

Due to Governor Gavin Newsom's Executive Order and the City Council's Proclamation of Local Emergency, we can no longer offer an in-person meeting location for the community to attend public meetings.

You may watch the meeting live in the following ways:

- Visit the City's website santa-ana.org/city-meetings and select the active link for the current Planning Commission meeting.
- Visit the City's YouTube site at youtube.com/cityofsantaanavideos/live.
- For Spanish audio, visit santaana.granicus.com/MediaPlayer.php?publish_id=1

You may provide a comment in the following ways:

- Send an e-mail to ecomments@santa-ana.org (reference "Planning Commission Public Comment for Agenda Item No. #" in the subject line). Make sure to include your name, whether you are in support of or in opposition to the item and why. The deadline to submit comments is 5:00 p.m. **on the day of the meeting**. Comments received by the deadline will be distributed to the Commission prior to the start of the meeting and will also be posted on our website at www.santa-ana.org/cc/city-meetings. Comments received after the deadline may not be distributed to the Commission but will be posted on the City's website at the earliest possible opportunity after the meeting; or
- Join the Zoom Webinar directly at: <https://us02web.zoom.us/j/315965149>; or
- Call 669-900-9128 and enter Meeting ID: 315 965 149# when prompted. Callers can begin joining the speaker que by 5:00 p.m. on the day of the meeting. While the item that you would like to comment on is being discussed, dial *9 to let us know that you want to speak. After the clerk confirms the last three digits of caller's phone number and unmutes them, the caller must press *6 to speak. You will have 3 minutes to state your name, whether you are in support of or in opposition to the item, and why. *If you are calling in and watching YouTube, please turn your*

CITY OF SANTA ANA PLANNING COMMISSION REGULAR MEETING AGENDA

NOVEMBER 9, 2020
5:30 P.M.

VIRTUAL MEETING

MARK McLOUGHLIN
Chair, Citywide Representative

CYNTHIA CONTRERAS-LEO
Vice Chair, Ward 5 Representative

FELIX RIVERA
Ward 2 Representative

V. THAI PHAN
Ward 4 Representative



Minh Thai
Executive Director

Lisa E. Storck
Legal Counsel

Vince Fregoso, AICP
Planning Manager

Sarah Bernal
Recording Secretary

NORMA GARCIA
Ward 1 Representative

KENNETH NGUYEN
Ward 3 Representative

THOMAS MORRISSEY
Ward 6 Representative

Si tiene preguntas en español, favor de llamar a Narcee Perez al (714) 667-2260.
Nếu cần liên lạc bằng tiếng Việt, xin điện thoại cho Tony Lai số (714) 565-2627.

Translation Services: If you require translation services to participate in this meeting, please contact Sarah Bernal at sbernal@santa-ana.org no later than 48 hours prior to the scheduled meeting.

Special Assistance: If you need special assistance to participate in this meeting, please contact Michael Ortiz, ADA Program Coordinator, at (714) 647-5624. Please call prior to the meeting date, to allow the City time to make reasonable arrangements for accessibility to this meeting [Americans with Disabilities Act, Title II, 28 CFR 35.102].

Basic Planning Commission Meeting Information

The Planning Commission Agenda can be found online at

<https://www.santa-ana.org/cc/city-meetings>

Planning Commission: The Santa Ana Planning Commission consists of seven residents of the city who are appointed by Santa Ana City Councilmembers. The Commission meets regularly on the second and fourth Monday of each month. Meetings begin at 5:30 p.m., unless otherwise noted.

The Planning Commission is responsible for providing input to the City Council on long-range planning. Santa Ana's long-range planning goals are embodied in the General Plan. The General Plan and the amendments to it are reviewed by the Planning Commission and adopted by the City Council. The General Plan is implemented through the City's development regulations.

The Planning Commission has the authority to approve or deny applications concerning development within the City. The category of applications includes Conditional Use Permits, Variances, Tentative Tract and Parcel Maps, Minor Exceptions, Site Plan Review, and Public Convenience or Necessity Determinations. The Planning Commission also makes recommendations to the City Council on all Zoning and General Plan amendments, Development Agreements, Specific Developments, and Specific Plans.

Agenda and Staff Reports: An agenda along with staff reports are provided for each Planning Commission meeting. The Planning Commission agenda and staff reports is posted at least 72 hours prior to the meeting on the City's website at www.santa-ana.org/cc/city-meetings, and on the posting boards outside the Civic Center entrance, Council Chamber, and Library. If you have any questions regarding any item of business on the agenda for this meeting, or any of the staff reports or other documentation relating to any agenda item, please contact the Planning and Building Agency at 714-667-2732.

The items on the agenda are arranged in four categories:

1. **Consent Calendar:** These are relatively minor in nature, do not have any outstanding issues or concerns, and do not require a public hearing. All consent calendar items are considered by the Commission as one item and a single vote is taken for their approval, unless an item is pulled from the consent calendar for individual discussion. There is typically no Commission discussion of consent calendar items unless requested.
2. **Business Items:** Items in this category are general in nature and may require Commission action. Public input may be received at the request of the Commission.
3. **Public Hearings:** This category is for case applications that require, by law, a hearing open to public comment because of the discretionary nature of the request. Public hearings are formally conducted and public input/testimony is requested at a specific time. This is your opportunity to speak on the item(s) that concern you.
4. **Work Study Session:** Items in this category are generally items requiring discussion. No action will be taken.

Public Hearing Procedure: The Planning Commission will follow the following procedure for all items listed as public hearing items:

1. The Chair will ask for presentation of the staff report;
2. The Commission will have the opportunity to question staff in order to clarify any specific points;
3. The public hearing will be opened;
4. The applicant/ project representative will be allowed to make a presentation, for a maximum of 15 minutes.
5. Members of the audience will be allowed to speak, for a maximum of 3 minutes per speaker.
6. The applicant will be given an opportunity to respond to comments made by the audience;
7. The public hearing will be closed; and
8. Discussion of the proposal will return to the Commission with formal action taken to approve, conditionally approve, deny, or continue review of the application.

Appeals: The formal action by the Planning Commission regarding Conditional Use Permits, Variances, Tentative Tract and Parcel Maps, Minor Exceptions, Site Plan Review, and Public Convenience or Necessity Determinations are final and shall become effective after the ten-day appeal period (unless the City Council in compliance with section 41-643, 41-644 or 41-645 holds a public hearing on the matter, then the formal action will become effective on the day following the hearing and decision by the City Council). An appeal from the decision or requirement of the Planning Commission may be made by any interested party, individual, or group. The appeal must be filed with the Clerk of the Council, accompanied by the required filing fee, and a copy sent to the Planning Department, within ten days of the date of the Commission's action, by 5:00 p.m. If the final day to appeal falls on a City Hall observed holiday or a day when City hall is closed, the final day to appeal shall be extended to the next day City Hall is

open for public business. Please note: Under California Government Code Sec. 65009, if you challenge in court any of the matters on this agenda for which a public hearing is to be conducted, you may be limited to raising only those issues which you (or someone else) raised orally at the public hearing or in written correspondence received by the Planning Commission or City Council at or before the hearing.

Submittal of information for dissemination or presentation

Written Materials/Handouts: Any member of the public who desires to submit documentation in hard copy form may do so prior to the meeting or at the time he/she addresses the Planning Commission. Please provide 15 copies of the information to be submitted and file with the Recording Secretary at the time of arrival to the meeting. This information will be disseminated to the Planning Commission at the time testimony is given.

Large Displays/Maps/Renderings: Any member of the public who desires to display freestanding large displays or renderings in conjunction with their public testimony is asked to notify the Planning and Building Agency at 714-667-2732 no later than noon on the day of the scheduled meeting.

Electronic Documents/Audio-Visuals: Any member of the public who desires to display information electronically in conjunction with their public testimony is asked to submit the information to the Planning and Building Agency at 714-667-2732 no later than noon on the day of the scheduled meeting.

Code of Ethics and Conduct: The people of the City of Santa Ana, at an election held on February 5, 2008, approved an amendment to the City Charter which established the Code of Ethics and Conduct for elected officials and members of appointed boards, commissions, and committees to assure public confidence. A copy of the City's Code can be found on the Clerk of the Council's webpage. The following are the core values expressed: Integrity · Honesty · Responsibility · Fairness · Accountability · Respect · Efficiency

Senate Bill 343: As required by Senate Bill 343, any non-confidential writings or documents provided to a majority of the Planning Commission members regarding any item on this agenda will be made available for public inspection in the Planning & Building Agency during normal business hours.

**CITY OF SANTA ANA
PLANNING COMMISSION
MEETING AGENDA**

CALL TO ORDER

ROLL CALL

PLEDGE OF ALLEGIANCE

PUBLIC COMMENTS (non-agenda items): Individuals may comment on an agenda item in the following ways: (1) You may submit written comments by email to ecomments@santa-ana.org (reference "Planning Commission Public Comment for Agenda Item #" in the subject line). The deadline to submit comments is 5:00 p.m. **on the day of the meeting**; or (2) You may join the Zoom Webinar directly at: <https://us02web.zoom.us/j/315965149>; or (3) You may comment by phone while the meeting is in progress by calling 669-900-9128. Enter Meeting ID: 315 965 149# when prompted. While the item that you would like to comment on is being discussed, dial *9 to let us know that you want to speak. After you are called upon, you must press *6 to unmute yourself. Please state your name, whether you are in support or opposition to an item and why. You will have 3 minutes to speak.

CONSENT CALENDAR

Individuals may comment on an agenda item in the following ways: (1) You may submit written comments by email to ecomments@santa-ana.org (reference "Planning Commission Public Comment for Agenda Item #" in the subject line). The deadline to submit comments is 5:00 p.m. **on the day of the meeting**; or (2) You may join the Zoom Webinar directly at: <https://us02web.zoom.us/j/315965149>; or (3) You may comment by phone while the meeting is in progress by calling 669-900-9128. Enter Meeting ID: 315 965 149# when prompted. While the item that you would like to comment on is being discussed, dial *9 to let us know that you want to speak. After you are called upon, you must press *6 to unmute yourself. Please state your name, whether you are in support or opposition to an item and why. You will have 3 minutes to speak.

RECOMMENDED ACTION: **Approve staff recommendation on the following Consent Calendar Item: A – B.**

A. MINUTES FROM THE OCTOBER 26, 2020 REGULAR MEETING.

RECOMMENDED ACTION: ***Approve the minutes.***

B. EXCUSED ABSENCES

RECOMMENDED ACTION: ***Excuse absent commission members.***

*** * * END OF CONSENT CALENDAR * * ***

BUSINESS CALENDAR

Individuals may comment on an agenda item in the following ways: (1) You may submit written comments by email to ecomments@santa-ana.org (reference "Planning Commission Public Comment for Agenda Item #" in the subject line). The deadline to submit comments is 5:00 p.m. **on the day of the meeting;** or (2) You may join the Zoom Webinar directly at: <https://us02web.zoom.us/j/315965149>; or (3) You may comment by phone while the meeting is in progress by calling 669-900-9128. Enter Meeting ID: 315 965 149# when prompted. While the item that you would like to comment on is being discussed, dial *9 to let us know that you want to speak. After you are called upon, you must press *6 to unmute yourself. Please state your name, whether you are in support or opposition to an item and why. You will have 3 minutes to speak.

PUBLIC HEARING

APPEAL OF PLANNING COMMISSION ACTIONS: The Planning Commission decision on Conditional Use Permits, Variances, Tentative Tract and Parcel Maps, Minor Exceptions, Site Plan Review, and Public Convenience or Necessity Determinations are final unless appealed within 10 days of the decision by any interested party or group (refer to the Basic Meeting Information page for more information). The Planning Commission recommendation on Zoning and General Plan amendments, Development Agreements, Specific Developments, and Specific Plans will be forwarded to the City Council for final determination. **NOTICE:** Legal notice for item no. 1 was published in the Orange County Reporter on October 14; notices mailed at least 10 days prior. Legal notice for item no. 2 was published in the Orange County Register on October 23; notices mailed at least 10 days prior. Legal notice for item no. 3 was published in the Orange County Reporter on October 28; notices mailed at least 10 days prior.

1. SITE PLAN REVIEW NO. 2020-04 – Selena Kelaher, Case Planner.

Due to a lack of quorum, matter was continued from the October 26, 2020 regular meeting.

LOCATION: 1801 East Fourth Street located in the Metro East Mixed-Use Overlay Zone (MEMU), Active Urban (AU) zoning district

REQUEST: The applicant is requesting approval of a site plan review to facilitate construction of a mixed-use development project consisting of two buildings with a total of 644 residential units, 15,130 square feet of commercial space, 1,318 parking spaces and associated amenities and open space.

ENVIRONMENTAL DETERMINATION: In conjunction with the above request, the Planning Commission consider the following: Pursuant to the California Environmental Quality Act (CEQA), the project has been determined to be adequately evaluated in the previously certified Environmental Impact Report (EIR) No. 2006-01 (SCH No. 2006031041) and Subsequent EIR (SEIR) No. 2018-15 as per Sections 15162 and 15168 of the CEQA guidelines.

RECOMMENDED ACTION: Adopt a Resolution. A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ANA APPROVING SITE PLAN REVIEW NO. 2020-04 AS CONDITIONED FOR A NEW MIXED-USE RESIDENTIAL AND COMMERCIAL DEVELOPMENT FOR THE PROPERTY LOCATED AT 1801 EAST FOURTH STREET

2. ENVIRONMENTAL IMPACT REPORT NO. 2020-03 AND GENERAL PLAN AMENDMENT NO. 2020-06 FOR THE COMPREHENSIVE UPDATE TO THE SANTA ANA GENERAL PLAN – Vince Fregoso, Case Planner.

Due to a lack of quorum, the matter was adjourned from the November 5, 2020 special meeting.

LOCATION: Citywide

REQUEST: The City is requesting approval of a general plan amendment to facilitate a comprehensive update to the City's General Plan. The General Plan goals and policies will guide the City's physical development, fiscal and environmental sustainability, and overall quality of life for the community.

ENVIRONMENTAL DETERMINATION: In conjunction with the above request, the Planning Commission will consider the following: Pursuant to the California Environmental Quality Act (CEQA), Environmental Impact Report 2020-03 was prepared for the project to analyze the potential impacts of the project and identify measures to mitigate the environmental effects.

RECOMMENDED ACTIONS:

a) **Recommend that the City Council adopt a Resolution.** A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA ANA (1) ADOPTING ENVIRONMENTAL FINDINGS OF FACT AND A STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE GENERAL PLAN UPDATE PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, (2) CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT (STATE CLEARINGHOUSE NO. 2020029087), (3) ADOPTING THE MITIGATION MONITORING AND REPORTING PROGRAM, AND (4) APPROVING THE PROPOSED GENERAL PLAN UPDATE

b) **Recommend that the City Council adopt a Resolution.** A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA ANA APPROVING GENERAL PLAN AMENDMENT NO. 2020-06 FOR THE COMPREHENSIVE UPDATE TO THE SANTA ANA GENERAL PLAN

3. CONDITIONAL USE PERMIT NO. 2020-19 AND VARIANCE NO. 2020-04 – Fernanda Aria, Case Planner.

LOCATION: 4111 South Main Street located in the General Commercial (C2) zoning district.

REQUEST: The applicant is requesting approval of a (1) conditional use permit to permit the construction of a new major wireless communications facility disguised as a mono-pine and a (2) variance to permit the wireless facility at a height of 80 feet in lieu of a maximum of 60 feet.

ENVIRONMENTAL DETERMINATION: In conjunction with the above request, the Planning Commission will consider the following: The project is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15303 of the CEQA Guidelines – New Construction. Notice of Exemption, Environmental Review No. 2018-117 will be filed for this project.

RECOMMENDED ACTIONS: *Continue the matter to December 14, 2020.*

*****END OF BUSINESS CALENDAR*****

COMMENTS

4. STAFF COMMENTS

5. COMMISSION MEMBER COMMENTS

ADJOURNMENT – The meeting scheduled for Monday, November 23 is canceled. The next regular meeting will be held via teleconference on Monday, December 14 at 5:30 p.m.

**ACTION MINUTES OF THE REGULAR MEETING
OF THE SANTA ANA PLANNING COMMISSION**

OCTOBER 26, 2020

CALLED TO ORDER

VIRTUAL MEETING
CITY HALL, ROSS ANNEX
20 CIVIC CENTER PLAZA, ROOM 1600
SANTA ANA, CALIFORNIA
5:30 P.M.

ATTENDANCE

COMMISSIONERS Present:
CYNTHIA CONTRERAS-LEO, *Vice Chair*
MARK MCLOUGHLIN, *Chair*
THOMAS MORRISSEY
V. THAI PHAN

COMMISSIONERS Absent: None.
NORMA GARCIA
KENNETH NGUYEN
FELIX RIVERA

PLANNING & BUILDING AGENCY STAFF Present:
MINH THAI, *Executive Director*
VINCE FREGOSO, *Planning Manager*
RYAN HODGE, *Assistant City Attorney*
SELENA KELAHER, *Associate Planner*
JERRY GUEVARA, *Assistant Planner*
SARAH BERNAL, *Recording Secretary*

PLEDGE OF ALLEGIANCE

PUBLIC COMMENTS (on non-agenda items): None.

CONSENT CALENDAR ITEMS

**All votes were taken by roll call*

1. MINUTES FROM THE OCTOBER 12, 2020 REGULAR MEETING

MOTION: Approve the minutes.

MOTION: MORRISSEY **SECOND:** PHAN

VOTE: **AYES:** Contreras-Leo, McLoughlin, Morrissey, Phan (4)
NOES: None (0)
ABSTAIN:: None (0)

ABSENT: Garcia, Nguyen Rivera (3)

BUSINESS CALENDAR

PUBLIC HEARING

Item No. 1 moved to the end of the calendar

2. **ENVIRONMENTAL REVIEW NO. 2018-83, GENERAL PLAN AMENDMENT NO. 2020-04, AMENDMENT APPLICATION NO. 2020-02, AND TENTATIVE TRACT MAP NO. 2019-02**
– Jerry Guevara, Case Planner.

LOCATION: 301 and 305 North Mountain View Street located in the General Agricultural (A1) zoning district.

REQUEST: The applicant proposes to construct a new eight-unit condominium development. In order to facilitate the construction of this project, the applicant is requesting approval of the following land use entitlements: (1) a general plan amendment to change the site's current land use designation from Low-Medium Density Residential (LMR-11) to Medium Density Residential (MR-15), (2) an amendment application to change the zoning designation of the property from General Agricultural (A1) to Two-Family Residence (R2), and (3) a tentative tract map to allow subdivision of the property for condominium purposes. In addition, the applicant is requesting adoption of a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program. In conjunction with this project, the City is also proposing to change the General Plan Land Use designation and zoning of adjacent properties on the block stretching from First Street to Fifth Street to ensure consistency between zoning and the General Plan.

Case Planner Guevara provided a staff presentation.

Commission discussion ensued regarding the zoning designation and general plan amendment.

Recording Secretary provided a summary report of written communication received.

Chair McLoughlin opened the public hearing. Representatives of the project spoke in support of the matter. Answered questions regarding parking. There were no other speakers and the public hearing was closed.

Further discussion ensued regarding City parking standards and permit parking.

MOTIONS:

- a) **Adopt a Resolution.** A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ANA ADOPTING A MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM, ENVIRONMENTAL

REVIEW NO. 2018-83, RELATIVE TO TENTATIVE TRACT MAP NO. 2019-02 FOR THE PROJECT LOCATED AT 301 AND 305 NORTH MOUNTAIN VIEW STREET

- b) **Adopt a Resolution:** A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ANA APPROVING TENTATIVE TRACT MAP NO. 2019-02 AS CONDITIONED TO CREATE A SUBDIVISION OF EIGHT (8) CONDOMINIUM UNITS AT 301 AND 305 NORTH MOUNTAIN VIEW STREET
- c) **Recommend that the City Council adopt a Resolution:** A RESOLUTION OF CITY COUNCIL OF THE CITY OF SANTA ANA ADOPTING A MITIGATED NEGATIVE DECLARATION AND MITIGATION MONITORING AND REPORTING PROGRAM, ENVIRONMENTAL REVIEW NO. 2018-83, RELATIVE TO GENERAL PLAN AMENDMENT NO. 2020-04 AND AMENDMENT APPLICATION NO. 2020-02 FOR THE PROJECT LOCATED AT 301 AND 305 NORTH MOUNTAIN VIEW STREET
- d) **Recommend that the City Council adopt a Resolution:** A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA ANA APPROVING GENERAL PLAN AMENDMENT NO. 2020-04 TO CHANGE THE GENERAL PLAN LAND USE DESIGNATIONS FOR THE PROPERTIES LOCATED AT 4310, 4314, 4318, 4322, 4326 AND 4330 WEST FIFTH STREET; 113, 117, 121, 201, 203, 207, 211, 221, 223, 225, 227, 229, 231, 233, 235, 237, 239, 241, 243, 245, 247, 301, 305, 321, 323, 325, 327, 329, 331, 333, 335, 337, 339, 341, 343, 345, 347, 349, 351, 353, 355, 357, 359, 361, 363, 365, 409 AND 411 NORTH MOUNTAIN VIEW STREET; AND 4311, 4315, 4317, 4319, 4321, 4323, 4325, 4327, 4329, 4331, 4333, 4335, 4337 AND 4339 WEST FIRST STREET
- e) **Recommend that the City Council adopt an Ordinance:** AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SANTA ANA APPROVING AMENDMENT APPLICATION NO. 2020-02 REZONING THE PROPERTIES LOCATED AT 4310, 4314, 4318, 4322, 4326 AND 4330 WEST FIFTH STREET; 113, 117, 121, 201, 203, 207, 211, 221, 223, 225, 227, 229, 231, 233, 235, 237, 239, 241, 243, 245, 247, 301, AND 305 NORTH MOUNTAIN VIEW STREET; AND 4311 WEST FIRST STREET

MOTION: MORRISSEY **SECOND:** PHAN

VOTE: **AYES:** Contreras-Leo, Garcia, McLoughlin, Morrissey, Phan (4)
NOES: None (0)
ABSTAIN: None (0)
ABSENT: Garcia, Nguyen, Rivera (3)

1. **SITE PLAN REVIEW NO. 2020-04** – Selena Kelaher, Case Planner.

