (oxides of nitrogen [NOx] 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



		<p>implemented at all construction sites within the South Coast Air Basin.</p> <p>Daily emissions from the proposed project would not exceed the SCAQMD's regional construction or operation emissions thresholds (see <b>Attachment 5</b>). Because the proposed development is consistent with existing zoning and the General Plan, it is compliant with the SIP, RAQS, and the Clean Air Act.</p> <p><b>(ERR3).</b></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>The proposed project site is not located within the California Coastal Zone, as defined by the California Coastal Act (Public Resources Code, Division 20, Section 3000 et. seq.). Therefore, the proposed development, which is located approximately 12 miles from the coast, does not require state review under the California Coastal Act as the City of Orange is not within the California Coastal Commission's jurisdiction. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>(Attachments 6 &amp; 7; ERR 4).</b></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 I ESA was completed by Pacific Environmental Company (PEC) in December 2019. The report did not find any recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled environmental conditions (CRECs) at the project site.</p> <p>Since the proposed project site was historically used for agricultural purposes there is a potential that agricultural related chemicals, including pesticides, herbicides, and fertilizers, may have been used and stored onsite. However, since the project site is currently paved or covered by buildings, direct contact to potential remaining chemical concentrations in the soil is minimized. Onsite near-surface soils were generally mixed with fill material or disturbed during grating when previous site development</p>

activities occurred. Combined with the likelihood that any residual agricultural chemicals would have degraded since the area was last used for agriculture, PEC concluded that, at this time, former use of agricultural chemicals is not a significant environmental concern.

Further, because the project would involve rehabilitation of the interior of an existing structure, and because any exterior activities would be limited to minor utility trenching, the project would not result in substantial ground disturbance that could exacerbate any subterranean contamination.

A records review for the project site did not find any underground storage tanks (USTs) or leaking underground storage tanks (LUSTs).  
• Vapor encroachment conditions do not exist at this property. There are currently no environmental liens or activity and use limitations associated with the subject site.

Asbestos containing materials (ACMs) and leadbased paint (LBP) were found on the subject property. PEC completed an Asbestos and Lead- Based Paint Inspection Report in October 2019. A total of 76 bulk samples were collected and assessed for asbestos using Polarized Light Microscopy with dispersion staining per EPA protocols. Results indicated that mastic, pipe insulation material, and window putty at the project site contained asbestos. Lead content of paint onsite was measured using X-Ray Fluorescence. No LBPs were identified in areas that were tested although ceramic tile finishes that are glazed with lead were found in restrooms onsite. While the tiles are not considered LBPs, they do present a possible lead exposure hazard during renovations if not handled properly. To mitigate potential adverse impacts from ACMs onsite, materials containing asbestos should be removed by a licensed and certified asbestos abatement contractor prior to demolition or renovation (Rule 1403 of the SCAQMD and Cal/OSHA

		<p>Asbestos Regulations). Ceramic and shower wall tiles containing lead should be removed following lead-safe work protocols. Additional suspect materials containing lead encountered during renovation or demolition activities would be sampled and analyzed by PEC.</p> <p>Therefore, based on the findings of the Phase I ESA prepared for the project, the lack of underground storage tanks or other contamination records identifying the project site, and with compliance with existing state and local laws regarding the handling and disposal of ACMs and LBP (through implementation of <b>Mitigation Measure 2</b>), no further analysis is necessary.</p> <p><b>(Attachments 7 and 8, ERR 5, and Mitigation Measure 2).</b></p>
<p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No  <input type="checkbox"/> 18]</p>	<p>The US Fish and Wildlife Service's Information for Planning and Consultation (IPaC) webmap was used to identify the presence of federally listed special-status plants or wildlife species on the project site. The habitat ranges of two Threatened or Endangered species of bird and one species of fish overlap with the proposed project area. However, the project site does not encompass critical habitat areas for the federally listed species that have these areas defined. Current urban uses on the project site and surrounding area similarly discourage wildlife activity. As a result, no federally listed species are expected to be present within the proposed development site. Further, the project would involve interior rehabilitation of the existing structure with limited exterior upgrades made to the structure and would, therefore, not encroach into or impact any existing natural habitats. Therefore, the proposed development would not have any impacts on wildlife movement, migration, or nursery sites.</p> <p>Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p>

