



June 15, 2017

Jennifer Lilley, AICP  
City Planner  
City of Brea  
Planning Division  
1 Civic Center Circle  
Brea, CA 92821

**RE: Brea Place Project Addendum Design/Land Use Revisions**

Ms. Lilley,

At the April 25, 2017 Brea Planning Commission meeting, the Planning Commission requested that the Brea Place Project applicant consider modifications to the proposed project. Specifically, the Planning Commission requested that: (a) Building B be reduced to a maximum of three stories where the building is closest to the existing single-family residences to the north of the project site; (b) the Building B residential dwelling unit decrease because of the reduction in building height; (c) modifications to the architecture and massing of Building A be considered. The applicant has submitted revised plans to the City for the purpose of addressing Planning Commissioners' comments on the Brea Place Project and is requesting the City's consideration of the modified project.

The Addendum to the City of Brea General Plan Final Program Environmental Impact Report (EIR) prepared for the proposed Brea Place Project found that the proposed project would not result in new significant environmental impacts or increase the severity of any previously identified significant impacts analyzed in the Final EIR. Given these requested revisions, we reviewed the Addendum to determine whether these revisions would change the conclusion of this document. As demonstrated in the attached memorandum, the Addendum and the other previously approved environmental documents adequately address the impacts of the project, as modified. Accordingly, no further CEQA analysis is required because of these proposed changes.

Thank you for the opportunity to provide this analysis. Please feel free contact me at (714) 786-6128 or at [dana.privitt@kimley-horn.com](mailto:dana.privitt@kimley-horn.com) if you have any questions or require additional information.

Sincerely,

**KIMLEY-HORN AND ASSOCIATES, INC.**

A handwritten signature in black ink, appearing to read "Dana C. Privitt".

By: Dana C. Privitt, AICP  
Associate

Attachment

## Attachment

### Brea Place Project

#### Addendum to the City of Brea General Plan Final EIR Design/Land Use Revisions Under Consideration

The purpose of this memo is to provide the City of Brea with additional information to substantiate that the proposed revisions to the Brea Place Project are adequately addressed in the Addendum to the City of Brea General Plan Final Environmental Impact Report (referred to as the 2003 General Plan EIR or EIR). The approximately 30-acre site is generally bordered by the Tracks at Brea Trail, a linear trail to the north; Birch Street to the south; State Route (SR) 57 to the east; and the Brea Marketplace Shopping Center and single-family residences to the west. The site is bisected north to south by State College Boulevard with development proposed east and west of State College Boulevard. Regional access to the site is provided by SR-57.

Brea Place Acquisition Partners, LLC, known as Brea Partners (applicant) has requested the City of Brea's consideration of the approval of discretionary actions associated with the proposed Brea Place Project. An Addendum to 2003 General Plan EIR was prepared in February 2017. The Addendum evaluated the potential environmental impacts of the proposed mixed-use project in comparison to existing conditions and to the development assumptions set forth in the 2003 General Plan accompanying 2003 General Plan EIR, the Mixed Use Zoning, Public Facilities Zoning, and Parks/Recreation/Open Space Zoning Amendment (Zoning Amendment), and 2014-2021 Housing Element. Together, the noted documents and the Addendum, with other technical analysis documents prepared for and included as appendices to the Addendum, serve as the environmental documentation for the project. Discretionary actions associated with the project are the approval of the Addendum to the 2003 General Plan EIR, Conditional Use Permit for a hotel in the "C-C (PD) Major Shopping Center (Precise Development)" zone; Tentative Parcel Map for the West Parcel; Conditional Use Permit for shared parking and parking ratio modification; and Precise Plan of Development for non-residential, residential, and hotel development.

As originally proposed by the applicant, the Addendum addresses potential impacts associated with the construction and operation of 747 apartment units; 16,900 square feet of retail uses, a 150-room hotel, and the vertical expansion of an existing stand-alone parking structure, as well as open space and amenities.

Building A	5-story wrap structure with a southeast corner section provided as a 7-story podium, with 462 apartment units
Building B	Combination 3-, 4-, and 5-story wrap structure with 285 residential units.
Hotel	150-room hotel

At the April 25, 2017 Brea Planning Commission meeting, the Planning Commission requested that the applicant consider modifications to the proposed project. Specifically, the Planning Commission requested that: (a) Building B be reduced to a maximum of three stories where the building is closest to the existing single-family residences to the north of the project site; (b) the Building B residential dwelling unit decrease because of the reduction in building height; (c) modifications to the architecture and massing of Building A be considered. The applicant has submitted revised plans to the City for consideration. As revised the Brea Place project includes the following modifications.