LOCATION: 1801 East Fourth Street located in the Metro East Mixed-Use Overlay Zone (MEMU), Active Urban (AU) zoning district

REQUEST: The applicant is requesting approval of a site plan review to facilitate construction of Central Pointe, a mixed-use development project consisting of two buildings with a total of 644 residential units, 15,130 square feet of commercial space, 1,318 parking spaces and associated amenities and open space.

Commissioner Phan recused herself due to a conflict of her interest; her employer, Ruttan & Tucker, represents the owner.

Due to a lack of quorum, the item was adjourned to the next regular meeting on November 9, 2020 at 5:30 p.m.

*****END OF BUSINESS CALENDAR*****

COMMENTS

3. STAFF COMMENTS:

Planning Manager Fregoso:

- Special Meeting scheduled for November 5 at 5:30 p.m. to review the General Plan Update.
- Please reach out to staff if Commission would like to meet with staff to discuss the General Plan Update.

4. COMMISSION MEMBER COMMENTS:

- Commissioner Morrissey: Should consider zoning inconsistency at the time the General Plan is adopted rather than spot zoning.
- Commissioner Phan: Echoed Commissioner Morrissey's comment regarding zoning.
- Vice Chair Contreras-Leo: Echoed Commissioner Morrissey's comment regarding zoning.
- Chair McLoughlin: Inquired about community interest for the Special Meeting on November 5.

6:28 P.M. – There will be a Special meeting on November 5, 2020. The next Regular meeting will be on Monday, November 9, 2020 at 5:30 p.m.

Sarah Bernal
Recording Secretary

REQUEST FOR Planning Commission Action



PLANNING COMMISSION MEETING DATE:

OCTOBER 26, 2020

TITLE:

**PUBLIC HEARING – SITE PLAN REVIEW NO. 2020-04
FOR THE CENTRAL POINTE MIXED-USE
DEVELOPMENT AT 1801 EAST FOURTH STREET**

PLANNING COMMISSION SECRETARY

APPROVED

- As Recommended
- As Amended
- Set Public Hearing For _____

DENIED

- Applicant's Request
- Staff Recommendation

**CONTINUED TO 11-09-2020 DUE TO
LACK OF QUORUM**

Prepared by Selena Kelaher, AICP

Executive Director

Planning Manager

RECOMMENDED ACTION

Adopt a resolution approving Site Plan Review No. 2020-04 as conditioned.

Property Owner and Applicant Information

1. Owner: Park Center Santa Ana Associates, L.P.
2. Applicant: Waterford Property Company
3. Project Representative: Sean Rawson

Executive Summary

Sean Rawson with Waterford Property Company, representing Park Center Santa Ana Associates, L.P, is requesting approval of a site plan review application to facilitate construction of Central Pointe, a mixed-use development project consisting of two buildings with a total of 644 multi-family residential units, 15,130 square feet of commercial space, and associated amenities and open space at 1801 East Fourth Street. Staff is recommending approval of the applicant's request due to the project's compliance with the intent of the Metro East Mixed-Use Overlay Zone by providing a highly amenitized, mid-rise, mixed-use development within an urban environment.

Table 1: Project and Location Information

Item	Information
Project Address	1801 East Fourth Street
Nearest Intersection	Fourth Street and Cabrillo Park Drive
General Plan Designation	District Center (DC)
Zoning Designation	Metro East Mixed-Use Overlay Zone (MEMU), Active Urban (AU) district

Item	Information	
Surrounding Land Uses (Exhibit 2)	Commercial (North)	
	Commercial (East)	
	Commercial (South)	
	Santa Ana (I-5) Freeway and Commercial (West)	
Site Size	8.03 net acres	
Existing Site Development	Vacant	
Use Permissions	Mixed-use projects permitted by MEMU Overlay Section 4.1 Land Uses, Table 3, Section 4.1.3	
Code Sections Affected	Development Standards	MEMU Overlay, Sections 4.1 through 4.8
	Site Plan Review	MEMU Overlay, Sections 8

Project Description

The proposed project contains two buildings with an outdoor lawn in the center of the development. Each building includes five stories of residential units and ground-floor commercial space wrapped around seven levels of parking (one subterranean level and six above-grade levels) with a rooftop amenity deck. The total height of the project is approximately 86 feet. The project has a density of 81 dwelling units per acre and a floor area ratio of approximately 2.2. The unit mix varies from studio units, one-bedroom units, two-bedroom units, and three-bedroom units, with 12 different floor plans proposed. Residential common open space includes the private balconies or patios, the great lawn, nine courtyards, fitness rooms, club rooms, and a rooftop amenity deck with a pool and spa. Commercial spaces will line Fourth Street and provide opportunities for new eating establishments, service uses, and/or retail businesses. Publicly accessible open space includes the linear park along the east side of the development, a plaza at the corner of Fourth Street and Cabrillo Park Drive, and internal paseos. The outdoor areas will be programmed with picnic tables, benches, umbrellas, lawn games, decorative hardscape, a recreation trail, and landscaping.

Vehicular access to the site is provided from both Parkcourt Place and Fourth Street. Onsite parking includes 18 surface level parking spaces off of Fourth Street and a multi-level parking structure for each building. A total of 1,318 parking spaces are proposed which is a ratio of 2.04 spaces per unit. Offsite improvements include a new signalized intersection and crosswalks at Cabrillo Park Drive and Parkcourt Place. The existing median on Parkcourt Place will be reconstructed to provide a 100-foot left turn pocket to allow for vehicles to turn into the site as well as a dedicated left turn lane from Parkcourt Place to northbound Cabrillo Park Drive. The project will construct an additional westbound right-turn lane at Fourth Street and the northbound I-5 ramp and a dedicated right-turn lane on Cabrillo Park Drive. In addition, the project will also pay its fair share in modifying the eastbound shared through/right-turn lane to construct a free-right turn lane at the Fourth Street and southbound SR-55 ramp.

The building has been designed with contemporary architectural elements comprised of high quality, long lasting materials such as metal siding, stone veneer, simulated wood siding, fiber cement lap siding, fiber cement panels, stucco, metal and glass railings and aluminum storefronts (Exhibits 3 through 9).

Table 2: Project Summary

	Building A	Building B
Units	325 units	319 units
Commercial Square Footage (SF)	9,568 SF	5,562 SF
Building SF	286,655 SF	274,145 SF
Unit Mix/Room	19 studios (6%) 162 one-bedrooms (50%) 121 two-bedrooms (37%) 23 three-bedrooms (7%)	20 studios (6%) 164 one-bedrooms (51%) 127 two-bedrooms (40%) 8 three-bedrooms (3%)
Unit SF	518 to 543 SF studios 683 to 778 SF one-bedrooms 1,066 to 1,148 SF two-bedrooms 1,274 to 1,339 SF three-bedrooms	518 to 543 SF studios 683 to 778 SF one-bedrooms 1,066 to 1,148 SF two-bedrooms 1,274 to 1,339 SF three-bedrooms
Height & Stories	8-stories, 85'5"	8-stories, 85'5"
Parking	650 spaces (2.00 spaces per unit)	650 spaces (2.03 space per unit)
Open Space/ Amenities	Ground Level Courtyards 12,650 SF Roof Deck 15,961 SF Fitness and Club Room	Ground Level Courtyards 10,271 SF Roof Deck 15,961 SF Fitness and Club Room

Project and Site Background

The MEMU Overlay Zone was adopted in 2007 to facilitate mixed-used development opportunities in a portion of the City between the Santa Ana (I-5) and Costa Mesa (SR-55) freeways centered on First and Fourth streets. In 2018, the City approved an expansion of the MEMU Overlay Zone primarily along First Street to Grand Avenue that resulted in an additional 33 acres of potential mixed-use development.

In 2006, Shea Homes proposed a mixed-use project at the site consisting of almost 600 residential units, and 7,750 square feet of commercial space within a 5-story, 8-story and 20-story buildings. However, the due to economic conditions, the application was withdrawn. Currently, the project site is vacant and undeveloped.

In 2019, the applicant submitted plans to the development review committee and planning staff for review. Planning staff requested that the applicant maximize the amount of commercial space at the project, enhance the corner of Fourth Street and Cabrillo Park Drive, enhance the building materials, and increase in the number of parking spaces. A market analysis was completed for the project and evidenced that no more than 21,000 square feet can be successfully supported. The

applicant revised their initial proposal to increase the commercial square footage from 9,100 to 15,130 square feet, reflecting a 40 percent increase from the original proposal.

On October 12, 2020, the Planning Commission held a work study session to overview the project. A summary of the Commission's comments and the applicant's response to the comments is included in the table below.

Table 3: October 12, 2020 Work Study Session Summary

Commission Comment	Central Pointe Project
Provide adequate public open space on site	The Active Urban District requires that 15% of the site be publically accessible open space (52,468 SF required). The project meets the requirement by providing a total of 54,568 SF of publically accessible open space. The publically accessible open space includes the 31,596 SF linear park, plaza at Fourth St. and Cabrillo Park Dr., 15,727 SF central park, and forecourts as shown in Exhibit 9.
Provide adequate private/common area open space	The Active Urban District requires a total of 76,148 SF of private/common open space. The project exceeds the requirement by providing 106,654 SF of private/common open space through balconies for each unit, courtyards, rooftop amenity decks and a dog run as shown on the unit floor plans and on Exhibit 9.
Inclusion of larger trees and landscape at installation	The conceptual landscape plan includes a variety of tree species and sizes that are a minimum of 48-inch box trees. Condition of Approval No. 11 requires a minimum of 48-inch box trees and a minimum of a 10-foot brown truck height for the palm trees.
The viability of the commercial uses and intended goals of the MEMU	The Market and Fiscal Impact analysis and peer review of the study concluded that the project could support between 10,000 to 21,000 SF of commercial space. Additionally, a subsequent analysis on the feasibility of a neighborhood market on-site was conducted. The analysis concluded that it would be infeasible to include a market on-site Exhibit 15.
Parking for the commercial use	The Active Urban District requires 2.0 parking spaces per unit inclusive of nonresidential uses and guest parking (1,288 space required). The project exceeds this requirement by providing 1,318 spaces. Therefore, there are 30 additional parking spaces for the project (18 surface level parking spaces off Fourth Street adjacent to the commercial space and 12 spaces within the parking structures). The 30 additional spaces is a ratio of one parking space per every 500 square feet of commercial space. Condition of Approval No. 12 requires submittal of a parking management plan which will include management of parking for commercial and leasing office purpose and requires active monitoring of parking by the property manager.
Inclusion of green building features	The project will comply with the requirements of the CALGreen Building Code, which includes constructing a cool roof, electric vehicle charging stations, water and energy efficient fixtures and appliances, and drought tolerant plants and permeable surfaces. Energy efficient building construction elements include low/no VOC paint, highly rated insulation, and carbon absorbing framing.

Analysis of the Issues

Site Plan Review

The SAMC and Section 8.2 of the MEMU Overlay Zone require that the Planning Commission review a site plan review application for any project proposed within an overlay zone. An analysis of the required MEMU Overlay Findings and the project’s compliance with the MEMU is provided in Table 4 on the following page.

Table 4: MEMU Findings for Site Plan Approval

Finding	Project Compliance
<p>That the proposed development plan is consistent with and will further the objectives outlined in Section 1.2 for the MEMU Overlay Zone.</p>	<p>The development will activate a vacant and underutilized 8-acre site in the MEMU Overlay Zone. The project will create a new mixed-use development within close proximity to office buildings, Cabrillo Park, Mabury Park, and less than two miles from Downtown Santa Ana providing opportunities to live, work, and recreate. Each building will be five-stories of residential units wrapped around a seven-level parking structure. The height of the buildings will blend in with the heights of the nearby office buildings which range from single-story, three-story and eight-story buildings and will create an interface with the Santa Ana (I-5) Freeway.</p> <p>The project will be built to California Building Code standards, which include energy and water conservation measures and will improve pedestrian mobility by providing new sidewalks and parkways along Fourth Street and Parkcourt Place. In addition, the publically accessible linear park will serve as a link to the meandering trail along Mabury Street and to Mabury Park to the north. Each building has a centrally located bike room, and there is a rideshare pick-up/drop-off in the middle of the project site. Additionally, the project is within walking distance of the OCTA Route 463 bus stop at Fourth Street and Cabrillo Park Drive.</p> <p>The commercial space has been designed with retail floor heights of 20 feet with storefronts that will be visible from Fourth Street. In addition, the commercial space links directly to an on-site public plaza at the corner of Fourth Street and Cabrillo Park Drive which will include outdoor dining opportunities, decorative hardscape, specimen trees and plantings, umbrellas, seating and lawn games. In addition, the ground floor residential units along Cabrillo Park Drive will have doors and patios with direct access to the street to help activate the street.</p>
<p>That the proposed development plan is consistent with the development standards specified in Section 4 of the MEMU Overlay Zone.</p>	<p>The project is consistent with the development standards specified in Section 4 of the MEMU Overlay Zone including land use, stories, minimum development site area, building frontages, publically accessible open space, private/common open space, building setbacks, and parking and access. The propose project is a mixed-use development that has been well designed to fit within the Active Urban District. Further, the access and egress for the project has been thoroughly review by the Public works Agency for compliance with all applicable development standards.</p>
<p>That the proposed development plan is designed</p>	<p>The project is consistent with the development standards specified in Section 5 of the MEMU Overlay Zone. The building is designed with a high quality design that includes</p>

Finding	Project Compliance
<p>to be compatible with adjacent development in terms of similarity of scale, height, and site configuration and otherwise achieves the objectives of the Design Principles specified in Section 5 of the MEMU Overlay Zone.</p>	<p>varied massing, changes in form, and is comprised of high quality material including metal siding, stone veneer, simulated wood siding, fiber cement lap siding, fiber cement panels, stucco, metal and glass railings, and aluminum storefronts. During the development review process, the architectural design was peer reviewed by John Kaliski Architects and City staff, which resulted in higher-quality building materials, an increase in the commercial square footage and a plaza at the corner of Fourth Street and Cabrillo Park Drive. The project massing is broken into distinct building elements, facades are broken up with the inclusion of private balconies, courtyards, and contrasting building materials. The commercial storefronts are enhanced with cornices and metal canopies and the primary access to the commercial uses will be from Fourth Street. The project promotes pedestrian activity with landscaping and publically accessible open space. Parking areas are screened from the street. Lastly, over 40 percent of the units are over 1,000 square feet.</p>
<p>That the land use uses, site design, and operational considerations in the proposed development plan have been planned in a manner that will result in a compatible and harmonious operation as specified in Section 7 of the MEMU Overlay Zone.</p>	<p>The project is consistent with the development standards specified in Section 7 of the MEMU Overlay Zone. The project has been designed to ensure compatibility between the residential and non-residential uses on site. The commercial uses have separate entrances from the residential uses, and the parking management plan will manage parking between the residential and nonresidential uses. Each building has a dedicated move-in and commercial loading area that will be screened with roll-up doors and controlled by the property management company. On site lighting will be consistent with Chapter 8 of the Santa Ana Municipal Code (Building Security Ordinance).</p>

California Environmental Quality Act (CEQA)

The 2007 Metro East Mixed-Use Overlay Zone Environmental Impact Report (EIR) (SCH No. 2006031041) and 2018 Subsequent EIR (SEIR) anticipated potential development of 5,551 residential units, 963,000 square feet of commercial development, and 690,000 of office development. The 2007 EIR and 2018 SEIR analyzed impacts related to aesthetics, agriculture/forestry, air quality, biology, cultural resources, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population/housing, public services, transportation/traffic, tribal cultural resources and utilities. The EIR and SEIR concluded that there would be significant and unavoidable impacts associated with air quality, noise, and transportation/traffic.

A traffic impact analysis was prepared for this project by Linscott Law and Greenspan which analyzed the projects impacts on 25 intersections. Of the 25 intersections studied, the intersections of (1) Fourth Street and the I-5 northbound ramp and (2) Fourth Street and the SR-55 southbound ramp are expected to have a significant impact under 2025 cumulative plus project conditions and 2040 buildout plus project conditions. As such, the off-site improvements listed in the anticipated development potential description above apply to the project to reduce impacts below a level of significance. In addition, a health risk assessment (HRA) was prepared by Urban Crossroads to

identify any impacts from developing a residential community near a major freeway. The HRA concluded that a less than significant impact to project residents would occur due to the project's proximity to a major freeway (Exhibits 11 and 12).

The Central Pointe development is within the range of development analyzed as part of the MEMU Overlay zone EIR and SEIR. The Mitigation Monitoring and Reporting Program of the MEMU EIR and SEIR applies to the project and will mitigate impacts below the level of significance.

Economic Development

The applicant's retained the services of two economic consultants, The Concord Group and RSG, to prepare a market and fiscal impact analysis for the project (Exhibit 13). To validate the findings of the analysis, the City retained AECOM to peer review the applicants study (Exhibit 14).

The MEMU does not identify an amount of commercial space required for projects, only that development be mixed-use. Further, one of the objectives of the MEMU is to "facilitate project designs that encourage adequate amounts of retail or commercial space to service residents and/or employees within the development and the larger Metro East Overlay Zone area." The project proposes 15,130 square feet of commercial space. The applicant's study noted that the proposed 15,130 square feet would be sufficient to serve the project and MEMU area. The City's peer review estimates that the project could support between 10,000 and 21,000 square feet of commercial space; therefore, the proposed 15,130 square feet is within this range. Additionally, the proportion of commercial space to the overall size of the development is similar to the proportions approved for nearby mixed-use projects. The project proposes 2.6 percent of the total building square footage as commercial space. The three mixed-use projects within a half-mile of the project site either under construction or in the pipeline (The Madison, AMG First Point, and Elan) provide a similar proportion of commercial spaces at 1.4 to 3.5 percent of the total building square footage, while the Nineteen01 project provided a lower ratio. Unlike projects such as The Bowery, where no commercial space exists in the immediate area, this site is approximately ½ mile from Seventeenth Street, a main commercial corridor. This corridor contains a mixture of commercial uses, such as restaurants, dry cleaners, service stations and supermarkets. Additionally, a retail center located south of the site on East Fourth Street, although partially vacant, also provides retail opportunities in the MEMU zone.

AECOM estimates the following fiscal outcome over a 25-year forecast period:

- Approximately \$24.6 million in revenue to the City's General Fund (construction period revenues, recurring property tax revenue, utility user tax, residential sales tax and business tax)
- Approximately \$14.3 million in expenditures from the City General Fund (public services)
- The net new General Fund revenue is projected to be approximately \$10.3 million from the development of the project.

Table 5: Public Notification and Community Outreach

Public Notification and Community Outreach each	
Required Measures	<p>A community meeting was held on August 15, 2019 at 6:00 p.m. at Creekside Plaza, 505 N. Tustin Ave., Suite 243 in accordance with the provisions of the City's Sunshine Ordinance. Invitations/notices were mailed to property owners and occupants/tenants in a 500-foot radius from the project site. Approximately 15 members of the public attended, as well as two City staff. The applicant provided all the required information to the City after the meeting. Details from the community meeting were posted to the project's webpage at https://www.santa-ana.org/pb/planning-division/major-planning-projects-and-monthly-development-project-reports/central-pointe (Exhibit 16)</p> <p>On October 16, 2020 notification by mail was mailed to all property owners, occupants, and other interested parties within 500 feet of the project site in accordance with SAMC requirements. Newspaper posting was published in the Orange County Reporter in accordance with SAMC requirements.</p>
Additional Measures	<p>On October 22, 2020, the applicant provided an email update on the project to the members of the public that attended the Sunshine meeting.</p>

Conclusion

Based on the analysis provided within this report, staff recommends that the Planning Commission approve Site Plan Review No. 2020-04 as conditioned.


 Selena Kelaher, AICP
 Associate Planner

SK:sb

S:\Planning Commission\2020\10-26-20\SPR No. 2020-04 - 1801 E. Fourth Street Central Pointe\SPR Central Pointe.pc 102620 AP.docx

Exhibits:

1. Resolution (Site Plan Review)
2. Vicinity Zoning and Aerial Map
3. Site Photos
4. Site Plan
5. Residential Unit Floor Plans
6. Building A Elevations
7. Building B Elevations
8. Renderings

9. Open Space Plan
10. Conformance to Development Standards
11. Health Risk Assessment
12. Traffic Impact Analysis
13. Market and Fiscal Analysis (The Concord Group)
14. Peer review of the Market and Fiscal Analysis (AECOM)
15. Neighborhood Market Feasibility
16. Sunshine Meeting Minutes

EXHIBIT 1

1 - 10

RESOLUTION NO. 2020-xx

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ANA APPROVING SITE PLAN REVIEW NO. 2020-04 AS CONDITIONED FOR A NEW MIXED-USE RESIDENTIAL AND COMMERCIAL DEVELOPMENT FOR THE PROPERTY LOCATED AT 1801 EAST FOURTH STREET

BE IT RESOLVED BY THE PLANNING COMMISSION OF THE CITY OF SANTA ANA AS FOLLOWS:

Section 1. The Planning Commission of the City of Santa Ana hereby finds, determines and declares as follows:

- A. Sean Rawson with Waterford Property Company, representing Park Center Santa Ana Associates, L.P (“Applicant”), is requesting approval of Site Plan Review No. 2020-04, as conditioned, to allow the construction of a new mixed-use development consisting of 644 multi-family residential units and 15,130 square feet of commercial space at 1801 East Fourth Street.
- B. The subject site has a General Plan land use designation of District Center (DC). The site is located within the Professional zoning district and has an overlay zone designation of Metro East Mixed-Use (MEMU) Overlay Zone (OZ-1), Active Urban district, which permits medium- to high-intensity mixed-use residential, commercial, office, and hotel developments subject to approval of a site plan review (SPR) application by the Planning Commission.
- C. The MEMU Overlay Zone was adopted in 2007 as a result of interest in developing mixed-use residential and commercial projects in the project area. In 2018, the City of Santa Ana expanded the MEMU designation along First Street between Grand Avenue and the Santa Ana (I-5) Freeway. The regulating plan, which establishes land uses and development standards, allows a variety of housing and commercial projects, including mixed-use residential communities, live/work units, hotels, and offices.
- D. A noticed public hearing was scheduled to be heard before the Planning Commission of the City of Santa Ana on October 26, 2020, but at that time there was not a quorum of the Planning Commission therefore, the item was continued by the Chair to the next regular meeting. On November 9, 2020, the Planning Commission of the City of Santa Ana held the duly noticed public hearing and considered all testimony, written and oral for the project.