		<b>(Attachment 10 and ERR 6)</b>
<p><b>Explosive and Flammable Hazards</b></p> <p>24 CPR Part 51 Subpart C</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>There are inherent potential dangers associated with locating HUD-assisted projects near hazardous facilities which store, handle, or process hazardous substances of a flammable or explosive nature. According to HUD Guidance, if a project includes development, construction, rehabilitation that will increase residential densities, or conversion, then the record must demonstrate that the project site is not located near hazardous facilities or must implement mitigation measures.</p> <p>While the project would involve rehabilitation of the existing convent into supportive and affordable housing, the use of the project site, is currently serving as a religious residential land use, is not changing. Regardless, explosive and flammable hazards would not be present at the project site, which is designed for residential uses. The Phase 1 ESA (available as <b>Attachment 7</b>) did not identify the presence of explosive or flammable materials at the project site. The project site is located within approximately 400 feet of two sites regulated by California Environmental Protection Agency (CalEPA), the St. Joseph Medical Office tower and the Center for Cancer Prevention and Treatment, located south of the project site across West La Veta Avenue. Both facilities are shown to have tanks of diesel fuel (100-599 gallons in size) and the Center for Cancer Prevention and Treatment is listed as a hazardous waste generator (pharmaceutical wastes). These are uses commonly found in urbanized areas and would not pose a threat to the future residents of the site. Further, these sites are regulated by CalEPA, who provides routine oversight of maintenance and handling of such hazardous materials. Finally, using the available information, HUD's Acceptable Separation Distance calculator was utilized. Conservatively analyzing the largest chemical container listed above, 599 gallons</p>



		<p>and not in a diked location, the minimum acceptable distance from this container is approximately 224 feet for persons and 40 feet for buildings. As the project site is located approximately 400 feet away from these facilities, the project site would not be exposed to flammable or explosive hazards.</p> <p>As a result, the proposed project would not expose residents or the surrounding community to dangerous explosive or flammable hazards.</p> <p><b>(Attachment 11)</b></p>
<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CPR Part 658</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input type="checkbox"/></p>	<p>The proposed development is not located on or adjacent to existing farmland. Surrounding land uses are designated for urban uses. The project site, like much of Orange County, consists of urban and built-up land according to the California Farmland Mapping and Monitoring program database. In addition, the proposed project would not impact protected farmlands and does not involve activities that could result in the conversion of farmland to non-agricultural uses. In short, the project would not result in physical impacts beyond the boundaries of the project site, and would not impact any prime farmland, unique farmland, or farmland of local importance, as identified by the California Department of Conservation. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>(Attachment 12).</b></p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CPR Part 55</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Floodplain management in the area would not suffer any adverse impacts from the proposed project as it is not located on a floodplain. According to FEMA FIRM panels 06059 C0161J and 06059 C0163J) the project site is located in an area of minimal flood hazard (Zone X) and is not located within a special flood hazard area. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>(Attachment 4).</b></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</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The California State Historic Preservation Office (SHPO) was consulted in September 2020 by the County of Orange to identify the presence of any known historical or cultural resources on the proposed project site. The County and SHPO assumed that the convent building is eligible for the National Register of Historic Places for the purposes of the consultation; however, pursuant to 36 CFR 800.S(c)(1), SHPO concurred with the County's finding that the proposed adaptive reuse rehabilitation project would not adversely affect the assumed eligible property. As such, the SHPO did not object to the County's finding of no adverse effects.</p> <p>With regard to undiscovered archaeological resources, as described in <b>Mitigation Measure 2</b>, rehabilitation activities would cease and an archaeologist would be contacted in the event that historic or cultural resources were discovered on the project site. 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 and the Juarefio Band of Mission Indians, were consulted by the County of Orange. Included as <b>Mitigation Measure 3</b>, the Kizh Nation requested that a Native American monitor be present during ground-disturbing activities.</p> <p>The proposed project would not result in an adverse effect on historic resources with implementation of the mitigation measures presented below. Therefore, the project is in compliance with NHPA Section 106. There are no formal compliance steps required and no further mitigation is necessary beyond the mitigation measures identified above.</p> <p><b>(Attachments 13 and ERR 7).</b></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 type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><b>Construction Noise.</b> A temporary increase in noise levels would occur during the rehabilitation phase of the proposed project as a result of construction equipment and delivery of materials. Noise increases would</p>