Building A

- The corner feature of Building A has been reduced from 7 stories to 5 stories;
- Reduction in residential units from 462 to 425 units; and
- Where closest to the intersection of Birch Street at State College Boulevard, Building A would be set back from Birch Street to create a streetscape including landscaping and courtyard areas; the setback would vary from approximately 3 feet to 59 feet.

Building B

- Reduction in building height from a combination of 3, 4, and 5 stories to a 3-story building at the north elevation, west elevation, and a part of the east elevation. The south elevation and a part of the east elevation would be 4 stories.

Commercial Uses in Buildings A and B

- Reduction in the combined commercial uses in Building A and B from 16,900 square feet to 5,000 square feet.

Hotel

- Reduction in hotel rooms from 150 to 146 rooms.

Other

- Reduction in floor to area ratio (FAR) from 1.9 to 1.73;
- Increase in the overall parking ratio from approximately 1.75 stalls per residential unit to 1.85 stalls per residential unit;
- Reduction in average daily traffic trips by 1,421 trips.

Pursuant to provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §§ 21000 et seq.); and the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] §§ 15000 et seq.), the City of Brea is the Lead Agency charged with the responsibility of deciding whether to approve the Brea Place Project. As part of its decision-making process and as set forth in CEQA Guidelines Section 15164, the City is required to review and consider whether the proposed project would create new significant impacts or significant impacts that would be substantially more severe than those disclosed in 2003 General Plan EIR. Additional CEQA review would only be triggered if the proposed project, as revised, creates new significant impacts or impacts that are more severe than those disclosed in 2003 General Plan EIR. To use an Addendum as the appropriate CEQA document for the proposed project, the City must find that major revisions of EIR are not necessary and that none of the conditions described in State CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred.

If none of conditions set forth in CEQA Guidelines Section 15162(a) are present, and only minor technical changes or additions are necessary to update the previously certified EIR, an addendum may be prepared, consistent with CEQA Guidelines Section 15164. The Addendum determined that the Brea Place Project would not result in any new project or cumulative impacts or increase the severity of a previously identified significant impact as previously analyzed in the 2003 General Plan EIR. This memo finds that the potential impacts of the project with design/land use revisions under consideration are adequately addressed in the Addendum to EIR.

The 2003 General Plan EIR identified effects of future development that would be less than significant; significant impacts that could be mitigated to less than significant levels; and impacts that would remain significant and unavoidable after the implementation of feasible mitigation. As previously noted, the Addendum for the Brea Place Project identifies whether the project would be consistent with these findings. The Addendum concludes that there are no new significant impacts nor are there any substantial increases in the severity of any previously identified environmental impacts.

The following narrative summarizes the findings of the Addendum and identifies whether the impacts of the Brea Place Project, with a reduction in residential apartment units, a reduction in commercial square footage, and a reduction in hotel rooms, would either be the same or less than the anticipated levels described in the Addendum.

***Aesthetics:*** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. The Brea Place Project would have no impact on scenic vistas or State scenic highways. The proposed project would not be out of character with existing development in the project area and surrounding land uses.

The East Parcel is the site of the proposed hotel and has a General Plan land use designation of “Regional Commercial” and a zoning designation of “C-C (PD) Major Shopping Center (Precise Development)”. Municipal Code Section 20.232.030 allows a maximum height of 75 feet. The West Parcel is the site of the proposed residential buildings and expanded parking structure and has a General Plan land use designation of “Mixed Use I” and a zoning designation of Mixed Use I (MU-I). Municipal Code Section 20.258.020.A.Table 2-3 permits a maximum building height of 100 feet. The maximum building heights of the proposed project would not exceed these height limits. No significant shade and shadow impacts were identified by the City.

