

**ADDENDUM  
TO THE 2016 CERTIFIED ENVIRONMENTAL  
IMPACT REPORT  
(SCH. NO 2016031025)**

**FOR THE  
CIRCULATION ELEMENT UPDATE PROJECT  
YORBA LINDA, CALIFORNIA**



February 2022

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**FOR THE  
CIRCULATION ELEMENT UPDATE PROJECT  
YORBA LINDA, CALIFORNIA**

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Project No. CYL2101.01



February 2022

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## TABLE OF CONTENTS

<b>1.0 INTRODUCTION .....</b>	<b>1-1</b>
1.1 Purpose and Scope .....	1-1
1.2 Evaluation of Environmental Impacts .....	1-3
1.2.1 Approved Project and 2016 Certified FEIR .....	1-3
1.2.2 Proposed Project and Addendum .....	1-4
1.3 Findings of this Addendum .....	1-1
1.4 Format of Addendum .....	1-2
1.4.1 Chapter 1.0: Introduction .....	1-2
1.4.2 Chapter 2.0: Project Description .....	1-2
1.4.3 Chapter 3.0: Comparative Evaluation of Environmental Impacts .....	1-2
1.5 Existing Documents to Be Incorporated by Reference .....	1-2
1.6 Contact Persons .....	1-3
<b>2.0 PROJECT DESCRIPTION .....</b>	<b>2-1</b>
2.1 Background .....	2-1
2.2 Approved Project .....	2-1
2.2.1 Planning Area and Setting .....	2-1
2.2.2 Approved Project Characteristics .....	2-5
2.3 Proposed Project .....	2-5
2.4 Project Objectives .....	2-5
2.5 Discretionary Actions .....	2-6
<b>3.0 COMPARATIVE EVALUATION OF ENVIRONMENTAL IMPACTS .....</b>	<b>2.5-1</b>
3.1 Impacts Identified in the 2016 Certified FEIR .....	3.1-1
3.2 Air Quality .....	3.2-1
3.2.1 Existing Environmental Setting .....	3.2-1
3.2.2 Comparison of the Impacts for the Approved Project and Proposed Project .....	3.2-1
3.2.3 Findings Related to Air Quality .....	3.2-6
3.2.4 Mitigation Measures .....	3.2-7
3.3 Biological Resources .....	3.3-1
3.3.1 Existing Environmental Setting .....	3.3-1
3.3.2 Comparison of the Impacts for the Approved Project and Proposed Project .....	3.3-1
3.3.3 Findings Related to Biological Resources .....	3.3-4
3.3.4 Mitigation Measures .....	3.3-5
3.4 Greenhouse gas emissions .....	3.4-1
3.4.1 Existing Environmental Setting .....	3.4-1
3.4.2 Comparison of the Impacts for the Approved Project and Proposed Project .....	3.4-1
3.4.3 Findings Related to Greenhouse Gas Emissions .....	3.4-3
3.4.4 Mitigation Measures .....	3.4-3
3.5 Land Use and planning .....	3.5-1
3.5.1 Existing Environmental Setting .....	3.5-1
3.5.2 Comparison of the Impacts for the Approved Project and Proposed Project .....	3.5-1
3.5.3 Findings Related to Land Use and Planning .....	3.5-3
3.5.4 Mitigation Measures .....	3.5-4

3.6	Noise.....	3.6-1
3.6.1	Existing Environmental Setting.....	3.6-1
3.6.2	Comparison of the Impacts for the Approved Project and Proposed Project .....	3.6-1
3.6.3	Findings Related to Noise .....	3.6-5
3.6.4	Mitigation Measures.....	3.6-6
3.7	Public Services.....	3.7-1
3.7.1	Existing Environmental Setting.....	3.7-1
3.7.2	Comparison of the Impacts for the Approved Project and Proposed Project .....	3.7-2
3.7.3	Findings Related to Public Services .....	3.7-3
3.7.4	Mitigation Measures.....	3.7-4
3.8	Transportation and Traffic .....	3.8-1
3.8.1	Existing Environmental Setting.....	3.8-1
3.8.2	Comparison of the Impacts for the Approved Project and Proposed Project .....	3.8-1
3.8.3	Findings Related to Transportation and Traffic .....	3.8-5
3.8.4	Mitigation Measures.....	3.8-6
<b>4.0</b>	<b>REFERENCES .....</b>	<b>4-1</b>
4.1	Published References.....	4-1
4.2	Online References .....	4-1

## FIGURE

Figure 2.1: Planning Area .....	2-3
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## APPENDIX

### A: DRAFT CIRCULATION ELEMENT UPDATE

## LIST OF ACRONYMS AND ABBREVIATIONS

AAQS	ambient air quality standards
AB	Assembly Bill
ADT	average daily traffic
Approved Project	2016 Certified Environmental Impact Report for the City of Yorba Linda General Plan
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BMP	best management practices
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
City	City of Yorba Linda
CMP	Congestion Management Plan
CO	carbon monoxide
County	County of Orange
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
FEIR	Final Environmental Impact Report
GHG	greenhouse gas
in/sec	inches per second
IS	Initial Study
LOS	level of service
LUE	(General Plan) Land Use Element
mi	mile(s)
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MPAH	Master Plan of Arterial Highways

MTCO <sub>2</sub> e/yr/SP	metric tons of carbon dioxide equivalent per year per service population
NAAQS	National Ambient Air Quality Standards
NCCP/HCP	Natural Communities Conservation Plan/Habitat Conservation Plan
NO <sub>2</sub>	nitrogen dioxide
NOP	Notice of Preparation
O <sub>3</sub>	ozone
OCFA	Orange County Fire Authority
OCSD	Orange County Sheriff's Department
OCTA	Orange County Transportation Authority
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in size
PM <sub>10</sub>	particulate matter less than 10 microns in size
Proposed Project	Circulation Element Update Project
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SO <sub>2</sub>	sulfur dioxide
SP	service population
SR-57	State Route 57
SR-91	State Route 91
SR-241	State Route 241
State	State of California
TAC	toxic air contaminant
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
YLPL	Yorba Linda Public Library

## 1.0 INTRODUCTION

### 1.1 PURPOSE AND SCOPE

In May 2016, the City Council of the City of Yorba Linda (City) certified the City of Yorba Linda General Plan Update Final Environmental Impact Report (2016 Certified Final Environmental Impact Report [FEIR]) for the City of Yorba Linda General Plan Update Project [Approved Project]) (City of Yorba Linda 2016a). The Approved Project provided for a comprehensive update to the City's existing General Plan and is intended to guide growth and future development through the horizon year 2040. The Approved Project included the approval of the 2016 Circulation Element (City of Yorba Linda 2016b), which replaced the previous 1993 Circulation Element. The City is currently proposing amendments to the 2016 Circulation Element in order to update the roadway classification for Savi Ranch Parkway in order resolve inconsistencies existing conditions and provide consistency with the Orange County Transportation Authority (OCTA) Master Plan of Arterial Highways (MPAH), as conditionally approved. These amendments constitute the Circulation Element Update Project (Proposed Project). The Proposed Project that is the subject of this Addendum to the 2016 Certified FEIR involves revising the Circulation Element text and updating Exhibit CR-2 (Existing Roadway Functional Classification) to reclassify Savi Ranch Parkway from its current designation as a Collector Street to a Modified Primary Arterial (refer to Appendix A for the Draft Circulation Element updates). Old Canal Road has been added to the MPAH, as conditionally approved; however, this roadway is currently classified as a Divided Collector within the City's Circulation Element. The current configuration of Savi Ranch Parkway has not changed since the preparation of the Approved Project. The proposed reclassification would not allow for any increase in capacity of the roadway. As such, the Proposed Project would not require major revisions of the 2016 Certified FEIR or result in new significant environmental effects, and preparation of an Addendum is the appropriate CEQA documentation.

Since the scope of the Proposed Project involves reclassifying a roadway consistent with the existing conditions already analyzed under the Approved Project, any impacts would be the same as those previously covered by the 2016 Certified FEIR. The Approved Project would result in significant and unavoidable adverse impacts related to air quality and transportation, and a Statement of Overriding Considerations was adopted as part of the certification of the 2016 Certified FEIR. Since the Proposed Project would not result in new significant environmental effects, the preparation of an Addendum is sufficient under *State CEQA Guidelines* Sections 15162 and 15164.

Section 15162 of the *State CEQA Guidelines*, a subsequent Environmental Impact Report (EIR) is not required for the proposed changes unless the City determines on the basis of substantial evidence that one or more of the following conditions are met:

1. Substantial changes are proposed in the Proposed Project that will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the Proposed Project is undertaken that will require major revisions of the previous EIR or Negative Declaration due

to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR.
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR.
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
  - d. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15164 of the *State CEQA Guidelines* states that an Addendum to an EIR shall be prepared “if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Thus, if none of the above conditions are met, the City may not require preparation of a subsequent or supplemental EIR. Rather, the City can decide that no further environmental documentation is necessary or can require that an Addendum be prepared.

This Addendum reviews changes to the Approved Project and to existing conditions that have occurred since the 2016 Certified FEIR was approved and compares environmental effects of the Proposed Project with those analyzed and previously disclosed under the Approved Project. This Addendum also considers new information of substantial importance that was not known and could not have been known with exercise of reasonable diligence at the time the 2016 Certified FEIR was certified and evaluates whether there are new or more severe significant environmental effects associated with changes in circumstances under which project development is being undertaken. It further examines whether, as a result of any changes or any new information, a subsequent or supplemental EIR may be required. This examination includes an analysis of provisions of Section 21166 of the California Environmental Quality Act (CEQA) and Section 15162 of the *State CEQA Guidelines* and their applicability to the Proposed Project.

The City, as Lead Agency, prepared an FEIR for the Approved Project in 2016. The 2016 Certified FEIR found that implementation of the Approved Project would result in significant and unavoidable adverse impacts related to air quality and transportation. With the exception of the significant impacts related to these two environmental topics, all other potentially significant impacts were effectively mitigated to less than significant levels. The City Council certified the FEIR in November

2016, adopted the Mitigation Monitoring and Reporting Program (MMRP), and approved the Yorba Linda General Plan Update Project.

Pursuant to the provisions of CEQA and the *State CEQA Guidelines*, the City is the Lead Agency charged with the responsibility of deciding whether to approve the Proposed Project, in consideration of the potential environmental effects that could result from project implementation.

The City's review of the Proposed Project is limited to examining environmental effects associated with differences between the Proposed Project and the Approved Project reviewed in the 2016 Certified FEIR. Pursuant to CEQA and the *State CEQA Guidelines*, the City has prepared this Addendum to provide decision-makers with a factual basis for evaluating the specific environmental impacts associated with Proposed Project and to determine whether there are changes in circumstances or new information of substantial importance that would require preparation of a subsequent or supplemental EIR.

The 2016 Certified FEIR remains valid and is the certified CEQA document for future planning actions associated with implementation of the General Plan and Circulation Element. As such, the 2016 Certified FEIR along with this Addendum will be used to determine whether the Proposed Project falls within the scope analyzed in the 2016 Certified FEIR.

Based upon review of the facts as presented in the analysis contained in this document, the City finds that an Addendum to the previous 2016 Certified FEIR is the appropriate documentation to comply with CEQA. The rationale and the facts for this finding are provided in the body of this Addendum.

## **1.2 EVALUATION OF ENVIRONMENTAL IMPACTS**

### **1.2.1 Approved Project and 2016 Certified FEIR**

#### **1.2.1.1 EIR Process**

Consistent with Section 15063 of the *State CEQA Guidelines*, an Initial Study (IS) was not prepared for the Approved Project. The City staff determined that a Program EIR was the appropriate environmental document to be prepared for the Approved Project (refer to Section 1.2.1.2, Type of EIR, below for more information regarding the decision to prepare a Program EIR). The State Clearinghouse (SCH) issued a project number for the EIR (SCH No. 2016031025). In accordance with the *State CEQA Guidelines*, Section 15082, the Notice of Preparation (NOP) was circulated in March 2016 to responsible agencies and individuals for a period of 30 days, during which time written comments were solicited pertaining to environmental issues and topics that the EIR should evaluate.

The Draft EIR was circulated for public review for the required 45-day public review period, from June 1, 2016, to August 14, 2016. The City Council certified the Final EIR in November 2016 and approved the project.

#### **1.2.1.2 Type of EIR**

The 2016 Certified FEIR serves as a Program EIR pursuant to the *State CEQA Guidelines*, Section 15168.

The use of a Program EIR provides an occasion for a more exhaustive consideration of effects and alternatives than otherwise would be practical under a Project EIR. However, subsequent activities occurring as a result of program/project approval and certification of a Program EIR must be further evaluated in light of the Program EIR to determine whether or not an additional environmental document must be prepared. If an agency finds that no new effects could occur and that no new mitigation would be required, then the agency can determine that subsequent activities are covered under the Program EIR and no further environmental documentation would be required. Conversely, an agency may determine that future projects could require the preparation of a new IS, Mitigated Negative Declaration (MND), or EIR. If new environmental documentation is required, a Program EIR can be used to focus the scope of the subsequent environmental document (*State CEQA Guidelines*, Section 15168).

The Approved Project included the adoption of the Land Use Element (LUE), Circulation Element, Economic Development Element, Housing Element, Historic Resources Element, Open Space and Recreation Element, Conservation Element, Public Health and Safety Element, Public Services and Utilities Element, Noise Element, and Growth Management Element, which are intended to guide future development patterns and the aesthetic character of Yorba Linda through the implementation of goals, policies, and implementation strategies.

Subsequent activities associated with implementation of the Approved Project that would require approval of a discretionary action would require a project-specific analysis of environmental impacts associated with implementing maps, plans, and approvals. When reviewing future projects, the City would utilize the tiering provisions in CEQA to determine whether, in the light of project-specific circumstances, the 2016 Certified FEIR prepared for the Approved Project would still provide an adequate description of the broad effects of future projects as they are considered. Although environmental impacts of future individual projects occurring as a result of project approval would be analyzed under and compared against the analysis set forth in the 2016 Certified FEIR, a site-specific analysis is required under CEQA.