		<p>be short-term, restricted to daytime hours, and would primarily be limited to the interior of the structure. As stated in the project description, the only exterior improvements that could occur as part of the project would be limited to utility connections, if deemed necessary through the rehabilitation process. Therefore, the increased noise during construction would be limited and would not exceed applicable standards for construction noise.</p> <p><b>Operational Noise.</b> Increases in neighborhood noise levels would still comply with Orange County noise limits. Sources of operational noises would be limited to operational noise sources typical of multi-family residential land uses, such as project-generated traffic and use of open space on the east side of the project site. The HUD DNL Electronic Assessment Tool was used to calculate ambient noise levels on the project site generated by roadway traffic on nearby streets. Two scenarios were run, a scenario including noise from the SR-22 freeway, South Batavia Street, and West La Veta Avenue, and a similar model where the SR-22 freeway was not included. The SR-22 is barely situated within the 1,000 foot buffer of the project site and is approximately 20-feet below grade. Including the SR-22 freeway, the ambient noise level at the project site is 64 dBA. Removing the SR-22 highway from the model reduces ambient noise levels at the development site to 61 dBA. In both scenarios, ambient noise at the proposed project site remains below the HUD noise threshold of 65 dBA. Therefore, as the Project Site is within HUD's Acceptable Noise Zone (not exceeding 65 dB), there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>(Attachments 14; ERR 8).</b></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, according to the</p>

<p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>		<p>US Environmental Protection Agency (USEPA). There are no sole source aquifers in Orange County. The nearest sole source aquifer to the project site is located along the southern United States border with Mexico, approximately 90 miles south. Project-related improvements to the project site would not result in impacts to this sole source aquifer given the distance between the aquifer and the project site. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>(Attachment 15).</b></p>
<p><b>Wetlands Protection</b></p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>Wetlands resources would not be affected by the proposed project. As determined using the US Fish and Wildlife Service's (USFWS) National Wetlands Inventory, there are no known wetlands within or adjacent to the project site. The project site is previously disturbed by existing development and is a relative flat site located within an urbanized environment. There are no drainages or hydrologic features on the project site, nor are there depressions or topographical features indicative of potential wetland areas.. The Santiago Creek is located approximately 0.5 miles southeast of the project site. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>(ERR 9 and Attachment 16).</b></p>
<p><b>Wild and Scenic Rivers</b></p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The proposed project area does not contain any resources protected under the Wild and Scenic Rivers Act. The nearest Wild and Scenic River to the project site is Bautista Creek, approximately 56 miles east. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</p> <p><b>(Attachment 17; ERR 10).</b></p>
<p><b>• ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b></p> <p>Executive Order 12898</p>	<p>Yes    No</p> <p><input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The proposed development would have a beneficial impact on extremely-low- to low income individuals by adding 49 new</p>



		<p>affordable housing units in an urban area near <b>multiple amenities. There are no</b> environmental hazards on or adjacent to the project site other than what has already been described in the sections above. Existing environmental impacts would be reduced or mitigated through incorporation of design features, compliance with applicable regulations and policies, and implementation of mitigation measures. As a result, the proposed project would not negatively impact the surrounding community, least of all low-income or minority populations. Since the proposed project would not expose anyone to adverse environmental conditions, it would not violate Executive Order 12898.</p> <p><b>(ERR 11).</b></p>
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**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	2	rrhe proposed project area is zoned Public Institution (P-I), rwhich permits housing as an accessory use. This development is