With respect to the revised project now under consideration, aesthetic impacts would continue to have no impact or a less than significant impact with mitigation. As previously noted, the southeast corner feature of Building A would be reduced from 7 stories to 5 stories. Where closest to the intersection of Birch Street at State College Boulevard, Building A would be set back from Birch Street to create a streetscape including landscaping and courtyard areas; the setback would vary from approximately 3 feet to 59 feet. With respect to Building B, there would be a reduction in building height from a combination of 3, 4, and 5 stories to a 3-story building at the north elevation, west elevation, and a part of the east elevation. The south elevation and a part of the east elevation would be 4 stories. The changes to the building heights and massing are proposed, in part, to increase the aesthetic compatibility of the project with surrounding development. The project would be required to implement applicable mitigation measures set forth in the Mitigation Monitoring and Reporting Program (MMRP). This finding is consistent with 2003 General Plan EIR and the Addendum for the Brea Place Project.

The findings of the Addendum would therefore continue to be applicable to the revised project. Accordingly, no new impacts nor a substantial increase in the severity of a previously identified significant impact would occur.

***Agriculture and Forestry Resources.*** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR; the Brea Place Project would have no impact on agricultural or forestry resources. The project site is located in an urbanized environment surrounding by existing development. The project site and surrounding properties are not zoned for agriculture and the project site is not under a Williamson Contract. The project, as revised, would not change the no impact finding.

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**Air Quality:** The Addendum determined that because construction activities would not exceed the South Coast Air Quality Management District's (SCAQMD) significance thresholds, short-term construction emissions would be considered to have a less than significant impact. The 2003 General Plan EIR identified vehicle and stationary source air quality emissions, as well as carbon monoxide hotspots at four intersections, to be significant and unavoidable impacts. The project would cumulatively contribute to significant unavoidable impacts associated with vehicles and stationary source emissions. However, no hotspot impacts would occur. The Addendum identified that the proposed project's construction emissions do not present any new significant environmental impacts not previously addressed in the 2003 General Plan EIR, nor substantially increase the severity of previously identified environmental effects. It is noted that the proposed project is consistent with the allowable land uses for the project site; is consistent with development in the area; and would be in compliance with SCAQMD regional air quality requirements and applicable mitigation measures set forth in the 2003 General Plan EIR.

With respect to the revised project, the project would generate 1,421 fewer average daily trips when compared to the originally proposed project. The reduction in vehicle trips would have an incremental reduction in operational air emissions, the findings of the Addendum would also be applicable to the project, as revised. Accordingly, no new impacts nor a substantial increase in the severity of a previously identified significant impact would occur.

**Biological Resources:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR as they apply to the project site. The project site is located in an urbanized environment surrounding by existing development. Based on site observations, no significant changes to the site conditions have occurred since the 2003 General Plan EIR was prepared and certified. The Addendum found that the project would not result in any new adverse impacts or increase the severity of any previously identified impacts on biological resources. The proposed project would not require changes to the mitigation measures presented in the 2003 General Plan EIR. No additional mitigation measures are required. With respect to the revisions under consideration, development would occur on the same property. A reduction in development would not change the findings of the Addendum.

**Cultural Resources:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. The Brea Place Project would have no impact on known historic, archeological, or paleontological resources. The project site is in an urbanized environment surrounded by existing development. With respect to the proposed revised project, development would occur on the same property. Both the originally proposed project and revised project would not require changes to the mitigation measures presented in the 2003 General Plan EIR. The conclusions of the Addendum are applicable to the revised project.

**Geology and Soils:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. Policy PS-8.4 in the General Plan requires geological and geotechnical investigations of all new development in seismic and geologic hazards areas. The proposed project would be consistent with the 2003 General Plan EIR as it would not introduce any new risk factors associated with seismicity, soils, and geology. A site-specific geotechnical exploration report was prepared for the proposed Brea Place Project. The Addendum notes that the project would not create a new significant impact or a substantial increase in the severity of previously identified effects. The project would be required to comply with applicable building regulations and standards.

With respect to the proposed project, as revised, development would occur on the same development footprint. The reduction in development would not require changes to how the project is constructed or operated. The proposed revisions would not cause a significant impact.

**Greenhouse Gas Emissions:** The 2003 General Plan EIR did not evaluate the effects of greenhouse gas (GHG) emission generation. At the time of approval of the 2003 General Plan EIR, the contribution of GHG emissions to climate change was a prominent issue of concern. On March 18, 2010, amendments to the State CEQA Guidelines took effect which set forth requirements for the analysis of GHG emissions under CEQA. Since the EIR has already been certified, the determination of whether GHG emissions and climate change needs to be analyzed for this specific development is governed by the law on supplemental or subsequent EIRs (PRC § 21166 and CEQA Guidelines §§ 15162 and 15163). GHG emissions and climate change are not required to be analyzed under those standards unless it constitutes “new information of substantial importance, which was not known and could not have been known at the time” the 2003 General Plan EIR was approved (State CEQA Guidelines § 15162(a)(3)).