### 1.2.2 Proposed Project and Addendum

This Addendum compares anticipated environmental effects of the Proposed Project with those disclosed in the 2016 Certified FEIR to review whether any conditions set forth in Section 15162 of the *State CEQA Guidelines* requiring preparation of a subsequent or supplemental EIR are met. Potential environmental effects of the Proposed Project are addressed for each of the following areas, which were included in the 2016 Certified FEIR:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population, Housing, and Employment
- Public Services
- Recreation
- Transportation/Traffic
- Utilities and Service Systems

The City had determined in the 2016 Certified FEIR prepared for the Approved Project that the following issues would have less than significant or no impact: Aesthetic Resources; Agricultural Resources; Cultural Resources; Geology and Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; Mineral Resources; Population, Housing, and Employment; Recreation; and Utilities and Service Systems. The Proposed Project does not necessitate a change in these determinations, as the existing site conditions have not substantially changed from those identified for the 2016 Certified FEIR. Furthermore, the nature of the proposed text amendments to reclassify Savi Ranch Parkway consistent with existing conditions does not result in physical development or alter projected growth and development anticipated by the Approved Project. Therefore, the environmental analysis provided in the 2016 Certified FEIR remains relevant and applicable to the Proposed Project for the areas unaffected by changes for these topic areas. A brief description of these topics areas is provided in Section 3.1 of this Addendum below. Environmental topics areas that were identified as less than significant with mitigation incorporated in the 2016 Certified FEIR include Air Quality, Biological Resources, Greenhouse Gas Emissions, Land Use and Planning, Noise, Public Services, and Transportation and Traffic. These topics areas are analyzed in detail in Sections 3.2 to 3.8 below.

### 1.3 FINDINGS OF THIS ADDENDUM

The City is the Lead Agency for the Proposed Project. The City has determined that analyses of project environmental effects are best provided through use of an Addendum and that none of the following conditions set forth in Public Resources Code Section 21166 or Section 15162 of the *State CEQA Guidelines* requiring preparation of a subsequent or supplemental EIR have been met:

1. There are no substantial changes to the Approved Project that would require major revisions of the 2016 Certified FEIR due to new significant environmental effects or a substantial increase in severity of impacts identified in the 2016 Certified FEIR.
2. Substantial changes have not occurred in the circumstances under which the Proposed Project is being undertaken that will require major revisions to the 2016 Certified FEIR to disclose new significant environmental effects or that would result in a substantial increase in severity of impacts identified in the 2016 Certified FEIR.
3. There is no new information of substantial importance that was not known at the time the 2016 Certified FEIR was certified, indicating any of the following:
  - a. The Proposed Project will have one or more new significant effects not discussed in the 2016 Certified FEIR.
  - b. There are impacts determined to be significant in the 2016 Certified FEIR that would be substantially more severe.
  - c. There are additional mitigation measures or alternatives to the Proposed Project that would substantially reduce one or more significant effects identified in the 2016 Certified FEIR.

- d. There are additional mitigation measures or alternatives rejected by the City that are considerably different from those analyzed in the 2016 Certified FEIR that would substantially reduce a significant impact identified in that 2016 Certified FEIR.

The complete evaluation of potential environmental effects of the Proposed Project, including rationale and facts supporting the City's findings, is contained in Chapter 3.0 of this Addendum.

## 1.4 FORMAT OF ADDENDUM

This Addendum has been organized into three chapters, as described in the sections below.

### 1.4.1 Chapter 1.0: Introduction

Chapter 1.0 includes a description of the purpose and scope of the Addendum, previous environmental documentation, project approvals, findings of the Addendum, and existing documents to be incorporated by reference.

### 1.4.2 Chapter 2.0: Project Description

Chapter 2.0 describes the Planning Area, the necessary City discretionary actions to implement the Proposed Project, and an overview of the Proposed Project.

### 1.4.3 Chapter 3.0: Comparative Evaluation of Environmental Impacts

Chapter 3.0 contains the environmental analyses of the Proposed Project's impacts compared to the impacts of the Approved Project analyzed in the 2016 Certified FEIR. This comparative analysis has been undertaken pursuant to the provisions of CEQA to provide the City of Yorba Linda decision-makers with a factual basis for determining whether the Proposed Project, changes in circumstances, or new information since the 2016 Certified FEIR was certified require additional environmental review or preparation of a subsequent or supplemental EIR. Chapter 3.0 also contains findings for each environmental topic to determine whether conditions set forth in Public Resources Code Section 21166 or Section 15162 of the *State CEQA Guidelines* requiring preparation of a subsequent or supplemental EIR have been met.

## 1.5 EXISTING DOCUMENTS TO BE INCORPORATED BY REFERENCE

As permitted in Section 15150 of the *State CEQA Guidelines*, this Addendum references several technical studies, analyses, and reports. Information from the documents that have been incorporated by reference has been briefly summarized in the appropriate section(s) of this Addendum. Documents incorporated by reference are available for review at the City of Yorba Linda, Planning Division, 4845 Casa Loma Avenue, Yorba Linda, CA 92886. Contact Nate Farnsworth at (714) 961 7130 for additional information.

Documents incorporated by reference include, but are not limited to, the following:

- City of Yorba Linda; Final Environmental Impact Report, November 2016
- City of Yorba Linda; General Plan, as amended
- City of Yorba Linda Municipal Code

## 1.6 CONTACT PERSONS

The Lead Agency for the Addendum for the Proposed Project is the City. Questions regarding preparation of this Addendum, its assumptions, or its conclusions should be referred to the following:

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Planning Division  
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Email: [nfarnsworth@yorbalindaca.gov](mailto:nfarnsworth@yorbalindaca.gov)

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## 2.0 PROJECT DESCRIPTION

### 2.1 BACKGROUND

The City is proposing minor amendments to the General Plan Circulation Element in order to resolve inconsistencies with existing conditions and to address the current MPAH amendments for Savi Ranch Parkway and Old Canal Road. These streets form the eastern gateway into Yorba Linda and Anaheim and serve as the sole point of access to the Savi Ranch multiuse area. The OCTA Board of Directors conditionally approved the MPAH Amendments on July 12, 2021. The Approved Project was adopted in October 2016 and provided a comprehensive update to the City's 1993 General Plan. As a result of the conditional approval of the MPAH amendment and inconsistencies between existing conditions and the current Circulation Element, an Addendum to the previously certified FEIR for the City of Yorba Linda General Plan Update (2016 Certified FEIR) is being prepared for the Proposed Project.

Savi Ranch is a 235-acre mixed-use development and is the largest job center in Yorba Linda, with over 4,500 jobs. Land uses include large-box retail stores, commercial/industrial uses, research and development uses, medical uses, auto sales uses, dining uses, and two affordable housing developments. Savi Ranch generates over \$1 billion in sales tax annually. Research indicates that 78 percent of the employees commute more than 10 miles (mi) each way to work and only 3.1 percent of the employees live within Yorba Linda. Savi Ranch Parkway is the sole point of ingress/egress to Savi Ranch and is currently configured as a four-lane divided facility. The overall purpose of the proposed amendments to the Circulation Element analyzed in this Addendum is to reclassify the roadways to reflect their existing configurations.

### 2.2 APPROVED PROJECT

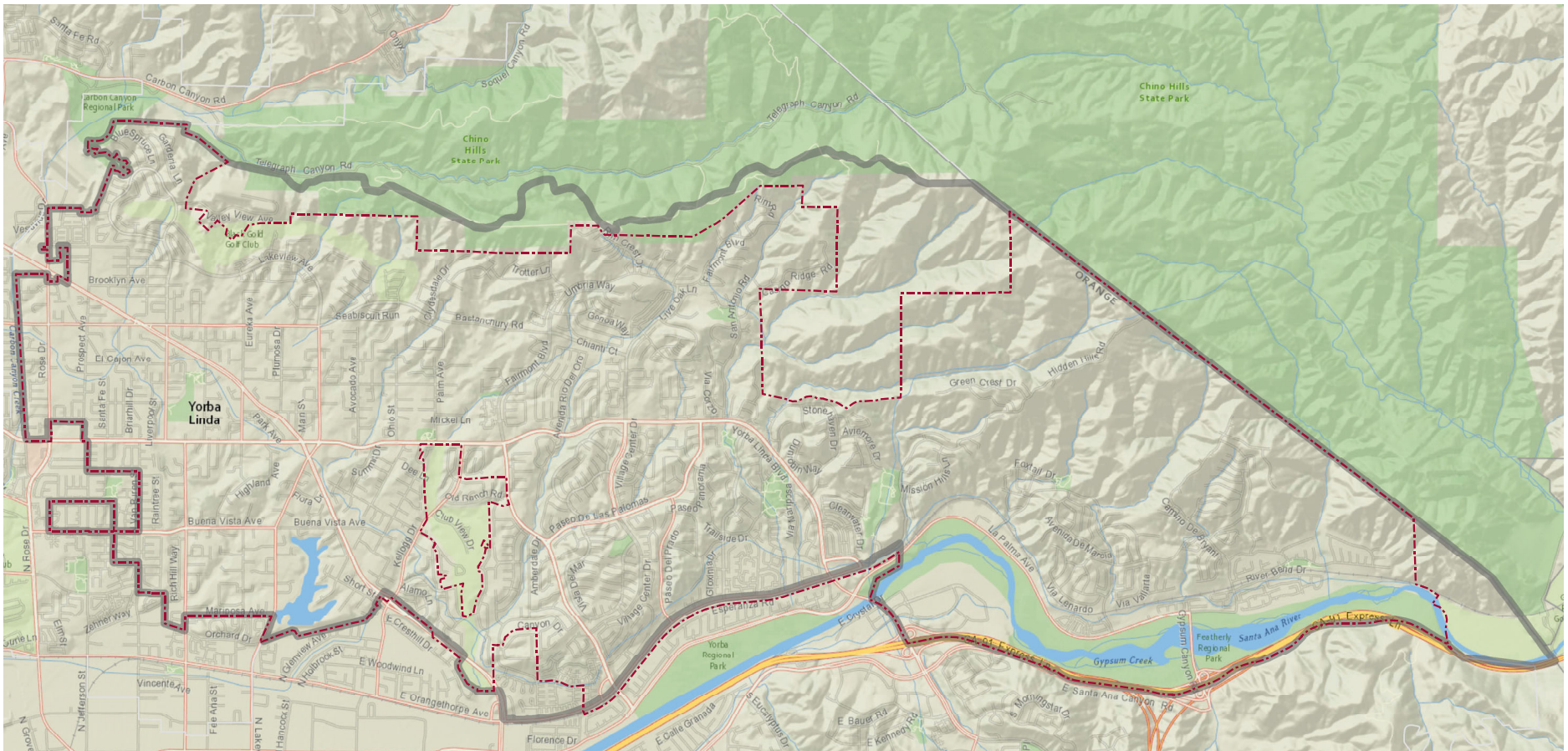
#### 2.2.1 Planning Area and Setting

Yorba Linda (referred to as the Planning Area in the 2016 Certified FEIR) is located in the northeastern portion of Orange County. Yorba Linda includes the entire 20 square miles within the limits of Yorba Linda in Orange County, California. Refer to Figure 2.1, Planning Area, which shows the Planning Area and the regional project location. Yorba Linda is bordered on the west by Brea and Placentia, on the east by Chino Hills in San Bernardino County, on the south by Anaheim, and on the north by unincorporated Orange County. The Planning Area consists of all land within the jurisdictional limits of Yorba Linda, as well as the area within Yorba Linda's Sphere of Influence in unincorporated Orange County.

Regional access to the City is provided by State Route 91 (SR-91), which traverses the southern portion of Yorba Linda from east to west, and State Route 57 (SR-57), which is located 3 mi from the eastern portion and travels north to south. In addition, the State Route 241 (SR-241) northernmost terminus, which connects to SR-91, is located within Yorba Linda.

In addition, OCTA maintains stops for several bus transit routes that provide both regional and local access to and within Yorba Linda. The City also maintains over 100 miles of trails coordinated for use by hikers, bikers, and equestrians.

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- - - - - City Boundary  
 Sphere of Influence

LSA



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MILES

SOURCE: City of Yorba Linda General Plan Update

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FIGURE 2-1

City of Yorba Linda  
 Circulation Element Update Addendum  
 Planning Area

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### 2.2.2 Approved Project Characteristics

The Approved Project, as analyzed in the 2016 Certified FEIR, provided for a comprehensive update to the City's existing General Plan and is intended to guide growth and future development through the horizon year 2040. The Approved Project included the approval of the 2016 Circulation Element, which replaced the previous 1993 Circulation Element.

## 2.3 PROPOSED PROJECT

The City is proposing an amendment to the General Plan Circulation Element in order to resolve inconsistencies with existing conditions within Yorba Linda and provide consistency with the MPAH, as conditionally amended. This Addendum to the 2016 Certified FEIR analyzes the potential impacts of the proposed updates to the Circulation Element compared to the impacts identified in 2016 Certified FEIR for the Approved Project. The proposed amendment to the Circulation Element includes the following:

- **Savi Ranch Parkway** is currently a four-lane divided facility with an average daily traffic (ADT) ranging from 8,500 to 29,100 trips (Hartzog and Crabill Inc. 2018). The Primary Arterial classification for the MPAH supports an ADT up to 30,000 at level of service (LOS) C.
  - **Update Exhibit CR-2** to reclassify Savi Ranch Parkway from Yorba Linda's boundary line at Yorba Linda Boulevard to Old Canal Road as a Modified Primary (four-lane, divided, less than 100ft right-of-way) Arterial from the current classification of a Collector (two-lane, divided) in order to match the existing condition of the roadway.
  - **Update the list of Primary Arterials** in Yorba Linda to include Savi Ranch Parkway.

The MPAH has also been amended and conditionally approved to include Old Canal Road. Old Canal Road is currently a two-lane divided facility that provides the loop connection from each end of Savi Ranch Parkway with an ADT up to 5,800 (2018). Old Canal Road is currently classified as a Divided Collector in the City's Circulation Element; this classification supports an ADT up to 15,000 at LOS C. As there are no through movements at the Savi Ranch Parkway/Yorba Linda Boulevard intersection, Old Canal Road functions as a couplet to route travelers to either side of Yorba Linda Boulevard.<sup>1</sup> Old Canal Road is already currently classified as a Collector (two-lane, divided). Therefore, although this roadway is part of the conditionally approved MPAH amendment described above, no revisions to Circulation Element text or exhibit are required.