<p>Zoning / Scale and Urban Design</p>		<p>consistent with the City of Orange 2015-2020 Consolidated Plan as it would contribute to affordable housing, a high priority and strategic goal. Overall, the project would create 50 new affordable housing units, including 18 PSH units dedicated to assisting the homeless or at risk of homelessness and one manager's unit. By providing housing targeted at extremely low- and low-income households, including the homeless, the project would provide fair housing to various economic classes and individuals with special needs.</p> <p>The three-story proposed rehabilitation project would be consistent with nearby single and multi-family residences in the surrounding area that vary from one to two stories with taller buildings located to the west, including the hospital buildings that comprise the medical campus. As such, the existing convent is consistent in mass and scale to surrounding buildings and does not conflict with surrounding land uses.</p>
<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p>2</p>	<p><b>Slope and Drainage.</b> The proposed project site is relatively flat though the surface gently slopes to the southwest. The site is approximately 167 feet above mean sea level. The project site is entirely covered in impervious surfaces or managed landscaping and does not contain any naturally occurring landforms or steep slopes. The project would not involve alteration of hillsides or steep vegetated slopes and would, therefore, not substantially change the visual character of the site or alter any native plant communities. No further compliance steps are required.</p> <p><b>Soil Suitability.</b> The project site is located within the Peninsula Range geomorphic province on the Tustin Plain. This region is bound by the Santa Ana Mountains to the east, San Joaquin Hills to the south, and Downey Plains to the west. Sediments in this area are composed of alluvial deposits of gravel, sand, silt and clay. Since the project site is currently developed, most of the construction activities would occur within the building and construction equipment would be stored inside the building or at the existing parking lot.</p> <p><b>Storm Water Runoff.</b> There is minimal chance of erosion at the project site due to the flat topography of the area. In addition, minimal ground disturbance would occur because construction activities would primarily occur within the existing building. Potential erosion at the site would also be</p>

		<p>limited due to the area already being paved, landscaped, and populated with buildings that include storm drainage systems. In addition, in the event that ground disturbing activities are required (i.e., utility connections), such ground disturbances would be limited and would be required to comply with local and regional erosion control measures during ground disturbing activities to minimize erosion and stormwater pollution. As such, the project site would not include any areas of unmanaged vegetation or uncovered/exposed soils following implementation of the project that could result in soil erosion following a rain event. Therefore, because the project would primarily involve interior renovations of an existing structure, and because ground disturbance of outdoor areas would be limited in scale and scope, the project would not result in impacts related to erosion, drainage, or stormwater runoff.</p>
<p>Hazards and Nuisances including Site Safety and Noise</p>	<p>3</p>	<p><b>Hazardous Materials.</b>  The Project Site is located in an urbanized area and is not exposed to potential natural hazards, including hazardous terrain, volcanoes, steep slopes/landslide areas, and fire-prone areas. The Project Site does not include any known poisonous plants, animals, or insects, nor is it located in an area susceptible to wind or sandstorms.</p> <p>A Phase I ESA was conducted for the project by Pacific Environmental Company. This study is discussed in the Contamination and Toxic Substances section, above. In short, the study did not find any evidence of RECs, HRECs, or CRECs on the proposed project site. While the site was historically used for agriculture, soil contamination by residual agricultural chemicals, including pesticides, herbicides, and fertilizers is unlikely since the site is paved over and covered with buildings. In addition, previous site development activities would have mixed soil surfaces with fill material, minimizing direct contact with any potential remaining concentrations in the soil. It is likely that any residual agricultural chemicals would have degraded since the site was last used for agricultural purposes.</p> <p>Additional testing for asbestos-containing materials and leadbased paints was conducted during a Asbestos and Lead Based Paint Inspection Report completed by PEC in October 2019. The study did not find LBPs on the subject site. However, lead was found in the ceramic tile finishes in showers and restroom walls. During the renovations, the</p>



		<p>tiles should be removed following lead-safe work protocols. ACMs were found in mastic, pipe insulation material, and window putty throughout the project site. Removal of ACMs should be completed by a licensed and certified asbestos abatement contractor prior to demolition or renovation (see <b>Mitigation Measure 1</b>).</p> <p>A records review for the project site did not find any underground storage tanks (USTs) or leaking underground storage tanks (LUSTs). Vapor encroachment conditions do not exist at this property. There are currently no environmental liens or activity and use limitations associated with the subject site.</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 rehabilitation phase of the project as a result of materials being transported to the site and project-related rehabilitation activities. 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. Sources of noise during the operational phase include project generated traffic, recreational spaces associated with the project, car door slamming, and similar sounds associated with multi-family residential land uses. Adverse impacts from operational noise are not expected due to the relatively small size of the development. Operational noise generated by the proposed project would similarly comply with Orange County Noise Control Ordinances.</p>
Energy Consumption	2	<p>Because the project would renovate an existing building, the project would not be required to meet energy consumption standards for new residential buildings as outlined in the California Building Code, Title 24, 2001 Energy Efficiency Standards. However, the renovation design would incorporate numerous sustainability features into the existing 1950s building such as EnergyStar-rated light fixtures and appliances, and low-flow fixtures to reduce water consumption. The energy efficiency upgrades that would be included in the renovation would be a beneficial</p>



impact to energy consumption compared to the building's current energy consumption.

