



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:** Jamboree Permanent Supportive Housing (Jamboree PSH)

**Responsible Entity:** OC Homeless, Housing and Community Development

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

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

**Preparer:** Cindy Wolfe, Administrative Manager/Environmental Coordinator

**Certifying Officer Name and Title:** Craig Fee, Community Development Manager, OC Homeless, Housing and Community Development

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

**Consultant** (if applicable): AECOM  
999 Town & Country Road  
Orange, CA 92868

**Direct Comments to:** Cindy Wolfe, (714) 480-2869

**Project Location:** 2691 W. La Palma Avenue, Anaheim, CA 92801  
Census Tract 868.01 / APN 070-761-12

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

The proposed project consists of the rehabilitation and conversion of an existing 70-unit motel located on an approximately 1 acre lot at 2691 W. La Palma Avenue in the West Anaheim community in the City of Anaheim (refer to Figure 1, Project Vicinity) into efficiency units with small kitchenettes. These units would be targeted to extremely low income and homeless veterans and individuals with a mental health diagnosis.

The rehabilitation would include adjusting room layouts to provide for approximately 69 adequately-sized efficiency/studio units. Of the total unit count, 20 units would be available to veterans and 49 units would be available to homeless mentally ill individuals earning no more than 30 percent of the Area Median Income in Orange County. The existing 300 square foot bank of single-bed motel rooms would be modified to include a small kitchenette with a food preparation area, refrigerator, small sink, and microwave. The interior of the motel would be completely refinished to include all new flooring and paint, new plumbing fixtures, and include bathrooms that have been re-designed for accessibility and water efficiency. All units would be fully furnished. The building itself would be architecturally enhanced to modernize it within the context of the West Anaheim community. It would also receive building envelope renovations to make it more energy efficient and site upgrades to enhance ADA accessibility.

The existing management/office space would be renovated for use by the social services, case management, and property management staff who will serve the residents. The space would include approximately 3,500 square feet of common area amenities, such as individual counseling offices, full kitchen for teaching and social events, TV lounge, computer room, and multi-purpose gathering and meeting rooms. The project site would receive a fresh, water-wise landscape design, and be renovated to meet new accessibility standards. The existing pool would be filled in and repurposed as a passive recreational area with seating areas, BBQs and a community garden.

The project site is currently zoned as General-Commercial (C-G) and is designated as Office-Low (O-L) by the City of Anaheim General Plan. The proposed project involves General Plan Amendment from O-L to Medium Density Residential, a Zone Change from C-G to Residential Opportunity (RO) Overlay Zone, and a Conditional Use Permit application for Permanent Supportive Housing.

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

The objective of the proposed project is to rehabilitate an existing 70-unit motel to convert into efficiency units for homeless mentally ill individuals and veterans and provide much needed affordable housing for the most vulnerable and at-risk individuals in the community.



 Project Site

**Figure 1**  
**Project Vicinity Map**

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

The project site consists of an existing, two-story, approximately 24,010-square foot motel building occupied by Econolodge. The building is comprised of an office space, conference room, laundry room and 70 motel rooms. The remainder of the project site includes asphalt-paved vehicle parking areas and driveways, a pool area, and associated landscaping (refer to Figure 2, Site Map).

The project site is located in a neighborhood of Anaheim and Buena Park, which are located in a mixed industrial and commercial area. The immediately surrounding properties consist of industrial warehouse buildings (Auto Mart Collision Center at 1163 North Knowlwood Circle and Brookhurst Towing at 1165 North Knowlwood Circle) to the north; a commercial restaurant building (Rodrigo’s Mexican Grill at 2681 West La Palma Avenue) to the east; West La Palma Avenue, followed by residential buildings (8000-8049 Woodland Drive), an electrical substation (8800 La Palma Avenue), and a nursery (Martinez Nursery at 8734 La Palma Avenue) to the south; and a nursery (RV Nursery at 8735 La Palma Avenue) to the west.