- E. Section 41-595.5 of the Santa Ana Municipal Code (“SAMC”) requires a review by the Planning Commission of all plans within a zoning district classification combined with an OZ suffix where the applicant wants to apply the overlay zone, to ensure the project is in conformity with the overlay zone plan.
- F. The zoning designation for the subject property is proposed to be Metro East Mixed-Use (MEMU) Overlay Zone (OZ-1) in the Active Urban land use district.
- G. The Planning Commission determines that the following findings, which must be established in order to grant this Site Plan Review pursuant to SAMC Section 41-595.5, have been established for Site Plan Review No. 2020-04 to allow construction of the proposed project:
 - 1. That the proposed development plan is consistent with and will further the objectives outlined in Section 1.2 for the MEMU overlay district.

The development will activate a vacant and underutilized 8-acre site in the MEMU Overlay Zone. The project will create a new mixed-use development within close proximity to office buildings, Cabrillo Park, Mabury Park, and less than two miles from Downtown Santa Ana providing opportunities to live, work, and recreate. Each building will be five-stories of residential units wrapped around a seven-level parking structure. The height of the buildings will blend in with the heights of the nearby office buildings which range from single-story, three-story and eight-story buildings and will create an interface with the Santa Ana (I-5) Freeway.

The project will be built to California Building Code standards, which include energy and water conservation measures and will improve pedestrian mobility by providing new sidewalks, and parkways along Fourth Street and Parkcourt Place. In addition, the publically accessible linear park will serve as a link to the meandering trail along Mabury Street and to Mabury Park to the north. Each building has a centrally located bike room, and there is a rideshare pick-up/drop-off in the middle of the project site. Additionally, the project is within walking distance of the OCTA route 463 bus stop at Fourth Street and Cabrillo Park Drive.

The commercial space has been designed with retail floor heights of 20 feet with storefronts that will be visible from Fourth Street. In addition, the commercial space links directly to an on-site public plaza at the corner of Fourth Street and Cabrillo Park Drive which will include outdoor dining opportunities, decorative hardscape, specimen trees and plantings, umbrellas, seating and lawn games.

In addition, the ground floor residential units along Cabrillo Park Drive will have doors and patios with direct access to the street to help activate the street.

2. That the proposed development plan is consistent with the development standards specified in Section 4 of the MEMU overlay district.

The project is consistent with the development standards specified in Section 4 of the MEMU Overlay Zone including land use, stories, development site area, building frontages, publically accessible open space, private/common open space, building setbacks, and parking.

3. That the proposed development plan is designed to be compatible with adjacent development in terms of similarity of scale, height, and site configuration and otherwise achieves the objectives of the Design Principles specified in Section 5 of the MEMU overlay district.

The project is consistent with the development standards specified in Section 5 of the MEMU Overlay Zone. The buildings are designed with a high quality design that includes varied massing, changes in form, and is comprised of high quality material including metal siding, stone veneer, simulated wood siding, fiber cement lap siding, fiber cement panels, stucco, metal and glass railings, and aluminum storefronts. During the development review process, the architectural design was peer reviewed by John Kaliski Architects and City staff, which resulted in higher-quality building materials, an increase in the commercial square footage and a plaza at the corner of Fourth Street and Cabrillo Park Drive. The project massing is broken into discrete building elements, facades are broken up with the inclusion of private balconies, courtyards, and contrasting building materials. The commercial storefronts are enhanced with cornices and metal canopies and the primary access to the commercial uses will be from Fourth Street. The project promotes pedestrian activity with landscaping and publically accessible open space. Parking areas are screened from the street. Lastly, over 40 percent of the units are over 1,000 square feet.

4. That the land use uses, site design, and operational considerations in the proposed development plan have been planned in a manner that will result in a compatible and harmonious operation as specified in Section 7 of the MEMU overlay district.

The project is consistent with the development standards specified in Section 7 of the MEMU Overlay Zone. The project has been

designed to ensure compatibility between the residential and non-residential uses on site. The commercial uses have separate entrances from the residential uses, and the parking management plan will manage parking between the residential and nonresidential uses. Each building has a dedicated move-in and commercial loading area that will be screened with roll-up doors and controlled by the property management company. On site lighting will be consistent with Santa Ana Municipal Code Chapter 8 (Security Ordinance).

Section 2. The Applicant shall indemnify, protect, defend and hold the City and/or any of its officials, officers, employees, agents, departments, agencies, authorized volunteers, and instrumentalities thereof, harmless from any and all claims, demands, lawsuits, writs of mandamus, and other proceedings (whether legal, equitable, declaratory, administrative or adjudicatory in nature), and alternative dispute resolution procedures (including, but not limited to arbitrations, mediations, and such other procedures), judgments, orders, and decisions (collectively "Actions"), brought against the City and/or any of its officials, officers, employees, agents, departments, agencies, and instrumentalities thereof, that challenge, attack, or seek to modify, set aside, void, or annul, any action of, or any permit or approval issued by the City and/or any of its officials, officers, employees, agents, departments, agencies, and instrumentalities thereof (including actions approved by the voters of the City) for or concerning the project, whether such Actions are brought under the Ralph M. Brown Act, California Environmental Quality Act, the Planning and Zoning Law, the Subdivision Map Act, Code of Civil Procedure sections 1085 or 1094.5, or any other federal, state or local constitution, statute, law, ordinance, charter, rule, regulation, or any decision of a court of competent jurisdiction. It is expressly agreed that the City shall have the right to approve, which approval will not be unreasonably withheld, the legal counsel providing the City's defense, and that Applicant shall reimburse the City for any costs and expenses directly and necessarily incurred by the City in the course of the defense. City shall promptly notify the Applicant of any Action brought and City shall cooperate with Applicant in the defense of the Action.

Section 3. In accordance with the California Environmental Quality Act (CEQA), the project has been determined to be adequately evaluated in the previously certified Environmental Impact Report (EIR) No. 2006-01 (SCH No. 2006031041) and Subsequent EIR SEIR No. 2018-15 as per Sections 15162 and 15168 of the CEQA guidelines. All mitigation measures in EIR No. 2006-01 and SEIR No. 2018-15 and associated Mitigation Monitoring and Reporting Program (MMRP) will be enforced and apply to the proposed project. In addition, a traffic impact analysis dated July 30, 2020 was also prepared by Linscott Law and Greenspan which analyzed the project's impacts on 25 intersections. The off-site improvements listed the Traffic Impact Analysis shall be implemented. A health risk assessment (HRA) was prepared to identify any impacts from developing a residential community near a major freeway. The HRA finds that a less than significant impact to project residents would occur due to the project's proximity to a major freeway.

Section 4. The Planning Commission of the City of Santa Ana, after conducting the public hearing, hereby approves Site Plan Review No. 2020-04 as conditioned in Exhibit A attached hereto and incorporated as though fully set forth herein. This decision is based upon the evidence submitted at the above said hearing, which includes, but is not limited to: the Request for Planning Commission Action dated October 26, 2020, and November 9, 2020, and exhibits attached thereto; and the public testimony, written and oral, all of which are incorporated herein by this reference.

ADOPTED this 9th day of November, 2020 by the following vote:

AYES: Commissioners:
NOES: Commissioners:
ABSENT: Commissioners:
ABSTENTIONS: Commissioners:

Mark McLoughlin
Chairman

APPROVED AS TO FORM:
Sonia R. Carvalho, City Attorney

By: _____
Lisa Storck
Assistant City Attorney

CERTIFICATE OF ATTESTATION AND ORIGINALITY

I, SARAH BERNAL Recording Secretary, do hereby attest to and certify the attached Resolution No. 2020-xx to be the original resolution adopted by the Planning Commission of the City of Santa Ana on November 9, 2020.

Date: _____

Recording Secretary
City of Santa Ana

Conditions for Approval for Site Plan Review No. 2020-04

Site Plan Review No. 2020-04 is approved subject to compliance, to the reasonable satisfaction of the Planning Manager, with applicable sections of the Santa Ana Municipal Code, the California Administrative Code, the California Building Standards Code, and all other applicable regulations. In addition, it shall meet the following conditions of approval:

The Applicant must comply with each and every condition listed below prior to exercising the rights conferred by this site plan review.

The Applicant must remain in compliance with all conditions listed below throughout the life of the development project. Failure to comply with each and every condition may result in the revocation of the site plan review.

A. Planning Division

1. All proposed site improvements must conform to the Development Project Review approval of DP No. 2019-26, and the staff report exhibits incorporated herein by reference.
2. Applicant shall agree to all recommendations contained within the required technical studies and reports prepared for the project including the Traffic Impact Analysis dated July 30, 2020. All studies and reports shall be finalized by the Applicant and approved by the City of Santa Ana prior to issuance of building permits.
3. Any amendment to this site plan review, including modifications to approved materials, finishes, architecture, site plan, landscaping, unit count, mix, and square footages must be submitted to the Planning Division for review. At that time, staff will determine if administrative relief is available or if the site plan review must be amended.
4. The full volume (first and second levels) of the commercial square footage within both buildings along Fourth Street shall be maintained for commercial purposes only and may not be converted or used for residential purposes.
5. The publicly accessible open space areas as shown on the open space plan shall remain accessible to the public and include a combination of landscape and hardscape as specified in Section 4.5 of the Metro East Mixed-Use Overlay Zone requirements.
6. A residential property manager shall be available at all times that the Project is occupied and Applicant and onsite management shall at all times maintain a 24-hour emergency contact and contact information on file with the City that is also posted at the entrance to the leasing office for public view.

7. All Project mechanical equipment shall be screened from view from public and courtyard areas.
8. After Project occupancy, landscaping and hardscape materials must be maintained as shown on the approved landscape plans.
9. Prior to the issuance of any building permits the subject site must meet the requirements of the Subdivision Map Act (i.e. a Lot Merger or Parcel Map must be recorded for the subject property).
10. Prior to issuance of any building permits, a final detailed amenity plan must be reviewed and approved by Applicant and the Planning Division. The plan shall include details on the hardscape design, lighting concepts and outdoor furniture for amenity, plaza, or courtyard areas, as well as an installation plan.
11. Prior to issuance of building permits, the Applicant shall submit a construction schedule and staging plan to the Planning Division for review and approval. The plan shall include construction hours, staging areas, parking and site security/screening during Project construction.
12. Prior to installation of landscaping, the Applicant shall submit photos and specifications of all trees to be installed on the Project site for review and approval by the Planning Division. Specifications shall include, at a minimum, the species, box size (48 inches minimum), brown trunk height (10-foot minimum), and name and location of the supplier.
13. Applicant shall provide onsite parking for residents and visitors of the Project and actively monitor the parking demand of the Project site. Applicant shall continually monitor and take appropriate measures to manage the parking demand of the Project site to mitigate the use of offsite parking spaces on private or public properties and/or right-of-way. Prior to issuance of the certificate of occupancy and/or building permit finals, Applicant shall submit and obtain approval from the Planning and Building Agency a Parking Management Plan (the "PMP") meeting the requirements of this condition. The approved PMP shall be adhered to and be enforced by the Project at all times.
14. Prior to Certificate of Occupancy issuance, public art shall be installed on the Project site at a value of one-half of one percent (0.5%) of the total valuation of both buildings. The selection, design, and installation of the art shall be subject to review and approval by the Planning and Building Agency, the Community Development Agency, and the Applicant.
15. Prior to Certificate of Occupancy issuance, a Property Maintenance Agreement must be recorded against the property. The agreement will be subject to review and applicability by the Planning and Building Agency, the Community Development Agency, the Public Works Agency, and the City Attorney to ensure

that the property and all improvements located thereupon are properly maintained, Applicant (and the owner of the property upon which the authorized use and/or authorized improvements are located if different from the Applicant) shall execute a Maintenance Agreement with the City of Santa Ana which shall be recorded against the property and which shall be in a form reasonably satisfactory to the City Attorney. The Maintenance Agreement shall contain covenants, conditions and restrictions relating to the following:

(a) Compliance with operational conditions applicable during any period(s) of construction or major repair (e.g., proper screening and securing of the construction site; implementation of proper erosion control, dust control and noise mitigation measure; adherence to approved project phasing etc.);

(b) Compliance with ongoing operational conditions, requirements and restrictions, as applicable (including but not limited to hours of operation, security requirements, the proper storage and disposal of trash and debris, enforcement of the parking management plan, and/or restrictions on certain uses,

(c) Ongoing compliance with approved design and construction parameters, signage parameters and restrictions as well as landscape designs, as applicable;

(d) Ongoing maintenance, repair and upkeep of the property and all improvements located thereupon (including but not limited to controls on the proliferation of trash and debris about the property; the proper and timely removal of graffiti; the timely maintenance, repair and upkeep of damaged, vandalized and/or weathered buildings, structures and/or improvements; the timely maintenance, repair and upkeep of exterior paint, parking striping, lighting and irrigation fixtures, walls and fencing, publicly accessible bathrooms and bathroom fixtures, landscaping and related landscape improvements and the like, as applicable);

(e) If Applicant and the owner of the property are different (e.g., if the Applicant is a tenant or licensee of the property or any portion thereof), both the Applicant and the owner of the property shall be signatories to the Maintenance Agreement and both shall be jointly and severally liable for compliance with its terms.

(f) The Maintenance Agreement shall further provide that any party responsible for complying with its terms shall not assign its ownership interest in the property or any interest in any lease, sublease, license or sublicense, unless the prospective assignee agrees in writing to assume all of the duties, obligations and responsibilities set forth under the Maintenance Agreement.

(g) The Maintenance Agreement shall contain provisions relating to the enforcement of its conditions by the City and shall also contain provisions authorizing the City to recover costs and expenses which the City may incur arising out of any enforcement and/or remediation efforts which the City may

undertake in order to cure any deficiency in maintenance, repair or upkeep or to enforce any restrictions or conditions upon the use of the property. The maintenance agreement shall further provide that any unreimbursed costs and/or expenses incurred by the City to cure a deficiency in maintenance or to enforce use restrictions shall become a lien upon the property in an amount equivalent to the actual costs and/or expense incurred by the City.

EXHIBIT 2

1 - 20

**Central Pointe Mixed-Use Project SPR No. 2020-04
1801 E. Fourth Street**

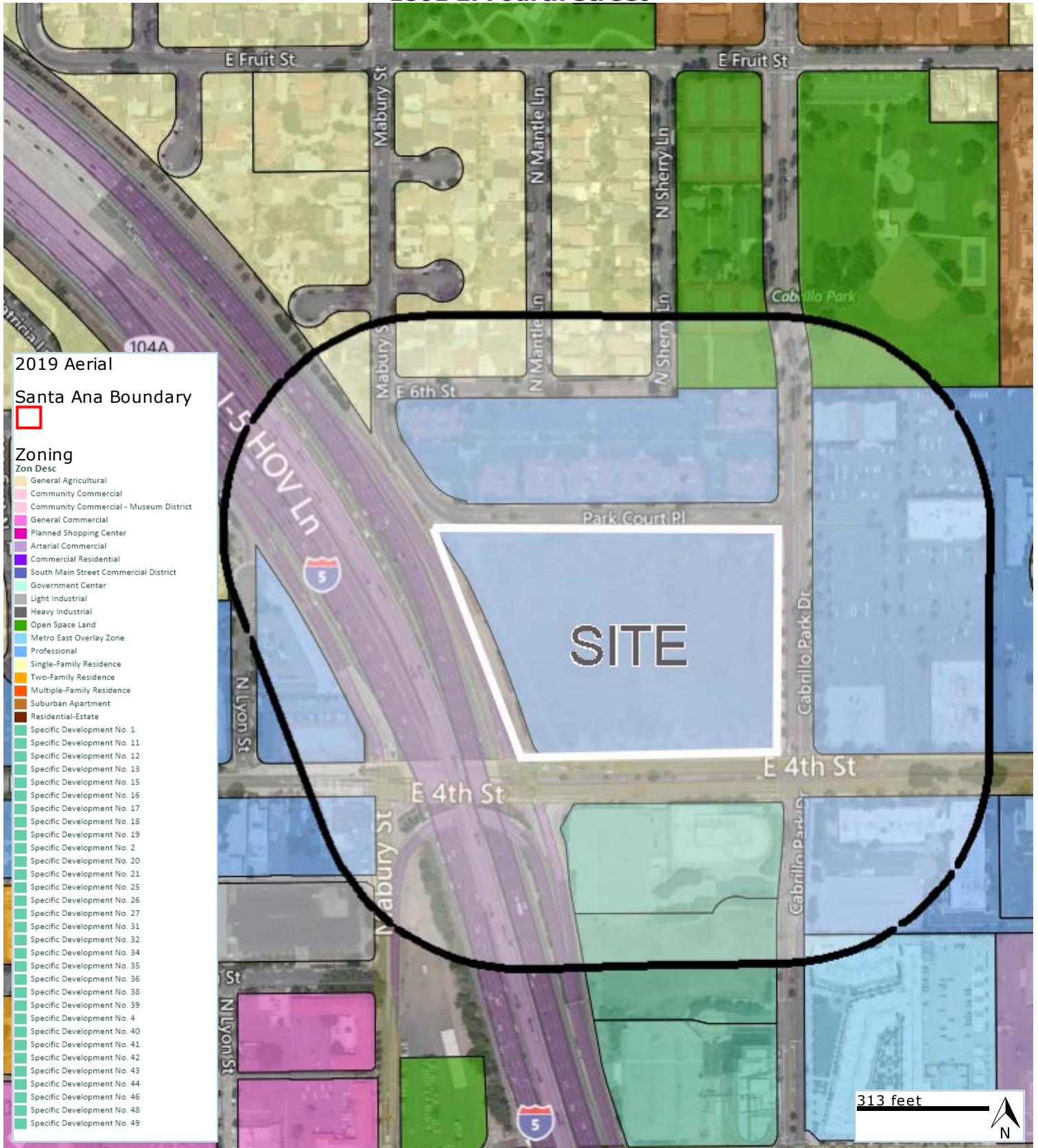


Exhibit 2 – Vicinity Zoning and Aerial View



EXHIBIT 3

1 - 22



SPR No. 2020-04
1801 East Fourth Street
Central Pointe Mixed-Use Development
Exhibit 3 – Site Photos

EXHIBIT 4

1 - 24

EXHIBIT 5

1 - 26



SPR No. 2020-04
 1801 East Fourth Street
 Central Pointe Mixed-Use Development
Exhibit 5 – Residential Unit Floor Plans



Plan 1-5
1 Bedroom / 1 Bathroom
831 SQ. FT.



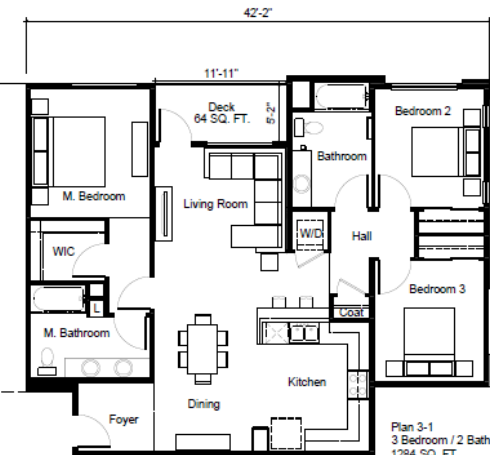
Plan 2-1
2 Bedroom / 2 Bathroom
1,066 SQ. FT.



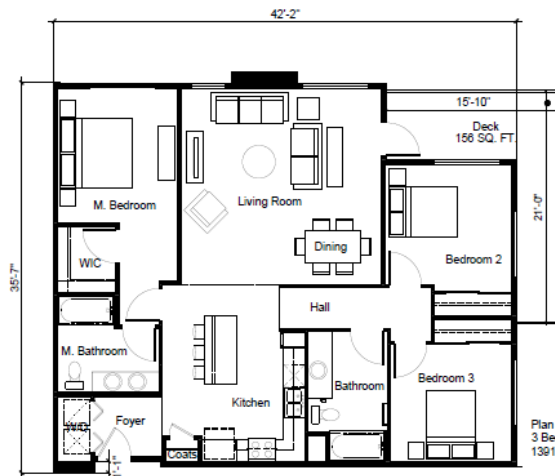
Plan 2-2
2 Bedroom / 2 Bathroom
1,148 SQ. FT.



Plan 2-3
2 Bedroom / 2 Bathroom
1,071 SQ. FT.



Plan 3-1
3 Bedroom / 2 Bathroom
1,284 SQ. FT.



Plan 3-2
3 Bedroom / 2 Bathroom
1,381 SQ. FT.

SPR No. 2020-04
1801 East Fourth Street
Central Pointe Mixed-Use Development
Exhibit 5 – Residential Unit Floor Plans

EXHIBIT 6

1 - 29



1. 4th Street Elevation (South)



Note: Refer to Material Boards for color and material information.

2. Cabrillo Park Drive Elevation (East)



3. Parkcourt Place Elevation (North)



Note: Refer to Material Boards for color and material information.

4. Site Interior Elevation (West)

SPR No. 2020-04
 1801 East Fourth Street
 Central Pointe Mixed-Use Development
Exhibit 6 – Building A Elevations

EXHIBIT 7

1 - 31



1. 4th Street Elevation (South)



2. Freeway Frontage Elevation (West)



3. Parkcourt Place Elevation (North)



Note: Refer to Material Boards for color and material information.