Additionally, given the limited duration and scope of proposed rehabilitation activities, temporary energy use during rehabilitation of the existing structure would not result in a significant increase in peak or base demands on regional energy supplies or require additional capacity from local or regional energy supplies, and it would not result in inefficient or unnecessary consumption of energy resources. Because the proposed land use (supportive and affordable housing) is functionally similar to the existing use as a convent, there would not be a substantial increase in greenhouse gas (GHG) emissions during project operation. Specifically, the primary contributor of GHG emissions during operation of the proposed project would be internal combustion vehicles used by residents and guests of the project and any internal combustion landscape maintenance equipment used to maintain common-space areas and decorative landscaping. Due to the California Air Resources Board's increasing vehicle efficiency standards, it is assumed that long-term transportation fuel consumption from project operations would steadily decline over time. Therefore, GHG emissions associated with operation of the project are not anticipated to be significant due to existing federal and state vehicle emissions regulations and the relatively small size of the project in comparison to the region and state as a whole.

#### **Climate Change**

Per Executive Order 14008, and HUD's guidance to demonstrate that projects are resilient to climate change, the following analysis includes a review of climate change hazards on the project site using FEMA's National Risk Index, which is an online tool used to illustrate the United States communities most at risk for 18 natural hazards, including avalanche, coastal flooding, cold wave, drought, earthquake, hail, heat wave, hurricane, ice storm, landslide, lightning, riverine flooding, strong wind, tornado, tsunami, volcanic activity, wildfire, and winter weather. Per the National Risk Index, the census tract including the Project Site (06059076000) has a "very high" summary risk index of 37.55/100, which is greater than the California average (22.57) and the national average (16.91).

	<p>However, the majority of the risk is informed by a very high risk score for earthquake hazards, and a moderate risk score for riverine flooding, with the remaining 16 natural hazards having low or very low risk scores (i.e., the Project Site is not at high risk for these hazards).</p> <p>The City of Orange, like much of southern California, faces geologic and seismic hazards where the risk of seismic-related ground shaking is relatively high. As such, the City of Orange's General Plan Public Safety Element includes goals and policies directed at reducing the risk of seismic hazards, by participating in state and federal earthquake preparedness and emergency response programs and by educating and training residents on how to respond to emergency situations. According to the City's General Plan Public Safety Element (Figure PS-1), the project site is not located within a liquefaction area, landslide hazard area, or 100-year flood area.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	2	<p>The proposed project has the potential to create employment opportunities during the rehabilitation phase; however, these employment opportunity would be limited in scale and temporary. Income patterns in the community would benefit from the construction of the 50-unit development, which includes 18 units reserved for homeless seniors earning at or below 30% AMI and 31 units for low-income seniors earning at or below 60% AMI. All units would be reserved for individuals aged 60 and older and all rooms would be fully handicap accessible.</p> <p>Mercy Housing California Resident Services would provide and coordinate a range of supportive social services that would help residents to live successfully and independently. Additional collaborators, including SJCO, the University of San Francisco, the Loyola Institute for Spirituality, St. Joseph Hospital, and Ronald McDonald House among other community-based agencies would aim to provide off-site services to serve the diverse needs of tenants. Since the project would receive State MHSA funding, the County of Orange Health Care Agency (HCA) would function as the lead provider of onsite supportive services to the MHSA-NPLH funded units, at no cost to tenants. Social services</p>