As discussed in the Addendum, there is no competent evidence of new information of severe impact, and thus the City may rely on an addendum. Therefore, the impact of GHG emissions on climate change was known at the time of adoption of the 2003 General Plan EIR and therefore; under CEQA standards, it is not new information that requires analysis in a supplemental EIR or negative declaration. No supplemental environmental analysis of the proposed project’s impacts on this issue is required under CEQA. This finding is applicable to the project, as revised.

**Hazards and Hazardous Materials:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. A Phase I Environmental Site Assessment (ESA) was prepared for the Brea Place Project. The Phase I ESA did not identify any evidence of a recognized environmental condition (i.e., the presence or likely presence of any hazardous materials) or environmental issues associated with the project site. The Addendum finds that the proposed project would not require changes to the mitigation measures presented in the 2003 General Plan EIR and no additional mitigation measure is required.

With respect to the revised project, the reduction in development would not change the findings of the Addendum with respect to hazardous materials. The findings of the Addendum would therefore be applicable to the revised project.

**Hydrology and Water Quality:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. The 2003 General Plan EIR determined that development resulting from implementation of the General Plan would result in an increase in impervious surfaces and therefore an increase in the amount and speed of runoff. Mitigation measures were indicated in the EIR to reduce potential impacts from flooding to less than significant. No water quality impacts were identified because projects would be required to comply with construction and operational water quality requirements.

A Preliminary Drainage Report was prepared and included in the Addendum. The Preliminary Drainage Report concluded that development would not significantly alter the existing drainage patterns or significantly change the volume of rate of surface water runoff from the project site. Drainage connections would not result in growth-inducing effects because it would serve the Brea Place Project as contemplated in the 2003 General Plan EIR. No new impacts would result from development.

With respect to water quality, the project would have no or less than significant impacts associated with surface water runoff and water quality with compliance with applicable local, regional, and State regulatory requirements. The project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit, including the preparation of a Stormwater Pollution Prevention Plan (SWPPP), and to implement Best Management Practices (BMPs) to preclude impacts during construction. Compliance with the requirements set forth in the NPDES General Construction Permit, including preparation of a SWPPP and incorporation of sediment control BMPs, and those provisions established by the Brea Municipal Code would reduce the potential for off-site and downstream water quality impacts associated with the proposed project.

A Preliminary Water Quality Management Plan (WQMP) was prepared for the proposed project to comply with the requirements of the County of Orange NPDES Stormwater Program. On-site water quality and storm water drainage would be controlled through the incorporation of infiltration, structural, and non-structural source-control BMPs. Long-term operational impacts associated with water quality standards would be less than significant.

With respect to the revised project under consideration, the project modifications would not change the footprint of the proposed development. The findings of the Addendum would be applicable to the project as modified. Accordingly, no new impacts nor a substantial increase in the severity of a previously identified significant impact would occur.

**Land Use:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. The issues of concern addressed in the Land Use section of the 2003 General Plan EIR were the potential for the General Plan to conflict with existing development on South Brea Boulevard and in the surrounding residential neighborhoods; and conflicts with habitat conservation plans and natural community conservation plans. Indirect land uses impacts such as traffic, noise, air quality, and biological resources were addressed in the respective sections of the 2003 General Plan EIR. The 2003 General Plan EIR notes that the General Plan does not propose any substantial alteration to existing land use patterns.

With respect to land use compatibility, the Addendum evaluated whether the proposed project would be consistent with the goals and policies of the City of Brea General Plan as applicable project.

Goal CD-1 Provide a balance of land uses to meet the present and future needs of all residents.

Policy CD-1.1 Create neighborhoods that effectively integrate single-family and multi-family housing with convenience and neighborhood shopping centers, park and recreation areas, and other uses appropriate for the neighborhoods.

Policy CD-1.2 Maintain a land use structure that balances the provision of jobs and housing with available infrastructure and public and human services.

Policy CD-1.3 Endeavor to create a mixture of employment opportunities for all economic levels of citizens.

Policy CD-1.4 Ensure that the City maintains a balance among residential, commercial, and industrial land uses.

Policy CD-1.5 Provide opportunities for development of housing that responds to diverse community needs in terms of density, size, location, design, and cost.