## 2.4 PROJECT OBJECTIVES

The Proposed Project would result in minor amendments to the City's General Plan Circulation Element, which would be generally consistent with the goals and objectives established for the Approved Project. Under the Approved Project, the City established the following intended project objectives for the General Plan Update in the 2016 Certified FEIR:

---

<sup>1</sup> Old Canal Road is called Pullman Street where it crosses underneath Yorba Linda Boulevard and connects with Savi Ranch Parkway within the City of Anaheim's jurisdiction.

- Provide for continued conformance with State Law.
- Ensure internal consistency amongst General Plan Elements.
- Address gaps in the 1993 General Plan identified by the community.
- Align the General Plan's policies to address major priorities and ensure that the City is in a position to respond to challenges and strategic opportunities.
- Comply with Section 21000 et seq. of CEQA, which requires that environmental impacts be addressed and mitigated.

In addition to the project objectives of the Approved Project, the Circulation Element also contains numerous goals, implementation strategies, and policies to enhance the development and maintenance of the transportation systems and to maximize freedom of vehicular and pedestrian movements within Yorba Linda. These project objectives and the goals, implementation strategies, and policies identified in the Circulation Element would also be applicable to the Proposed Project, including Policy CR-2.2: Maintain an Arterial Highway System that is in conformance with the Orange County Master Plan of Arterial Highways, to the greatest extent possible.

Furthermore, the City has established the following objectives for the Proposed Project:

- Classify arterials consistent with the current configuration of the roadways.
- Ensure consistency of the General Plan Circulation Element with the OCTA MPAH, as amended, in order to ensure consistency among adopted planning documents and compete for Regional Capacity Program funding for future improvements.

## 2.5 DISCRETIONARY ACTIONS

Discretionary approvals required for the Proposed Project include the following:

1. Approval of this Addendum to the 2016 Certified FEIR to address potential environmental effects as a result of implementation of the proposed project since the original City Council approval and FEIR certification in 2016
2. Revision of the Circulation Element text and Exhibit CR-2 (Existing Roadway Functional Classification) to reclassify Savi Ranch Parkway

### 3.0 COMPARATIVE EVALUATION OF ENVIRONMENTAL IMPACTS

The following discussion contains an analysis of the potential impacts of the changes to the Approved Project in relation to the Proposed Project. The potential impacts of the Proposed Project are compared to impacts identified for the Approved Project analyzed in the 2016 Certified FEIR, which the City approved in October 2016. As explained in Chapter 1.0, this comparative analysis has been undertaken pursuant to CEQA and to provide City decision-makers with a factual basis for determining whether the proposed changes to the Approved Project, changes in circumstances, or new information since the certification of the 2016 Certified FEIR require additional environmental review. Potential impacts associated with the Proposed Project are evaluated using the same thresholds applied in the 2016 Certified FEIR. The basis for each finding is explained in the analysis that follows.

#### 3.1 IMPACTS IDENTIFIED IN THE 2016 CERTIFIED FEIR

As discussed in Chapter 2.0, Project Description, the Proposed Project would result in minor text amendments to the City's General Plan Circulation Element and a revised figure, specifically reclassifying Savi Ranch Parkway. Since the scope of the Proposed Project involves updating the Circulation Element of the General Plan, which was already analyzed under the Approved Project, any impacts are anticipated to be similar to or less than those impacts previously covered by the 2016 Certified FEIR. Although impacts would be similar to or less than those previously covered by the 2016 Certified FEIR, a new analysis for impacts is provided in this Addendum as required by CEQA. The environmental analysis provided in the 2016 Certified FEIR remains relevant and applicable to the Proposed Project in areas unaffected by changes in existing conditions and changes in the Proposed Project for the environmental topics as listed below.

The City had determined in the 2016 Certified FEIR prepared for the Approved Project that the following issues would have less than significant or no impact and would therefore not be addressed: Aesthetic Resources; Agricultural Resources; Cultural Resources; Geology and Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; Mineral Resources; Population, Housing, and Employment; Recreation; and Utilities and Service Systems.

- **Aesthetic Resources:** The 2016 Certified FEIR determined that there would be no impacts to aesthetic resources. Sources of light and glare within the Planning Area are associated with buildings (interior and exterior), security lighting, sign illumination, parking area lighting, and sports fields. These sources are mostly associated with the residential, commercial, industrial, and recreational uses located throughout Yorba Linda. Other sources of nighttime light include streetlights and vehicular traffic along roadways. Additionally, ambient lighting comes from surrounding communities and roadways. The Proposed Project is reclassifying an existing roadway that includes no physical improvements that would alter the aesthetic or scenic resources within the Planning Area. Furthermore, as Savi Ranch Parkway would be reclassified consistent with its existing configuration, there would be no expansion of capacity that would result in additional vehicular traffic or related light and glare impacts from parked cars or headlights. Therefore, similar to the Approved Project, the Proposed Project would not result in any impacts to aesthetic resources.

- **Agricultural Resources:** The 2016 Certified FEIR determined that there would be no impacts to agricultural resources. The Planning Area is largely urbanized, with the majority of that development occurring in the form of residential and commercial land uses. The Proposed Project would not change the land use designation for any parcels and would not result in any land use changes or physical development that may impact the agricultural operations of these parcels. Furthermore, the conditions of the Planning Area have not changed since certification of the 2016 Certified FEIR. Therefore, like the Approved Project, the Proposed Project would not result in any impacts to agricultural resources.
- **Cultural Resources:** The 2016 Certified FEIR determined that the Approved Project would not cause a substantial change in the significance of a historical, an archaeological, or a tribal cultural resource. The Proposed Project involves the reclassifying of Savi Ranch Parkway consistent with existing conditions, which includes no physical improvements or ground disturbance that would alter cultural or tribal resources within the Planning Area. In addition, the conditions of the Planning Area have not changed since certification of the 2016 Certified FEIR. Furthermore, as the Proposed Project includes an update to the City's General Plan, the requirements of Senate Bill 18 for Native American Consultation apply. The City submitted a request for a Sacred Lands File search, and letters were sent to 14 tribes on November 10, 2021, to notify them of the Proposed Project. Tribes were provided 90 days from receipt of these notification letters to respond and request consultation. No requests for consultation have been received to date and the consultation window closed on February 8, 2022. Therefore, similar to the Approved Project, the Proposed Project would not result in any impacts to cultural and tribal cultural resources.
- **Geology and Soils:** The 2016 Certified FEIR determined that the Approved Project would not result in significant impacts to geology and soils. The Proposed Project is reclassifying an existing roadway that includes no physical improvements or results in ground disturbance within the Planning Area. The Proposed Project would not result in development that would expose people or structures to increased adverse effects from geological or soil activity. The conditions of the Planning Area have not changed since certification of the 2016 Certified FEIR. The reclassification of Savi Ranch Parkway consistent with existing conditions would not alter the conclusions of the impact analysis for geological resources. Therefore, similar to the Approved Project, the Proposed Project would not result in any impacts to geology and soils.
- **Hazards and Hazardous Materials:** The 2016 Certified FEIR determined that the Approved Project would not result in significant impacts to hazards and hazardous materials. The Approved Project could result in further development in the Planning Area that would involve the transport, use, and disposal of hazardous materials. However, it is not anticipated that the implementation of the Approved Project would result in an increased likelihood of accidents resulting in the release of hazardous materials. The Approved Project would not affect the City's in-place Emergency Operations Plan or its associated evacuation plans. There are no public airports or private airstrips within 2 mi of the Planning Area. There would not be known hazardous materials or emission present within 0.25 mi of a school. The conditions of the Planning Area, including the locations of hazardous waste, airports, schools, and evacuation routes, have not changed since certification of the 2016 FEIR. The Proposed Project does not

include any physical improvements that could generate hazardous materials or create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, the proposed reclassification of Savi Ranch Parkway would not alter any land use designations resulting in the location of hazardous materials near schools or changes to airport land use plans or evacuation routes. Therefore, like the Approved Project, the Proposed Project would not result in any impacts to hazards and hazardous materials.

- **Hydrology and Water Quality:** The 2016 Certified FEIR determined that the Approved Project would not result in significant impacts to hydrology and water quality. Improvements to drainage would be implemented as part of new development facilitated by the Approved Project, ensuring that drainage systems in the Planning Area would remain at an adequate level of service. The majority of new development under the Approved Project would occur in previously developed areas and would not result in the alteration of the existing course of a stream or river. Additionally, surface runoff would be unaffected in these areas. The existing storm water drainage system in the Planning Area is adequate for majority of the potential development allowed under the Approved Project. Impacts on erosion and siltation were determined to be less than significant, as any new development would also be required to comply with standard best management practices (BMPs) to prevent such occurrences.

The conditions of the Planning Area have not changed since certification of the 2016 Certified FEIR. The Proposed Project would update the Circulation Element of the General Plan by reclassifying Savi Ranch Parkway consistent with existing conditions and would not include any physical improvements. Therefore, the Proposed Project would not alter impervious surfaces or drainage or result in impacts related to the violation of water quality standards or waste discharge requirements. Therefore, like the Approved Project, the Proposed Project would not result in any impacts to hydrology and water quality.

- **Mineral Resources.** The 2016 Certified FEIR determined that the Approved Project would not have any significant impacts on mineral resources. Mineral resources present in the Planning Area include petroleum and aggregate materials, and there are active oils wells present. The Approved Project did not change the land use designation of Oil Production Combining Zone and would not preclude existing or future oil extraction. Areas with aggregate resources are already development with land uses that would preclude extraction and impacts were considered less than significant.

The conditions of the Planning Area have not changed since certification of the 2016 Certified FEIR. The Proposed Project would update the Circulation Element of the General Plan by reclassifying Savi Ranch Parkway consistent with existing conditions and would not include any physical improvements that would preclude resource extraction. In addition, this roadway classification would not revise adopted land use designations to preclude existing or future oil extraction. Therefore, the Proposed Project would not alter impervious surfaces or drainage or result in impacts related to the loss of availability of known or locally important mineral resources. Therefore, like the Approved Project, the Proposed Project would result in a less than significant impact to mineral resources.

- **Population, Housing, and Employment:** The 2016 Certified FEIR determined that the Approved Project would not have any significant impacts on population and housing resources. The City's population would grow as a result of the Approved Project; however, this growth would not occur at a large enough scale to meet a threshold of significance. Infrastructure and public service for this growth were addressed in the Approved Project. The implementation of the Proposed Project would update the Circulation Element consistent with existing conditions and would not include any physical development that would displace any existing housing or people. The reclassification of Savi Ranch Parkway to be consistent with current conditions would not result in additional capacity for this roadway and would not induce growth or alter any population projections and housing resources beyond what was anticipated in the 2016 Certified FEIR. Therefore, like the Approved Project, the Proposed Project would not result in any impacts to recreation.
- **Recreation:** The 2016 Certified FEIR determined that the Approved Project would not have any significant impacts on recreational resources. Yorba Linda has extensive parks and recreation facilities. It contains multipurpose trails that run over 100 mi and approximately 260 acres (ac) of parklands in the city. Over 40 percent of Yorba Linda's total land area is in recreational and open space uses. The conditions of the Planning Area have not changed since certification of the 2016 Certified FEIR. The reclassification of Savi Ranch Parkway consistent with existing conditions would not involve any physical improvements and would not alter any recreation resources. The reclassification of Savi Ranch Parkway to be consistent with current conditions would not result in additional capacity for this roadway or induce growth or alter any population projections that would result in the need for additional recreation resources beyond what was anticipated in the 2016 Certified FEIR. Therefore, like the Approved Project, the Proposed Project would not result in any impacts to recreation.
- **Utilities and Service Systems:** The 2016 DEIR determined that the Approved Project would not have any significant impacts on utilities and service systems and Yorba Linda has sufficient water, wastewater, landfill, and energy facility capacity to support the Approved Project. As the Proposed Project would not result in any physical development, it would not generate wastewater that would exceed the wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board. In addition, the Proposed Project would not result in the construction or expansion of water or wastewater treatments facilities that would cause significant impacts. As described above, the Proposed Project would not expand the capacity of the roadways, induce population growth, or result in the creation of employment opportunities. The Proposed Project would have no impact related to sufficient water supplies available to serve the Approved Project from existing entitlements and resources. The reclassification of Savi Ranch Parkway to be consistent with current conditions would not result in physical development resulting in waste that would impact landfill capacity. In addition, this reclassification would not result in additional capacity for this roadway or induce growth or alter any population projections requiring additional energy usage, utilities, or service systems beyond what was anticipated in the 2016 Certified FEIR. Therefore, similar to the Approved Project, the Proposed Project would not result in any impacts to utilities and service systems.

A discussion of all environmental topics not mentioned above will be further discussed in Sections 3.2 through 3.9 of this Addendum to the 2016 Certified FEIR.

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## 3.2 AIR QUALITY

### 3.2.1 Existing Environmental Setting

No substantial changes to the Planning Area have occurred since the preparation of the 2016 Certified FEIR. There have been no major changes to the existing setting of the Planning Area with respect to air quality.

The Planning Area includes all of Yorba Linda and is located under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and is part of the South Coast Air Basin (Basin). The SCAQMD reports to the California Air Resources Board (CARB), and all emissions are also governed by the California Ambient Air Quality Standards (CAAQS) as well as the National Ambient Air Quality Standards (NAAQS). The Basin is in nonattainment for the federal and State standards for ozone (O<sub>3</sub>) and particulate matter less than 2.5 microns in size (PM<sub>2.5</sub>). In addition, the Basin is in nonattainment for the State standard for particulate matter less than 10 microns in size (PM<sub>10</sub>) and is in attainment/maintenance for the federal PM<sub>10</sub>, carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), and sulfur dioxide (SO<sub>2</sub>) standards (EPA 2021). Ambient monitoring data for the years 2019 to 2021 was obtained from CARB for the Anaheim-Pampas Lane station.<sup>1</sup> The data indicated that the State and federal O<sub>3</sub> and PM<sub>2.5</sub> standards were exceeded on numerous occasions. As indicated in the monitoring results, only one violation of the federal PM<sub>10</sub> standard occurred during the 3-year period; however, the State PM<sub>10</sub> standard was exceeded on numerous occasions. In addition, NO<sub>2</sub> standards were also not exceeded in this area during the 3-year period.