		provided to residents would include mental health services, physical health services (including prevention plans), employment/vocational services, educational opportunities and linkages, substance use services, budget and financial training, assistance in obtaining and maintaining benefits/entitlements, and linkage to community-based services and resources among others.
Demographic Character Changes, Displacement	2	<p>Considering that the project site is located in an area surrounded by commercial (i.e., medical) and residential land uses, the proposed project would not adversely affect community character. The architectural design of the existing structure is consistent with the surrounding medical and religious buildings. Further, the project would not result in changes to the design or scale of the structure. Since the project site would rehabilitate and convert a Catholic convent into affordable housing, the proposed project would not displace existing residential units or businesses in the area.</p> <p>Increasing affordable housing units within the City and County of Orange supports the housing priorities detailed in the Orange County Consolidated Plan by building accommodations for people with very low to moderate incomes. While the proposed development is not part of an impacted census tract, it would positively impact the community by providing much needed service-affordable housing for low income and homeless seniors aged 62 and older. Four nearby tax credit apartment complexes are completely occupied and three of the senior communities surveyed had waiting lists between 150 and 615 individuals. Demand was highest for Triangle Terrace, another senior-focused affordable housing complex within a mile of the proposed project site, indicating high demand for affordable senior housing in this community.</p> <p>Existing utilities and adjacent roadways would not be affected by the proposed project, which would utilize current infrastructure, such as water and sewage. The proposed project would have a beneficial impact on the community by developing an affordable housing project that is consistent with the land use designation and zoning for the site.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	While the project could potentially increase enrollment at schools nearby, negative impacts on educational facilities is



		<p>not foreseen as the targeted population, elderly and homeless individuals aged 62 and older, are unlikely to have school age children living with them in the 1-bedroom units. As such, the Project would have no impact on educational facilities and classroom space.</p> <p>Regardless, the project site is located near multiple educational facilities, including:</p> <ul style="list-style-type: none"> <li>• West Orange Elementary School, approximately 0.7 miles north of the project site</li> <li>• Portola Middle School, approximately 1.2 miles northwest of the proposed development</li> <li>• Palmyra Elementary School, about 1.6 miles east of the proposed project area</li> <li>• Santiago High School, approximately 4 miles southwest of the project site</li> <li>• • Orange County School of the Arts, about 2.2 miles south of the proposed project.</li> </ul> <p>Again, given the nature of the targeted population for the Project, no project impacts are anticipated and no mitigation is necessary</p>
Commercial Facilities	2	<p>Adverse impacts to commercial facilities in the surrounding area are not anticipated. The area around the proposed project site encompasses a Hospital, medical offices, hospital supportive services, and multi-family dwellings. A wide range of retail and commercial land uses are located within one-quarter mile of the project, including a variety of restaurants, a pharmacy/drug store, and a clothing retailer located one-quarter mile west on Main Street, north of West La Veta Avenue. Further, the project site is located near public transit provided by the OC transit authority. Bus lines 53/53X, 56, and 453 service stops within a half mile of the project site. The 53/53X line provides access to the Anaheim Regional Transportation Intermodal Center (ARTIC) transit hub where individuals can transfer to the Metrolink, Amtrak, Greyhound, and Megabus stations to reach the greater region.</p>
Health Care and Social Services	2	<p>Increases in the local population could increase demand for health care and social services in the community. However, given the numerous healthcare and social service facilities in the area and the relatively small size of the project, adverse impacts on these services are not anticipated.</p> <p>The project is situated near numerous health care facilities, including:</p> <ul style="list-style-type: none"> <li>• St. Joseph Hospital, located next door to the project site at 1100 W. Stewart Dr., Orange, CA 92868</li> </ul>