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
	HOME	\$1,000,000
	Veterans Affairs Supportive Housing (VASH) Project-Based Voucher and Project-Based Housing Choice Vouchers	

**Estimated Total HUD Funded Amount: \$1,000,000**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$18,378,842**



 Project Site

**Figure 2**  
**Site Map**

**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"/>	Fullerton Municipal Airport is the nearest airport to the project site and is located approximately 2 miles to the north. The proposed project is not located within 2,500 feet of a civilian airport or within 15,000 feet of a military airport. In addition, the project site is not located within the safety zone as identified in the <i>Airport Environs Land Use Plan for Fullerton Municipal Airport</i> as prepared by the Orange County Airport Land Use Commission (ALUC 2004) and <i>Section 5.1: Land Use and Planning, The Fullerton Plan</i> (City of Fullerton 2012). Therefore, no adverse effects would result from the proposed project.
<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 project site is located approximately 11 miles inland from the Pacific Ocean and is not located within a Coastal Barrier Resource Area (USFWS 2018a). Therefore, no adverse effects would result from the proposed project.
<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 proposed project site is not located within a designated 100-Year Flood Hazard Zone, as defined on the Anaheim General Plan (City of Anaheim 2004), Figure S-6 (Flood Hazard Areas) of the Safety Element and FEMA Map 06059C0126J (effective date: 12/03/2009). Therefore, no adverse effects would result from the proposed project.

<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>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>Pursuant to guidelines set forth by HUD, since the proposed project is located in the South Coast Air Basin (Basin), which is a non-attainment area for ozone (O<sub>3</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), conformity with the State Implementation Plan (SIP) must be demonstrated. A project is shown to conform with the SIP if criteria pollutant emissions remain below the South Coast Air Quality Management District (SCAQMD) regional significance thresholds.</p> <p>The proposed project involves rehabilitation of an existing motel by adjusting room layouts into efficiency/studio units. The proposed project includes refinishing interior of the motel to include new flooring and paint, new plumbing fixtures, redesigned bathrooms for accessibility and water efficiency. Site work would be limited to filling in an existing pool and making ADA accessibility improvements. Given the nature of planned improvements to the site (predominantly interior tenant improvements), construction impacts would be negligible and well below SCAQMD daily emission thresholds for construction since no grading or heavy diesel off-road vehicles would be necessary. Similarly, given the nature of the proposed use, operational impacts will be well below the daily emission thresholds as well. As a result, no adverse effects would result from the proposed project.</p>
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The closest coastal zone (Bolsa Chica State Beach) is located approximately 10 miles southwest from the project site. Thus, the project site is not located within a Coastal

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>Zone, and therefore, does not involve the placement, erection or removal of materials within a Coastal Zone. No adverse effects would result from the proposed project.</p>
<p><b>Contamination and Toxic Substances</b>  24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes    No  <input checked="" type="checkbox"/>    <input type="checkbox"/></p>	<p>The Phase I Environmental Site Assessment (ESA) (Barr &amp; Clark 2018a) prepared for the proposed project concluded there is no evidence of recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs) in connection with the project site. In addition to the Phase I ESA, separate asbestos (Barr &amp; Clark 2018b) and lead-based paint (LBP) (Barr &amp; Clark 2018c) inspections were conducted. During the inspection of the project site, asbestos was detected in samples of several construction/building materials. Asbestos was detected in the exterior walls, interior walls and ceilings, workshop, laundry room, flooring and roofing. Also, although none of the tested painted surfaces indicated the presence of LBP at or above the respective action level, some of the tiled surfaces in the bathrooms, lobby and men’s restroom tested positive for lead. These surfaces were not painted and the lead is most likely in the glazing or the matrix of the tile itself. As a result, the following mitigation measures would be required.</p> <p>Mitigation Measure – Asbestos</p> <p><i>All asbestos containing construction/building materials in Damaged Condition shall be repaired immediately. If it is not feasible to repair these materials, they shall be removed immediately. Any work that disturbs these materials shall be performed by an asbestos contractor registered with the Division of Occupational</i></p>