4. Site Interior Elevation (West)

SPR No. 2020-04
 1801 East Fourth Street
 Central Pointe Mixed-Use Development
Exhibit 7 – Building B Elevations

EXHIBIT 8

1 - 33



SPR No. 2020-04
1801 East Fourth Street
Central Pointe Mixed-Use Development
Exhibit 8 – Renderings

EXHIBIT 9

1 - 35

Publicly Accessible Open Space:

Gross Site Area # 8.35 Acres
 Net Site Area # 8.03 Acres

Requirement: 50,468 sf required
 15% of net site area

Proposed: (Area shown hatched)

PAOS	Area (sf)
Forecourt A1	4,703
Forecourt A2	1,306
Forecourt A3	1,216
Linear Park	11,577
Total PAOS	184,568 sf proposed

Note: 13,880 sf of Structure and "Paved" Paved" not counted toward required PAOS

Private/Common Open Space:

Requirement #1: 67,960 sf
 25% of net site area

Requirement #2: 18,158 sf
 25% of gross site area for non-residential units

Total Req'd: 86,118 sf

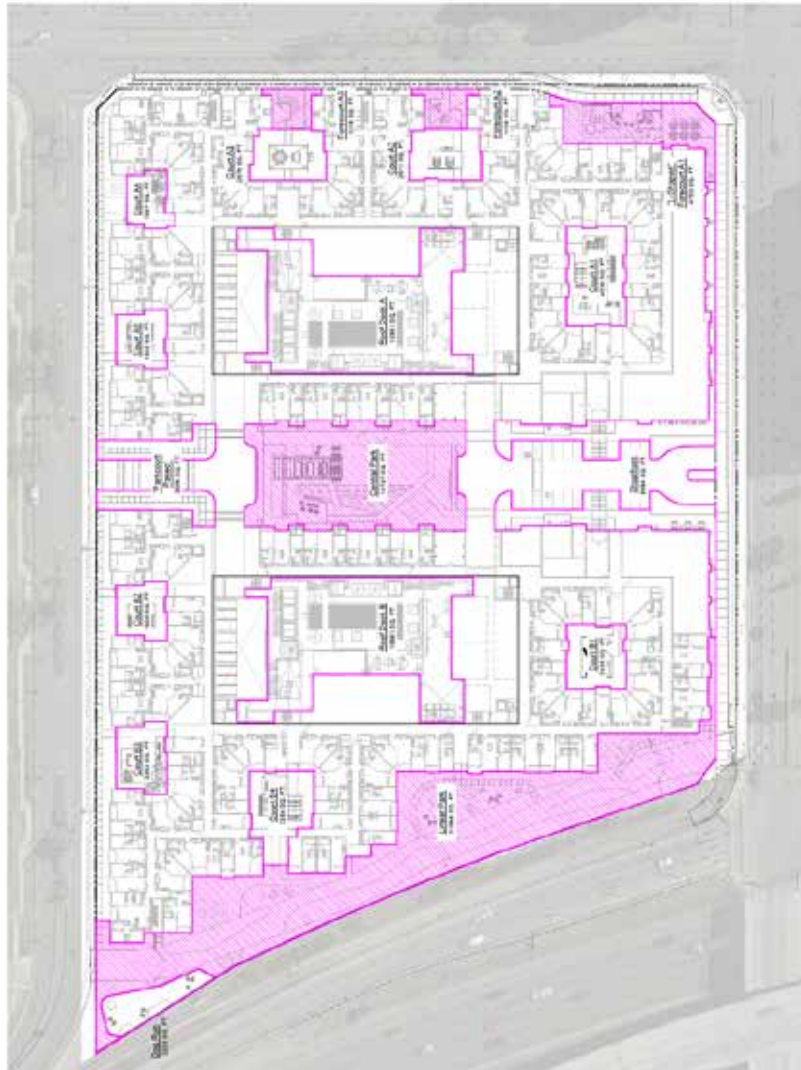
Proposed:

Open Space	Area (sf)	Area (sq ft)
Priv. Open Space	40,388	4,038
Courtyard A1	2,511	2,511
Courtyard A2	1,597	1,597
Courtyard A3	1,995	1,995
Courtyard A4	2,636	2,636
Courtyard B1	1,900	1,900
Courtyard B2	2,362	2,362
Courtyard B3	3,354	3,354
Courtyard B4	2,223	2,223
Dog Run	15,361	15,361
Roof Deck A	15,361	15,361
Roof Deck B	15,361	15,361
Total Proposed	116,654	116,654

Legend



Publicly Accessible Open Space



SPR No. 2020-04
 1801 East Fourth Street
 Central Pointe Mixed-Use Development
Exhibit 9 – Open Space Plan

EXHIBIT 10

1 - 37

Development Standards

Standard	Required by MEMU Active Urban	Provided
Land Uses	Mixed-Use Development	644 multi-family residential units and 15,130 SF of commercial space
Maximum Stories	3 minimum No maximum	Complies; 5 stories residential 7 level parking structure and amenity deck
Minimum Development Size	1 acre	Complies; 8.03 acres net
Street Level Building Frontages	Forecourt, Shopfront, Gallery or Arcade	Forecourt and Shopfront
Publicly Accessible Open Space	15% of lot area (52,468 sq. ft.)	Complies; 15% (52,521 SF)
Private and Common Open Space	90 SF per unit and 5% of site area for non-residential uses (58,716 SF)	Complies; 106,654 SF
Building to Street	10 feet maximum	Complies; 10 feet maximum
Building to Property Line	5 feet adjacent to any other use	N/A – no immediately adjacent uses
Building to Building	15 feet minimum between buildings	Complies; 95 feet between buildings
Parking	2.0 per unit inclusive of guest and non-residential SF (1,288 spaces)	Complies; 2.04 spaces/unit (1,318 spaces)

SPR No. 2020-04
 1801 East Fourth Street
 Central Pointe Mixed-Use Development
Exhibit 10 – Development Standards

EXHIBIT 11

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Central Pointe Mixed-Use Development

DIESEL PARTICULATE MATTER (DPM) HEALTH RISK ASSESSMENT
CITY OF SANTA ANA

PREPARED BY:

Haseeb Qureshi
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JUNE 5, 2020

13400-03 Freeway HRA Report

SPR No. 2020-04
1801 East Fourth Street
Central Pointe Mixed-Use Development
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LIST OF ABBREVIATED TERMS

(1)	Reference
AADT	Annual Average Daily Traffic Volumes
ARB	Air Resources Board
CAAQS	California Ambient Air Quality Standards
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
CO	Carbon Monoxide
CPF	Cancer Potency Factor
EPA	Environmental Protection Agency
HRA	Health Risk Assessment
LDA	Light Duty Auto
LDT	Light Duty Truck
LHD	Light Heavy Duty
MCY	Motorcycle
MDV	Medium Duty Vehicle
NO ₂	Nitrogen Dioxide
OBUS	Other Bus
OLM	Ozone Limiting
PM ₁₀	Particulate Matter 10 microns in diameter or less
PM _{2.5}	Particulate Matter 2.5 microns in diameter or less
PPM	Parts per Million
Project	Central Pointe Mixed-Use Development
PVMRM	Plume Volume Molar Ratio Methods
REL	Reference Exposure Level
RME	Reasonable Maximum Exposure
SBUS	School Bus
SCAQMD	South Coast Air Quality management District
TACs	Toxic Air Contaminants
UBUS	Urban Bus
URF	Unit Risk Factor
UTM	Universal Traverse Mercator

EXECUTIVE SUMMARY

In 2005, the California Air Resources Board (ARB) promulgated an advisory recommendation to avoid setting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. The ARB indicates that due to traffic-generated pollutants, there is an estimated increased cancer risk incidence of 300 to 1,700 per million in within this domain. At some point however, the increased cancer risk incidence due the effects of freeway/roadway corridor pollutants become indistinguishable from the ambient air quality condition. In this regard, the effects of freeway/roadway-source pollutants that may impact the Project site are already acknowledged and accounted for within the ambient air quality discussions presented within this Section. More specifically, the MATES-IV Study data for the Project site comprehensively reflects increased TAC-source cancer risks affecting the City and Project site, inclusive of increased cancer risks due to freeway sources.

The 2005 ARB guidance noted previously, information made available through the MATES-IV Study, and configuration and design of the Project would suggest that further assessment of freeway-source pollutant impacts is not warranted. Notwithstanding, this Off-Site Freeway-Source Air Toxic Health Risk Assessment has been prepared for the Project and is intended to:

- Comply with and support CEQA Section 15003 (i) policies addressing adequacy, completeness, and a good-faith effort at full disclosure;
- Disaggregate potential freeway-source air pollutant health effects from other background conditions identified in the MATES IV Study; and
- Identify means to reduce the specific effects of freeway-source pollutants at the Project site.

Findings and conclusions of this Assessment are summarized below.

SUMMARY OF FINDINGS

For carcinogenic exposures resulting from exposure to toxics from the freeway, the summation of risk for the maximum exposed residential receptor totaled 3.58 in one million and will not exceed the SCAQMD significance threshold of 10 in one million.

For chronic noncarcinogenic effects, the hazard index identified for each toxicological endpoint totaled less than one. For acute exposures, the hazard indices for the identified averaging times did not exceed unity. Therefore, noncarcinogenic hazards are calculated to be within acceptable limits and a less than significant impact would occur.

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1 INTRODUCTION

In 2005, the California Air Resources Board (ARB) promulgated an advisory recommendation to avoid setting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day or rural roads with 50,000 vehicles per day. According to the ARB, the increased cancer risk is 300 to 1,700 per million within this domain. The strongest association of traffic related emissions with adverse health outcomes was seen within 300 feet of roadways with high truck densities. Notwithstanding, the ARB notes that a site-specific analysis would be required to determine the actual risk near a particular land use and should consider factors such as prevailing wind direction, local topography and climate.

In consideration of the above referenced requirement, the assessment and dispersion modeling methodologies used in the preparation of this report were composed of all relevant and appropriate procedures presented by the U.S. Environmental Protection Agency, California Environmental Protection Agency and South Coast Air Quality Management District (SCAQMD). The methodologies and assumptions offered under this regulatory guidance were used to ensure that the assessment effectively quantified residential exposures associated with the generation of contaminant emissions from adjacent mobile source activity.

This report summarizes the protocol used to evaluate contaminant exposures and presents the results of the health risk assessment (HRA) prepared by Urban Crossroads, Inc., for the proposed Central Pointe Mixed-Use Development (referred to as "Project").

1.1 SITE LOCATION

The proposed Project is located at 1801 E Fourth Street at the northwest corner of 4th Street and Cabrillo Park Drive in the City of Santa Ana within the Metro East Mixed-Use (MEMU) Overlay District, as shown on Exhibit 1-A.

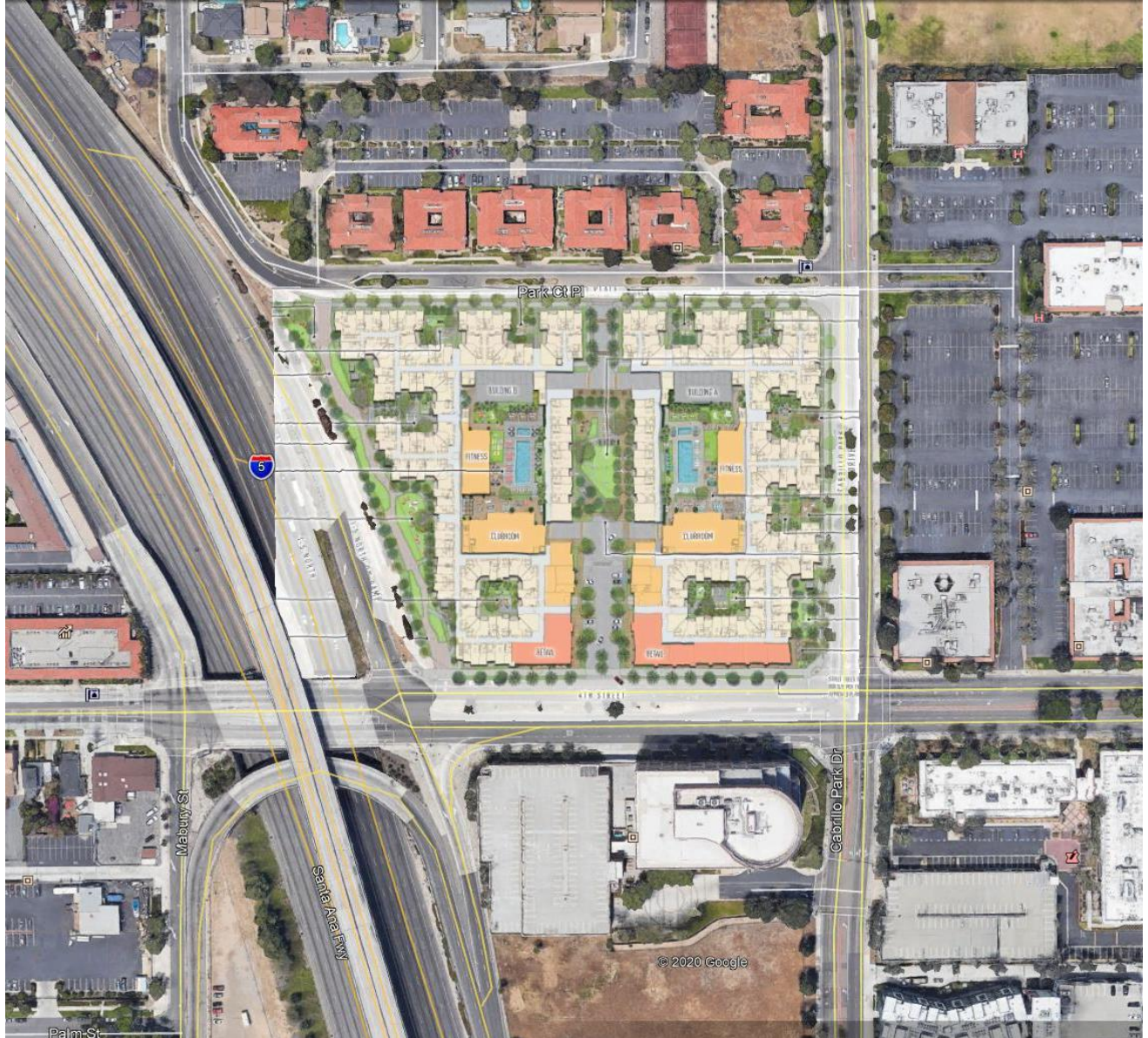
1.2 PROJECT DESCRIPTION

The Project is proposed to consist of up to 650 multi-family residential units and 8,800 square feet of commercial space on an approximately 8-acre site.

As part of the project design, the Project applicant has agreed to installing and maintaining air filtration systems with efficiencies equal to or exceeding a Minimum Efficiency Reporting Value (MERV) 13 as defined by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. (1)¹ in the proposed multi-family residential dwelling units.

1 The use of MERV filtration systems to reduce DPM and particulates has been successfully implemented by several lead agencies, including, but not limited to: City of Los Angeles, City of Claremont, City of Irvine, City of Glendale, City of Berkeley, City of Oakland, and the Los Angeles Unified School District (LAUSD). The average particle size efficiency (PSE) removal based on ASHRAE Standard 52.2 for MERV 13 is approximately 75% for 0.3 to 1.0 $\mu\text{g}/\text{m}^3$ (DPM) (2).

EXHIBIT 1-A: LOCATION MAP



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2 SOURCE IDENTIFICATION

The California Department of Transportation (Caltrans), Traffic and Vehicle Data Systems Unit collects and maintains traffic volume counts for vehicles traversing the California state highway system. Table 2-1 presents the annual average daily traffic volumes (AADT) for the freeway segment considered in the assessment.

TABLE 2-1 FREEWAY TRAFFIC VOLUMES

Roadway Segment	AADT	Vehicles Per Hour (ALL)	Vehicles Per Hour (gas)	Vehicles Per Hour (diesel)
I-5 Freeway	329,500	13,729	13,189	540

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3 SOURCE CHARACTERIZATION

In urban communities, vehicle emissions contribute significantly to localized concentrations of air contaminants. Typically, emissions generated from these sources are characterized by vehicle mix, the rate pollutants are generated during the course of travel and the number of vehicles traversing the roadway network.

Currently, emission factors are generated from a series of computer based programs to produce a composite emission rate for vehicles traveling at various speeds within a defined geographical area or along a discrete roadway segment. To account for the emission standards imposed on the California fleet, the ARB has developed the EMFAC2017 emission factor model. EMFAC2017 was utilized to identify pollutant emission rates for total organic gases (TOG), diesel particulates, particulates (PM10 and PM2.5), carbon monoxide (CO) and nitrogen oxide (NOx) compounds (2). To produce a representative vehicle fleet distribution, the assessment utilized ARB's Orange County population estimates for the 2020 calendar year. This approach provides an estimate of vehicle mix associated with operational profiles at the link or intersection level. Table 3-1 lists the identified fleet mix considered in the assessment.

Based upon the freeway traffic volumes and population profiles noted above, discrete traffic counts were identified for each roadway segment. Diesel vehicles account for 3.94 percent of the total on-road mobile fleet. For chronic (long term) exposures, AADT values were averaged to produce representative hourly traffic volumes.

An average observed route speed of 65 miles per hour was assumed for vehicles traversing the main highway link (I-5).

The focus of this HRA is on DPM associated with vehicular activity traversing I-5. Appendix 3.1 presents the on-road emission rate calculation worksheets for the freeway segment considered in the assessment.

TABLE 3-1: VEHICLE FLEET MIX PROFILE

Vehicle class	Orange County		
	Fuel	Population	Percent
LDA	Diesel	11,165	0.43
LDA	Gas	1,247,860	51.75
LDT1	Diesel	56	0.00
LDT1	Gas	134,019	5.46
LDT2	Diesel	2,427	0.07
LDT2	Gas	447,358	16.58
LHD1	Diesel	21,630	1.54
LHD1	Gas	36,819	1.59
LHD2	Diesel	8,344	0.58
LHD2	Gas	6,427	0.22
MCY	Gas	55,869	2.69
MDV	Diesel	6,029	0.25
MDV	Gas	312,580	15.17
MH	Diesel	2,902	0.20
MH	Gas	7,043	0.55
T6	Diesel	27,487	1.17
T6	Gas	7,555	0.12
T7	Diesel	10,494	1.42
T7	Gas	10	0.00
OBUS	Diesel	618	0.02
OBUS	Gas	996	0.04
SBUS	Diesel	1,330	0.08
SBUS	Gas	478	0.04
UBUS	Diesel	0	0.00
UBUS	Gas	210	0.02

Note: Vehicle category descriptions can be found on the California Air Resources Board website at <http://www.arb.ca.gov/msei/modeling.htm>.

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4 EXPOSURE QUANTIFICATION

In order to assess the impact of emitted compounds on individuals who reside at the proposed apartment complex, air quality modeling utilizing the AMS/EPA Regulatory Model AERMOD was performed to assess the downwind extent of mobile source emissions. AERMOD's air dispersion algorithms are based upon a planetary boundary layer turbulence structure and scaling concepts, including the treatment of surface and elevated sources in simple and complex terrain.

The model offers additional flexibility by allowing the user to assign initial vertical and lateral dispersion parameters for sources representative of a localized mobile fleet. For this assessment, the volume source algorithm was utilized to model the emissions generated from on-road mobile source activity.

Air dispersion models require additional input parameters including pollutant emission data and local meteorology. Due to their sensitivity to individual meteorological parameters such as wind speed and direction, the U.S. Environmental Protection Agency recommends that meteorological data used as input into dispersion models be selected on the basis of relative spatial and temporal conditions that exist in the area of concern. In response to this recommendation, the nearest meteorological data available from the SCAQMD John Wayne Airport Meteorological Data Station (Source Receptor Area 18), was used to represent local weather conditions and prevailing winds. Five years (2012-2016) of available AERMOD meteorological data was utilized in the modeling.

The modeling analysis also considered the spatial distribution of mobile source activity traversing the freeway in relation to the proposed site. To accommodate a Cartesian grid format, direction dependent calculations were obtained by identifying the universal transverse mercator (UTM) coordinates for each volume source location. On-site receptors were placed to provide coverage across the identified residential portion of the site. A ground level receptor height was assumed as a conservative measure. A graphical representation of the source-receptor grid network is presented in Exhibit 4-A.

A dispersion model input summary table is provided in Appendix 4.1. A complete listing of model input/output files are provided in electronic format in Appendix 4.2.

5 RISK CHARACTERIZATION

5.1 CARCINOGENIC CHEMICAL RISK

The SCAQMD CEQA Air Quality Handbook (1993) states that emissions of toxic air contaminants (TACs) are considered significant if a HRA shows an increased risk of greater than ten in one million. Based on guidance from the SCAQMD in the document Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (3), for purposes of this analysis, ten (10) in one million is used as the cancer risk threshold for the proposed Project.

Excess cancer risks are estimated as the upper-bound incremental probability that an individual will develop cancer over a lifetime as a direct result of exposure to potential carcinogens over a specified exposure duration. The estimated risk is expressed as a unitless probability. The cancer risk attributed to a chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). A risk level of 1 in a million implies a likelihood that up to one person, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. This risk would be an excess cancer risk that is in addition to any cancer risk borne by a person not exposed to these air toxics.

Health risks associated with exposure to carcinogenic compounds can be defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. Under a deterministic approach (i.e., point estimate methodology), the cancer risk probability is determined by multiplying the chemical's annual concentration by its unit risk factor (URF). The URF is a measure of the carcinogenic potential of a chemical when a dose is received through the inhalation pathway. It represents an upper bound estimate of the probability of contracting cancer as a result of continuous exposure to an ambient concentration of one microgram per cubic meter ($\mu\text{g}/\text{m}^3$) over a 70 year lifetime. The URFs utilized in the assessment and corresponding cancer potency factors were obtained from the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values*.