### 3.2.2 Comparison of the Impacts for the Approved Project and Proposed Project

*3.2.2.1 Impact 5.3-1: Construction activities associated with future development could result in a considerable increase of criteria air pollutants and precursor pollutants for which the region is designated nonattainment. [Threshold AQ-2 and AQ-3]*

#### 3.2.2.1.1 Approved Project

**Significant and Unavoidable Impact.** As described in the 2016 Certified FEIR, construction of future land uses would result in construction-generated emissions. Construction-generated emissions are only temporary but have the potential to be significant. No specific development was proposed as a part of the Approved Project. The 2016 Certified FEIR determined that emissions associated with individual construction projects had the potential to exceed the SCAQMD's significant thresholds (SCAQMD 2019).

Due to the fact that the scale of future construction activities is not known, the 2016 Certified FEIR determined that maximum daily emissions associated with an individual development project would be potentially significant, and mitigation would be required. Implementation of the SCAQMD's rules, regulations, and mitigation measures would reduce this impact, but not necessarily to a less than significant level. Mitigation Measure AQ-1 requires all future development projects that are subject

<sup>1</sup> The California Air Resources Board website states that data after 2019 may be preliminary (CARB 2021). Source: California Air Resources Board. n.d. Quality Assurance Air Monitoring Site Information. Website: <https://ww2.arb.ca.gov/applications/quality-assurance-air-monitoring-site-information> (accessed November 2, 2021).

to CEQA review and found to have a potentially significant construction air quality impacts to provide air quality mitigation measures as recommended by the SCAQMD. Therefore, this impact was considered significant and unavoidable. Implementation of policies in the Approved Project and MM AQ-1 would reduce potential air quality impacts, but due to the remaining potential for emissions to exceed the SCAQMD's thresholds, the impact was considered significant and unavoidable.

#### 3.2.2.1.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project involves an update to the City's Circulation Element for the reclassification of Savi Ranch Parkway in order to resolve inconsistencies with existing conditions within Yorba Linda and provide consistency with the MPAH, as amended. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses or future construction anticipated under the adopted General Plan. As the Proposed Project would update the Circulation Element to reflect the existing conditions, the proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway, there would be no changes to emissions of criteria air pollutants as a result of the Proposed Project. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

*3.2.2.2 Impact 5.3-2: Future development associated with implementation of the proposed General Plan Update could result in a considerable increase of criteria air pollutants and precursor pollutants for which the region is designated non-attainment. [Threshold AQ-2 and AQ-3]*

#### 3.2.2.2.1 Approved Project

**Significant and Unavoidable Impact.** As described in the 2016 Certified FEIR, the Planning Area is predominately developed. There remain some vacant or underdeveloped sites that the Approved Project designated as Focus Areas. Long term operational emissions of future development were calculated for the 2035 build out conditions. Actual emissions of criteria air pollutants and precursor pollutants associated with future development would change depending on project-specific conditions. Despite actual emissions of future development being unknown, it is possible for increased emissions to exceed the SCAQMD's significance thresholds. In addition, emissions associated with future development potentially can conflict with regional air quality planning efforts for the attainment and maintenance of ambient air quality standards (AAQS).

The Approved Project includes various measures intended to decrease the emissions of criteria air pollutants and precursor pollutants, but no policies specifically require future development to evaluate and mitigate potential air quality impacts for regional air quality. Mitigation Measure (MM) AQ-2 includes the consideration and mitigation of impacts on regional air quality when reviewing proposals for new development. MM AQ-2, in conjunction with policies outlined in the Approved Project, would help reduce long-term air quality impacts, but emissions associated with future development projects could nonetheless exceed SCAQMD-recommended significance thresholds. Therefore, this impact was considered significant and unavoidable.

#### 3.2.2.2.2 Proposed Project

The Proposed Project does not propose or facilitate any future physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or future development anticipated under the adopted General Plan. The proposed reclassification of Savi Ranch Parkway would not produce emissions of criteria air pollutants and precursor pollutants or alter the anticipated emissions from future development included in the City's adopted General Plan. Furthermore, the proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway. There would be no changes to emissions of criteria air pollutants as a result of the Proposed Project. As the Proposed Project would not alter the emissions anticipated from future development associated with the Approved Project for which the region is in nonattainment, the conclusions of the 2016 Certified FEIR remain valid.

*3.2.2.3 Impact 5.3-3: Implementation of the proposed General Plan Update is not anticipated to result in new major sources of TACs. However, future development associated with implementation of the proposed General Plan Update could result in new sensitive land uses located in close proximity to existing stationary or transportation sources of TACs. [Threshold AQ-3]*

#### 3.2.2.3.1 Approved Project

**Less Than Significant Impact with Mitigation.** Subsequent land use activities associated with implementation of the Approved Project could potentially include short-term construction sources of toxic air contaminants (TACs) and long-term operational sources of TACs. TAC emissions depend on the conditions of the specific project; some may be large enough to exceed project-level significance thresholds. SCAQMD-recommended measures would be required, but even with mitigation measures, potential emissions from TACs may still exceed SCAQMD thresholds. As a result, this impact was considered potentially significant. Given that future development of sensitive land uses could potentially occur proximate to stationary- and mobile-source TACs, this impact was considered potentially significant; however, with the implementation of the Approved Project's policies and MM AQ-3, this impact was considered less than significant with mitigation.

#### 3.2.2.3.2 Proposed Project

The Proposed Project would not result in future development of new sensitive land uses in the vicinity of existing stationary or mobile sources of TACs. The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. As no development or changes to existing land uses are proposed, there would be no changes to sources of TACs in relation to sensitive land uses. Therefore, the Proposed Project would not alter the location of existing or future development in relation to stationary or mobile sources of TACs as anticipated in the adopted General Plan, and the conclusions of the 2016 Certified FEIR remain valid.

*3.2.2.4 Impact 5.3-4: Implementation of the proposed General Plan Update would not be anticipated to result in mobile-source CO concentrations that would exceed applicable ambient air quality standards. [Threshold AQ-4]*

**3.2.2.4.1 Approved Project**

**Less Than Significant Impact.** SCAQMD's 2003 Air Quality Management Plan included a detailed CO analysis as a part of the Federal Attainment Plan for Carbon Monoxide (SCAQMD 2003). The findings of the SCAQMD analysis concluded that the that potential for localized CO concentrations at the intersections in the Planning Area would not exceed applicable standards. Additionally, the Approved Project included policies to reduce vehicle use and congestion within the Planning Area. Additional policies were included in the Approved Project to promote the use of alternative means of transportation, ridesharing, and use of alternatively fueled vehicles that would help to further reduce mobile-source emissions. Therefore, this impact was considered less than significant.

**3.2.2.4.2 Proposed Project**

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. The proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway resulting in mobile-source CO concentrations. As there would be no changes to mobile-source CO concentrations, the Proposed Project would not alter the conclusions of the 2016 Certified FEIR related to mobile-source CO concentrations, and the conclusions of the 2016 Certified FEIR remain valid.

*3.2.2.5 Impact 5.3-5: Implementation of the proposed General Plan Update would not result in a significant overall increase in odors that would affect a substantial number of individuals. [Threshold AQ-5]*

**3.2.2.5.1 Approved Project**

**Less Than Significant Impact.** Implementation of the Approved Project could result in new development within the Planning Area. Residential development is not considered to be a source of odorous emissions, and no major existing sources of odors were identified in the Planning Area. Commercial development may include odor-emitting sources. The SCAQMD adopted nuisance rule (Rule 402) prohibits the discharge of air contaminants that cause "injury, detriment, nuisance or annoyance" to any "considerable number of persons."<sup>1</sup> Construction-generated odors such as the use of diesel-powered equipment is temporary and disperses rapidly with increased distance from the source. If new development is proposed near residences or sensitive receptors, the development projects would be required to evaluate and mitigating potential impacts. Continued enforcement of Rule 402, including the proposed Policy LU-3.1 ("Consider and mitigate the impacts

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<sup>1</sup> South Coast Air Quality Management District. n.d. Visible Emissions, Public Nuisance & Fugitive Dust. Website: <https://www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust> (accessed November 2, 2021).

on surrounding land uses and infrastructure when reviewing proposals for new development”), would decrease potential impacts, and impacts were considered less than significant.

#### 3.2.2.5.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. The proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway, and there would be no changes to the construction or future development anticipated in the General Plan that would result in an increase in odors as a result of the Proposed Project. Therefore, the Proposed Project would not alter the odors anticipated to occur as a result of the Approved Project, and the conclusions of the 2016 Certified FEIR remain valid.

*3.2.2.6 Impact 5.3-6: Future development associated with implementation of the proposed General Plan Update could result in a considerable increase of criteria air pollutants and precursor pollutants for which the region is designated non-attainment. Increased emissions may conflict with applicable air quality planning efforts. [Threshold AQ-1]*

#### 3.2.2.6.1 Approved Project

**Significant and Unavoidable Impact.** The Approved Project required a review of the project’s consistency with the Air Quality Management Plan (AQMP) for new and amended General Plan elements. Future development associated with the Approved Project would result in increased emissions of regional criteria air pollutants and precursors that are forecasted to exceed the SCAQMD project-level significance thresholds. Although these thresholds apply to individual development projects, future projects associated with the Approved Project could potentially increase air quality violations that could delay the attainment of the AAQS. As a result, the Approved Project would not be consistent with the AQMP. In addition, although build out of the Approved Project would be consistent with the growth projections, its implementation would result in increased emissions of criteria air pollutants and precursors for which the region is currently designated nonattainment. Implementation of the policies included in the General Plan and MM AQ-2 would help to reduce long-term air quality impacts. However, emissions associated with future development projects could potentially exceed SCAQMD-recommended significance thresholds. Therefore, this impact was considered significant and unavoidable.

#### 3.2.2.6.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. As no new emissions or criteria air pollutants or precursor pollutants would be generated, the Proposed Project would not conflict with applicable air quality planning efforts. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. Furthermore, the proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway, and there would be no increase in emissions that may conflict with applicable air quality planning efforts as a result of the

Proposed Project. Therefore, the Proposed Project would not alter the emissions anticipated by the Approved Project, and the conclusions of the 2016 Certified FEIR remain valid.

### *3.2.2.7 Cumulative Air Quality Impacts*

#### *3.2.2.7.1 Approved Project*

**Significant and Unavoidable Impact.** The 2016 Certified FEIR analyzed a cumulative study area for potential air quality impacts of the Basin. Each project in the Basin is required to comply with SCAQMD rules and regulations and is subject to independent review. Since the combination, number, and size of projects that could be under construction at any one time are unknown, even with implementation of MM AQ-1, the Approved Project was determined to result in significant cumulative construction emissions from criteria pollutants. Additionally, even with implementation of MM AQ-2, due to the magnitude of development and associated mobile- and stationary-source air quality impacts, impacts would be significant and unavoidable. Cumulative impacts with respect to the generation of odors affecting a substantial number of people were determined to be less than significant following compliance with odor policies enforced by the SCAQMD (including Rule 402) and Policy LU-3.1.

#### *3.2.2.7.2 Proposed Project*

Implementation of the Proposed Project would not result in changes in cumulative air quality impacts. No changes would occur because the Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The proposed Circulation Element update is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. Therefore, the Proposed Project would not have a significant impact on cumulative air quality impacts, and the conclusions of the 2016 Certified FEIR remain valid.

### **3.2.3 Findings Related to Air Quality**

#### *3.2.3.1 No New Significant Effects Requiring Major Revisions to the 2016 Certified FEIR*

Based on the foregoing analysis and information, there is no evidence that the Proposed Project requires a major change to the 2016 Certified FEIR. The Proposed Project would not result in new significant environmental impacts related to air quality, and there would not be a substantial increase in the severity of impacts described in the 2016 Certified FEIR.

#### *3.2.3.2 No Substantial Change in Circumstances Requiring Major Revisions to the 2016 Certified FEIR*

No major changes to the Planning Area have taken place since preparation of the 2016 Certified FEIR that would require revisions to the analysis in the 2016 Certified FEIR. There is no information in the record or otherwise available that indicates that there are substantial changes in circumstances pertaining to air quality that would require major changes to the 2016 Certified FEIR.

### *3.2.3.3 No New Information Showing Greater Significant Effects than the 2016 Certified FEIR*

This Addendum has analyzed all available relevant information to determine whether there is new information that was not available at the time the 2016 Certified FEIR was certified, indicating that a new significant effect not reported in that document may occur. Based on the information and analyses above, there is no substantial new information indicating that there would be a new significant impact related to air quality requiring major revisions to the 2016 Certified FEIR.

### *3.2.3.4 No New Information Showing the Ability to Reduce Significant Effects in the 2016 Certified FEIR*

There is no new information, mitigation, or alternative to the Proposed Project that would substantially reduce one or more significant impacts pertaining to air quality identified and considered in the 2016 Certified FEIR.

### **3.2.4 Mitigation Measures**

MM AQ-1, MM AQ-2, and MM AQ-3 identified in the 2016 Certified FEIR are not applicable to the Proposed Project, as they each include requirements for future development projects. As the Proposed Project does not include or facilitate any physical development, these requirements and mitigation measures do not apply.

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### 3.3 BIOLOGICAL RESOURCES

#### 3.3.1 Existing Environmental Setting

The Planning Area is located adjacent to Chino and Puente Hills, which include vegetation communities such as oak woodland, chaparral, and coastal sage scrub. The topography varies from steep hillsides to gently rolling hills. The southern region of the Planning Area is adjacent to the Santa Ana River and Chino Hills State Park, which contain vegetation communities of coastal sage scrub (CSS). Grasslands composed of nonnative annual grasses such as filaree, wild oats, and wild radish are also scattered throughout the Planning Area. Development of Yorba Linda has decreased the presence of native and perennial grasses.