<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
		<p><i>Safety and Health. If renovation or demolition activities are to affect these materials, an asbestos abatement contractor registered with the Division of Occupational Safety and Health shall be contracted to perform all portions of the work affecting these materials.</i></p> <p>Mitigation Measure – LBP</p> <p><i>The tile surfaces are not a likely source of lead dust contamination as long as they remain intact. However, if future renovation or repair activities require removal or breakage of the tile or disturbance of the surfaces, it shall be done by a lead certified contractor.</i></p> <p>Therefore, no adverse effects would occur after the implementation of the above mitigation measures.</p>
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is located within an existing urbanized area that has been previously disturbed by development and human activity. It is currently paved with a small area of ornamental landscaping in front of the building and next to the parking areas. Based on the U.S. Fish and Wildlife Service (USFWS)’s online Critical Habitat for Threatened & Endangered Species mapper, the proposed project would have No Effect on listed species (USFWS 2018b). No adverse effects would result from the proposed project.
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	No underground storage tanks (USTs) or aboveground storage tanks (ASTs) used for hazardous materials storage were reported for the project site per the Phase I ESA prepared for the proposed project (Barr & Clark 2018a). The closest surrounding locations (within 2 miles) with aboveground petroleum storage tank facility are Walmart (approximately 0.5 miles southwest), Sears

<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
		<p>Service Center (approximately 0.7 miles southwest), Knott's Berry Farm (approximately 1.1 miles west), and House of Imports (approximately 2 miles southeast). These surrounding locations would be subject to extensive state and federal regulations. These may include (but not be limited to): Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program); California Accidental Release Prevention Program; Hazard Communication Plans; Chemical Hygiene Plan and others. Agencies which have authority over the production, handling, transporting, and disposing of hazardous materials include (but are not limited to): California Occupational Safety and Health Administration (Cal OSHA); California Environmental Protection Agency (Cal EPA); the Department of Toxic Substances Control (DTSC); Regional Water Quality Control Board (RWQCB); Caltrans; and California Highway Patrol. No adverse effects would result from the proposed project.</p>
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site does not include prime or unique farmland (CDC 2014). No adverse effects would result from the proposed project.
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project site is not located within a designated 100-Year Flood Hazard Zone, as defined on the Anaheim General Plan (City of Anaheim 2004), Figure S-6 (Flood Hazard Areas) of the Safety Element and FEMA Map 06059C0126J (effective date: 12/03/2009). In addition, the

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>project site is also not found within any of the other locations set forth in Table 1 of 24 CFR Part 55.11 Table. No adverse effects would result from the proposed project.</p>
<p><b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The proposed project consists of acquisition and rehabilitation of an existing motel building. The site is paved except for a small landscaped area in the front of the building and next to the parking areas. The existing motel, constructed in 1977, is not a historic property since it is not 50 years in age or older per Section 106 of the National Historic Preservation Act (NHPA). There are also no known historic resources within the project area per the records search conducted by South Central Coastal Information Center in March 2018. Majority of the rehabilitation work would occur within the interior of the existing motel building and would not require any ground disturbance. The only earthwork that would occur as part of the proposed project would be associated with re-landscaping the existing landscaped area at shallow depths (e.g., less than 1 to 2 feet).</p> <p>In late March 2018, Orange County Community Resources (OCCR) initiated consultation with the California Department of Parks and Recreation, Office of Historic Preservation (OHP), to request concurrence with their determination that no historic property would be adversely affected as a result of implementation of the proposed project in accordance with Section 106 of the NHPA and HUD requirements. OHP's State Historic Preservation Officer (SHPO) concurred with OCCR's determination in their letter response dated April 3, 2018. No adverse effects would result from the proposed project.</p>

<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>Noise Abatement and Control</b>  Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p><b>Construction</b></p> <p>The proposed project would involve interior and exterior improvements that would occur within an industrial/commercial zone. Section 6.70.010 of the Anaheim Municipal Code states that construction and building repair activities are exempted from the applications of the Municipal Code between the hours of 7:00 AM and 7:00 PM. With restriction of construction activities to the hours of 7:00 AM and 7:00 PM, no adverse effects would result from the construction of the proposed project.</p> <p><b>Operational Noise</b></p> <p>The noise environment surrounding the proposed project is typical for a light industrial/commercial area. The most prominent noise source is traffic on La Palma Avenue, a primary arterial road which generates approximately 22,000 to 30,000 average daily traffic from the City of Buena Park and City of Anaheim border to Magnolia Avenue (the closest road segment to the project site) (City of Anaheim 2018b). From an operational perspective, noise from the proposed project would be characteristic of the existing environment and would not induce new sources of noise. The new facility uses that would result with project development would be similar to the existing uses. The existing pool, located in the center of the site surrounded by a wall and motel building, would be filled in and repurposed as a passive recreational area with seating areas, BBQs and a community garden. It would continue to be surrounded by a wall and building, thus insulated from traffic noise. Also, it is expected that many occupants of the proposed project would utilize other means of transportation besides</p>