Notwithstanding, it is the intent of the HRA to provide risk estimates from near-field on-road sources that are reflective of anticipated exposures experienced at a given residential occupancy. As such, a review of relevant guidance was conducted to determine applicability of the use of early life exposure adjustments to identified carcinogens. For risk assessments conducted under the auspices of The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, Connelly, Statutes of 1987; Health and Safety Code Section 44300 et seq.) a weighting factor is applied to all carcinogens regardless of purported mechanism of action. However, for this assessment, the HRA relied upon U.S. Environmental Protection Agency guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act "through the mutagenic mode of action." The U.S. Environmental Protection Agency has identified 19 compounds that elicit a mutagenic mode of action for

carcinogenesis. None of the gaseous compounds considered in the HRA elicit a mutagenic mode of action and, therefore, early life exposure adjustments were not considered. For diesel particulates, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise < 1% of the exhaust particulate mass. To date, the U.S. Environmental Agency reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action.

To effectively quantify dose, the procedure requires the incorporation of several discrete exposure variates. Once determined, contaminant dose is multiplied by the cancer potency factor (CPF) in units of inverse dose expressed in milligrams per kilogram per day (mg/kg/day)⁻¹ to derive the cancer risk estimate. Therefore, to assess exposures associated with the proposed residential population, the following dose algorithm was utilized.

$$CDI = (C_{air} \times EF \times ED \times IR) / (BW \times AT)$$

Where:

CDI	=	chronic daily intake (mg/kg/day)
C _{air}	=	concentration of contaminant in air (mg/m ³)
EF	=	exposure frequency (days/year)
ED	=	exposure duration (years)
IR	=	inhalation rate (m ³ /day)
BW	=	body weight (kg)
AT	=	averaging time (days)

To represent residential exposures, the assessment employed the U.S. Environmental Protection Agency's guidance to develop viable dose estimates based on reasonable maximum exposures (RME). Specifically, activity patterns for population mobility recommended by the U.S. Environmental Protection Agency and presented in the *Exposure Factors Handbook* were utilized. As a result, lifetime risk values for residents were adjusted to account for an exposure duration of 350 days per year for 30 years (i.e., 95th percentile). These values are consistent with the California Environmental Quality Act which considers the evaluation of environmental effects of proposed projects in a manner that reflects both reasonable and feasible assumptions.

5.2 NON-CARCINOGENIC EXPOSURES

An evaluation of the potential noncancerous effects of contaminant exposures was also conducted. Under the point estimate approach, adverse health effects are evaluated by comparing the concentration of each compound with the appropriate Reference Exposure Level (REL). Available REL's presented in the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* were considered in the assessment.

To quantify noncarcinogenic impacts, the hazard index approach was used. The hazard index assumes that subthreshold exposures adversely affect a specific organ or organ system (i.e., toxicological endpoint). For each discrete pollutant exposure, target organs presented in regulatory guidance were utilized.

To calculate the hazard index, the pollutant concentration or dose is divided by the appropriate toxicity value. For compounds affecting the same toxicological endpoint, this ratio is summed. Where the total equals or exceeds one (i.e., unity), a health hazard is presumed to exist. For chronic exposures, REL's were converted to units expressed in mg/kg/day to accommodate the above referenced intake algorithm. To assess acute noncancer impacts, the maximum pollutant concentration is divided by the REL for the corresponding averaging time (e.g., 1-hour). No exposure adjustments are considered for short duration exposures.

Appendix 3.2, summarizes the REL's and corresponding reference dose values used in the evaluation of chronic noncarcinogenic and acute exposures. The noncancer hazard quotient for identified compounds generated from each source and a summation for each toxicological endpoint are presented on this table.

For chronic noncarcinogenic effects, the hazard index identified for each toxicological endpoint totaled less than the threshold of 1.0 for all exposure scenarios. For acute exposures, the hazard indices for the identified averaging times did not exceed the threshold of 1.0. Therefore, acute and chronic non-carcinogenic hazards were predicted to be within acceptable limits and are less than significant.

5.3 POTENTIAL CANCER AND NON-CANCER RISKS²

For carcinogenic exposures resulting from exposure to toxics from the freeway, the summation of risk for the maximum exposed residential receptor totaled 3.58 in one million and will not exceed the SCAQMD significance threshold of 10 in one million.

2 SCAQMD guidance does not require assessment of the potential health risk to on-site workers. Excerpts from the document OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines—The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2003), also indicate that it is not necessary to examine the health effects to on-site workers unless required by RCRA (Resource Conservation and Recovery Act) / CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) or the worker resides on-site.

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6 REFERENCES

1. **American Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc.** *Method of Testing General Ventilation Air Cleaning Devices for Removal by Particle Size*. 2017. ANSI/ASHRAE Standard 52.2.2017.
2. **California Department of Transportation.** EMFAC Software. [Online]
<http://www.dot.ca.gov/hq/env/air/pages/emfac.htm>.
3. **South Coast Air Quality Management District.** Mobile Source Toxics Analysis. [Online] 2003.
http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html.

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7 CERTIFICATION

The contents of this HRA represent an accurate depiction of the potential impacts to the proposed Central Pointe Mixed-Use Development Project. The information contained in this HRA is based on the best available data at the time of preparation. If you have any questions, please contact me directly at (949) 336-5987.

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Bachelor of Arts in Environmental Analysis and Design
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PROFESSIONAL AFFILIATIONS

AEP – Association of Environmental Planners
AWMA – Air and Waste Management Association
ASTM – American Society for Testing and Materials

PROFESSIONAL CERTIFICATIONS

Environmental Site Assessment – American Society for Testing and Materials • June 2013
Planned Communities and Urban Infill – Urban Land Institute • June 2011
Indoor Air Quality and Industrial Hygiene – EMSL Analytical • April 2008
Principles of Ambient Air Monitoring – California Air Resources Board • August 2007
AB2588 Regulatory Standards – Trinity Consultants • November 2006
Air Dispersion Modeling – Lakes Environmental • June 2006

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APPENDIX 3.1:
EMISSION RATE CALCULATION WORKSHEETS

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EMFAC2017
Worksheet
(65 mph)

EMFAC2017 Emission Rates
Region Type: County
Region: ORANGE
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Pollutant Classification: Criteria

Region	CalYr	Season	Veh_Class	Fuel	MdlYr	Speed (miles/hr)	Population (vehicles)	Wt Frac	CO_RUNEX (gms/mile)	CO_RUNEX AVE (gms/mile)	NOX_RUNEX (gms/mile)	NOx_RUNEX AVE (gms/mile)	PM10_RUNEX (gms/mile)	PM10_RUNEX AVE (gms/mile)	PM10_PMTW (gms/mile)	PM10_PMTW_AVE (gms/mile)	PM10_PMBW (gms/mile)	PM10_PMBW_AVE (gms/mile)
ORANGE	2020	Annual	LDA	DSL	Aggregated	65	11164.903	0.0048	0.1576780	0.00074923	0.0868281	0.00041257	0.0082320	0.00003912	0.0080	0.00003801	0.03675	0.000174622
ORANGE	2020	Annual	LDA	GAS	Aggregated	65	1247860.077	0.5311	0.5131502	0.27251912	0.0438778	0.02330222	0.0014267	0.00075769	0.0080	0.00424857	0.03675	0.019516854
ORANGE	2020	Annual	LDT1	DSL	Aggregated	65	55.819	0.0000	1.8674899	0.00004436	1.3902125	0.00003303	0.1898617	0.00000451	0.0080	0.00000019	0.03675	0.000000873
ORANGE	2020	Annual	LDT1	GAS	Aggregated	65	134019.271	0.0570	1.0208223	0.05822426	0.1234590	0.00704169	0.0020130	0.00011482	0.0080	0.00045629	0.03675	0.002096096
ORANGE	2020	Annual	LDT2	DSL	Aggregated	65	2427.176	0.0010	0.0729230	0.00007533	0.0357127	0.00003689	0.0045846	0.00000474	0.0080	0.00000826	0.03675	0.000037962
ORANGE	2020	Annual	LDT2	GAS	Aggregated	65	447357.582	0.1904	0.6886944	0.13111970	0.0859344	0.01636095	0.0013986	0.00026629	0.0080	0.00152311	0.03675	0.006996788
ORANGE	2020	Annual	LHDT1	DSL	Aggregated	65	21629.925	0.0092	0.5292682	0.00487211	2.2226139	0.02046000	0.0169925	0.00015642	0.0120	0.00011046	0.07644	0.000703659
ORANGE	2020	Annual	LHDT1	GAS	Aggregated	65	36819.260	0.0157	0.8630355	0.01352354	0.2146306	0.00336320	0.0010699	0.00001676	0.0080	0.00012536	0.07644	0.001197794
ORANGE	2020	Annual	LHDT2	DSL	Aggregated	65	8343.637	0.0036	0.4462804	0.00158471	1.8266933	0.00648646	0.0162931	0.00005786	0.0120	0.00004261	0.08918	0.000316672
ORANGE	2020	Annual	LHDT2	GAS	Aggregated	65	6427.420	0.0027	0.5119900	0.00140051	0.2149770	0.00058805	0.00009178	0.00000251	0.0080	0.00002188	0.08918	0.000243944
ORANGE	2020	Annual	MCY	GAS	Aggregated	65	55868.871	0.0238	23.7251412	0.56411192	1.2028594	0.02860035	0.0018872	0.00004487	0.0040	0.00009511	0.01176	0.000279617
ORANGE	2020	Annual	MDV	DSL	Aggregated	65	6028.952	0.0026	0.1265906	0.00032481	0.0591852	0.00015186	0.0048780	0.00001252	0.0080	0.00002053	0.03675	0.000094294
ORANGE	2020	Annual	MDV	GAS	Aggregated	65	312579.715	0.1330	0.9627388	0.12807249	0.1229682	0.01635837	0.0014811	0.00019704	0.0080	0.00106423	0.03675	0.004888827
ORANGE	2020	Annual	MH	DSL	Aggregated	65	2901.594	0.0012	0.2650886	0.00032735	3.6428042	0.00449841	0.1460253	0.00018032	0.0160	0.00001976	0.13034	0.000160954
ORANGE	2020	Annual	MH	GAS	Aggregated	65	7043.392	0.0030	2.2246649	0.00666857	0.4283714	0.00128407	0.0012950	0.00000388	0.0120	0.00003597	0.13034	0.000390702
ORANGE	2020	Annual	MHDT	DSL	Aggregated	65	27487.170	0.0117	0.3870657	0.00452795	2.5404975	0.0071908	0.0975440	0.00114108	0.0120	0.00014038	0.13034	0.001524735
ORANGE	2020	Annual	MHDT	GAS	Aggregated	65	7554.979	0.0032	0.9441306	0.00303565	0.3448827	0.00110890	0.00007712	0.00000248	0.0120	0.00003858	0.13034	0.000419081
ORANGE	2020	Annual	HHDT	DSL	Aggregated	65	10494.469	0.0045	0.3731136	0.00166643	4.0257130	0.01798001	0.0808631	0.00036116	0.0360	0.00016079	0.06174	0.000275749
ORANGE	2020	Annual	HHDT	GAS	Aggregated	65	10.178	0.0000	24.2851878	0.00010520	5.5044337	0.00002384	0.0012867	0.00000001	0.0200	0.00000009	0.06174	0.000000267
ORANGE	2020	Annual	OBUS	DSL	Aggregated	65	617.692	0.0003	0.5133360	0.00013495	3.8917273	0.000102306	0.1074946	0.00002826	0.0120	0.00000315	0.13034	0.000034264
ORANGE	2020	Annual	OBUS	GAS	Aggregated	65	995.682	0.0004	1.4501108	0.00061448	0.5132142	0.00021747	0.0007231	0.00000031	0.0120	0.00000508	0.13034	0.000055231
ORANGE	2020	Annual	SBUS	DSL	Aggregated	65	1330.412	0.0006	0.0000000	0.00000000	0.0000000	0.00000000	0.00000000	0.00000000	0.0120	0.00000679	0.74480	0.000421708
ORANGE	2020	Annual	SBUS	GAS	Aggregated	65	477.537	0.0002	0.0000000	0.00000000	0.0000000	0.00000000	0.00000000	0.00000000	0.0080	0.00000163	0.74480	0.000151368
ORANGE	2020	Annual	UBUS	DSL	Aggregated	65	0.000	0.0000	0.0000000	0.00000000	0.0000000	0.00000000	0.00000000	0.00000000	0.0000	0.00000000	0.0000	0.000000000
ORANGE	2020	Annual	UBUS	GAS	Aggregated	65	209.765	0.0001	0.2433834	0.00002173	0.3161702	0.00002823	0.0002009	0.00000002	0.0120	0.00000107	0.13035	0.000011637
							2349705	1.0		1.194		0.179		0.0034		0.008		0.040

EMFAC2017 Emission Rates
Region Type: County
Region: ORANGE
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Pollutant Classification: TOG GAS

Region	CalYr	Season	Veh_Class	Fuel	MdlYr	Speed (miles/hr)	Population (vehicles)	Wt Frac	TOG_RUNEX (gms/mile)	TOG_RUNEX AVE (gms/mile)
ORANGE	2020	Annual	LDA	GAS	Aggregated	65	1247860.077	0.5528	0.0145697	0.0081
ORANGE	2020	Annual	LDT1	GAS	Aggregated	65	134019.271	0.0594	0.0364124	0.0022
ORANGE	2020	Annual	LDT2	GAS	Aggregated	65	447357.582	0.1982	0.0215635	0.0043
ORANGE	2020	Annual	LHDT1	GAS	Aggregated	65	36819.260	0.0163	0.0447649	0.0007
ORANGE	2020	Annual	LHDT2	GAS	Aggregated	65	6427.420	0.0028	0.0296607	0.0001
ORANGE	2020	Annual	MCY	GAS	Aggregated	65	55868.871	0.0248	2.7688096	0.0685
ORANGE	2020	Annual	MDV	GAS	Aggregated	65	312579.715	0.1385	0.0341850	0.0047
ORANGE	2020	Annual	MH	GAS	Aggregated	65	7043.392	0.0031	0.0913197	0.0003
ORANGE	2020	Annual	MHDT	GAS	Aggregated	65	7554.979	0.0033	0.0611843	0.0002
ORANGE	2020	Annual	HHDT	GAS	Aggregated	65	10.178	0.0000	0.9835975	0.0000
ORANGE	2020	Annual	OBUS	GAS	Aggregated	65	995.682	0.0004	0.0883973	0.0000
ORANGE	2020	Annual	SBUS	GAS	Aggregated	65	477.537	0.0002	0.0000000	0.0000
ORANGE	2020	Annual	UBUS	GAS	Aggregated	65	209.765	0.0001	0.0141811	0.0000
							2257224	1.0		0.089

EMFAC2017
Worksheet
(65 mph)

PM2_5_RUNEX (gms/mile)	PM2_5_RUNEX_AVE (gms/mile)	PM2_5_PMTW (gms/mile)	PM2_5_PMTW_AVE (gms/mile)	PM2_5_PMBW (gms/mile)	PM2_5_PMBW_AVE (gms/mile)
0.0078759	0.000037423	0.0020	0.000009503	0.01575	0.000074838
0.0013119	0.000696685	0.0020	0.001062142	0.01575	0.008364366
0.1816483	0.000004315	0.0020	0.000000048	0.01575	0.000000374
0.0018511	0.000105579	0.0020	0.000114073	0.01575	0.000898327
0.0043863	0.000004531	0.0020	0.000002066	0.01575	0.000016269
0.0012861	0.000244850	0.0020	0.000380778	0.01575	0.002998623
0.0162574	0.000149655	0.0030	0.000027616	0.03276	0.000301568
0.0009842	0.000015422	0.0020	0.000031339	0.03276	0.000513340
0.0155883	0.000055353	0.0030	0.000010653	0.03822	0.000135716
0.0008438	0.000002308	0.0020	0.000005471	0.03822	0.000104548
0.0017678	0.000042032	0.0010	0.000023777	0.00504	0.000119836
0.0046670	0.000011975	0.0020	0.000005132	0.01575	0.000040412
0.0013630	0.000181322	0.0020	0.000266059	0.01575	0.002095212
0.1397083	0.000172522	0.0040	0.000004940	0.05586	0.000068980
0.0011917	0.000003572	0.0030	0.000008993	0.05586	0.000167444
0.0933243	0.001091720	0.0030	0.000035094	0.05586	0.000653458
0.0007091	0.000002280	0.0030	0.000009646	0.05586	0.000179606
0.0773650	0.000345535	0.0090	0.000040197	0.02646	0.000118178
0.0011830	0.000000005	0.0050	0.000000022	0.02646	0.000000115
0.1028444	0.000027036	0.0030	0.000000789	0.05586	0.000014684
0.0006651	0.000000282	0.0030	0.000001271	0.05586	0.000023671
0.0000000	0.000000000	0.0030	0.000001699	0.3192	0.000180732
0.0000000	0.000000000	0.0020	0.000000406	0.31920	0.000064872
0.0000000	0.000000000	0.0000	0.000000000	0.0000	0.000000000
0.0001847	0.000000016	0.0030	0.000000268	0.05587	0.000004987
0.0032		0.002		0.017	

EMFAC2017
Worksheet
(65 mph)

EMFAC2017 Emission Rates
Region Type: County
Region: Orange (SC)
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Pollutant Classification: TOG DSL

Region	CalYr	Season	Veh_Class	Fuel	MdlYr	Speed (miles/hr)	Population (vehicles)	Wt Frac	TOG_RUNEX (gms/mile)	TOG_RUNEX AVE (gms/mile)
ORANGE	2020	Annual	LDA	DSL	Aggregated	65	11164.903	0.1207	0.0140263	0.0017
ORANGE	2020	Annual	LDT1	DSL	Aggregated	65	55.819	0.0006	0.2697117	0.0002
ORANGE	2020	Annual	LDT2	DSL	Aggregated	65	2427.176	0.0262	0.0099900	0.0003
ORANGE	2020	Annual	LHDT1	DSL	Aggregated	65	21629.925	0.2339	0.0791822	0.0185
ORANGE	2020	Annual	LHDT2	DSL	Aggregated	65	8343.637	0.0902	0.0686702	0.0062
ORANGE	2020	Annual	MDV	DSL	Aggregated	65	6028.952	0.0652	0.0091178	0.0006
ORANGE	2020	Annual	MH	DSL	Aggregated	65	2901.594	0.0314	0.0638991	0.0020
ORANGE	2020	Annual	MHDT	DSL	Aggregated	65	27487.170	0.2972	0.1043012	0.0310
ORANGE	2020	Annual	HHDT	DSL	Aggregated	65	10494.469	0.1135	0.1028850	0.0117
ORANGE	2020	Annual	OBUS	DSL	Aggregated	65	617.692	0.0067	0.1618479	0.0011
ORANGE	2020	Annual	SBUS	DSL	Aggregated	65	1330.412	0.0144	0.0000000	0.0000
ORANGE	2020	Annual	UBUS	DSL	Aggregated	65	0.000	0.0000	0.0000000	0.0000
							92482	1.0		0.073

EMFAC2017 Emission Rates
Region Type: County
Region: Orange (SC)
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Pollutant Classification: DSL Particulate

Region	CalYr	Season	Veh_Class	Fuel	MdlYr	Speed (miles/hr)	Population (vehicles)	Wt Frac	PM10_RUNEX (gms/mile)	PM10_RUNEX AVE (gms/mile)
ORANGE	2020	Annual	LDA	DSL	Aggregated	65	11164.903	0.1207	0.0082320	0.0010
ORANGE	2020	Annual	LDT1	DSL	Aggregated	65	55.819	0.0006	0.1898617	0.0001
ORANGE	2020	Annual	LDT2	DSL	Aggregated	65	2427.176	0.0262	0.0045846	0.0001
ORANGE	2020	Annual	LHDT1	DSL	Aggregated	65	21629.925	0.2339	0.0169925	0.0040
ORANGE	2020	Annual	LHDT2	DSL	Aggregated	65	8343.637	0.0902	0.0162931	0.0015
ORANGE	2020	Annual	MDV	DSL	Aggregated	65	6028.952	0.0652	0.0048780	0.0003
ORANGE	2020	Annual	MH	DSL	Aggregated	65	2901.594	0.0314	0.1460253	0.0046
ORANGE	2020	Annual	MHDT	DSL	Aggregated	65	27487.170	0.2972	0.0975440	0.0290
ORANGE	2020	Annual	HHDT	DSL	Aggregated	65	10494.469	0.1135	0.0808631	0.0092
ORANGE	2020	Annual	OBUS	DSL	Aggregated	65	617.692	0.0067	0.1074946	0.0007
ORANGE	2020	Annual	SBUS	DSL	Aggregated	65	1330.412	0.0144	0.0000000	0.0000
ORANGE	2020	Annual	UBUS	DSL	Aggregated	65	0.000	0.0000	0.0000000	0.0000
							92482	1.0		0.050

On-Road Mobile Sources
Emission Rate Computation

Interstate 5 Mainline

DSL Particulate Emissions

Number of Sources	9
Link Length (meters)	520
Volume/Baseline (VPH)	540
Pollutant Mass Emission Rate (gr/mi)	0.050

$$Emission\ Rate\ (gr/sec) = ((Mass\ Emission\ Rate\ x\ Volume/Baseline)/(1609.3\ m/mile) \times (3600\ sec/hr)) \times L$$

Pollutant Emission Rate (gr/sec)	0.00242
Pollutant Emission Rate (gr/sec/source)	2.69E-04

All	2349705
DSL	92482

Diesel Fleet Mix (weight fraction)

0.0394

Link Counts		AADT	VPH all	VPH gas	VPH diesel
1	Interstate 5 Mainline	329500	13729	13189	540
6	I-5 SB On-Ramp at 1st St.	14900	621	596	24

APPENDIX 3.2:
RISK CALCULATION WORKSHEETS

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Table A1
Quantification of Carcinogenic Risks and Noncarcinogenic Hazards
30 Year Exposure Scenario / Maximum Residential Receptor

Source	Concentration		Weight Fraction	Contaminant	Carcinogenic Risk			Noncarcinogenic Hazards / Toxicological Endpoints*									
	(ug/m3)	(mg/m3)			URF	CPF	RISK	REL	RfD	RESP	CNS/PNS	CV/BL	IMMUN	KIDN	GI/LV	REPRO	EYES
	(b)	(c)			(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)
Freeway	0.02900	2.9E-05	1.00E+00	Diesel Particulates	3.0E-04	1.1E+00	3.6E-06	5.0E+00	1.4E-03	5.6E-03							
Total							3.58E-06			5.6E-03	0.0E+00	0.0E+00	0.0E+00	0.0E+00	0.0E+00	0.0E+00	0.0E+00

* Key to Toxicological Endpoints

RESP Respiratory System
CNS/PNS Central/Peripheral Nervous System
CV/BL Cardiovascular/Blood System
IMMUN Immune System
KIDN Kidney
GI/LV Gastrointestinal System/Liver
REPRO Reproductive System (e.g., teratogenic and developmental effects)
EYES Eye irritation and/or other effects

Note: Exposure factors used to calculate contaminant intake

exposure frequency (days/year) 350
exposure duration (years) 30
inhalation rate (m3/day) 20
average body weight (kg) 70
averaging time_(cancer) (days) 25550
averaging time_(noncancer) (days) 10950

APPENDIX 4.1:
AERMOD MODEL OUTPUT SUMMARY FILE

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▲ *** AERMOD - VERSION 19191 *** *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
E FIRST ST.ISC *** 06/05/20
*** AERMET - VERSION 16216 *** ***
*** 02:17:27

PAGE 1
*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** MODEL SETUP OPTIONS SUMMARY

**Model Is Setup For Calculation of Average CONCentration Values.

-- DEPOSITION LOGIC --

**NO GAS DEPOSITION Data Provided.

**NO PARTICLE DEPOSITION Data Provided.

**Model Uses NO DRY DEPLETION. DRYDPLT = F

**Model Uses NO WET DEPLETION. WETDPLT = F

**Model Uses URBAN Dispersion Algorithm for the SBL for 9 Source(s),
for Total of 1 Urban Area(s):

Urban Population = 3010232.0 ; Urban Roughness Length = 1.000 m

**Model Uses Regulatory DEFAULT Options:

1. Stack-tip Downwash.
2. Model Accounts for ELEVated Terrain Effects.
3. Use Calms Processing Routine.
4. Use Missing Data Processing Routine.
5. No Exponential Decay.
6. Urban Roughness Length of 1.0 Meter Assumed.