Policy CD-1.6 Accommodate a broad range of business uses that provide employment at all income levels and that make a positive contribution to the City's tax base.

Policy CD-1.7 Create and maintain linked open spaces and pedestrian access that serve the entire community.

Policy CD-1.8 Connect, where possible, all neighborhoods of the community and surrounding areas located within the City and Sphere of Influence with greenways and well-planned, well-located park areas. Maximize connections to hillside and open space areas.

Policy CD-1.9 Encourage new development that is organized around compact, walkable, mixed-use neighborhoods and districts to conserve open space resources, minimize infrastructure costs, and reduce reliance on the automobile.

Policy CD-1.10 Preserve open space wherever possible, especially in the hillside areas.

Policy CD-1.11 Maintain a mixture of business and retail uses within the community.

Policy CD-1.12 Preserve existing older but well-maintained neighborhoods.

Policy CD-1.13 Address "mansionization" in the community.

Policy CD-1.14 Update and enforce the Neighborhood Preservation Ordinance.

The proposed uses are consistent with these land use designations and the development standards governing development on the property. Therefore, the proposed project would not produce any new adverse impacts resulting from conflicts with existing land use plans on the existing project site or within the City of Brea. Accordingly, the Addendum noted no new impacts nor a substantial increase in the severity of a previously identified significant impact would occur and no potential conflicts on land use and planning have been identified. With respect to the revised project under consideration, the proposed reduction in apartment units, commercial square footage, and hotel rooms would not be inconsistent with applicable goals and policies. The findings of the Addendum would therefore be applicable to the revised project.

**Mineral Resources:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. 2003 General Plan EIR found that the project area does not contain known mineral resources. No impacts were identified. This finding is also applicable to the project as revised; no impacts are identified and no mitigation is required.

**Noise:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. The 2003 General Plan EIR determined that implementation of the goals and policies contained in the General Plan would reduce noise impacts from stationary sources and transportation sources on sensitive land uses throughout the City. The 2003 General Plan EIR also determined that roadway noise levels would be less than significant with mitigation specified locations were impacts would occur. The noted locations are not adjacent to the project site and are therefore not applicable.

A noise analysis was prepared for the proposed Brea Place Project. No significant construction or operational noise impacts were identified. With respect to the revised project, the proposed revisions would result in less development and an incremental reduction in vehicular traffic. The incremental

change in the projected number of daily trips would not result in a decibel reduction that would be discernible. The findings of the Addendum would therefore be applicable to the revised project.

**Population and Housing:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR with respect to population and housing. The Brea Place Project proposed 747 dwelling units and was identified to have an estimated population of 2,099 persons. The Addendum noted that the potential population increase associated with the additional residential units would be consistent with the range of development assumptions set forth in the 2003 General Plan EIR and 2013 Addendum for the Housing Element. As currently proposed, the project would reduce the number of proposed apartment units from 747 units to 653 units, a reduction of 94 units. The estimated residential population would be 1,828 or a reduction of 271 persons. These assumptions are consistent with the City's population and housing projects. The findings of the Addendum would therefore be applicable to the revised project.

**Public Services:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR with respect to fire and police protection services and facilities, schools, or libraries. The 2003 General Plan EIR determined that the compliance with goals and policies in the, and payment of school fees (Senate Bill 50) would alleviate any adverse impacts and no mitigation would be required. The EIR notes that the City can impose conditions of approval on development projects to ensure that development does not proceed in advance of the City's ability to have adequate response capabilities. The Addendum found that impacts associated with the Brea Place Project would be consistent with the findings of the 2003 General Plan EIR.

With respect to the revised project, the reduction in on-site development would have an incremental decrease related to public services. As with the originally proposed project, no significant impacts would occur. Therefore, the findings of the Addendum would be applicable to the project as modified.

**Recreation:** The 2003 General Plan EIR evaluated the potential for General Plan implementation to impact recreation and found impacts to be less than significant. The 2003 General Plan EIR determined that upon implementation of the General Plan, the City would exceed its minimum park service standard of 5 acres per 1,000 residents. The Community Resources chapter of the General Plan includes goals and policies for the provision of additional parks and recreational opportunities. The implementation guide for the General Plan calls for the City to require the dedication of park facilities (or in lieu fees) as a condition of new development pursuant to the Quimby Act.