<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
		<p>an automobile. Thus, fewer trips would be generated as a result of the proposed project. The proposed project involves General Plan Amendment from O-L to Medium Density Residential, a Zone Change from C-G to Residential Opportunity (RO) Overlay Zone, and a Conditional Use Permit application for Permanent Supportive Housing. According to the Noise Element of the City of Anaheim General Plan, exterior noise levels at residential locations should not exceed a Community Noise Equivalent Level (CNEL) of 65 decibels (dB) while interior levels shall not exceed an annual CNEL of 45 dB in any habitable room. The proposed project would be required to be designed to meet City's noise standards. In addition, prior to issuance of building permits, the property owner/developer would be required to demonstrate that project's noise levels would be less than 65 dBA CNEL for future proposed outdoor use areas. No adverse effects would result from operation of the proposed project.</p>
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is not located within a U.S. EPA-designated sole source aquifer watershed area per EPA Map of Sole Source Aquifer Locations website (EPA 2018a). No adverse effects would result from the proposed project.
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is located within a mixed industrial and commercial area lacking any water features or resources, and thus, does not involve new construction within or adjacent to wetlands, marshes, wet meadows, mud flats or natural ponds per maps issued by the U.S. Fish & Wildlife Services (USFWS 2018c). No adverse effects would result from the proposed project.

<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>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 project site is not located within one mile of a listed Wild and Scenic River (EPA 2018b). No adverse effects would result from the proposed project.
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>  Executive Order 12898	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Based on the analysis of this Environmental Assessment, the proposed project would not expose persons to adverse environmental conditions. Therefore, the proposed project would not expose low income or minority populations to adverse environmental conditions. Furthermore, since the proposed project would provide permanent supportive housing to extremely low income and homeless veterans and individuals with a mental health diagnosis, it would provide a benefit to populations with very low income. Therefore, the proposed project would have a beneficial effect related to environmental justice.

**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	<p>The current zoning designation of the project site is C-G with a general plan land use designation of O-L. The proposed project involves General Plan Amendment from O-L to Medium Density Residential, a Zone Change from C-G to Residential Opportunity (RO) Overlay Zone, and a Conditional Use Permit application for Permanent Supportive Housing.</p> <p>The existing building would be architecturally enhanced to modernize it against the backdrop of the West Anaheim community. It would also receive building envelope renovations to make it more energy efficient and site upgrades to enhance ADA accessibility.</p> <p>The proposed project would comply with all of the standards set forth in the Anaheim General Plan and applicable zoning ordinance and design standards. Therefore, no adverse impacts would occur.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>The proposed project involves rehabilitation of an existing motel by adjusting room layouts to provide for efficiency/studio units. Site work would be limited to filling in an existing pool and making ADA accessibility improvements.</p> <p>The proposed project would re-use an existing structure that already has adequate drainage and stormwater runoff systems in place, and was previously constructed on adequate soils that do not have slope stability issues or other hazardous geologic conditions. Therefore, no adverse impacts would occur.</p>
Hazards and Nuisances including Site Safety and Noise	3	<p>The Phase I ESA (Barr &amp; Clark 2018a) prepared for the project revealed no evidence of a REC connected with the project site. Also, the proposed project site is not within 1 mile of a National Priorities List (NPL) site or within 0.5 mile of a Superfund Enterprise Management System (SEMS) site. However, during the inspection of the project site, asbestos was detected in samples of several construction/building materials, and some of the tiled surfaces tested positive for lead. As a result, the following Mitigation Measures would be required.</p> <p>Mitigation Measure – Asbestos</p> <p><i>All asbestos containing construction/building materials in Damaged Condition shall be repaired immediately. If it is not feasible to repair these materials, they shall be</i></p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p><i>removed immediately. Any work that disturbs these materials shall be performed by an asbestos contractor registered with the Division of Occupational Safety and Health. If renovation or demolition activities are to affect these materials, an asbestos abatement contractor registered with the Division of Occupational Safety and Health shall be contracted to perform all portions of the work affecting these materials.</i></p> <p>Mitigation Measure – LBP</p> <p><i>The tile surfaces are not a likely source of lead dust contamination as long as they remain intact. However, if future renovation or repair activities require removal or breakage of the tile or disturbance of the surfaces, it shall be done by a lead certified contractor.</i></p> <p>No adverse effects would occur after the implementation of the above mitigation measures.</p>
Energy Consumption	1	<p>The Anaheim Public Utility District (APUD) would provide electricity for the proposed project. APUD’s distribution system consists of approximately 3,400 circuit miles of transmission and distribution lines, over 1,600 miles of which are underground (FirstCarbon Solutions 2016). APUD has an annual historic system peak demand of 593 megawatts and provides more than 2.9 million megawatt-hours annually to its customers (FirstCarbon Solutions 2016), including the existing motel on the project site. In addition, Southern California Gas Company (SoCal Gas) would provide gas service for the proposed project. SoCal Gas provides gas service in the City of Anaheim, including the existing motel on the project site, and has facilities throughout the City. The availability of natural gas service is based upon current gas supply and regulatory policies. As a public utility, SoCal Gas is under the jurisdiction of the Public Utilities Commission and federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service will be provided in accordance with revised conditions.</p> <p>The proposed project consists of rehabilitation of an existing motel by adjusting room layouts into efficiency/studio units, where the number of units and square footage would remain the same. The proposed project includes refinishing interior of the motel to include new flooring and paint, new plumbing fixtures, redesigned bathrooms for accessibility and water efficiency. It would</p>



Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>also include filling in the pool and replacing it with a passive recreation space that includes BBQs, seating areas, and a community garden; this new recreation space would also consist of a water-wise landscape design. Under the proposed project, the land use type would change from motel (service/commercial) to residential. Given the energy efficiency upgrades and change in land use type (from commercial to residential, where residential energy consumption is less than commercial energy consumption), the proposed project would consume less energy than existing conditions. Additionally, it is anticipated that APUD and SoCal Gas would have the capabilities to meet future demands. Therefore, no adverse effects would result from the proposed project.</p>
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	1	<p>The proposed project is a permanent supportive housing for extremely low income and homeless veterans and individuals with a mental health diagnosis. It is designed to provide immediate and basic human needs for those who find themselves without such resources. The proposed project would not serve as a substantial source of employment, nor would it affect change to income patterns in the area. There is currently a large contingent of homeless persons in Orange County and the proposed project would serve some of these persons. Therefore, minor beneficial effects would result from the proposed project.</p>
Demographic Character Changes, Displacement	2	<p>The project site consists of an existing motel. The proposed project could alter the existing demographic and characteristics of the current neighborhood since extremely low income and homeless veterans and individuals with a mental health diagnosis would relocate towards it in order to utilize the services that would be provided. The proposed project would not displace any persons, and it is unlikely that the proposed use would result in any negative demographic character changes. No adverse effects would result from the proposed project.</p>
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	<p>The closest private school (AcaciaWood College Preparatory Academy) is approximately 0.40 miles and closest elementary school (Dysinger Elementary School)</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		is approximately 0.6 miles. The use of the 69 unit supportive
		housing is not expected to have an impact or displace of existing schools or cultural facilities. Therefore, no adverse effects would result from the proposed project.
Commercial Facilities	2	The proposed project is located in a mixed commercial and industrial area that contains retail services that provide essential items such as food, medicine, and other convenience shopping. In addition, the proposed project would provide basic necessities, such as food and shelter for occupants. It is not expected that the proposed project would have an impact on commercial facilities. Therefore, no adverse effects would result from the proposed project.
Health Care and Social Services	1	County-provided social services, health care and veteran services are provided within 1.75 to 6.75 miles of the site (Google Earth Pro 2018). The closest County-provided social services are Meals on Wheels (approximately 1.75 miles southwest of the project site) and Orange County Social Services Agency (located approximately 4 miles southwest of the project site). Also, the closest County-provided health care and veterans services are the Healthcare Center of Orange County (located approximately 2.20 miles southwest of the project site), Orange County Health Care Agency located approximately 3.40 miles northeast of the project site, and the North Orange County Vet Center (located approximately 6.75 miles southeast of the project site). The proposed project would not affect health care and social services. The proposed project would result in a beneficial effect since it would be providing additional social services including sheltering the homeless and providing services to help persons re-enter the workforce and to find permanent housing. Therefore, no adverse effects would result from the proposed project.
Solid Waste Disposal / Recycling	2	Solid waste generated in the City of Anaheim is hauled by the City's franchised hauler to material recovery facilities located in the City, with the remaining waste taken primarily to the Olinda Alpha Landfill near the City of Brea (Dudek 2017). Solid waste is also taken to the Frank R. Bowerman Landfill near the City of Irvine and the Prima Deshecha Landfill near the City of San Juan Capistrano (Dudek 2017). These three landfills are owned and operated by Orange County Waste & Recycling.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>Olinda Alpha Landfill has a permitted maximum throughput of 8,000 tons per day (CalRecycle 2018a), the Frank R.</p>