**Other Options Specified:

ADJ_U* - Use ADJ_U* option for SBL in AERMET

CCVR_Sub - Meteorological data includes CCVR substitutions

TEMP_Sub - Meteorological data includes TEMP substitutions

**Model Accepts FLAGPOLE Receptor Heights.

**The User Specified a Pollutant Type of: DPM

**Model Calculates ANNUAL Averages Only

**This Run Includes: 9 Source(s); 1 Source Group(s); and 348
Receptor(s)

with: 0 POINT(s), including
0 POINTCAP(s) and 0 POINTHOR(s)

and: 9 VOLUME source(s)

and: 0 AREA type source(s)
and: 0 LINE source(s)
and: 0 RLINE/RLINEXT source(s)
and: 0 OPENPIT source(s)
and: 0 BUOYANT LINE source(s) with 0 line(s)

**Model Set To Continue RUNNING After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 16216

**Output Options Selected:

Model Outputs Tables of ANNUAL Averages by Receptor
Model Outputs External File(s) of High Values for Plotting (PLOTFILE

Keyword)

Model Outputs Separate Summary File of High Ranked Values (SUMMFILE

Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
m for Missing

Hours

b for Both Calm

and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 17.00 ; Decay
Coef. = 0.000 ; Rot. Angle = 0.0
Emission Units = GRAMS/SEC ;
Emission Rate Unit Factor = 0.10000E+07
Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.5 MB of RAM.

**Input Runstream File: aermod.inp

**Output Print File: aermod.out

**Detailed Error/Message File: 13400 FREEWAY HRA.ERR

**File for Summary of Results: 13400 FREEWAY HRA.SUM

▲ *** AERMOD - VERSION 19191 *** *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
E FIRST ST.ISC *** 06/05/20
*** AERMET - VERSION 16216 *** ***
*** 02:17:27

PAGE 2

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** METEOROLOGICAL DAYS SELECTED FOR

Name: UNKNOWN

Name: UNKNOWN

Year: 2012

Year: 2012

First 24 hours of scalar data

YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O	LEN	Z0	BOWEN
ALBEDO	REF	WS	WD	HT	REF	TA	HT							

12	01	01	1	01	-4.5	0.082	-9.000	-9.000	-999.	56.	11.0	0.12	2.65
1.00	0.87	62.			5.8	283.8	2.0						
12	01	01	1	02	-3.5	0.073	-9.000	-9.000	-999.	47.	9.9	0.12	2.65
1.00	0.77	27.			5.8	283.1	2.0						
12	01	01	1	03	-3.5	0.073	-9.000	-9.000	-999.	47.	9.9	0.12	2.65
1.00	0.77	336.			5.8	283.1	2.0						
12	01	01	1	04	-3.3	0.070	-9.000	-9.000	-999.	45.	9.7	0.12	2.65
1.00	0.74	34.			5.8	283.1	2.0						
12	01	01	1	05	-3.0	0.068	-9.000	-9.000	-999.	42.	9.4	0.12	2.65
1.00	0.70	154.			5.8	282.5	2.0						
12	01	01	1	06	-999.0	-9.000	-9.000	-9.000	-999.	-999.	-99999.0	0.12	2.65
1.00	0.00	0.			5.8	282.0	2.0						
12	01	01	1	07	-2.0	0.059	-9.000	-9.000	-999.	34.	9.0	0.12	2.65
1.00	0.55	343.			5.8	281.4	2.0						
12	01	01	1	08	-2.6	0.066	-9.000	-9.000	-999.	40.	9.7	0.12	2.65
0.53	0.69	25.			5.8	281.4	2.0						
12	01	01	1	09	21.6	0.133	0.252	0.010	27.	116.	-9.9	0.12	2.65
0.31	1.03	344.			5.8	282.5	2.0						
12	01	01	1	10	115.6	0.162	0.713	0.008	114.	156.	-3.3	0.12	2.65
0.24	1.06	233.			5.8	286.4	2.0						
12	01	01	1	11	160.9	0.126	1.129	0.005	325.	108.	-1.1	0.12	2.65
0.21	0.67	261.			5.8	291.4	2.0						
12	01	01	1	12	187.0	0.138	1.467	0.005	614.	123.	-1.3	0.12	2.65
0.20	0.75	252.			5.8	294.9	2.0						
12	01	01	1	13	186.9	0.189	1.755	0.005	1051.	197.	-3.3	0.12	2.65
0.20	1.23	280.			5.8	297.5	2.0						
12	01	01	1	14	168.3	0.247	1.857	0.005	1383.	295.	-8.1	0.12	2.65
0.21	1.86	268.			5.8	299.2	2.0						
12	01	01	1	15	115.3	0.275	1.688	0.005	1517.	346.	-16.3	0.12	2.65
0.24	2.25	248.			5.8	298.1	2.0						
12	01	01	1	16	41.5	0.262	1.211	0.005	1552.	322.	-39.2	0.12	2.65
0.33	2.32	227.			5.8	295.9	2.0						
12	01	01	1	17	-17.9	0.217	-9.000	-9.000	-999.	244.	52.0	0.12	2.65
0.60	2.18	227.			5.8	292.5	2.0						
12	01	01	1	18	-24.7	0.250	-9.000	-9.000	-999.	300.	68.7	0.12	2.65
1.00	2.50	219.			5.8	288.8	2.0						
12	01	01	1	19	-5.2	0.088	-9.000	-9.000	-999.	91.	12.0	0.12	2.65
1.00	0.94	201.			5.8	287.5	2.0						
12	01	01	1	20	-3.5	0.073	-9.000	-9.000	-999.	47.	10.0	0.12	2.65
1.00	0.77	259.			5.8	287.0	2.0						
12	01	01	1	21	-2.6	0.064	-9.000	-9.000	-999.	39.	9.1	0.12	2.65

```

1.00  0.65  264.  5.8  286.4  2.0
  12 01 01  1 22  -4.4  0.081 -9.000 -9.000 -999.  55.  10.9  0.12  2.65
1.00  0.86  211.  5.8  285.9  2.0
  12 01 01  1 23  -4.2  0.079 -9.000 -9.000 -999.  53.  10.7  0.12  2.65
1.00  0.84  247.  5.8  284.9  2.0
  12 01 01  1 24  -7.1  0.103 -9.000 -9.000 -999.  80.  14.1  0.12  2.65
1.00  1.09  236.  5.8  283.8  2.0

```

First hour of profile data

```

YR MO DY HR HEIGHT F  WDIR      WSPD AMB_TMP sigmaA  sigmaW  sigmaV
12 01 01 01   5.8 1   62.     0.87  283.8  99.0  -99.00 -99.00

```

F indicates top of profile (=1) or below (=0)

```

^ *** AERMOD - VERSION 19191 ***      *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
E FIRST ST.ISC          ***          06/05/20
*** AERMET - VERSION 16216 ***      ***
***                                02:17:27

```

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```

*** MODELOPTs:   RegDFault  CONC  ELEV  FLGPOL  URBAN  ADJ_U*

```

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS ***

** CONC OF DPM IN MICROGRAMS/M**3

**

```

          NETWORK
GROUP ID          AVERAGE CONC          RECEPTOR (XR, YR,
ZELEV, ZHILL, ZFLAG) OF TYPE  GRID-ID
-----

```

```

ALL          1ST HIGHEST VALUE IS          0.11599 AT ( 421925.73, 3734653.54,
36.00,      36.00, 7.00) DC
          2ND HIGHEST VALUE IS          0.11329 AT ( 421937.11, 3734627.53,
36.00,      36.00, 7.00) DC
          3RD HIGHEST VALUE IS          0.11286 AT ( 421925.73, 3734662.21,
36.00,      36.00, 7.00) DC
          4TH HIGHEST VALUE IS          0.11236 AT ( 421902.97, 3734705.56,
36.45,      36.45, 7.00) DC
          5TH HIGHEST VALUE IS          0.11117 AT ( 421914.35, 3734688.22,
36.26,      36.26, 7.00) DC
          6TH HIGHEST VALUE IS          0.11073 AT ( 421937.11, 3734636.20,
36.00,      36.00, 7.00) DC
          7TH HIGHEST VALUE IS          0.10963 AT ( 421948.49, 3734601.52,
36.00,      36.00, 7.00) DC

```


36.08, 8TH HIGHEST VALUE IS 0.10923 AT (421925.73, 3734670.88,
36.08, 36.08, 7.00) DC
36.00, 9TH HIGHEST VALUE IS 0.10818 AT (421937.11, 3734644.87,
36.00, 36.00, 7.00) DC
36.54, 10TH HIGHEST VALUE IS 0.10817 AT (421902.97, 3734714.23,
36.54, 36.54, 7.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

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E FIRST ST.ISC *** 06/05/20
*** AERMET - VERSION 16216 *** ***
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*** MODELOPTs: RegDFault CONC ELEV FLGPOL URBAN ADJ_U*

*** Message Summary : AERMOD Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 2 Warning Message(s)
A Total of 1864 Informational Message(s)

A Total of 43848 Hours Were Processed

A Total of 1500 Calm Hours Identified

A Total of 364 Missing Hours Identified (0.83 Percent)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****
ME W186 99 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used
0.50
ME W187 99 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

APPENDIX 4.2:

**AERMOD MODEL INPUT/OUTPUT FILES
(ELECTRONIC FORMAT, AVAILABLE ON REQUEST)**

```
** Lakes Environmental AERMOD MPI
**
*****
**
** AERMOD INPUT PRODUCED BY:
** AERMOD VIEW VER. 9.9.0
** LAKES ENVIRONMENTAL SOFTWARE INC.
** DATE: 6/5/2020
** FILE: C:\LAKES\AERMOD VIEW\13400 FREEWAY HRA\13400 FREEWAY HRA.ADI
**
```

```
*****
**
**
*****
```

```
** AERMOD CONTROL PATHWAY
*****
**
**
```

```
CO STARTING
  TITLEONE C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660 E FIRST ST.ISC
  MODELOPT DFAULT CONC
  AVERTIME ANNUAL
  URBANOPT 3010232
  POLLUTID DPM
  FLAGPOLE 0.00
  RUNORNOT RUN
  ERRORFIL "13400 FREEWAY HRA.ERR"
```

```
CO FINISHED
**
*****
```

```
** AERMOD SOURCE PATHWAY
*****
**
**
```

```
SO STARTING
** SOURCE LOCATION **
** SOURCE ID - TYPE - X COORD. - Y COORD. **
```

```
** -----
```

```
** LINE SOURCE REPRESENTED BY ADJACENT VOLUME SOURCES
** LINE VOLUME SOURCE ID = SLINE1
** DESCRSRC I-5 MAINLINE
** PREFIX
** LENGTH OF SIDE = 57.91
** CONFIGURATION = ADJACENT
** EMISSION RATE = 0.00242
** VERTICAL DIMENSION = 7.59
** SZINIT = 3.53
** NODES = 4
** 421732.353, 3734852.628, 37.00, 0.00, 26.93
** 421856.672, 3734643.962, 36.00, 0.00, 26.93
```

```

** 421905.810, 3734500.098, 35.00, 0.00, 26.93
** 421939.898, 3734380.185, 34.94, 0.00, 26.93
** -----
LOCATION L0000001      VOLUME  421747.173 3734827.753 37.00
LOCATION L0000002      VOLUME  421776.813 3734778.004 37.00
LOCATION L0000003      VOLUME  421806.453 3734728.254 36.69
LOCATION L0000004      VOLUME  421836.093 3734678.504 36.15
LOCATION L0000005      VOLUME  421862.394 3734627.210 36.00
LOCATION L0000006      VOLUME  421881.112 3734572.408 36.00
LOCATION L0000007      VOLUME  421899.829 3734517.607 35.42
LOCATION L0000008      VOLUME  421916.585 3734462.192 35.00
LOCATION L0000009      VOLUME  421932.421 3734406.489 35.00

```

```

** END OF LINE VOLUME SOURCE ID = SLINE1

```

```

** SOURCE PARAMETERS **

```

```

** LINE VOLUME SOURCE ID = SLINE1

```

SRCPARAM L0000001	0.0002688889	0.00	26.93	3.53
SRCPARAM L0000002	0.0002688889	0.00	26.93	3.53
SRCPARAM L0000003	0.0002688889	0.00	26.93	3.53
SRCPARAM L0000004	0.0002688889	0.00	26.93	3.53
SRCPARAM L0000005	0.0002688889	0.00	26.93	3.53
SRCPARAM L0000006	0.0002688889	0.00	26.93	3.53
SRCPARAM L0000007	0.0002688889	0.00	26.93	3.53
SRCPARAM L0000008	0.0002688889	0.00	26.93	3.53
SRCPARAM L0000009	0.0002688889	0.00	26.93	3.53

```

** -----
URBANSRC ALL
SRCGROUP ALL

```

```

SO FINISHED

```

```

**

```

```

*****

```

```

** AERMOD RECEPTOR PATHWAY

```

```

*****

```

```

**

```

```

**

```

```

RE STARTING

```

```

INCLUDED "13400 FREEWAY HRA.ROU"

```

```

RE FINISHED

```

```

**

```

```

*****

```

```

** AERMOD METEOROLOGY PATHWAY

```

```

*****

```

```

**

```

```

**

```

```

ME STARTING

```

```

SURFFILE KSNA_V9_ADJU\KSNA_V9.SFC

```

```

PROFFILE KSNA_V9_ADJU\KSNA_V9.PFL

```

```

SURFDATA 93184 2012

```

```

UAIRDATA 3190 2012

```

```

PROFBASE 17.0 METERS

```

```

ME FINISHED

```

```

**
*****
** AERMOD OUTPUT PATHWAY
*****
**
**
OU STARTING
** AUTO-GENERATED PLOTFILES
  PLOTFILE ANNUAL ALL "13400 FREEWAY HRA.AD\AN00GALL.PLT" 31
  SUMMFILE "13400 FREEWAY HRA.SUM"
OU FINISHED

```

*** Message Summary For AERMOD Model Setup ***

----- Summary of Total Messages -----

```

A Total of          0 Fatal Error Message(s)
A Total of          2 Warning Message(s)
A Total of          0 Informational Message(s)

```

```

***** FATAL ERROR MESSAGES *****
      *** NONE ***

```

```

***** WARNING MESSAGES *****
ME W186      99      MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used
      0.50
ME W187      99      MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

```

```

*****
*** SETUP Finishes Successfully ***
*****

```

```

^ *** AERMOD - VERSION 19191 ***      *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
E FIRST ST.ISC          ***          06/05/20
*** AERMET - VERSION 16216 ***      ***
      ***          02:17:27

```

```

                                PAGE 1
*** MODELOPTs:   RegDFault  CONC  ELEV  FLGPOL  URBAN  ADJ_U*

```

*** MODEL SETUP OPTIONS SUMMARY

 **Model Is Setup For Calculation of Average CONCentration Values.

```

-- DEPOSITION LOGIC --
**NO GAS DEPOSITION Data Provided.
**NO PARTICLE DEPOSITION Data Provided.
**Model Uses NO DRY DEPLETION.  DRYDPLT = F
**Model Uses NO WET DEPLETION.  WETDPLT = F

**Model Uses URBAN Dispersion Algorithm for the SBL for      9 Source(s),
  for Total of      1 Urban Area(s):
  Urban Population =  3010232.0 ; Urban Roughness Length =  1.000 m

**Model Uses Regulatory DEFAULT Options:
  1. Stack-tip Downwash.
  2. Model Accounts for ELEVated Terrain Effects.
  3. Use Calms Processing Routine.
  4. Use Missing Data Processing Routine.
  5. No Exponential Decay.
  6. Urban Roughness Length of 1.0 Meter Assumed.

**Other Options Specified:
  ADJ_U*   - Use ADJ_U* option for SBL in AERMET
  CCVR_Sub - Meteorological data includes CCVR substitutions
  TEMP_Sub - Meteorological data includes TEMP substitutions

**Model Accepts FLAGPOLE Receptor Heights.

**The User Specified a Pollutant Type of:  DPM

**Model Calculates ANNUAL Averages Only

**This Run Includes:      9 Source(s);      1 Source Group(s); and      348
Receptor(s)

      with:      0 POINT(s), including
                  0 POINTCAP(s) and      0 POINTHOR(s)
      and:      9 VOLUME source(s)
      and:      0 AREA type source(s)
      and:      0 LINE source(s)
      and:      0 RLINE/RLINEXT source(s)
      and:      0 OPENPIT source(s)
      and:      0 BUOYANT LINE source(s) with      0 line(s)