		<ul style="list-style-type: none"> <li>• CHOC Children’s Hospital, located across the street from the project area at 505 S. Main St., Orange, CA 92868</li> <li>• HealthBridge Orange Pediatric Hospital, approximately 2 miles east of the project site at 393 S. Tustin St., Orange, CA 92866</li> <li>• Chapman Global Medical Center, about 3 miles northeast of the project area at 2601 E. Chapman Ave, Orange, CA 92869</li> <li>• Irvine Hospital, approximately 2 miles west of the project site at The City Dr. S., Orange, CA 92868</li> </ul> <p>In addition, pharmacies are located within St. Joseph Hospital and at the northwest corner of the intersection of Main Street and West La Veta Avenue (CVS Pharmacy) approximately one-quarter mile west of the project site.</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. Some solid waste would be created during the proposed rehabilitation activities. However, this waste would be required to adhere to local waste diversion initiatives.</p> <p>Currently, the subject property is occupied by a 3-story approximately 47,355 square foot 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. The solid waste generated by the proposed project would be typical of the types of wastes generated by multifamily residential land uses throughout the City of Orange. Nothing inherent in the project description or in the type or intensity of land use would indicate that the project would generate a higher-than-normal level of typical municipal solid waste, or that it would generate any unique or hazardous types of wastes requiring unusual disposal methods. As a result, adverse impacts from solid waste disposal associated with the proposed project are not anticipated.</p>
Waste Water / Sanitary Sewers	2	<p>Wastewater and sewage services would be provided by the City of Orange. The Orange County Sanitation District (OCSD) treats sewage for the City of Orange. OCSD provides wastewater collection, treatment, and disposal services for nearly 2.6 million people in a 479-square-mile</p>

		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.
Water Supply	2	The proposed development would receive water from the City of Orange, which is serviced by the Orange County Water District (OCWD). OCWD supplies water to north and central Orange County. OCWD replenishes water within the Orange County 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. Because the project site is currently characterized by a convent, which would have similar water demands to multi-family residential housing, the project is not anticipated to result in an increase in water demand on the project site. Further, rehabilitation activities would result in replacement of aging fixtures with more water-efficient fixtures, thus reducing water demand. 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 County Fire Authority Station #70, approximately 1.6 miles southeast of the project site at 2301 Old Grand St., Santa Ana, CA 92705</li> <li>• Orange County Fire Authority Station #71, about 2.3 miles southeast of the project area at 1029 W. 17th St., Santa Ana, CA 92706</li> <li>• Orange Police Department, approximately 2 miles north of the project site at 1107 N. Batavia St., Orange, CA 92867</li> <li>• Orange County Fire Authority Station #23, about 5.5 miles northeast of the project area at 5020 E. Santiago Canyon Rd, Orange, CA 92869</li> <li>• Anaheim Police Department, approximately 6.7 miles northwest of the project site at 425 S. Harbor Blvd, Anaheim, CA 92805</li> </ul> <p>Since existing Police and Fire Departments adequately serve the proposed project area, the development is not expected to increase demand for public safety services in the community.</p>
Parks, Open Space and Recreation	2	Recreational spaces in close proximity to the project site include:



		<ul style="list-style-type: none"> <li>• El Camino Real Park, approximately 1.5 miles north of the project site at 400 N. Main St., Orange, CA 92868</li> <li>• Hart Park, about 1.1 miles southeast of the project area at 701 S. Glassell St., Orange, CA 92866</li> <li>• Santiago Creek Wildlife and Watershed, approximately 0.6 miles south of the project site at Santiago Park, 600 E. Memory Ln., Santa Ana, CA 92705</li> <li>• Morrison Park, about 2.2 miles southwest of the project area at 2801 N. Westwood Ave, Santa Ana, CA 92706</li> <li>• Memory Lane Park approximately 2.3 miles southwest of the project site at 1668-1680 W. Memory Ln., Santa Ana, CA 92706</li> </ul> <p>The proposed development would also include green space that could reduce nearby park use by residents. Given the relatively small size of the proposed project and the availability of green spaces in the surrounding area, adverse impacts to parks, open spaces, and recreational areas is not anticipated.</p>
Transportation and Accessibility	2	<p>The proposed project is conveniently located near public transit stops along West La Veta Avenue. The nearest stop is located at the corner of West La Veta Avenue and South Parker Street, only 600 feet east of the project site. This stop is serviced by OC Transit Authority bus lines 56 and 453. The 53/53X bus lines can be reached within a quarter mile of the project site and provides local service to Anaheim (north) and Irvine (south) via Main Street, with busses arriving every 20 minutes Monday through Friday, from 7-9am and 4-6pm. The 53/53X also provide direct access to the Anaheim Regional Transportation Intermodal Center (ARTIC), a regional transit hub where public transit riders can transfer to the Metrolink, Amtrak, Greyhound, and Megabus stations. The adjacent parking lot would accommodate 33 vehicles.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	<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</p>

		alteration of unique natural features or water resources. Groundwater recharge would be minimally impacted by the proposed project since the area is already paved and covered with buildings. Recharge could occur over green spaces in the parking lot and open space on the east side of the project site. There are no sole source aquifers in the City of Orange.
Vegetation, Wildlife	2	While the proposed project is located within the ranges of two endangered or threatened species of birds and one species of fish, none of these species are found on the project site as it is developed and located 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 <b>ERR 5</b> ). The project site currently includes managed landscaping, such as turf grass, trees of varying size and species, and decorative shrubs. This existing landscaping would remain in place as part of the project.
Other Factors		None identified.