		<p>Bowerman Landfill has a permitted maximum throughput of 11,500 tons per day (CalRecycle 2018b), and the Prima Deshecha Landfill has a permitted maximum throughput of 4,000 tons per day (CalRecycle 2018c).</p> <p>The California Department of Resources Recycling and Recovery (CalRecycle) publishes solid waste generation rates based on land use types. Under the proposed project, while the number of units and square footage would remain the same, the land use type would change from motel (service) to residential, resulting in a change in solid waste generation. According to the CalRecycle, hotel/motel service uses can generate solid waste at a rate of approximately 4 pounds per unit per day, whereas single-family residential uses can generate solid waste at a rate of approximately 11.4 pounds per unit per day (CalRecycle 2016). Based on these generation rates, the proposed project's residential units could generate solid waste at a rate of approximately 798 pounds per day (or 0.399 tons per day), compared to 280 pounds per day (or 0.14 tons per day) from existing motel use (representing an increase of 518 pounds per day or 0.259 tons per day from existing use). This increase could be accommodated by all three landfills. Furthermore, the improvements required as part of the proposed project would be required to comply with the California Green Building Code (Cal Green) which requires efficiency measures related to construction-related solid waste. Also, the proposed project would be required to submit plans for the proposed project to the Public Works Department, Streets and Sanitation Division, for review and approval to ensure that the plans comply with Assembly Bill 939, as well as the Orange County and City of Anaheim Integrated Waste Management Plans as administered by the City of Anaheim. Therefore, no adverse impacts would result from the proposed project.</p>
Wastewater / Sanitary Sewers	2	<p>Wastewater generated on the project site is transported by trunk sewers to the Orange County Sanitation District (OCSD) Reclamation Plant No. 1, located in the City of Fountain Valley, and Reclamation Plant No. 2, located in the City of Huntington Beach. Although these treatment</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		capacities are expected to expand in the future, Reclamation Plant No. 1 currently has a design capacity of
		<p>144 million gallons per day (mgd), and Reclamation Plant No. 2 has a design capacity of 108 mgd (City of Anaheim 2004). Despite these existing design capacities, for the 2015–2016 fiscal year, average wastewater flows at Reclamation Plant No. 1 were 117 mgd, and flows at Reclamation Plant No. 2 were 67 mgd, totaling 184 mgd (OCSD 2018). Thus, under their current design capacities, Reclamation Plant Nos. 1 and 2 have a collectively surplus treatment capacity of approximately 68 mgd. In addition, Reclamation Plants Nos. 1 and 2 are required to adhere to the treatment requirements specified in the NPDES permits issued by the RWQCB, which requires wastewater produced by the proposed project to comply with RWQCB treatment requirements (City of Anaheim 2018a).</p> <p>Using an OCSD unit flow factor of 150 gpd/room, the existing motel generates approximately 10,500 gpd (or 0.0105 mgd) of wastewater (City of Anaheim 2005; PlaceWorks 2016). Under the proposed project, while the number of units and square footage would remain the same, the land use type would change to residential. Using an OCSD unit flow factor of 1,488 gpd/acre low residential (City of Anaheim 2005; PlaceWorks 2016), the proposed project would generate approximately 863 gpd (or 0.0009 mgd); thus, the wastewater generation would decrease compared to existing conditions. The proposed project would generate the same types of municipal wastewater that are currently generated throughout the City. The proposed project would not include industrial uses or activities that would require unique wastewater treatment processes. In addition, part of the rehabilitation would be to upgrade the on-site sewer system if necessary to accommodate the proposed project. Therefore, no adverse impacts are expected from the proposed project.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