#### 3.3.2 Comparison of the Impacts for the Approved Project and Proposed Project

*3.3.2.1 Impact 5.4-1: The General Plan Update would not result in a substantial adverse impact on any special status or sensitive species. [Threshold BIO-1]*

##### 3.3.2.1.1 Approved Project

**Less Than Significant Impact With Mitigation.** The City is essentially built out, with only 2,586 acres of vacant land remaining within the Planning Area. The development anticipated in the General Plan Update would be located primarily in the established the downtown area of the City. Project-specific EIRs have been or will be prepared for proposed development within the Planning Area, with required mitigation for associated impacts to biological resources. The Approved Project contains goals and policies to protect sensitive areas as well as Mitigation Measure BIO-1, which requires a site inspection to determine if any species are present that are currently or candidates to become special status. Therefore, impacts were less than significant with mitigation.

##### 3.3.2.1.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. Furthermore, the proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway. There would be no development or changes in policies adopted by the Approved Project that would result in additional impacts to special stats or sensitive species. As, the Proposed Project would not alter the potential impacts from future development on any special status or sensitive species, the conclusions of the 2016 Certified FEIR remain valid.

*3.3.2.2 Impact 5.4-2: The Proposed Project has the potential to lead to development in the Cielo/Esperanza Focus Area that could affect riparian habitat. [Threshold BIO-2]; and Impact 5.4-3: The Proposed Project has the potential to lead to development in the Cielo/Esperanza Focus Area that could affect protected wetlands. [Threshold BIO-3]*

##### 3.3.2.2.1 Approved Project

**Less Than Significant Impact with Mitigation.** As discussed above, the majority of new development that would occur as a part of the Approved Project would occur within areas that are primarily built out, and no significant impacts to biological resources were anticipated. MMs are identified in the

project-specific EIRs to mitigate potential impacts to wetlands and riparian habitat to a less than significant level. Therefore, with the implementation of MM BIO-1, impacts were considered less than significant with mitigation.

#### 3.3.2.2.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project, including potential development that could affect protected wetlands. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. Furthermore, the proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway. There would be no development or changes in policies adopted by the Approved Project that would result in additional impacts to wetlands or riparian habitat. As the Proposed Project would not alter the potential impacts from future development on wetlands or riparian habitat, the conclusions of the 2016 Certified FEIR remain valid.

#### 3.3.2.3 *Impact 5.4-4: The General Plan Update would not result in development that substantially interferes with the movement of wildlife. [Threshold BIO-4]*

##### 3.3.2.3.1 Approved Project

**Less Than Significant Impact with Mitigation.** Due to the degree of development within the Planning Area, the Cielo/Esperanza Focus Area is the only area that provides for the local movement of wildlife. However, the Cielo/Esperanza Focus Area is constrained by development to the south and west, which consequentially restricts regional connectivity of wildlife to other habitat areas. Any future development would adhere to MM BIO-1. Therefore, development within the Planning Area is not anticipated to substantially interfere with wildlife movement, and impacts were considered less than significant with mitigation.

##### 3.3.2.3.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. The proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway. As no changes to the City's circulation or roadway network would occur, the Proposed Project would not interfere with wildlife movement or existing wildlife corridors. As the Proposed Project would not alter the potential impacts from future development on wildlife corridors, the conclusions of the 2016 Certified FEIR remain valid.

#### 3.3.2.4 *Impact 5.4-5: The General Plan Update would not conflict with any ordinance such as a tree preservation ordinance. [Threshold BIO-5]*

##### 3.3.2.4.1 Approved Project

**Less Than Significant Impact.** Due to the degree of build out within the Planning Area, the majority of all development anticipated by the General Plan would occur in areas that are already disturbed.

The Cielo/Esperanza Focus Area is considered the only area with the potential to affect biological resources and is located outside Yorba Linda city limits within unincorporated Orange County. The County of Orange (County) does not have any applicable ordinances or policies such as tree preservation. Therefore, no mitigation would be required, and no significant impacts would occur from the Approved Project.

#### 3.3.2.4.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. The proposed reclassification would not result in development or changes to adopted policies that would conflict with any ordinances related to protection of biological resources a result of the Proposed Project. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

*3.3.2.5 Impact 5.4-6: Although portions of the Project area are located near the Orange County Natural Communities Conservation Plan and Habitat Conservation Plan, there would be no impact on these areas as a result of Project implementation. [Threshold BIO-6]*

#### 3.3.2.5.1 Approved Project

**Less Than Significant Impact with Mitigation.** The City of Yorba Linda is subject to the Orange County Central-Coastal Natural Communities Conservation Plan and Habitat Conservation Plan (NCCP/HCP). The Approved Project would allow for potential development on undeveloped land only in the Cielo/Esperanza Focus Area. Any development in the other six Focus Areas would be considered infill as it would occur on previously disturbed/developed land. All new development would be subject to MM BIO-1, which would identify potential impacts to sensitive species through conducting a survey and require subsequent mitigation. Therefore, potential impacts of the Approved Project were reduced to less than significant with mitigation incorporated.

#### 3.3.2.5.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses or development assumptions included under the adopted General Plan that could impact resources within the areas subject to the NCCP/HCP. Therefore, the Proposed Project would not impact areas subject to the Orange County NCCP/HCP and would not alter potential impacts to NCCP/HCP land as identified in the 2016 Certified EIR. The conclusions of the 2016 Certified FEIR remain valid.

#### 3.3.2.6 Cumulative Biological Resources Impacts

##### 3.3.2.6.1 Approved Project

**Less Than Significant Impact.** Despite the potential for commercial, residential, and industrial growth in the Planning Area from implementation of the Approved Project, cumulative impacts on biological resources would be less than significant, as new development would mostly be limited to currently developed land. Development within the Cielo/Esperanza Focus Area would not be

considered significant due to its relative size compared to the Planning Area. Development in this Focus Area would not impede the movement of wildlife. Therefore, cumulative impacts to biological resources were less than significant.

#### **3.3.2.6.2 Proposed Project**

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. Therefore, the Proposed Project would not result in cumulatively considerable impacts on biological resources and would not alter the conclusions of the 2016 Certified FEIR related to cumulative impacts. The conclusions of the 2016 Certified FEIR remain valid.

### **3.3.3 Findings Related to Biological Resources**

#### **3.3.3.1 *No New Significant Effects Requiring Major Revisions to the 2016 Certified FEIR***

Based on the foregoing analysis and information, there is no evidence that the Proposed Project requires a major change to the 2016 Certified FEIR. The Proposed Project would not result in new significant environmental impacts related to biological resources, and there would not be a substantial increase in the severity of impacts described in the 2016 Certified FEIR.

#### **3.3.3.2 *No Substantial Change in Circumstances Requiring Major Revisions to the 2016 Certified FEIR***

No major changes to the Planning Area have taken place since preparation of the 2016 Certified FEIR that would require revisions to the analysis in the 2016 Certified FEIR. There is no information in the record or otherwise available that indicates that there are substantial changes in circumstances pertaining to biological resources that would require major changes to the 2016 Certified FEIR.

#### **3.3.3.3 *No New Information Showing Greater Significant Effects Than the 2016 Certified FEIR***

This Addendum has analyzed all available relevant information to determine whether there is new information that was not available at the time the 2016 Certified FEIR was certified, indicating that a new significant effect not reported in that document may occur. Based on the information and analyses above, there is no substantial new information indicating that there would be a new significant impact related to biological resources requiring major revisions to the 2016 Certified FEIR.

#### **3.3.3.4 *No New Information Showing the Ability to Reduce Significant Effects in the 2016 Certified FEIR***

There is no new information, mitigation, or alternative to the Proposed Project that would substantially reduce one or more significant impacts pertaining to biological resources identified and considered in the 2016 Certified FEIR.

### 3.3.4 Mitigation Measures

MM BIO-1 as identified in the 2016 Certified FEIR is not applicable to the Proposed Project, as it includes requirements for future development projects. As the Proposed Project does not include or facilitate any physical development, these requirements and mitigation measures do not apply.

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## 3.4 GREENHOUSE GAS EMISSIONS

### 3.4.1 Existing Environmental Setting

No substantial changes to the Planning Area have occurred since the preparation of the 2016 Certified FEIR. There have been no major changes to the existing setting of the Planning Area with respect to global climate change.

The Planning Area is developed and consists of primarily residential, commercial, medical, institutional, industrial, and open space and recreation uses. These uses currently generate criteria air pollutants from natural gas use for energy, heating and cooking, vehicle trips, and area sources such as landscaping equipment and consumer cleaning products.

### 3.4.2 Comparison of the Impacts for the Approved Project and Proposed Project

*3.4.2.1 Impact 5.7-1: GHG emissions generated by future development associated with implementation of the proposed General Plan Update would have a less-than-significant impact on the environment. [Threshold GHG-1]*

#### 3.4.2.1.1 Approved Project

**Less Than Significant Impact with Mitigation.** Increased GHG emissions associated with the Approved Project would result from increases in motor vehicle use. The remaining emissions would constitute approximately 16 percent energy use, 4 percent water use, 2 percent waste generation, and 1 percent from area sources. Based on this service population for 2035 build out of the General Plan and the estimated greenhouse gas (GHG) emissions, build out of the Approved Project would result in an estimated 5.2 metric tons of carbon dioxide equivalent per service population (MTCO<sub>2</sub>e/yr/SP). Estimated GHG emissions would not exceed the SCAQMD threshold of 6.6 MTCO<sub>2</sub>e/yr/SP. Therefore, the Approved Project would not generate GHG emissions that would cause a significant impact on the environment.

Policies in the Approved Project in combination with MM AQ-1 and AQ-2 would also further reduce GHG emissions associated with future development. These policies and MMs would promote the use of alternative means of transportation, energy and water conservation, and waste reduction, which would help to reduce long-term operational GHG emissions associated with future development. Therefore, this impact was considered less than significant.

#### 3.4.2.1.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. The proposed reclassification would not allow for any increase in the capacity of the roadway or induce growth altering the build out anticipated under the Approved Project. Therefore, the Proposed Project would not generate GHG emissions or alter the GHG emissions generated by future development associated with the Approved Project. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

### **3.4.2.2** *Impact 5.7-2: Implementation of the proposed General Plan Update would not conflict with an applicable GHG-reduction plan, policy, or regulation. [Threshold GHG-2]*

#### **3.4.2.2.1** *Approved Project*

**Less Than Significant Impact with Mitigation.** The Approved Project would be consistent with the subregional Sustainable Communities Strategy for Orange County, as incorporated into the Southern California Association of Governments (SCAG) 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In addition, the adopted Housing Element includes policies that would be consistent with and help implement Assembly Bill (AB) 32 GHG-reduction goals. These goals include those related to energy and water conservation, waste reduction, and conservation of open space. The Housing Element also establishes a Sustainability and Green Building Program. Furthermore, the Approved Project includes policies and MM AQ-2 to promote the use of alternative means of transportation, energy and water conservation, and waste reduction, which would help to further reduce long-term operational GHG emissions associated with future development. The Approved Project would not conflict with applicable GHG-reduction plans, policies, or regulations, and impacts were considered less than significant.

#### **3.4.2.2.2** *Proposed Project*

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses or development assumptions identified under the adopted General Plan. The Proposed Project would not alter any policies included in the adopted General Plan related to GHG reduction goals. In addition, the proposed reclassification of Savi Ranch Parkway would not conflict with the goals and policies designed to reduce GHG emissions. Furthermore, the proposed reclassification would reflect existing conditions and not allow for any increase in the capacity of the roadway or induce growth resulting in additional GHG emissions. Therefore, the Proposed Project would not conflict with an applicable GHG-reduction plan, policy, or regulation. The Proposed Project would not alter the GHG emissions generated by future development associated with the Approved Project. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

### **3.4.2.3** *Cumulative Greenhouse Gas Emissions Impacts*

#### **3.4.2.3.1** *Approved Project*

**Less Than Significant Impact with Mitigation.** Any increase in GHG emissions that may result from future development anticipated from build out of the Approved Project would not exceed the SCAQMD threshold of 6.6 MTCO<sub>2</sub>e/yr/SP. In addition, policies and regulations included in the Approved Project and MM AQ-2 would not conflict with existing GHG reduction plans. Therefore, the 2016 Certified FEIR determined that the Approved Project did not result in a cumulatively considerable impact related to GHG emissions.

#### **3.4.2.3.2** *Proposed Project*

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in physical development, construction activities, or direct

changes to the existing land uses identified or development assumptions included under the adopted General Plan. Therefore, the Proposed Project would not alter the cumulative build out conditions identified for the Approved Project, and the conclusions of the 2016 Certified FEIR remain valid.

### **3.4.3 Findings Related to Greenhouse Gas Emissions**

#### ***3.4.3.1 No New Significant Effects Requiring Major Revisions to the 2016 Certified FEIR***

Based on the foregoing analysis and information, there is no evidence that the Proposed Project requires a major change to the 2016 Certified FEIR. The Proposed Project would not result in new significant environmental impacts related to global climate change, and there would not be a substantial increase in the severity of impacts described in the 2016 Certified FEIR.

#### ***3.4.3.2 No Substantial Change in Circumstances Requiring Major Revisions to the 2016 Certified FEIR***

No major changes to the Planning Area have taken place since preparation of the 2016 Certified FEIR that would require revisions to the analysis in the 2016 Certified FEIR. There is no information in the record or otherwise available that indicates that there are substantial changes in circumstances pertaining to global climate change that would require major changes to the 2016 Certified FEIR.

#### ***3.4.3.3 No New Information Showing Greater Significant Effects Than in the 2016 Certified FEIR***

This analysis has analyzed all available relevant information to determine whether there is new information that was not available at the time the 2016 Certified FEIR was certified, indicating that a new significant effect not reported in that document may occur. Based on the information and analyses above, there is no substantial new information indicating that there would be a new significant impact to global climate change requiring major revisions to the 2016 Certified FEIR.

#### ***3.4.3.4 No New Information Showing the Ability to Reduce Significant Effects in the 2016 Certified FEIR***

There is no new information, mitigation, or alternative to the project that would substantially reduce one or more significant impacts pertaining to global climate change identified and considered in the 2016 Certified FEIR.