The project is required to provide 75 square feet per dwelling unit as common open space which for the originally proposed project would have been be 56,025 square feet (1.29 acres). The project exceeded this requirement and would have provided 74,818 square feet (1.72 acres) of common open space. The City also requires, and the project would have provided, 50 square feet of private open space for each residential unit. Both Buildings A and B would provide tenants with swimming pools and spas; club houses; barbecues, tables, and seating areas for outdoor dining; tot lots and green areas. A fitness center would also be provided in Building A and Building B.

Additionally, the City requires residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. The applicant would pay in-lieu fees at the time of building permit issuance. The Addendum identified no new impacts or a substantial increase in the severity of a previously identified significant impact; impacts on recreational facilities would be less than significant.

As it applies to the revised project, there would be a reduction of 94 apartment units. As previously noted, the City requires 75 square feet per dwelling unit as common open space. The revised project would be required to provide 48,975 square feet (1.12 acres) of common space; the revised project would provide 80,530 square feet (1.85 acres) of common open space. It should be noted that the amount of common open space proposed to be provided with the revised project exceeds the amount of common open space that was proposed with original project (74,818 square feet [1.72 acres]) although fewer residential units are associated with the revised project. As noted, the City also requires, and the revised project would provide, 50 square feet of private open space for each residential unit. As with the originally proposed project, both Buildings A and B would provide tenants with swimming pools and spas; club houses; barbeques, tables, and seating areas for outdoor dining; tot lots and green areas. A fitness center would also be provided in Building A and Building B. Additionally, the applicant would pay in-lieu fees at the time of building permit issuance. The findings of the Addendum are also applicable to the revised project.

**Transportation and Circulation:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR. The 2003 General Plan EIR found that with the addition of traffic anticipated under buildout of the General Plan, 13 intersections in the City would exceed level of service (LOS) standards during peak hours. These standards are LOS D for City intersections and LOS E for intersections in the Congestion Management Program. However, goals and policies in the General Plan would minimize the impacts associated with future trips. Transportation improvements in the City's Nexus Program, funded by traffic impact fees from all new development in the City, also would reduce impacts at area intersections to a less than significant level.

A Traffic Impact Analysis was prepared for the proposed project. At the time the Traffic Impact Analysis was prepared, the project had assumed 798 residential units; the project was reduced to 747 units. The evaluation an additional 21 units represents a conservative approach and does not change the results of the analysis. The analysis estimated that the project would add 7,121 daily trips with 513 morning peak hour trips and 642 evening peak hour trips. Mitigation measures were identified in the Traffic Impact Analysis to mitigate the effect of additional development at the driveways within the project site. The Addendum stated that with the improvements identified in Mitigation Measures 1, 2, and 3, the Traffic Impact Analysis supports the conclusion that the project driveways would operate at acceptable levels of service. It was also noted that with the movement restrictions at Driveway B, Driveway A (located north of Driveway B on State College Boulevard) would operate at an acceptable level of service.

With respect to the revised project now under consideration, the changes would result in a reduction in vehicular trips. There would be fewer apartment units, less commercial square footage, and fewer hotel rooms. Under the revised project scenario, the project would generate 5,700 daily trips with 439 morning peak hour trips and 514 evening peak hour trips. This is a reduction of 1,421 daily trips, 74 morning peak hour trips, and 128 evening peak hour trips. The findings of the Addendum and requirements for mitigation would also be applicable to the revised project.

**Utilities and Service Systems:** The Addendum determined that there would be no substantial change from the findings in 2003 General Plan EIR with respect to wastewater treatment and facilities, storm water infrastructure and facilities, water supply, and solid waste disposal. The 2003 General Plan EIR did not identify any significant impacts on utilities and service systems. A sewer study was prepared for the proposed project to evaluate whether the development of the project would exceed the capacity of the existing sewer main capacity located within State College Boulevard. The sewer study concluded that the existing sewer system has sufficient capacity to carry all flows (wet and dry weather) from the proposed project without the need for sewer upgrades. The drainage report concluded that the addition of surface

water runoff from the Brea Place Project would not adversely affect the capacity of the existing 60-inch storm drain pipe such that new storm drains within State College Boulevard would be required to be removed and replaced with larger storm drains to accommodate flow from the project. All other impacts would also be less than significant.

With respect to the revised project under consideration, the reduction in development would have an incremental demand reduction with respect to wastewater, storm water, and landfill facilities, and water supply. The findings of the Addendum would therefore be applicable to the revised project.