**Model Set To Continue RUNNING After the Setup Testing.

**The AERMET Input Meteorological Data Version Date:  16216

**Output Options Selected:
  Model Outputs Tables of ANNUAL Averages by Receptor
  Model Outputs External File(s) of High Values for Plotting (PLOTFILE

```

Keyword)

Model Outputs Separate Summary File of High Ranked Values (SUMMFILE

Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
m for Missing

Hours

b for Both Calm

and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 17.00 ; Decay
Coef. = 0.000 ; Rot. Angle = 0.0
Emission Units = GRAMS/SEC ;
Emission Rate Unit Factor = 0.10000E+07
Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.5 MB of RAM.

**Input Runstream File: aermod.inp

**Output Print File: aermod.out

**Detailed Error/Message File: 13400 FREEWAY HRA.ERR

**File for Summary of Results: 13400 FREEWAY HRA.SUM

▲ *** AERMOD - VERSION 19191 *** *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
E FIRST ST.ISC *** 06/05/20
*** AERMET - VERSION 16216 *** ***
*** 02:17:27

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*** MODELOPTs: RegDFault CONC ELEV FLGPOL URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

INIT.	URBAN	NUMBER	EMISSION	RATE		BASE	RELEASE	INIT.	
SOURCE		EMISSION	RATE		X	Y	ELEV.	HEIGHT	SY
SZ	SOURCE	SCALAR	VARY		(METERS)	(METERS)	(METERS)	(METERS)	(METERS)
ID		CATS.		BY					

L0000001		0	0.26889E-03		421747.2	3734827.8	37.0	0.00	26.93
3.53	YES								
L0000002		0	0.26889E-03		421776.8	3734778.0	37.0	0.00	26.93

3010232. L0000001 , L0000002 , L0000003 , L0000004 ,
L0000005 , L0000006 , L0000007 ,
L0000008 ,

L0000009 ,
▲ *** AERMOD - VERSION 19191 *** *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
E FIRST ST.ISC *** 06/05/20
*** AERMET - VERSION 16216 *** ***
*** 02:17:27

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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(421959.9, 3734566.8, 35.9, 35.9, 7.0);	(421971.2, 3734566.8, 36.0, 36.0, 7.0);
(421982.6, 3734566.8, 36.0, 36.0, 7.0);	(421994.0, 3734566.8, 36.0, 36.0, 7.0);
(422005.4, 3734566.8, 36.0, 36.0, 7.0);	(422016.8, 3734566.8, 36.0, 36.0, 7.0);
(422028.1, 3734566.8, 36.0, 36.0, 7.0);	(422039.5, 3734566.8, 36.0, 36.0, 7.0);
(422050.9, 3734566.8, 36.0, 36.0, 7.0);	(422062.3, 3734566.8, 36.0, 36.0, 7.0);
(422073.7, 3734566.8, 36.0, 36.0, 7.0);	(422085.0, 3734566.8, 36.0, 36.0, 7.0);
(422096.4, 3734566.8, 36.0, 36.0, 7.0);	(422107.8, 3734566.8, 36.0, 36.0, 7.0);
(422119.2, 3734566.8, 36.0, 36.0, 7.0);	(422130.6, 3734566.8, 36.0, 36.0, 7.0);
(421959.9, 3734575.5, 36.0, 36.0, 7.0);	(421971.2, 3734575.5, 36.0, 36.0, 7.0);
(421982.6, 3734575.5, 36.0, 36.0, 7.0);	(421994.0, 3734575.5, 36.0, 36.0, 7.0);
(422005.4, 3734575.5, 36.0, 36.0, 7.0);	(422016.8, 3734575.5, 36.0, 36.0, 7.0);
(422028.1, 3734575.5, 36.0, 36.0, 7.0);	(422039.5, 3734575.5, 36.0, 36.0, 7.0);
(422050.9, 3734575.5, 36.0, 36.0, 7.0);	(422062.3, 3734575.5, 36.0, 36.0, 7.0);
(422073.7, 3734575.5, 36.0, 36.0, 7.0);	(422085.0, 3734575.5, 36.0, 36.0, 7.0);
(422096.4, 3734575.5, 36.0, 36.0, 7.0);	(422107.8, 3734575.5, 36.0, 36.0, 7.0);
(422119.2, 3734575.5, 36.0, 36.0, 7.0);	(422130.6, 3734575.5, 36.0, 36.0, 7.0);

(421959.9, 3734584.2, 36.0, 36.0, 7.0); (421971.2,
 3734584.2, 36.0, 36.0, 7.0);
 (421982.6, 3734584.2, 36.0, 36.0, 7.0); (421994.0,
 3734584.2, 36.0, 36.0, 7.0);
 (422005.4, 3734584.2, 36.0, 36.0, 7.0); (422016.8,
 3734584.2, 36.0, 36.0, 7.0);
 (422028.1, 3734584.2, 36.0, 36.0, 7.0); (422039.5,
 3734584.2, 36.0, 36.0, 7.0);
 (422050.9, 3734584.2, 36.0, 36.0, 7.0); (422062.3,
 3734584.2, 36.0, 36.0, 7.0);
 (422073.7, 3734584.2, 36.0, 36.0, 7.0); (422085.0,
 3734584.2, 36.0, 36.0, 7.0);
 (422096.4, 3734584.2, 36.0, 36.0, 7.0); (422107.8,
 3734584.2, 36.0, 36.0, 7.0);
 (422119.2, 3734584.2, 36.0, 36.0, 7.0); (422130.6,
 3734584.2, 36.0, 36.0, 7.0);
 (421959.9, 3734592.8, 36.0, 36.0, 7.0); (421971.2,
 3734592.8, 36.0, 36.0, 7.0);
 (421982.6, 3734592.8, 36.0, 36.0, 7.0); (421994.0,
 3734592.8, 36.0, 36.0, 7.0);
 (422005.4, 3734592.8, 36.0, 36.0, 7.0); (422016.8,
 3734592.8, 36.0, 36.0, 7.0);
 (422028.1, 3734592.8, 36.0, 36.0, 7.0); (422039.5,
 3734592.8, 36.0, 36.0, 7.0);
 (422050.9, 3734592.8, 36.0, 36.0, 7.0); (422062.3,
 3734592.8, 36.0, 36.0, 7.0);
 (422073.7, 3734592.8, 36.0, 36.0, 7.0); (422085.0,
 3734592.8, 36.0, 36.0, 7.0);
 (422096.4, 3734592.8, 36.0, 36.0, 7.0); (422107.8,
 3734592.8, 36.0, 36.0, 7.0);
 (422119.2, 3734592.8, 36.0, 36.0, 7.0); (422130.6,
 3734592.8, 36.0, 36.0, 7.0);
 (421948.5, 3734601.5, 36.0, 36.0, 7.0); (421959.9,
 3734601.5, 36.0, 36.0, 7.0);
 (421971.2, 3734601.5, 36.0, 36.0, 7.0); (421982.6,
 3734601.5, 36.0, 36.0, 7.0);
 (421994.0, 3734601.5, 36.0, 36.0, 7.0); (422005.4,
 3734601.5, 36.0, 36.0, 7.0);
 (422016.8, 3734601.5, 36.0, 36.0, 7.0); (422028.1,
 3734601.5, 36.0, 36.0, 7.0);
 (422039.5, 3734601.5, 36.0, 36.0, 7.0); (422050.9,
 3734601.5, 36.0, 36.0, 7.0);
 (422062.3, 3734601.5, 36.0, 36.0, 7.0); (422073.7,
 3734601.5, 36.0, 36.0, 7.0);
 (422085.0, 3734601.5, 36.0, 36.0, 7.0); (422096.4,
 3734601.5, 36.0, 36.0, 7.0);
 (422107.8, 3734601.5, 36.0, 36.0, 7.0); (422119.2,
 3734601.5, 36.0, 36.0, 7.0);
 (422130.6, 3734601.5, 36.0, 36.0, 7.0); (421948.5,
 3734610.2, 36.0, 36.0, 7.0);

```

( 421959.9, 3734610.2, 36.0, 36.0, 7.0); ( 421971.2,
3734610.2, 36.0, 36.0, 7.0);
( 421982.6, 3734610.2, 36.0, 36.0, 7.0); ( 421994.0,
3734610.2, 36.0, 36.0, 7.0);
( 422005.4, 3734610.2, 36.0, 36.0, 7.0); ( 422016.8,
3734610.2, 36.0, 36.0, 7.0);
( 422028.1, 3734610.2, 36.0, 36.0, 7.0); ( 422039.5,
3734610.2, 36.0, 36.0, 7.0);
^ *** AERMOD - VERSION 19191 *** *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
E FIRST ST.ISC *** 06/05/20
*** AERMET - VERSION 16216 *** ***
*** 02:17:27

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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

```

( 422050.9, 3734610.2, 36.0, 36.0, 7.0); ( 422062.3,
3734610.2, 36.0, 36.0, 7.0);
( 422073.7, 3734610.2, 36.0, 36.0, 7.0); ( 422085.0,
3734610.2, 36.0, 36.0, 7.0);
( 422096.4, 3734610.2, 36.0, 36.0, 7.0); ( 422107.8,
3734610.2, 36.0, 36.0, 7.0);
( 422119.2, 3734610.2, 36.0, 36.0, 7.0); ( 422130.6,
3734610.2, 36.0, 36.0, 7.0);
( 421948.5, 3734618.9, 36.0, 36.0, 7.0); ( 421959.9,
3734618.9, 36.0, 36.0, 7.0);
( 421971.2, 3734618.9, 36.0, 36.0, 7.0); ( 421982.6,
3734618.9, 36.0, 36.0, 7.0);
( 421994.0, 3734618.9, 36.0, 36.0, 7.0); ( 422005.4,
3734618.9, 36.0, 36.0, 7.0);
( 422016.8, 3734618.9, 36.0, 36.0, 7.0); ( 422028.1,
3734618.9, 36.0, 36.0, 7.0);
( 422039.5, 3734618.9, 36.0, 36.0, 7.0); ( 422050.9,
3734618.9, 36.0, 36.0, 7.0);
( 422062.3, 3734618.9, 36.0, 36.0, 7.0); ( 422073.7,
3734618.9, 36.0, 36.0, 7.0);
( 422085.0, 3734618.9, 36.0, 36.0, 7.0); ( 422096.4,
3734618.9, 36.0, 36.0, 7.0);
( 422107.8, 3734618.9, 36.0, 36.0, 7.0); ( 422119.2,
3734618.9, 36.0, 36.0, 7.0);
( 422130.6, 3734618.9, 36.0, 36.0, 7.0); ( 421937.1,
3734627.5, 36.0, 36.0, 7.0);
( 421948.5, 3734627.5, 36.0, 36.0, 7.0); ( 421959.9,
3734627.5, 36.0, 36.0, 7.0);
( 421971.2, 3734627.5, 36.0, 36.0, 7.0); ( 421982.6,
3734627.5, 36.0, 36.0, 7.0);

```

(421994.0, 3734627.5, 36.0, 36.0, 7.0); (422005.4,
 3734627.5, 36.0, 36.0, 7.0);
 (422016.8, 3734627.5, 36.0, 36.0, 7.0); (422028.1,
 3734627.5, 36.0, 36.0, 7.0);
 (422039.5, 3734627.5, 36.0, 36.0, 7.0); (422050.9,
 3734627.5, 36.0, 36.0, 7.0);
 (422062.3, 3734627.5, 36.0, 36.0, 7.0); (422073.7,
 3734627.5, 36.0, 36.0, 7.0);
 (422085.0, 3734627.5, 36.0, 36.0, 7.0); (422096.4,
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^ *** AERMOD - VERSION 19191 *** *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
E FIRST ST.ISC *** 06/05/20
*** AERMET - VERSION 16216 *** ***
*** 02:17:27

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PAGE 7

*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

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E FIRST ST.ISC *** 06/05/20
*** AERMET - VERSION 16216 *** ***
*** 02:17:27

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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

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 *** AERMOD - VERSION 19191 *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
 E FIRST ST.ISC *** 06/05/20
 *** AERMET - VERSION 16216 *** ***
 *** 02:17:27

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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** METEOROLOGICAL DAYS SELECTED FOR

PROCESSING ***

(1=YES; 0=NO)

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NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

*** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED

CATEGORIES ***

(METERS/SEC)

1.54, 3.09, 5.14, 8.23,

10.80,

*** AERMOD - VERSION 19191 *** C:\LAKES\AERMOD VIEW\1660 E FIRST ST\1660
 E FIRST ST.ISC *** 06/05/20
 *** AERMET - VERSION 16216 *** ***
 *** 02:17:27

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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL

DATA ***

Surface file: KSNA_V9_ADJU\KSNA_V9.SFC
Met Version: 16216
Profile file: KSNA_V9_ADJU\KSNA_V9.PFL

Surface format: FREE

Profile format: FREE

Surface station no.: 93184
Name: UNKNOWN

Upper air station no.: 3190
Name: UNKNOWN

Year: 2012

Year: 2012

First 24 hours of scalar data

YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O	LEN	Z0	BOWEN
ALBEDO	REF	WS	WD	HT	REF	TA	HT							
12	01	01	1	01	-4.5	0.082	-9.000	-9.000	-999.	56.	11.0	0.12	2.65	
1.00	0.87	62.		5.8	283.8	2.0								
12	01	01	1	02	-3.5	0.073	-9.000	-9.000	-999.	47.	9.9	0.12	2.65	
1.00	0.77	27.		5.8	283.1	2.0								
12	01	01	1	03	-3.5	0.073	-9.000	-9.000	-999.	47.	9.9	0.12	2.65	
1.00	0.77	336.		5.8	283.1	2.0								
12	01	01	1	04	-3.3	0.070	-9.000	-9.000	-999.	45.	9.7	0.12	2.65	
1.00	0.74	34.		5.8	283.1	2.0								
12	01	01	1	05	-3.0	0.068	-9.000	-9.000	-999.	42.	9.4	0.12	2.65	
1.00	0.70	154.		5.8	282.5	2.0								
12	01	01	1	06	-999.0	-9.000	-9.000	-9.000	-999.	-999.	-99999.0	0.12	2.65	
1.00	0.00	0.		5.8	282.0	2.0								
12	01	01	1	07	-2.0	0.059	-9.000	-9.000	-999.	34.	9.0	0.12	2.65	
1.00	0.55	343.		5.8	281.4	2.0								
12	01	01	1	08	-2.6	0.066	-9.000	-9.000	-999.	40.	9.7	0.12	2.65	
0.53	0.69	25.		5.8	281.4	2.0								
12	01	01	1	09	21.6	0.133	0.252	0.010	27.	116.	-9.9	0.12	2.65	
0.31	1.03	344.		5.8	282.5	2.0								
12	01	01	1	10	115.6	0.162	0.713	0.008	114.	156.	-3.3	0.12	2.65	
0.24	1.06	233.		5.8	286.4	2.0								
12	01	01	1	11	160.9	0.126	1.129	0.005	325.	108.	-1.1	0.12	2.65	
0.21	0.67	261.		5.8	291.4	2.0								
12	01	01	1	12	187.0	0.138	1.467	0.005	614.	123.	-1.3	0.12	2.65	
0.20	0.75	252.		5.8	294.9	2.0								
12	01	01	1	13	186.9	0.189	1.755	0.005	1051.	197.	-3.3	0.12	2.65	
0.20	1.23	280.		5.8	297.5	2.0								
12	01	01	1	14	168.3	0.247	1.857	0.005	1383.	295.	-8.1	0.12	2.65	
0.21	1.86	268.		5.8	299.2	2.0								
12	01	01	1	15	115.3	0.275	1.688	0.005	1517.	346.	-16.3	0.12	2.65	
0.24	2.25	248.		5.8	298.1	2.0								

3734566.84	0.09644		
421982.63	3734566.84	0.08740	421994.01
3734566.84	0.07937		
422005.39	3734566.84	0.07220	422016.77
3734566.84	0.06580		
422028.15	3734566.84	0.06006	422039.53
3734566.84	0.05491		
422050.91	3734566.84	0.05028	422062.29
3734566.84	0.04614		
422073.67	3734566.84	0.04242	422085.05
3734566.84	0.03907		
422096.43	3734566.84	0.03608	422107.81
3734566.84	0.03340		
422119.19	3734566.84	0.03098	422130.57
3734566.84	0.02881		
421959.87	3734575.51	0.10469	421971.25
3734575.51	0.09489		
421982.63	3734575.51	0.08620	421994.01
3734575.51	0.07846		
422005.39	3734575.51	0.07156	422016.77
3734575.51	0.06537		
422028.15	3734575.51	0.05981	422039.53
3734575.51	0.05481		
422050.91	3734575.51	0.05031	422062.29
3734575.51	0.04625		
422073.67	3734575.51	0.04260	422085.05
3734575.51	0.03932		
422096.43	3734575.51	0.03636	422107.81
3734575.51	0.03370		
422119.19	3734575.51	0.03129	422130.57
3734575.51	0.02913		
421959.87	3734584.18	0.10300	421971.25
3734584.18	0.09351		
421982.63	3734584.18	0.08510	421994.01
3734584.18	0.07763		
422005.39	3734584.18	0.07095	422016.77
3734584.18	0.06496		
422028.15	3734584.18	0.05957	422039.53
3734584.18	0.05471		
422050.91	3734584.18	0.05032	422062.29
3734584.18	0.04635		
422073.67	3734584.18	0.04276	422085.05
3734584.18	0.03953		
422096.43	3734584.18	0.03661	422107.81
3734584.18	0.03397		
422119.19	3734584.18	0.03158	422130.57
3734584.18	0.02942		
421959.87	3734592.85	0.10129	421971.25
3734592.85	0.09209		
421982.63	3734592.85	0.08396	421994.01

Y-COORD (M)	CONC		
422130.57	3734601.52	0.02991	421948.49
3734610.19	0.10746		
421959.87	3734610.19	0.09772	421971.25
3734610.19	0.08915		
421982.63	3734610.19	0.08158	421994.01
3734610.19	0.07485		
422005.39	3734610.19	0.06883	422016.77
3734610.19	0.06340		
422028.15	3734610.19	0.05849	422039.53
3734610.19	0.05403		
422050.91	3734610.19	0.04998	422062.29
3734610.19	0.04629		
422073.67	3734610.19	0.04292	422085.05
3734610.19	0.03986		
422096.43	3734610.19	0.03707	422107.81
3734610.19	0.03453		
422119.19	3734610.19	0.03221	422130.57
3734610.19	0.03010		
421948.49	3734618.86	0.10525	421959.87
3734618.86	0.09588		
421971.25	3734618.86	0.08764	421982.63
3734618.86	0.08034		
421994.01	3734618.86	0.07385	422005.39
3734618.86	0.06804		
422016.77	3734618.86	0.06279	422028.15
3734618.86	0.05803		
422039.53	3734618.86	0.05371	422050.91
3734618.86	0.04976		
422062.29	3734618.86	0.04617	422073.67
3734618.86	0.04288		
422085.05	3734618.86	0.03988	422096.43
3734618.86	0.03714		
422107.81	3734618.86	0.03463	422119.19
3734618.86	0.03235		
422130.57	3734618.86	0.03026	421937.11
3734627.53	0.11329		
421948.49	3734627.53	0.10305	421959.87
3734627.53	0.09404		
421971.25	3734627.53	0.08611	421982.63
3734627.53	0.07909		
421994.01	3734627.53	0.07283	422005.39
3734627.53	0.06721		
422016.77	3734627.53	0.06214	422028.15
3734627.53	0.05753		
422039.53	3734627.53	0.05334	422050.91
3734627.53	0.04950		
422062.29	3734627.53	0.04600	422073.67

** CONC OF DPM IN MICROGRAMS/M**3

**

Y-COORD (M)	X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)
3734644.87	422039.53	3734644.87	0.05248	422050.91
3734644.87	422062.29	3734644.87	0.04555	422073.67
3734644.87	422085.05	3734644.87	0.03970	422096.43
3734644.87	422107.81	3734644.87	0.03475	422119.19
3734653.54	422130.57	3734644.87	0.03055	421925.73
3734653.54	421937.11	3734653.54	0.10560	421948.49
3734653.54	421959.87	3734653.54	0.08851	421971.25
3734653.54	421982.63	3734653.54	0.07522	421994.01
3734653.54	422005.39	3734653.54	0.06457	422016.77
3734653.54	422028.15	3734653.54	0.05583	422039.53
3734653.54	422050.91	3734653.54	0.04850	422062.29
3734653.54	422073.67	3734653.54	0.04231	422085.05
3734653.54	422096.43	3734653.54	0.03705	422107.81
3734653.54	422119.19	3734653.54	0.03258	422130.57
3734662.21	421925.73	3734662.21	0.11286	421937.11
3734662.21	421948.49	3734662.21	0.09429	421959.87
3734662.21	421971.25	3734662.21	0.07991	421982.63
3734662.21	421994.01	3734662.21	0.06851	422005.39
3734662.21	422016.77	3734662.21	0.05923	422028.15
3734662.21	422039.53	3734662.21	0.05150	422050.91
3734662.21	422062.29	3734662.21	0.04497	422073.67
3734662.21	422085.05	3734662.21	0.03941	422096.43

3734662.21	0.03694			
422107.81	3734662.21	0.03467		422119.19
3734662.21	0.03256			
422130.57	3734662.21	0.03062		421925.73
3734670.88	0.10923			
421937.11	3734670.88	0.09997		421948.49
3734670.88	0.09179			
421959.87	3734670.88	0.08456		421971.25
3734670.88	0.07814			
421982.63	3734670.88	0.07241		421994.01
3734670.88	0.06726			
422005.39	3734670.88	0.06260		422016.77
3734670.88	0.05835			
422028.15	3734670.88	0.05447		422039.53
3734670.88	0.05090			
422050.91	3734670.88	0.04762		422062.29
3734670.88	0.04459			
422073.67	3734670.88	0.04178		422085.05
3734670.88	0.03919			
422096.43	3734670.88	0.03679		422107.81
3734670.88	0.03456			
422119.19	3734670.88	0.03250		422130.57
3734670.88	0.03059			
421925.73	3734679.55	0.10561		421937.11
3734679.55	0.09697			
421948.49	3734679.55	0.08928		421959.87
3734679.55	0.08246			
421971.25	3734679.55	0.07635		421982.63
3734679.55	0.07090			
421994.01	3734679.55	0.06598		422005.39
3734679.55	0.06152			
422016.77	3734679.55	0.05745		422028.15
3734679.55	0.05372			
422039.53	3734679.55	0.05029		422050.91
3734679.55	0.04712			
422062.29	3734679.55	0.04418		422073.67
3734679.55	0.04147			

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*** MODELOPTs: RegDFault CONC ELEV FLGPOL URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5
YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): L000001 , L000002
, L000003 , L000004 , L000005 ,
L000006 , L000007 , L000008 , L000009 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS

		** CONC OF DPM	IN MICROGRAMS/M**3
		**	
X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)
Y-COORD (M)	CONC		
422085.05	3734679.55	0.03894	422096.43
3734679.55	0.03660		
422107.81	3734679.55	0.03443	422119.19
3734679.55	0.03242		
422130.57	3734679.55	0.03055	421914.35
3734688.22	0.11117		
421925.73	3734688.22	0.10207	421937.11
3734688.22	0.09399		
421948.49	3734688.22	0.08679	421959.87
3734688.22	0.08036		
421971.25	3734688.22	0.07460	421982.63
3734688.22	0.06941		
421994.01	3734688.22	0.06472	422005.39
3734688.22	0.06045		
422016.77	3734688.22	0.05655	422028.15
3734688.22	0.05296		
422039.53	3734688.22	0.04965	422050.91
3734688.22	0.04659		
422062.29	3734688.22	0.04375	422073.67
3734688.22	0.04112		
422085.05	3734688.22	0.03867	422096.43
3734688.22	0.03640		
422107.81	3734688.22	0.03428	422119.19
3734688.22	0.03231		
422130.57	3734688.22	0.03048	421914.35
3734696.89	0.10719		
421925.73	3734696.89	0.09871	421937.11
3734696.89	0.09114		
421948.49	3734696.89	0.08438	421959.87
3734696.89	0.07831		
421971.25	3734696.89	0.07286	421982.63
3734696.89	0.06793		
421994.01	3734696.89	0.06346	422005.39
3734696.89	0.05937		
422016.77	3734696.89	0.05563	422028.15
3734696.89	0.05219		
422039.53	3734696.89	0.04900	422050.91
3734696.89	0.04605		
422062.29	3734696.89	0.04331	422073.67

3734696.89	0.04076			
422085.05	3734696.89	0.03839		422096.43
3734696.89	0.03618			
422107.81	3734696.89	0.03412		422119.19
3734696.89	0.03219			
422130.57	3734696.89	0.03040		421902.97
3734705.56	0.11236			
421914.35	3734705.56	0.10343		421925.73
3734705.56	0.09548			
421937.11	3734705.56	0.08838		421948.49
3734705.56	0.08202			
421959.87	3734705.56	0.07628		421971.25
3734705.56	0.07113			
421982.63	3734705.56	0.06645		421994.01
3734705.56	0.06219			
422005.39	3734705.56	0.05829		422016.77
3734705.56	0.05471			
422028.15	3734705.56	0.05141		422039.53
3734705.56	0.04835			
422050.91	3734705.56	0.04550		422062.29
3734705.56	0.04286			
422073.67	3734705.56	0.04038		422085.05
3734705.56	0.03808			
422096.43	3734705.56	0.03593		422107.81
3734705.56	0.03393			
422119.19	3734705.56	0.03205		422130.57
3734705.56	0.03030			
421902.97	3734714.23	0.10817		421914.35
3734714.23	0.09976			
421925.73	3734714.23	0.09232		421937.11
3734714.23	0.08567			
421948.49	3734714.23	0.07970		421959.87
3734714.23	0.07432			
421971.25	3734714.23	0.06944		421982.63
3734714.23	0.06500			
421994.01	3734714.23	0.06094		422005.39
3734714.23	0.05722			
422016.77	3734714.23	0.05379		422028.15
3734714.23	0.05061			
422039.53	3734714.23	0.04767		422050.91
3734714.23	0.04493			