### **3.4.4 Mitigation Measures**

MM AQ-1 and MM AQ-2 include requirements for future development to provide adequate mitigation for potentially significant construction emissions, criteria pollutant, and precursor emissions, which would also mitigate potential impacts from GHG emissions. These mitigation measures included for GHG emissions as identified in the 2016 Certified FEIR are not applicable to the Proposed Project, as they each include requirements for future development projects. As the Proposed Project does not include or facilitate any physical development, these requirements and MMs do not apply.

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## 3.5 LAND USE AND PLANNING

### 3.5.1 Existing Environmental Setting

No substantial changes to the Planning Area have occurred since the preparation of the 2016 Certified FEIR. There have been no major changes to the existing setting of the Planning Area with respect to the existing or designated land uses.

The Planning Area encompasses approximately 23 square miles (approximately 14,800 ac) within the Yorba Linda city limits, as well as the area within Yorba Linda's Sphere of Influence in unincorporated Orange County. Yorba Linda is predominately a suburban, low-density community. Residential, recreational, and open space uses are the predominant land uses characterizing Yorba Linda. Relevant documents in addition to the General Plan include the Yorba Linda Zoning Code and the Parks and Recreation Master Plan. Both the Esperanza Hills Specific Plan and the Cielo Vista Specific Plan apply to the Cielo/Esperanza Focus Area, within Yorba Linda's Sphere of Influence.

### 3.5.2 Comparison of the Impacts for the Approved Project and Proposed Project

#### 3.5.2.1 *Impact 5.10-1: Implementation of the General Plan Update would not physically divide an established community. [Threshold LU-1]*

##### 3.5.2.1.1 Approved Project

**Less Than Significant Impact.** Yorba Linda is essentially built out with the exception of recreational space, open space, and the Cielo/Esperanza Focus Area, where future development is anticipated. Development in this Focus Area would not physically divide an established community. Rather, development would provide new travel pathways between developed areas to the west and south of the Focus Area. Future development would be required to perform project-specific evaluations of a project's potential to physically divide an established community. Therefore, the Approved Project would not result in a significant impact related to the physical division of an established community.

##### 3.5.2.1.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. In addition, the proposed reclassification would not alter the existing circulation system or allow for any increase in the capacity of the roadway or induce growth that would physically divide an established community. Therefore, the Proposed Project would not have a significant impact by physically dividing an established community and would not alter the land use designations and associated development included in the Approved Project. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

*3.5.2.2 Impact 5.10-2: Implementation of the General Plan Update would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]*

**3.5.2.2.1 Approved Project**

**Less Than Significant Impact.** The Approved Project, an update to the previously adopted 1993 City of Yorba Linda General Plan, was intended to shape future development within the Planning Area for a 20-year planning period. The 2016 Certified FEIR for the updated General Plan Elements was prepared in compliance with State planning law, California Government Code Section 65300. Anticipated build out associated with the Approved Project was evaluated for consistency with applicable State, regional, and local laws, regulations, plans, and guidelines. The Approved Project was determined to be consistent with all adopted plans/policies, and impacts were considered less than significant.

**3.5.2.2.2 Proposed Project**

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. As the Proposed Project would update the Circulation Element to reflect the existing conditions of the built environment within Yorba Linda, the proposed reclassification would be consistent with all policies adopted as part of the Approved Project and adopted General Plan. Therefore, the Proposed Project would not result in changes to the General Plan that would result in inconsistencies with adopted plans and policies, and the conclusions of the 2016 Certified FEIR remain valid.

*3.5.2.3 Impact 5.10-3: Implementation of the General Plan Update would not conflict with any applicable habitat conservation plan or natural community conservation plan. [Threshold LU-1]*

**3.5.2.3.1 Approved Project**

**Less Than Significant Impact with Mitigation.** As described above, Yorba Linda is subject to the Orange County Central-Coastal NCCP/HCP. The Approved Project would allow for potential development on undeveloped land; however, all new development would be subject to MM BIO-1, which would identify potential impacts to sensitive species through conducting a survey and require project-specific mitigation. Therefore, impacts from the Approved Project were considered less than significant with mitigation incorporated.

**3.5.2.3.2 Proposed Project**

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions under the adopted General Plan. As the Proposed Project would update the Circulation Element to reflect the existing conditions, the proposed reclassification would not result in development that might be inconsistent with HCP/NCCP. Therefore, the Proposed Project would not conflict with any applicable HCP/NCCP or alter the development anticipated by the

Approved Project resulting in a conflict with an HCP/NCCP. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

#### *3.5.2.4 Cumulative Land Use Impacts*

##### *3.5.2.4.1 Approved Project*

**Less Than Significant Impact.** The Approved Project allows the potential for additional development within the Planning Area. However, proposed land use designations would be consistent with existing land uses and would encourage compatible patterns of land use development. Therefore, implementation of the Approved Project would not result in significant impacts associated with land use compatibility. The goals and policies of the Approved Project direct future projects and growth within the Planning Area while minimizing existing and potential land use conflicts. The Approved Project is designed to maintain and improve a balance of residential and nonresidential development, ensuring that adjacent land uses are compatible and effectively developing or redeveloping vacant sites. Therefore, cumulative land use impacts were considered less than significant.

##### *3.5.2.4.2 Proposed Project*

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in changes to the existing or designated land uses identified or development assumptions included under the adopted General Plan. Furthermore, the proposed reclassification would reflect existing conditions and not allow for any increase in the capacity of the roadway or induce growth that would alter the development assumptions of the Approved Project. Therefore, the Proposed Project would not have a significant impact on cumulative impacts on land use and planning and would not alter the conclusions of the 2016 Certified FEIR. The conclusions of the 2016 Certified FEIR remain valid.

### **3.5.3 Findings Related to Land Use and Planning**

#### *3.5.3.1 No New Significant Effects Requiring Major Revisions to the 2016 Certified FEIR*

Based on the foregoing analysis and information, there is no evidence that the Proposed Project requires a major change to the 2016 Certified FEIR. The Proposed Project would not result in new significant environmental impacts related to land use and planning, and there would not be a substantial increase in the severity of impacts described in the 2016 Certified FEIR.

#### *3.5.3.2 No Substantial Change in Circumstances Requiring Major Revisions to the 2016 Certified FEIR*

No major changes to the Planning Area have taken place since the preparation of the 2016 Certified FEIR. There is no information in the record or otherwise available that indicates that there are substantial changes in circumstances pertaining to land use and planning that would require major changes to the 2016 Certified FEIR.

#### *3.5.3.3 No New Information Showing Greater Significant Effects Than the 2016 Certified FEIR*

This Addendum has analyzed all available relevant information to determine whether there is new information that was not available at the time the 2016 Certified FEIR was certified, indicating that a new significant effect not reported in that document may occur. Based on the information and analyses above, there is no substantial new information indicating that there would be a new significant impact related to land use and planning requiring major revisions to the 2016 Certified FEIR.

#### *3.5.3.4 No New Information Showing the Ability to Reduce Significant Effects in the 2016 Certified FEIR*

There is no new information, mitigation, or alternative to the project that would substantially reduce one or more significant impacts pertaining to land use and planning identified and considered in the 2016 Certified FEIR.

#### **3.5.4 Mitigation Measures**

MM BIO-1 pertaining to Land Use and Planning identified in the 2016 Certified FEIR is not applicable to the Proposed Project, as it includes requirements for future development projects. As the Proposed Project does not include or facilitate any physical development, these requirements and mitigation measures do not apply.

## 3.6 NOISE

### 3.6.1 Existing Environmental Setting

No substantial changes to the Planning Area have occurred since the preparation of the 2016 Certified FEIR. There have been no major changes to the existing setting of the Planning Area with respect to noise.

The Planning Area is developed and consists of a mix of residential, commercial, industrial, and open space and recreation uses. Noise-sensitive receptors in the City include residences, schools, hospitals, churches, and similar uses that are sensitive to noise. The Planning Area is not located within the noise contours of the nearest airport, the City of Fullerton's Municipal Airport. Industrial and commercial activities, such as loading and unloading of trucks, contribute to the noise environment in Yorba Linda. Major vibration sources in Yorba Linda include construction activities, rail operations, and heavy vehicle traffic.

### 3.6.2 Comparison of the Impacts for the Approved Project and Proposed Project

*3.6.2.1 Impact 5.12-1: Construction activities associated with the proposed General Plan Update could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and could result in exposure of persons to or generation of noise levels in excess of standards established in the General Plan and Noise Ordinance. [Thresholds NOI-1 & NOI-4]*

#### 3.6.2.1.1 Approved Project

**Less Than Significant Impact.** While the Planning Area is essentially fully developed, some parcels within the Planning Area are vacant or undeveloped. Construction noise depends on the phase and associated activities but has the potential to reach high levels. Increases in ambient noise levels from construction activities that may result from implementation of future projects facilitated by the Approved Project may result in potentially significant impacts; however, all future projects would be required to comply with project-specific mitigation and the City's Noise Ordinance. Furthermore, the Approved Project includes Goal N-3 to mitigate noise impacts from nontransportation sources, and Policy N-3.1 would ensure compliance with standards and procedures for mitigation of construction-related activities that introduce excessive noise levels. Therefore, impacts associated with the Approved Project would be less than significant.

#### 3.6.2.1.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in physical development requiring construction activities. Furthermore, the proposed reclassification would not alter traffic patterns or allow for any increase in the capacity of the roadway or induce growth resulting in exposure of persons to noise levels in excess of standards established in the General Plan and Noise Ordinance. Therefore, the Proposed Project would increase ambient noise levels from construction activities and would not alter the assumptions of the Approved Project. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

*3.6.2.2 Impact 5.12-2: The proposed General Plan Update could result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project and could result in exposure of persons to or generation of noise levels in excess of the City's noise standards. This impact would be considered potentially significant. [Threshold NOI-1 & NOI-3]*

#### 3.6.2.2.1 Approved Project

**Less Than Significant Impact with Mitigation** The primary noise sources within the Planning Area consist of vehicle traffic. Major roadways within the Planning Area include but are not limited to Imperial Highway, Yorba Linda Boulevard, Bastanchury Road, Lakeview Avenue, Fairmont Boulevard, and Rose Drive. Noise levels at the future build out year (2035) are predicted to increase specifically along Yorba Linda Boulevard, Imperial Highway, Bastanchury Road, Fairmont Boulevard, and Esperanza Road. Actual increases in noises levels would depend on the type of land uses proposed, distances from area roadways, and site conditions. Future development could potentially experience noise levels that exceed the City's noise standards for land use compatibility. Therefore, vehicular traffic noise production on area roadways is considered a potentially significant impact. The Approved Project would not result in an increase in train traffic, but the development of future land uses could be exposed to train noise levels that exceed the City's noise standards for land use compatibility. Noises of this type can lead to increased levels of annoyance for occupants of nearby noise-sensitive land uses. Therefore, exposure to railroad noise levels can be a potentially significant impact.

Future development would be required to analyze project-related impacts and include necessary noise reduction measures. Policies included in the Approved Project have the potential to reduce impacts of future development associated with the Approved Project. MM NOI-1 sets noise standards adapted from the State of California General Plan Guidelines for land use compatibility and are consistent with the City's current noise standards as outlined in the 1993 City of Yorba Linda General Plan Noise Element. With implementation of MM NOI-1 in conjunction with proposed policies in the Approved Project, this impact was considered less than significant with mitigation.

#### 3.6.2.2.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions under the adopted General Plan. Furthermore, as the Proposed Project would update the Circulation Element to reflect the existing conditions of the built environment as analyzed for the Approved Project, the proposed reclassification would not allow for any increase in the capacity of the roadway resulting in a permanent increase in ambient noise. As the Proposed Project would not alter the land use assumptions and future development anticipated by the Approved Project, the conclusions of the 2016 Certified FEIR remain valid.

*3.6.2.3 Impact 5.12-3: Future development associated with the proposed General Plan Update could result in new noise-sensitive land uses encroaching upon existing or proposed stationary noise sources or new stationary noise sources encroaching upon existing or proposed noise-sensitive land uses. This could result in a substantial permanent increase in*

*ambient noise levels in the project vicinity above existing levels or could result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies. As a result, this impact is considered potentially significant. [Threshold NOI-1 & NOI-3]*

#### 3.6.2.3.1 Approved Project

**Less Than Significant Impact.** Implementation of the Approved Project could result in the future development of land uses that may generate noise levels that exceed City noise standards. Additionally, new noise sensitive land uses could be located in areas of preexisting stationary noise sources. Noise levels could exceed standards established in the local general plan or noise ordinance or of applicable standards of other agencies by substantial permanent increase in ambient noise levels above levels without the Approved Project. As a result, exposure to nontransportation noise would be considered potentially significant impact. Implementation of policies established in the Approved Project would reduce noise associated with new nontransportation noise sources and the placement of new noise-sensitive land uses over which the City has jurisdiction. Therefore, this impact was considered less than significant.

#### 3.6.2.3.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. As the Proposed Project would update the Circulation Element to reflect the existing conditions of the built environment within Yorba Linda, the proposed reclassification would not allow for any increase in the capacity of the roadway or induce growth resulting in additional future development. As the Proposed Project would not facilitate development of noise sensitive land uses or alter the roadway network or circulation system within the Planning Area, the Proposed Project would not impact noise-sensitive land uses or expose persons to noise levels in excess of applicable noise standards. As the Proposed Project would not alter the land use designations, alter locations of sensitive land uses, or result in the development of new noise sources, the conclusions of the 2016 Certified FEIR remain valid.

*3.6.2.4 Impact 5.12-4: The proposed General Plan Update could result in exposure of persons to or generation of excessive groundborne vibration levels. [Threshold NOI-2]*

#### 3.6.2.4.1 Approved Project

**Less Than Significant Impact.** Construction activities are the primary sources of ground-borne vibration within the Planning Area. Typical construction activities generate ground-borne vibration levels of less than 0.2 inches per second (in/sec) (the architectural damage risk threshold established by the California Department of Transportation [Caltrans]). Pavement breaking and pile driving exceed typical construction activity vibration levels. As a result, short-term exposure to vibration levels would be considered a potentially significant impact. However due to the short-term nature and intermittent frequency of construction vibrations, in addition to the required compliance with the City's hourly restrictions on construction activities, construction vibration level increases would not result in a significant increase in annoyance. By restricting the hours of the day in which construction vibrations can be generated, potential impacts are reduced to a less than significant

level. Individual development projects would be subject to site-specific environmental review, which would necessitate identification of site-specific mitigation in the event that significant impacts are identified. Therefore, this impact was considered less than significant.