**Additional Studies Performed:**

- Phase 1 Environmental Assessment, Prepared by Pacific Environmental Company, December 2019
- Asbestos and Lead-Based Paint Inspection Report, Prepared by Pacific Environmental Company, October 2019

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

- Phase 1 Environmental Assessment, Prepared by Pacific Environmental Company, December 2019
- Asbestos and Lead-Based Paint Inspection Report, Prepared by Pacific Environmental Company, October 2019

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

- California Environmental Protection Agency. Site Reports for the St. Joseph Medical Office Tower and the Center for Cancer Prevention and Treatment. Generated August 29, 2022.
- 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>.

- City of Orange. General Plan 2021-2029 Housing Element. January 2022.
- City of Orange. General Plan Public Safety Element. March 2010.
- 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/rulebook/rule-iv/rule-403.pdf?sfvrsn=4>.
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- USFWS. 2020. “National Wetlands Inventory, Surface Waters and Wetlands Map.” Accessed October 2020. <https://www.fws.gov/wetlands/data/mapper.html>.
- U.S. Housing and Urban Development Agency. 2022. Acceptable Separation Distance (ASD) Electronic Assessment Tool. <https://www.hudexchange.info/programs/environmental-review/asd-calculator>. accessed August 29, 2022.
- 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:**

The following entitlements are required by City of Orange.

- Tentative Parcel map No. 0014-20
- Minor Site Plan Review No. 1006-20.

#### **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. A Draft Environmental Assessment was made available for public review and comment by the County of Orange on December 11, 2020.



Before finalizing the project's Environmental Assessment, the City of Orange will publicly disseminate/publish the Environmental Assessment's findings, as required by 24 CFR 58.43 and 24 CFR 58.70. The City will consider the public comments received on any Project-related notices and, if appropriate, would make modifications in response to the comments

### **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 was chosen from several properties based on feasibility, location, and affordability. Physical and social constraints were also considered in identifying and rejecting alternatives. 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 create 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:**

Mercy Housing California is proposing to rehabilitate and convert the Villa St. Joseph Catholic convent into an affordable housing development serving homeless and low-income seniors aged 62 and older. The project would be owned by St. Joseph College of Orange and Mercy Housing

California (MHC). MHC Resident Services in partnership with the County of Orange Health Care Agency would coordinate and provide social services for residents free of cost. The existing convent would be converted into 50 units, consisting of 6 studio units, 43 one-bedroom units and 1 two-bedroom manager's unit. 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.

#### *Contamination and Toxic Substances*

**Mitigation Measure 1:** Prior to the beginning of the construction phase, damaged and/or significantly damaged asbestos-containing construction materials, which pose the greatest risk for asbestos exposure, shall be removed in compliance with South Coast Air Quality Management District Rule 1403 Procedure 5. Shower wall tiles should be removed following lead-safe work protocols.

#### *Historic Preservation (Cultural Resources)*

**Mitigation Measure 2:** 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 3:** The developer shall be required to retain the services of a qualified Native American monitor during construction-related ground-disturbing activities. The tribal representative from the Gabrieleño Band of Indians Kizh Nation defines ground disturbance to include 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 include ground-disturbing 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 resources are encountered, they shall be documented by the Native American monitor and collected for preservation.






**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

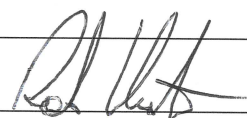
The project will not result in a significant impact on the quality of the human environment.

**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: August 31, 2022

Name/Title/Organization: Brent Schleck/Senior Environmental Planner/Michael Baker Intl.

Certifying Officer Signature:  Date: September 1, 2022

Name/Title: Rob Houston, 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).