

## MEMORANDUM – DISNEYLAND FORWARD PEER REVIEW OF INITIAL STUDY

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**To:** Elaine Thienprasiddhi, City of Anaheim  
**From:** Alex Martini, Dudek  
**Subject:** Disneyland Forward – Dudek Peer Review of Initial Study  
**Date:** October 5, 2021

The following memorandum outlines Dudek’s comments on the peer reviewed Initial Study for the Disneyland Forward Project (City of Anaheim).

### Initial Study Comments

#### Project Description

1. Suggest adding figures to Project Description.
2. Project Description overall seems dense, would be easier for the general public to follow if subheadings were added. Suggest the following:
  - a. Background – Adding a background section upfront so the reader knows what previous CEQA documents have been approved that are related to the project (i.e., EIRs No. 311 and 340).
    - i. Sub-Headings for “transportation improvements” and “infrastructure improvements” would help explain exactly what is being proposed as part of the project. (e.g., is the Gene Autry Way and Clementine Street extension proposed as part of the project? Currently unclear in PD).
  - b. Project Description – Description of what the current project is proposing to do (i.e., preparation of a Subsequent EIR that will analyze the proposed change compared to what was previously approved).
    - i. This section could benefit with the addition of a table to clarify what was previous analyzed and approved in EIRs 311 and 340 compared to what is currently being proposed.
  - c. Project Location
    - i. For the non-Disneyland reader, it isn’t clear what a Manchester Cast Member Lot is. We assume this is where certain Disneyland employees are assigned to park and the

nomenclature is based on closest arterial roadway. Sometimes it's helpful to have a list of acronyms and definitions up front. It might be helpful to have something similar for DisneylandForward Project terms as well.

- d. Environmental Setting – No comment.
- e. Project Phasing – No comment.
- f. Project Permits and Approval – No comment.

## Aesthetics

- 1. It would also be helpful for those thresholds that have mitigation from the previous EIRs to be listed or included in the discussion. Full discussion not necessarily required within the Initial study, but should be mentioned. More robust discussion can be saved for the SEIR.

## Agriculture

- 1. Thresholds A and E: This is the first time EIR No. 313 is mentioned. Dudek thought the project was evaluating the incremental change from EIR's 311 and 340? Provide a discussion of EIR No. 313 in the PD.
  - a. *The potential environmental impacts of the Project will be reviewed in a Subsequent Environmental Impact Report (SEIR) to EIR No. 311 (The Disneyland Resort) and SEIR No. 340 (The Anaheim Resort Specific Plan). The review will be limited to the impacts of the Project's proposed changes (moving previously approved and vested uses to other areas of the DRSP and ARSP) to The Disneyland Resort Project, previously analyzed in certified EIR No. 311, and The Anaheim Resort Specific Plan Project, previously analyzed in certified SEIR No. 340, and other project actions listed in Section 1.5 (Project Approval and Permits)."*
- 2. Mention of this EIR No. 313 continues to come up a number of times throughout the Initial Study, however, it's usually only brought up in the conclusory sentence and there's no discussion of what the analysis or significance determination was in the 313 EIR. If the project is going to analyze the incremental change from the 313 EIR, it should be added to the PD, or removed throughout.

## Cultural Resources

- 1. Threshold A, second paragraph: "However, given the passage of time, there is potential for historic resources to be located in the Project site, which may not have been previously evaluated or that may not have been of historic age (e.g., fifty years old) when last evaluated."
  - a. Consider replacing "...when last evaluated" with "...when previous historical resources identification efforts occurred."
- 2. Threshold B, first paragraph: "EIR No. 311 concluded that no impacts to cultural, historic, or prehistoric resources were expected to occur from development of the DRSP; however, mitigation was identified

requiring evidence that an archaeologist has been hired to detect any unexpected discoveries of cultural resources during grading or development which reduced impacts to less than significant levels.”

- a. Consider replacing “...detect...” with “...identify and evaluate...”
3. Threshold C, towards the end of the paragraph...
    - a. Consider adding Public Resources Code 5097.98 reference and briefly outlining responsibilities of NAHC, the most likely descendant, and landowner.

## Hazards and Hazardous Materials

1. Threshold G: Mention of EIR No. 313 in conclusory sentence only under this threshold.

## Hydrology and Water Quality

1. Thresholds A, B, and C: Mention of EIR No. 313 in conclusory sentence only under these thresholds.

## Noise

1. Thresholds A and B: Mention of EIR No. 313 in conclusory sentence only under these thresholds.
2. Threshold A: “The Project has the potential to increase noise levels in the vicinity of the Project site related to theme park attractions and outdoor activities, as well as operational sources such as vehicle noise and building equipment noise.”
  - a. Agree, because as we understand from the PD and the “areas of change” on the site plans, new theme park and/or hotel uses could replace what are now parking lot uses. These new uses are likely to introduce new stationary sources of noise (e.g. HVAC and other electro-mechanical, and potential PA or speech/music sound reinforcement) to the environment.

## Population and Housing

1. Threshold A: Mention of EIR No. 313 in conclusory sentence only under this threshold.

## Public Services

1. Threshold A: Mention of EIR No. 313 in conclusory sentence only under this threshold.

## Transportation

1. Threshold A: CEQA no longer requires LOS to be evaluated as a potential transportation impact. Add a statement that describes the shift from LOS to VMT for analyzing impacts. The LOS information can be included here but suggest moving to the end of the discussion and clarify that this information is provided for reference only.

2. Threshold A: “Also, Project consistency with other programs, plans, ordinances, and policies related to transit, bicycle, and pedestrian facilities will be evaluated in the Draft SEIR.”
  - a. Suggest moving this to the beginning of the discussion. This statement addresses the primary issues related to this threshold. It would also be helpful to list the relevant programs, plans, polices, etc. that will be evaluated in the SEIR
3. Threshold B: VMT analysis to be included in SEIR.
4. Threshold D: We recommend this threshold still be carried over into SEIR and further analysis be completed.

## Tribal Cultural Resources

1. Threshold A: Mention of EIR No. 313 in conclusory sentence only under this threshold.
2. Consider expanding to specifically state required compliance with Assembly Bill 52 and Senate Bill 18.

## Utilities and Service Systems

1. Thresholds A, B, and C: Mention of EIR No. 313 in conclusory sentence only under these thresholds.

## Wildfire

1. Dudek understands the desire to lump the analysis for all the thresholds together, but better practice is to answer each one individually with a custom response so the public knows each question was considered and responded to.

## Mandatory Findings of Significance

1. Same comment as above (answer each threshold individually). These responses should also describe the studies that will be done in order to answer these questions. So for example, under a. describe that a cultural study will be conducted as part of the SEIR, etc.