#### 3.6.2.4.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions under the adopted General Plan. As the Proposed Project would update the Circulation Element to reflect the existing conditions, the proposed reclassification would not allow for any increase in the capacity of the roadway or induce growth resulting in additional future development or construction activities that might generate ground-borne vibration levels. Therefore, the Proposed Project would not expose persons to or generation of excessive ground-borne vibration. The Proposed Project would not result in any new significant impacts and would not alter the development assumptions of the Approved Project. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

#### 3.6.2.5 *Impact 5.12-5: The proposed General Plan Update would not expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a public or private airport. [Thresholds NOI-5 and NOI-6]*

##### 3.6.2.5.1 Approved Project

**No Impact.** The Planning Area is not located within an airport land use plan area or within 2 mi of a public or private airport. Therefore, implementation of the Approved Project would not expose people within the Planning Area to excessive noise levels. No impact associated with the exposure of sensitive receptors to aircraft noise levels was anticipated to occur as a result of the Approved Project.

##### 3.6.2.5.2 Proposed Project

As stated above, the Planning Area is not located within an airport land use plan or within 2 mi of a public or private airport. In addition, the Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. Therefore, the Proposed Project would have no impact on exposing people residing or working in the project area to excessive noise levels for a project located within the vicinity of a public or private airport, and the conclusions of the 2016 Certified FEIR remain valid.

#### 3.6.2.6 *Cumulative Noise Impacts*

##### 3.6.2.6.1 Approved Project

**Less Than Significant Impact.** The Approved Project allows for additional development within the Planning Area. However, because construction activities associated with development projects are usually localized and their duration and intensity are limited, construction-generated noise and vibration levels would not be anticipated to contribute substantially to the cumulative environment at any given location. In addition, construction activities would be subject to compliance with the Yorba Linda Municipal Code requirements. For these reasons, the Approved Project's contribution

to cumulative short-term noise or vibration exposure were considered a less than significant impact, and impacts are not considered cumulatively considerable.

#### 3.6.2.6.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in any physical development or direct changes to the existing land uses identified or development assumptions included under the adopted General Plan that would contribute to cumulative noise or vibration within the Planning Area. Therefore, the Proposed Project would not have a significant impact on cumulative noise impacts and the conclusions of the 2016 Certified FEIR remain valid.

### 3.6.3 Findings Related to Noise

#### 3.6.3.1 *No New Significant Effects Requiring Major Revisions to the 2016 Certified FEIR*

Based on the foregoing analysis and information, there is no evidence that the Proposed Project requires a major change to the 2016 Certified FEIR. The Proposed Project would not result in new significant environmental impacts related to noise, and there would not be a substantial increase in the severity of impacts described in the 2016 Certified FEIR.

#### 3.6.3.2 *No Substantial Change in Circumstances Requiring Major Revisions to the 2016 Certified FEIR*

No major changes to the Planning Area have taken place since preparation of the 2016 Certified FEIR that would require revisions to the analysis in the 2016 Certified FEIR. There is no information in the record or otherwise available that indicates that there are substantial changes in circumstances pertaining to noise that would require major changes to the 2016 Certified FEIR.

#### 3.6.3.3 *No New Information Showing Greater Significant Effects Than the 2016 Certified FEIR*

This Addendum has analyzed all available relevant information to determine whether there is new information that was not available at the time the 2016 Certified FEIR was certified, indicating that a new significant effect not reported in that document may occur. Based on the information and analyses above, there is no substantial new information indicating that there would be a new significant impact related to noise requiring major revisions to the 2016 Certified FEIR.

#### 3.6.3.4 *No New Information Showing the Ability to Reduce Significant Effects in the 2016 Certified FEIR*

There is no new information, mitigation, or alternative to the project that would substantially reduce one or more significant impacts pertaining to noise identified and considered in the 2016 Certified FEIR.

#### **3.6.4 Mitigation Measures**

MM NOI-1 as identified in the 2016 Certified FEIR is not applicable to the Proposed Project, as it includes requirements for future development projects. As the Proposed Project does not include or facilitate any physical development, these requirements and mitigation measures do not apply.

## 3.7 PUBLIC SERVICES

### 3.7.1 Existing Environmental Setting

No substantial changes to the Planning Area have occurred since the preparation of the 2016 Certified FEIR. There have been no major changes to the existing setting of the Planning Area with respect to public services.

#### 3.7.1.1 Fire Protection

The Orange County Fire Authority (OCFA) is responsible for fire protection in Yorba Linda. The OCFA serves 23 cities within Orange County in addition to all unincorporated areas from 77 regular stations and 10 reserve stations.<sup>1</sup> There are three OCFA fire stations within Yorba Linda: Station 53, Station 10, and Station 32.<sup>2</sup>

#### 3.7.1.2 Police Protection

Yorba Linda's police protection services are provided by the Orange County Sheriff's Department (OCSd). OCSd has approximately 3,800 sworn staff members and over 800 reservists.<sup>3</sup> The Yorba Linda Police Services Facility is located at 20994 Yorba Linda Boulevard in Yorba Linda.<sup>4</sup>

#### 3.7.1.3 Public Schools

Yorba Linda is served by the Placentia-Yorba Linda Unified School District, in addition to several private schools. There are over 25,000 students in the district, which includes 23 elementary schools, 8 middle schools, 1 K–8 school, 5 comprehensive high schools, 1 continuation high school, 1 K–12 home school, 1 special education school, and 1 independent-study high school.<sup>5</sup>

#### 3.7.1.4 Public Libraries

The Yorba Linda Public Library (YLPL) provides library services to Yorba Linda. The single branch is located at 4852 Lakeview Avenue in Yorba Linda. The library is a brand-new 45,000-square-foot facility, completed in 2020.<sup>6</sup>

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<sup>1</sup> Orange County Fire Authority. Member Cities. Website: <https://ocfa.org/AboutUs/PartnerCities.aspx#:~:text=OCFA%20Coverage,stations%20located%20throughout%20Orange%20County> (accessed October 2021).

<sup>2</sup> City of Yorba Linda. Fire. Website: <https://www.yorbalindaca.gov/270/Fire> (accessed October 2021).

<sup>3</sup> Orange County Sheriff's Department. About OC Sheriff. Website: <https://www.ocsheriff.gov/about-ocsheriff> (accessed October 2021).

<sup>4</sup> City of Yorba Linda. Police. Website: <https://www.yorbalindaca.gov/275/Police> (accessed October 2021).

<sup>5</sup> Placentia-Yorba Linda Unified School District. High Schools. Website: [https://www.pylusd.org/apps/pages/index.jsp?uREC\\_ID=932850&type=d&pREC\\_ID=1265872](https://www.pylusd.org/apps/pages/index.jsp?uREC_ID=932850&type=d&pREC_ID=1265872) (accessed October 2021).

<sup>6</sup> City of Yorba Linda. Public Library & Cultural Arts Center. Website: <https://newylpl.com/overview/> (accessed October 2021).

### 3.7.2 Comparison of the Impacts for the Approved Project and Proposed Project

#### 3.7.2.1 *Impact 5.14-1: The implementation of the General Plan Update could result in a need for expansion of public services, including schools, fire protection, police protection, and parks. [Threshold PS-1]*

##### 3.7.2.1.1 Approved Project

**Less Than Significant Impact with Mitigation.** Potential future development associated with the Approved Project would represent an increase on the demands of the resources of the OCFA, OCSD, schools, libraries, and parks. The majority of the development associated with the Approved Project would occur on in fill sights or be redevelopment on currently developed sites; however, some development would be located in Very High Fire Hazard Severity Zones (VHFHSZs) determined by the California Department of Forestry and Fire Protection (CAL FIRE). Therefore, fire hazards associated with potential development in these VHFHSZs have potentially significant impacts. With implementation of MM PS-1, PS-2, and PS-3, impacts would be reduced to a less than significant level.

In addition, the City, per the existing Municipal Code, collects development impact fees to mitigate the cost of expanded services as a result of new development. Revenue from these fees, in addition to taxes on both sales and property, would increase in proportion to the amount of new development. As a result, the cost of increased fire protection, police protection, schools' services, and park expansion would be offset by these payments. Because it is not possible to predict the size, location, and form of growth associated with the Approved Project, environmental impacts could occur as a result of the construction of new public service facilities facilitated by the Approved Project. With MM PS-1 (fuel modification easements), MM PS-2 (OCFA /County design standards), MM PS-3 (water agency coordination), and goals and policies outlined in the Approved Project, impacts were considered less than significant.

##### 3.7.2.1.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. The proposed reclassification would not allow for any increase in the capacity of the roadway or induce growth resulting in additional future development. As no changes to the build out anticipated under the Approved Project would occur, there would be no need for the expansion of public services as a result of the Proposed Project, and no impact would occur. The Proposed Project would not alter the land uses designations or alter the anticipated future development under the Approved Project. Therefore, the conclusions of the 2016 Certified FEIR remain valid.

#### 3.7.2.2 *Cumulative Public Services Impact*

##### 3.7.2.2.1 Approved Project

**Less Than Significant Impact.** The potential impacts on public services as a result of future development facilitated by the Approved Project would be offset by the collection of taxes and development impact fees. Additionally, the Approved Project contains multiple goals and policies to

ensure the adequate provision of such services. The demand on the City's resources would not be increased significantly given the relatively small amount of growth that could occur under the Approved Project, and additional demands for schools and parks are speculative and would be addressed by collection of development impacts fees and taxes. Therefore, cumulative impacts to public services were less than significant.

#### **3.7.2.2.2 Proposed Project**

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in direct changes to the existing land uses identified or future development anticipated under the adopted General Plan, and no expansion of public services would be required. Therefore, the Proposed Project would not have a significant impact on cumulative public service impacts, and the conclusions of the 2016 Certified FEIR remain valid.

### **3.7.3 Findings Related to Public Services**

#### **3.7.3.1 No New Significant Effects Requiring Major Revisions to the 2016 Certified FEIR**

Based on the foregoing analysis and information, there is no evidence that the Proposed Project requires a major change to the 2016 Certified FEIR. The Proposed Project would not result in new significant environmental impacts related to public services, and there would not be a substantial increase in the severity of impacts described in the 2016 Certified FEIR.

#### **3.7.3.2 No Substantial Change in Circumstances Requiring Major Revisions to the 2016 Certified FEIR**

No major changes to the Planning Area have taken place since preparation of the 2016 Certified FEIR that would require revisions to the analysis in the 2016 Certified FEIR. There is no information in the record or otherwise available that indicates that there are substantial changes in circumstances pertaining to public services that would require major changes to the 2016 Certified FEIR.

#### **3.7.3.3 No New Information Showing Greater Significant Effects Than the 2016 Certified FEIR**

This Addendum has analyzed all available relevant information to determine whether there is new information that was not available at the time the 2016 Certified FEIR was certified, indicating that a new significant effect not reported in that document may occur. Based on the information and analyses above, there is no substantial new information indicating that there would be a new significant impact related to public services requiring major revisions to the 2016 Certified FEIR.

#### **3.7.3.4 No New Information Showing the Ability to Reduce Significant Effects in the 2016 Certified FEIR**

There is no new information, mitigation, or alternative to the Project that would substantially reduce one or more significant impacts pertaining to public services identified and considered in the 2016 Certified FEIR.

#### **3.7.4 Mitigation Measures**

MM PS-1, MM PS-2, and MM PS-3 identified in the 2016 Certified FEIR are not applicable to the Proposed Project, as they each include requirements for future development projects. As the Proposed Project does not include or facilitate any physical development, these requirements and mitigation measures do not apply.

## 3.8 TRANSPORTATION AND TRAFFIC

### 3.8.1 Existing Environmental Setting

No substantial changes to the Planning Area have occurred since the preparation of the 2016 Certified FEIR. There have been no major changes to the existing setting of the Planning Area with respect to transportation and traffic.

The City uses a functional roadway classification system to define the intended uses of roadways. The system provides a framework for the design and operation of the roadway system and helps identify preferred characteristics of each street. The existing General Plan and the Approved Project use a functional classification system consistent with classification systems used throughout Orange County. It includes the following street classifications: Major, Primary, Secondary, Collector, and Smart Street. The OCTA operates the local public transit routes that extend into Yorba Linda. Bicycle routes are provided on a number of roadways within Yorba Linda, connecting neighborhoods, parks, schools, and other neighborhood facilities. Most city bikeways are Class II, on-street bike lanes marked in the curb or parking lane on selected Yorba Linda streets. Sidewalks are provided along arterial roadways and most residential streets throughout Yorba Linda. Yorba Linda's circulation has been designed to provide adequate facilities for pedestrian circulation.

### 3.8.2 Comparison of the Impacts for the Approved Project and Proposed Project

**3.8.2.1** *Impact 5.16-1: Implementation of the General Plan Update could conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for intersections [Threshold TRA-1].*

#### 3.8.2.1.1 Approved Project

**Significant and Unavoidable Impact.** The Approved Project analyzed the remaining potential development and included assumptions for growth that were used to develop the Build Out Conditions in the year 2035. For the analysis of Build Out 2035 with Project traffic conditions, an intersection LOS analysis was performed for peak hours to evaluate Approved Project operating conditions.

The Approved Project would cause some intersections and roadway segments to operate at deficient LOS, resulting in significant traffic impacts. Improvements were identified to achieve better LOS under build out conditions at the deficient traffic study area intersections. These improvements are required as MM TRA-1 through MM TRA-7. Implementation of the Approved Project's policies and mitigation measures would reduce some impacts to significantly impacted intersections and roadway segments. However, impacts to three intersections and two roadway segments would remain significant and unavoidable.