Water Supply	2	<p>The City of Anaheim’s water supply is a blend of groundwater from their own wells and water imported from Northern California and the Colorado River by the Metropolitan Water District of Southern California (Metropolitan) (City of Anaheim 2018c). In its 2015 Urban Water Management Plan (UWMP), the City of Anaheim concluded that both Metropolitan and OCWD supplies are projected to meet future water demands (City of Anaheim 2016). The City of Anaheim’s 2015 UWMP projected that water demands would grow from 62,053-acre feet (AF) in</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>2015 to 67,143 AF in 2040. In 2016, actual demands decreased substantially to 53,146 AF due to local conservation and regional drought management regulations (City of Anaheim 2016).</p> <p>A public water system operated by the City of Anaheim serves the project site. The proposed project involves rehabilitation of an existing motel where the number of units and square footage would remain the same, but the land use type would change from motel (service) to residential. Using an OC Basin water demand rate of 97 gpd/unit, the existing motel generates approximately 6,790 gpd (or 0.00679 mgd or 0.025 AF/day) of water (City of Anaheim 2016). Under the proposed project, while the number of units and square footage would remain the same, the land use type would change to residential. Using an OC Basin water demand rate of 411 gpd/unit, the proposed project would use approximately 28,770 gpd (or 0.029 mgd or 0.107 AF/day) of water (City of Anaheim 2016), an increase of 21,890 gpd (or 0.022 mgd or 0.081 AF/year) compared to existing conditions. The proposed project would use a relatively nominal percentage of the projected water supply available to the City in future year scenarios. The City can meet its water demand under multiple dry years with diversified supply and conservation measures. In addition, the building envelope would be renovated to make it more energy efficient. Furthermore, the proposed project would be required to comply with all of the efficiency standards that are set forth in the California Code of Regulations Title 24 which (among other things) requires that water and energy efficiency are built into projects during construction, including (but not limited to) water-saving plumbing and water-saving plumbing and fixtures. As a result, no adverse effects are expected from the proposed project.</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The nearest fire station to the project site is Orange County Fire Authority Station #61 located at 8081 Western Avenue in the City of Buena Park, located approximately 1.4 miles to the southwest. The nearest City fire station is Station #02 located at 2141 W. Crescent Avenue, located approximately 1.6 miles to the southeast. The nearest police station (West Station) is approximately 3 miles southwest of the project site at 320 South Beach Boulevard. The nearest hospital with emergency room services is Anaheim Regional Medical</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Center at 1111 W. La Palma
		Avenue, approximately 2.5 miles to the east. Another nearby hospital with emergency room services is West Anaheim Medical Center at 3033 W. Orange Avenue, approximately 2.5 miles to the southwest. Due to the small number of occupants that would be permitted at the project site at any given time as well as the close proximity of police, fire, and medical services, no adverse impacts are expected from the proposed project. In addition, property management staff would also be present to assist residents as needed.
Parks, Open Space and Recreation	2	The nearest park is Peter Marshall Park, located approximately 2,100 feet south of the project site. Peter Marshall Park includes softball field, children's play area, football/soccer area and restrooms. Due to the limited number of residents using the 69 units, the proposed project is not expected to result in substantial impacts to nearby parks. In addition, the proposed project includes filling in the existing pool and repurposing it as a passive recreational area with seating areas, BBQs and a community garden to be used by occupants of the proposed project. Therefore, the proposed project would not adversely impact park and recreational facilities.
Transportation and Accessibility	2	The proposed project has multi-modal access through bus transit, rail transit, as well as the local and regional street network. Bus transportation is provided by Orange County Transportation Authority. The closest bus stop is located just west of the intersection of La Palma Avenue and Woodland Drive and is approximately 175 feet to the east, within walking distance from the project site. The closest train station is 2 miles north from the project site, located at the Buena Park Metrolink Station. Thus, the project site is walkable and located within short walking distance to a wide array of site/service amenities including, a grocery store, bus stop, park, and pharmacy. Therefore, no adverse effects would occur as a result of the proposed project.
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	The proposed project involves the rehabilitation and conversion of the existing motel building. The project site, as well as the adjacent properties, is fully developed with urban industrial/commercial uses (including buildings, paved yards and storage areas, etc.). As a result, there currently are no unique natural features or