#### 3.8.2.1.2 Proposed Project

Subsequent to certification of the 2016 Certified FEIR, the California Office of Administrative Law cleared revised CEQA guidelines for use. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled (VMT). The Proposed Project does not propose or facilitate any physical development that would result in

additional traffic, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would update the roadway classification of Savi Ranch Parkway consistent with existing conditions but would not alter the Circulation Element's goals or policies related to establishing measures of effectiveness for intersections.

The proposed reclassification of Savi Ranch Parkway to a Modified Primary Arterial would be consistent with the MPAH Primary Arterial designation of an ADT up to 30,000 with LOS C, which is also consistent with the existing conditions of an ADT ranging from 8,500 to 29,100. Therefore, this reclassification would ensure that the existing conditions are accurately reflected in the classifications of the Circulation Element. In addition, consistent with the revised *State CEQA Guidelines* Section 15064.3(b), the proposed reclassification would not allow for any increase in the capacity of the roadway or induce future growth that would lead to an increase in VMT or change the measures of effectiveness at any intersections. Therefore, the Proposed Project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for intersections or be inconsistent with *State CEQA Guidelines* Section 15064.3(b). Furthermore, the Proposed Project would not alter the roadway classifications of any roadway segments identified in the Approved Project as deficient or requiring mitigation, and the conclusions of the 2016 Certified FEIR remain valid.

**3.8.2.2** *Impact 5.16-2: Implementation of the General Plan Update would not exceed standards established by the Orange County Congestion Management Plan [Threshold TRA-2].*

**3.8.2.2.1** *Approved Project*

**Less Than Significant Impact.** The Approved Project included the following applicable goals and policies related to traffic: the Circulation Element, "Policy CR-3.3 Continue to adhere to OCTA's Congestion Management Program," and the Growth Management Element, "Policy GM-2.5 Maintain consistency with OCTA Congestion Management Plan and Master Plan of Arterial Highways pursuant to the requirement of state law to continue to receive State gasoline sales tax revenues." Therefore, this impact was considered less than significant.

**3.8.2.2.2** *Proposed Project*

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development or roadway circulation network analyzed under the Approved Project. As described above, there are no Congestion Management Plan (CMP) intersections located within the Planning Area. The Proposed Project does not include the development of any new intersections. Therefore, the Proposed Project would not impact the standards established by the Orange County Congestion Management Plan, and the conclusions of the 2016 Certified FEIR remain valid.

**3.8.2.3** *Impact 5.16-3: Implementation of the General Plan would not result in a change in air traffic patterns resulting in substantial safety risks [Threshold TRA-3].*

**3.8.2.3.1** *Approved Project*

**Less Than Significant Impact.** There are no airports located within the Planning Area. Corona Municipal Airport is located approximately 6 mi east of Yorba Linda, Fullerton Municipal Airport is

located 9 mi west of Yorba Linda, and John Wayne Airport is located approximately 14 mi south of Yorba Linda. The distance of the nearest airports to the Planning Area allows the implementation of the Approved Project to not result in a change in air traffic patterns. Therefore, this impact was considered less than significant.

#### 3.8.2.3.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The proposed Circulation Element update is a policy-level document that would not result in direct changes to the existing land uses identified or development assumptions included under the adopted General Plan. As described above, the distance of the nearest airports to the Planning Area allows the implementation of the Approved Project to not result in a change in air traffic patterns. Therefore, the Proposed Project would not impact air traffic patterns, resulting in substantial safety risks, and the conclusions of the 2016 Certified FEIR remain valid.

#### 3.8.2.4 *Impact 5.16-4: Implementation of the General Plan would not result in increased hazards due to a design feature of incompatible uses [Threshold TRA-4].*

##### 3.8.2.4.1 Approved Project

**Less Than Significant Impact.** The Approved Project would not result in inadequate features or incompatible uses. Future development would be reviewed through the City's design review process to determine the land use permit needed and the conditions for the establishment and operation of the project. Development would be required to comply with relevant Municipal Code standards. Additionally, the OCFA would review development to ensure that developments are designed to meet adopted standards and that emergency access is provided. Therefore, the Approved Project would not result in significant impacts from insufficient design features or incompatible uses. Therefore, this impact was considered less than significant.

##### 3.8.2.4.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in changes to the existing roadway configuration or alter the development assumptions included under the adopted General Plan. The proposed reclassification would not alter traffic patterns, allow for any increase in the capacity of the roadway, or result in increased hazards due to new design features. Therefore, the Proposed Project would not increase hazards due to a design feature of incompatible uses, and the conclusions of the 2016 Certified FEIR remain valid.

#### 3.8.2.5 *Impact 5.16-5: Implementation of the General Plan Update would not result in inadequate emergency access [Threshold TRA-5].*

##### 3.8.2.5.1 Approved Project

**Less Than Significant Impact.** The Approved Project would not include policies that would change standards of emergency access or provide inadequate emergency access. Future development would be required to comply with the City's Zoning Code, applicable fire code, and ordinance review

requirements for construction and access to the site. Each individual project would be reviewed by the OCFA to determine the specific fire requirements in order to ensure compliance with these requirements. Furthermore, the City and the OCFA would review any modifications to existing roadways to ensure that adequate emergency access or emergency response would be maintained. Emergency response and evacuation procedures would be coordinated through Yorba Linda in coordination with the police and fire departments. Therefore, this impact was considered less than significant.

#### 3.8.2.5.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would not result in changes to the roadway configuration or alter the development assumptions included under the adopted General Plan. The proposed reclassification would not alter traffic patterns, allow for any increase in the capacity of the roadway, or result in any development that might result in inadequate emergency access. Therefore, the Proposed Project would not impact emergency access, and the conclusions of the 2016 Certified FEIR remain valid.

#### 3.8.2.6 *Impact 5.16-6: Implementation of the General Plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or decrease their performance or safety [Threshold TRA-6].*

##### 3.8.2.6.1 Approved Project

**Less Than Significant Impact.** Implementation of Approved Project would not conflict with adopted policies, plans, or programs regarding public transit. Therefore, impacts would be less than significant. The City of Yorba Linda Parks and Recreation Master Plan includes walking trails and paths, which would not be impacted by the implementation of the Approved Project. Policy CR-6.3 of the Approved Project requires that City to “support the recommendations and action strategies of the Parks and Recreation Master Plan for multi-purpose trails, equestrian facilities, and bikeways.” Therefore, this impact was considered less than significant.

##### 3.8.2.6.2 Proposed Project

The Proposed Project does not propose or facilitate any physical development, nor does it alter the anticipated development analyzed under the Approved Project. The Proposed Project is a policy-level document that would update the Circulation Element to reclassify Savi Ranch Parkway consistent with existing conditions but that would not result in changes to the existing or proposed circulation system related to public transit, bicycle, or pedestrian facilities identified in the adopted General Plan. In addition, the proposed reclassification of Savi Ranch Parkway would not alter the Circulation Element’s goals or policies related to transit, bicycle, or pedestrian facilities. Therefore, the Proposed Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or decrease their performance or safety, and the conclusions of the 2016 Certified FEIR remain valid.

### *3.8.2.7 Cumulative Traffic and Transportation Impacts*

#### *3.8.2.7.1 Approved Project*

**Cumulatively Considerable Impacts.** Development associated with build out of the Approved Project would involve an increase in residential and nonresidential development above existing conditions. Implementation of MM TRA-1 through MM TRA-7 would reduce associated traffic impacts. However, build out of the General Plan would result in a cumulatively considerable contribution to transportation and traffic impacts associated with the intersections and roadway sections.

#### *3.8.2.7.2 Proposed Project*

The Proposed Project does not propose or facilitate any physical development that would result in additional traffic, nor does it alter the anticipated development analyzed under the Approved Project. The proposed Circulation Element update would not alter the goals or policies of the Circulation Element, and the reclassification of Savi Ranch Parkway consistent with existing conditions would not alter the existing roadway configuration or result in inadequate emergency access; hazardous design features; or incompatibilities with transit, bicycle, and pedestrian facilities. Therefore, the Proposed Project would not have a significant impact on cumulative transportation and traffic impacts, and the conclusions of the 2016 Certified FEIR remain valid.

### **3.8.3 Findings Related to Transportation and Traffic**

#### *3.8.3.1 No New Significant Effects Requiring Major Revisions to the 2016 Certified FEIR*

Based on the foregoing analysis and information, there is no evidence that the Proposed Project requires a major change to the 2016 Certified FEIR. The Proposed Project would not result in new significant environmental impacts related to transportation and traffic, and there would not be a substantial increase in the severity of impacts described in the 2016 Certified FEIR.

#### *3.8.3.2 No Substantial Change in Circumstances Requiring Major Revisions to the 2016 Certified FEIR*

No major changes to the Planning Area have taken place since preparation of the 2016 Certified FEIR that would require revisions to the analysis in the 2016 Certified FEIR. There is no information in the record or otherwise available that indicates that there are substantial changes in circumstances pertaining to transportation and traffic that would require major changes to the 2016 Certified FEIR.

#### *3.8.3.3 No New Information Showing Greater Significant Effects Than the 2016 Certified FEIR*

No major changes to the Planning Area have taken place since preparation of the 2016 Certified FEIR that would require revisions to the analysis in the 2016 Certified FEIR. There is no information in the record or otherwise available that indicates that there are substantial changes in circumstances pertaining to transportation and traffic that would require major changes to the 2016 Certified FEIR.

#### ***3.8.3.4 No New Information Showing the Ability to Reduce Significant Effects in the 2016 Certified FEIR***

There is no new information, new alternative to the project, or additional mitigation measure that would substantially reduce one or more significant impacts pertaining to transportation and traffic identified and considered in the 2016 Certified FEIR.

#### **3.8.4 Mitigation Measures**

MM TRA-1 through MM TRA-7 identified in the 2016 Certified FEIR are not applicable to the Proposed Project, as they each include requirements for future development projects. As the Proposed Project does not include or facilitate any physical development, these requirements and mitigation measures do not apply.

## 4.0 REFERENCES

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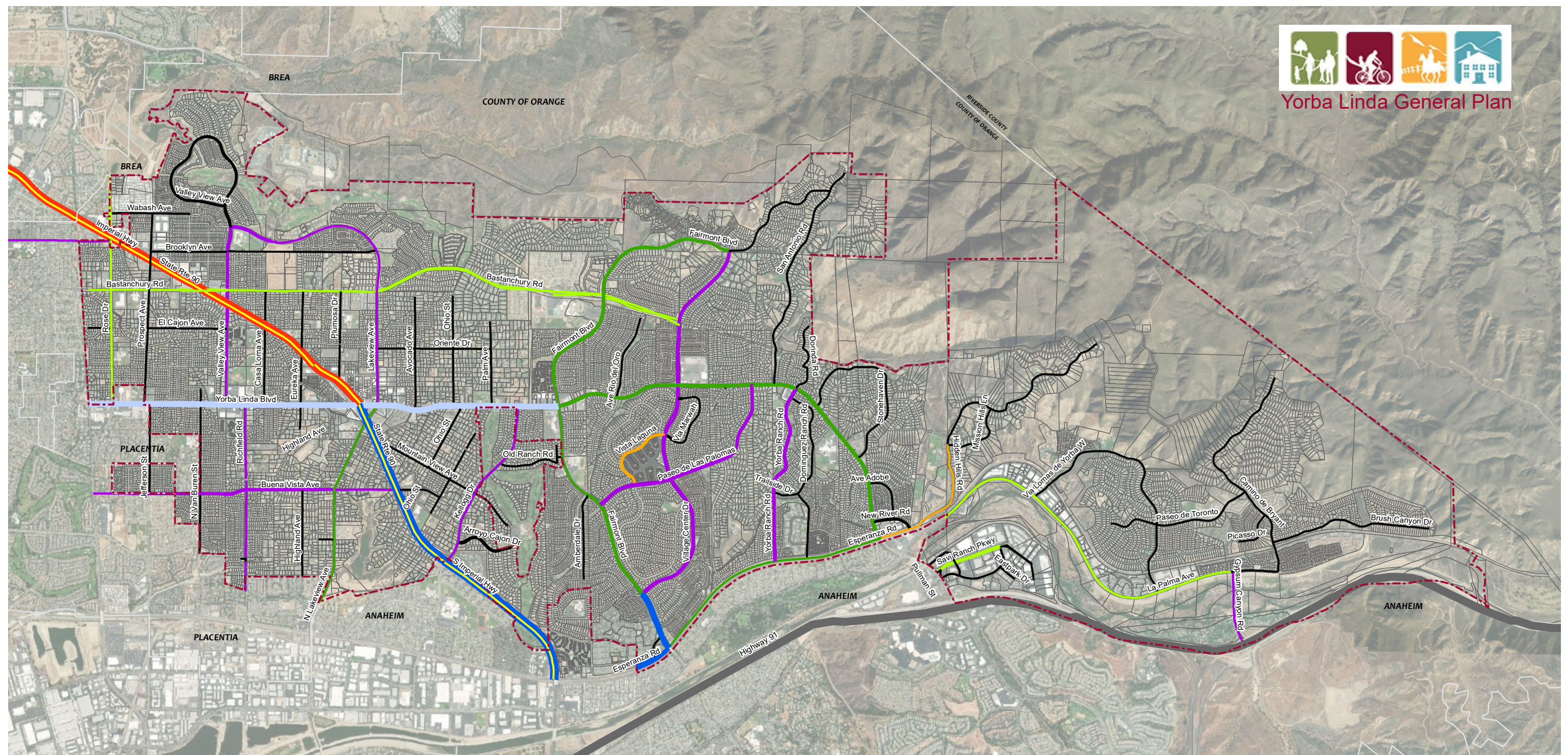
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## **APPENDIX A**

### **DRAFT CIRCULATION ELEMENT UPDATE**

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- |                       |                           |                         |
|-----------------------|---------------------------|-------------------------|
| ----- City Boundary   | Smart Street 6 Lane       | Modified Primary 4 Lane |
| Smart Street 4 Lane   | Secondary 4 Lane          |                         |
| Major 6 Lane          | Collector 2 Lane          |                         |
| Modified Major 6 Lane | Modified Collector 2 Lane |                         |
| Primary 4 Lane        |                           |                         |

## Existing Roadway Functional Classification



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