Environmental Assessment Factor	Impact Code	Impact Evaluation
		water resources located on or near the proposed project site. Therefore,
		the proposed project would not impact any unique natural features or water resources. No adverse effects would occur as a result of the proposed project.
Vegetation, Wildlife	2	The proposed project involves the rehabilitation and conversion of the existing motel building. The project site, as well as the adjacent properties, is fully developed with urban industrial/commercial uses (including buildings, paved yards and storage areas, etc.). Aside from some small, isolated ornamental landscaped areas in the front of the building and next to the parking areas, there are no vegetated or natural areas that could house wildlife or critical habitat. The proposed project would not impact vegetation or wildlife. No adverse effects would occur as a result of the proposed project.
Other Factors	NA	No other factors apply to this evaluation.

**Additional Studies Performed:**

No additional studies were performed.

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

No field inspection was performed.

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

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- . 2016. *2015 Urban Water Management Plan*. <http://anaheim.net/DocumentCenter/View/11777/Anaheim-UWMP-2016>. Accessed April 30, 2018.
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FirstCarbon Solutions. 2016. *Draft Initial Study/Mitigated Negative Declaration – 1700 South Lewis Street Trumark Townhomes Project, Development Project No. 2014-00124, City of Anaheim, Orange County, California*. <http://www.anaheim.net/DocumentCenter/View/13885/Trumark-on-Lewis-NOI-IS-MND>. Accessed April 30, 2018.

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**List of Permits Obtained:**

None.

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

A Notice of Finding of No Significant Impact and Notice of Intent to Request Release of Funds will be published in the *OC Register*. A public hearing will be held at the Board of Supervisor Meeting on or around June 26, 2018 for approval of the project. The Orange County Health Care Agency posted a Notice of 30-day Public Review and Comment on March 13, 2018 through April 12, 2018 regarding the submittal of an application to the State-administered Mental Health Services Act Special Needs Housing Program (MHSA SNHP).

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

A project’s cumulative impact could occur if its incremental effects cause an adverse effect when combined with effects of other projects. None of the issue areas analyzed above would contribute an incremental adverse effect that could combine with other incremental effects. The intended use of the proposed project is located within an existing motel building in an area designated for commercial/industrial use. In general, the proposed use would be less impactful than the current use or potential other uses allowed under the light industrial zone. Therefore, no cumulative impacts would exist as a result of the proposed project.

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

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

If the proposed project were not implemented, the project site would continue to operate as a motel. Because there would be no construction/rehabilitation and no operational changes under the No Action Alternative, it would have no adverse environmental effects. Under this alternative, none of the benefits associated with the proposed project (e.g., providing permanent housing for low-income individuals) would occur.

**Summary of Findings and Conclusions:**

This proposed project is acquisition/rehabilitation and conversion of an existing motel building located in the City of Anaheim into an adequately-sized efficiency/studio units for veterans and homeless mentally ill individuals. The proposed project would not result in any permanent adverse impacts on the environment and would not be exposed to substantial impacts by the environment.

**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.

Law, Authority, or Factor	Mitigation Measure
Asbestos	<i>All asbestos containing construction materials in Damaged Condition shall be repaired immediately. If it is not feasible to repair these materials, they shall be removed immediately. Any work that disturbs these materials shall be performed by an asbestos contractor registered with the Division of Occupational Safety and Health. If renovation or demolition activities are to affect these materials, an asbestos abatement contractor registered with the Division of Occupational Safety and Health shall be contracted to perform all portions of the work affecting these materials.</i>
Lead-based Paint	<i>The tile surfaces are not a likely source of lead dust contamination as long as they remain intact. However, if future renovation or repair activities require removal or breakage of the tile or disturbance of the surfaces, it shall be done by a lead certified contractor.</i>

**Determination:**

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

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

Preparer Signature: Cindy Wolfe Date: 5/11/18

Name/Title/Organization: Cindy Wolfe / Administrative Manager/Environmental Coordinator /  
OC Homeless, Housing and Community Development

Certifying Officer Signature: CJ Date: 5-14-18

Name/Title: Craig Fee / Community Development 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).