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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5

YEARS FOR SOURCE GROUP: ALL

INCLUDING SOURCE(S): L0000001 , L0000002
, L0000003 , L0000004 , L0000005 ,
L0000006 , L0000007 , L0000008 , L0000009 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS

** CONC OF DPM IN MICROGRAMS/M**3

**

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)
Y-COORD (M)	CONC		
422062.29	3734714.23	0.04238	422073.67
3734714.23	0.03999		
422085.05	3734714.23	0.03776	422096.43
3734714.23	0.03568		
422107.81	3734714.23	0.03372	422119.19
3734714.23	0.03190		
422130.57	3734714.23	0.03019	421902.97
3734722.90	0.10408		
421914.35	3734722.90	0.09628	421925.73
3734722.90	0.08932		
421937.11	3734722.90	0.08308	421948.49
3734722.90	0.07747		
421959.87	3734722.90	0.07239	421971.25
3734722.90	0.06778		
421982.63	3734722.90	0.06355	421994.01
3734722.90	0.05969		
422005.39	3734722.90	0.05614	422016.77
3734722.90	0.05286		
422028.15	3734722.90	0.04982	422039.53
3734722.90	0.04699		
422050.91	3734722.90	0.04436	422062.29
3734722.90	0.04189		
422073.67	3734722.90	0.03959	422085.05
3734722.90	0.03743		
422096.43	3734722.90	0.03540	422107.81
3734722.90	0.03350		
422119.19	3734722.90	0.03172	422130.57
3734722.90	0.03005		

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*** MODELOPTs: RegDEFAULT CONC ELEV FLGPOL URBAN ADJ_U*

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS ***

** CONC OF DPM IN MICROGRAMS/M**3

**

GROUP ID	NETWORK	AVERAGE CONC	RECEPTOR (XR, YR,
ZELEV, ZHILL, ZFLAG)	OF TYPE	GRID-ID	
ALL	1ST HIGHEST VALUE IS	0.11599 AT (421925.73, 3734653.54,
36.00,	36.00, 7.00) DC		
	2ND HIGHEST VALUE IS	0.11329 AT (421937.11, 3734627.53,
36.00,	36.00, 7.00) DC		
	3RD HIGHEST VALUE IS	0.11286 AT (421925.73, 3734662.21,
36.00,	36.00, 7.00) DC		
	4TH HIGHEST VALUE IS	0.11236 AT (421902.97, 3734705.56,
36.45,	36.45, 7.00) DC		
	5TH HIGHEST VALUE IS	0.11117 AT (421914.35, 3734688.22,
36.26,	36.26, 7.00) DC		
	6TH HIGHEST VALUE IS	0.11073 AT (421937.11, 3734636.20,
36.00,	36.00, 7.00) DC		
	7TH HIGHEST VALUE IS	0.10963 AT (421948.49, 3734601.52,
36.00,	36.00, 7.00) DC		
	8TH HIGHEST VALUE IS	0.10923 AT (421925.73, 3734670.88,
36.08,	36.08, 7.00) DC		
	9TH HIGHEST VALUE IS	0.10818 AT (421937.11, 3734644.87,
36.00,	36.00, 7.00) DC		
	10TH HIGHEST VALUE IS	0.10817 AT (421902.97, 3734714.23,
36.54,	36.54, 7.00) DC		

*** RECEPTOR TYPES: GC = GRIDCART
 GP = GRIDPOLR
 DC = DISCCART
 DP = DISCPOLR

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*** MODELOPTs: RegDFault CONC ELEV FLGPOL URBAN ADJ_U*

*** Message Summary : AERMOD Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 2 Warning Message(s)
A Total of 1864 Informational Message(s)

A Total of 43848 Hours Were Processed

A Total of 1500 Calm Hours Identified

A Total of 364 Missing Hours Identified (0.83 Percent)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****
ME W186 99 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used
 0.50
ME W187 99 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

*** AERMOD Finishes Successfully ***

EXHIBIT 12

1 - 113

REVISED TRAFFIC IMPACT ANALYSIS REPORT
4TH AND CABRILLO MIXED-USE PROJECT
CENTRAL POINTE
Santa Ana, California
July 30, 2020 (Original dated August 27, 2019)

Prepared for:
ARNEL & AFFILIATES
949 South Coast Drive, 6th Floor
Costa Mesa, CA 92626



Prepared by:
Shane S. Green, P.E.
Transportation Engineer III
&
Megan Lam
Transportation Engineer II

LLG Ref. 2-19-4141-1



Under the Supervision of:
Richard E. Barretto, P.E.
Principal

SPR No. 2020-04
1801 East Fourth Street
Central Pointe Mixed Use Development
Exhibit 12 – Traffic Impact Analysis

Linscott, Law &
Greenspan, Engineers
2 Executive Circle
Suite 250
Irvine, CA 92614
949.825.6175 T
949.825.6173 F
www.llgengineers.com

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APPENDIX

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REVISED TRAFFIC IMPACT ANALYSIS REPORT
4TH AND CABRILLO MIXED-USE PROJECT
CENTRAL POINTE

Santa Ana, California
July 30, 2020 (Original dated August 27, 2019)

1.0 INTRODUCTION

This Traffic Impact Analysis report addresses the potential traffic impacts and circulation needs associated with 4th and Cabrillo Mixed-Use Project, formally named Central Pointe, (hereinafter referred to as Project) in the City of Santa Ana. The project proponent, Arnell & Affiliates, proposes to develop up to 644 apartment units, and up to 15,200 square-feet (SF) of retail/commercial floor area consisting of 3,500 SF of restaurant use and 11,700 SF of retail space. The Project site is an 8.35-acre vacant parcel of land within the Metro East Mixed-Use Overlay Zone that is generally located north of 4th Street, east of the Santa Ana (I-5) Freeway, and west of Cabrillo Park Drive.

1.1 Scope of Work

This traffic report documents the findings and recommendations of a traffic impact analysis conducted by Linscott, Law & Greenspan, Engineers (LLG) to determine the potential impacts associated with the proposed Project. The traffic analysis evaluates the existing operating conditions at twenty-five (25) key study intersections within the project vicinity, estimates the trip generation potential of the proposed Project, and forecasts future near-term (Year 2025) and long-term (Year 2040) operating conditions without and with the proposed Project. Where necessary, intersection improvements/mitigation measures are identified.

This revised traffic report satisfies the traffic impact requirements of the City of Santa Ana and is consistent with the current *Congestion Management Program (CMP) for Orange County* and addresses comments of City staff based on review of the draft traffic study. The Scope of Work for this traffic study, which is included in **Appendix A**, was developed in conjunction with and reflects input City of Santa Ana Public Works Department staff.

The project site has been visited and an inventory of adjacent area roadways and intersections was performed. Existing weekday peak hour traffic count information has been collected at twenty-five (25) key study intersections for use in the preparation of intersection level of service calculations. Information concerning cumulative projects (planned and/or approved) in the vicinity of the proposed Project has been researched at the City of Santa Ana and City of Tustin. Based on our research, there are twenty-eight (28) related projects located in the City of Santa Ana and two (2) related projects located in the City of Tustin. The thirty (30) related projects were considered in the cumulative traffic analysis for this project.

This traffic report analyzes existing and future weekday daily, AM peak hour and PM peak hour traffic conditions for a near-term (Year 2025) and long-term (Year 2040) traffic setting upon

completion of the proposed Project. Near-term (Year 2025) cumulative daily and peak hour traffic forecasts were projected by incorporating a one percent (1.0%) annual growth rate and the trip generation potential of thirty (30) related projects. Long-term (Year 2040) daily and peak hour traffic forecasts were projected based on modeled traffic projections prepared by OCTA utilizing the OCTAM 4.0 Year 2040 Model.

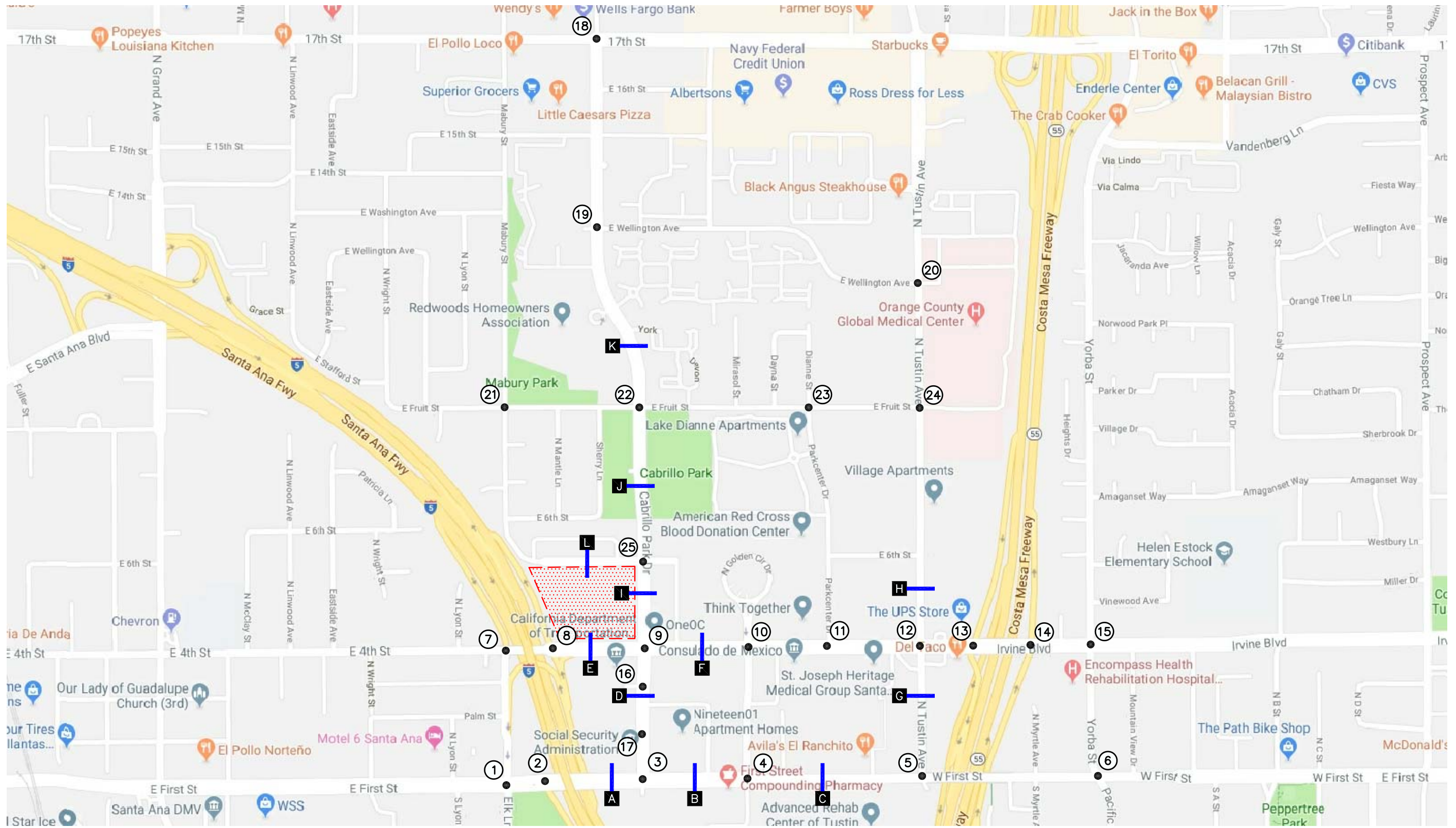
1.2 Study Area

Based on a “50 trip threshold” for analysis and collaboration with City staff, twenty-five (25) key study intersections have been identified for evaluation. The twenty-five (25) intersections listed below provide regional and local access to the study area and define the extent of the boundaries for this traffic impact investigation.

Key Study Intersections

- | | |
|--|---|
| 1. Elk Lane at First Street (Santa Ana) | 14. SR-55 NB Ramps at 4 th Street (Tustin/Caltrans) |
| 2. I-5 SB On-Ramp at First Street (Santa Ana/Caltrans) | 15. Yorba Street at 4 th Street (Tustin) |
| 3. Cabrillo Park Drive at First Street (Santa Ana) | 16. Cabrillo Park Drive at State Fund Access Road (Santa Ana) |
| 4. Golden Circle Drive at First Street (Santa Ana) | 17. Cabrillo Park Drive at Xerox Center Access Road (Santa Ana) |
| 5. Tustin Avenue at First Street (Tustin) | 18. Cabrillo Park Drive at 17 th Street (Santa Ana) |
| 6. Yorba Street at First Street (Tustin) | 19. Cabrillo Park Drive at Wellington Avenue (Santa Ana) |
| 7. I-5 SB On-Ramp/Mabury Street at 4 th Street (Santa Ana/Caltrans) | 20. Tustin Avenue at Wellington Avenue (Santa Ana) |
| 8. I-5 NB Ramps at 4 th Street (Santa Ana/Caltrans) | 21. Mabury Street at Fruit Street (Santa Ana) |
| 9. Cabrillo Park Drive at 4 th Street (Santa Ana) | 22. Cabrillo Park Drive at Fruit Street (Santa Ana) |
| 10. Golden Circle Drive at 4 th Street (Santa Ana) | 23. Park Center Drive at Fruit Street (Santa Ana) |
| 11. Park Center Drive at 4 th Street (Santa Ana) | 24. Tustin Avenue at Fruit Street (Santa Ana) |
| 12. Tustin Avenue at 4 th Street (Santa Ana) | 25. Cabrillo Park Drive at Park Court Place (Santa Ana) |
| 13. SR-55 SB Ramps at 4 th Street (Santa Ana/Caltrans) | |

Figure 1-1 presents a Vicinity Map, which illustrates the general location of the Project and depicts the study locations and surrounding street system. The Level of Service (LOS) investigations at these key locations were used to evaluate the potential traffic-related impacts associated with area growth, cumulative projects and the proposed Project. When necessary, this report recommends intersection and/or roadway improvements that may be required to accommodate future traffic volumes and restore/maintain an acceptable Level of Service, and/or mitigates the impact of the project.



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SOURCE: GOOGLE

KEY

- = STUDY INTERSECTION
- = ROADWAY SEGMENT
- = PROJECT SITE

FIGURE 1-1

VICINITY MAP

4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

Included in this Traffic Impact Analysis are:

- Existing traffic counts,
- Estimated project traffic generation/distribution/assignment,
- Estimated cumulative project traffic generation/distribution/assignment,
- AM and PM peak hour capacity analyses for existing conditions,
- AM and PM peak hour capacity analyses for existing plus project conditions,
- AM and PM peak hour capacity analyses for future near-term (Year 2025) traffic conditions without and with the proposed Project,
- AM and PM peak hour capacity analyses for future long-term (Year 2040) traffic conditions without and with the proposed Project,
- Caltrans Analysis,
- Site Access Evaluation,
- Queueing Analysis,
- Internal Circulation and Sight Distance Evaluation,
- Recommended Intersection Improvements,
- Congestion Management Program Compliance Assessment, and

2.0 PROJECT DESCRIPTION

The Project site is an 8.35-acre vacant parcel of land within the Metro East Mixed Use Overlay Zone that is generally located north of 4th Street, east of the Santa Ana (I-5) freeway, and west of Cabrillo Park Drive. **Figure 2-1** is an existing aerial photograph of the Project site.

Table 2-1 summarizes the project development totals. The proposed Project includes the development of up to 644 apartment units, 3,500 SF restaurant uses and 11,700 SF of retail space. The proposed Project will provide a total of 1,300 parking spaces within two buildings along with 18 surface parking spaces. “Building A” is proposed as a five-story apartment podium with up to 325 apartment homes consisting of approximately 19 ($\pm 5.8\%$) studio units, 162 ($\pm 49.8\%$) one-bedroom units, 121 ($\pm 37.2\%$) two-bedroom units and 23 ($\pm 7.1\%$) three-bedroom units and approximately 6,100 SF of ground floor retail/commercial space and 3,500 SF restaurant space “wrapped” around an eight-level partial subterranean parking structure with a total of approximately 650 spaces along with 9 ground floor spaces for retail/leasing. “Building B” is proposed as a five-story apartment podium with up to 319 apartment homes consisting of approximately 20 ($\pm 6.3\%$) studio units, 164 ($\pm 51.4\%$) one-bedroom units, 127 ($\pm 39.8\%$) two-bedroom units and 8 ($\pm 2.5\%$) three-bedroom units and approximately 5,600 SF of ground floor retail/commercial space “wrapped” around a eight-level partial subterranean parking structure with a total of approximately 650 spaces along with 9 ground floor spaces for retail/leasing. On-site facilities/amenities of the proposed Project include a leasing office, a lounge/lobby, business center, pool/spa, and a fitness center for residents. **Figure 2-2** presents the preferred Project site plan, prepared by KTGy.

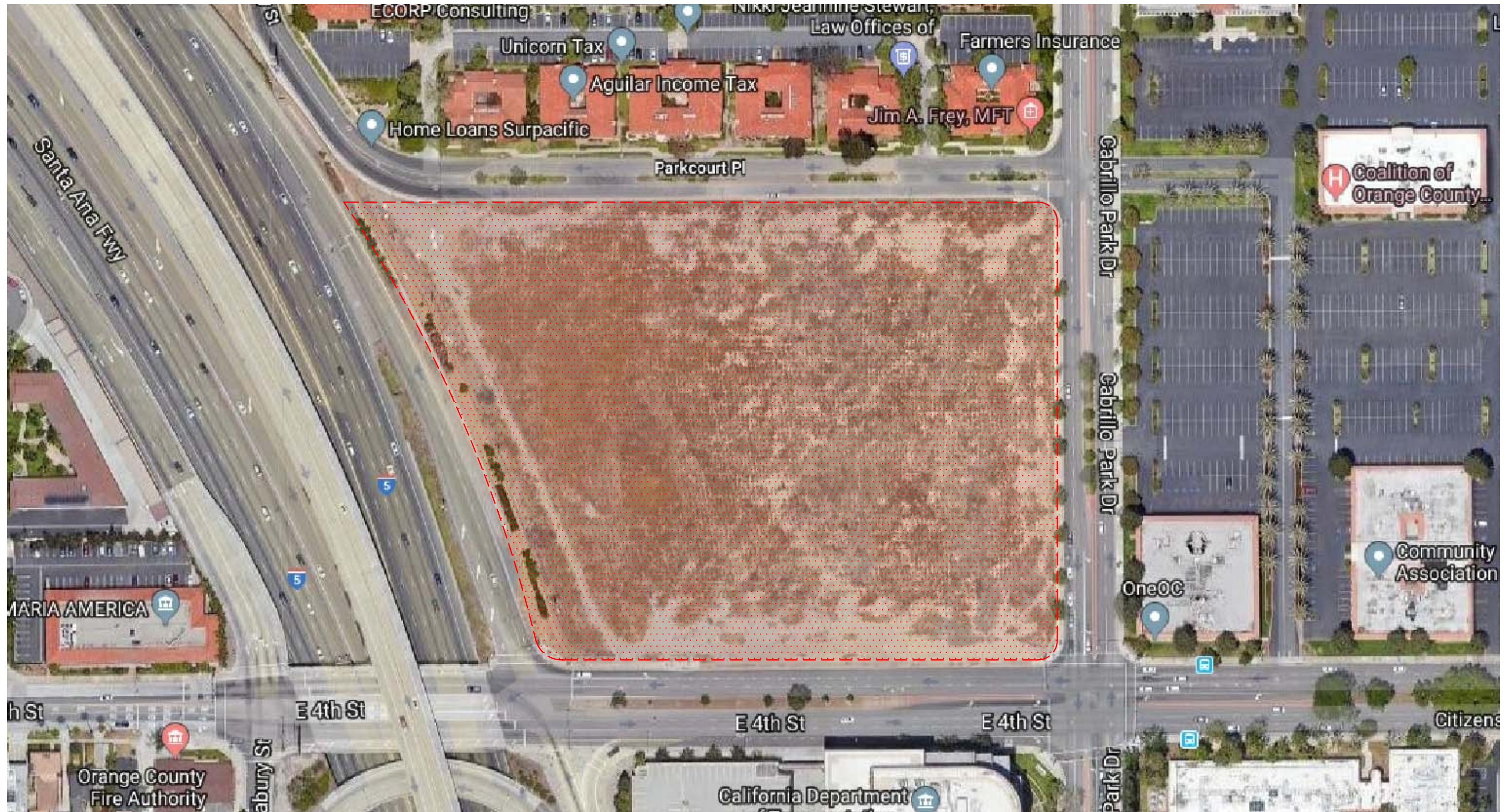
The Project is expected to be constructed and completed by Year 2025, which has been utilized to assess the Project’s potential traffic impacts at full occupancy of the project within an opening year traffic setting.

2.1 Site Access

Vehicular access to the proposed Project will be provided via one (1) full access unsignalized driveway along Park Court Place and one (1) right in/out only driveway located along 4th Street. As part of the proposed Project’s design features, an exclusive southbound right-turn lane will be constructed at the intersection of Cabrillo Park Drive/4th Street. Additionally, Project’s curb face is planned to be set back far enough to accommodate improvements at I-5 NB Ramps/4th Street, which include the construction of an additional right-turn lane.

2.2 Pedestrian Circulation

Pedestrian circulation for the proposed Project would be provided via existing public sidewalks along Park Court Place, Cabrillo Park Drive, and 4th Street within the vicinity of the Project. The existing sidewalk system within the Project vicinity provides direct connectivity to the existing development located along major thoroughfares. Pedestrian access to both the residential and retail components of the Project will be provided via building entries/exits located on Park Court Place and 4th Street.



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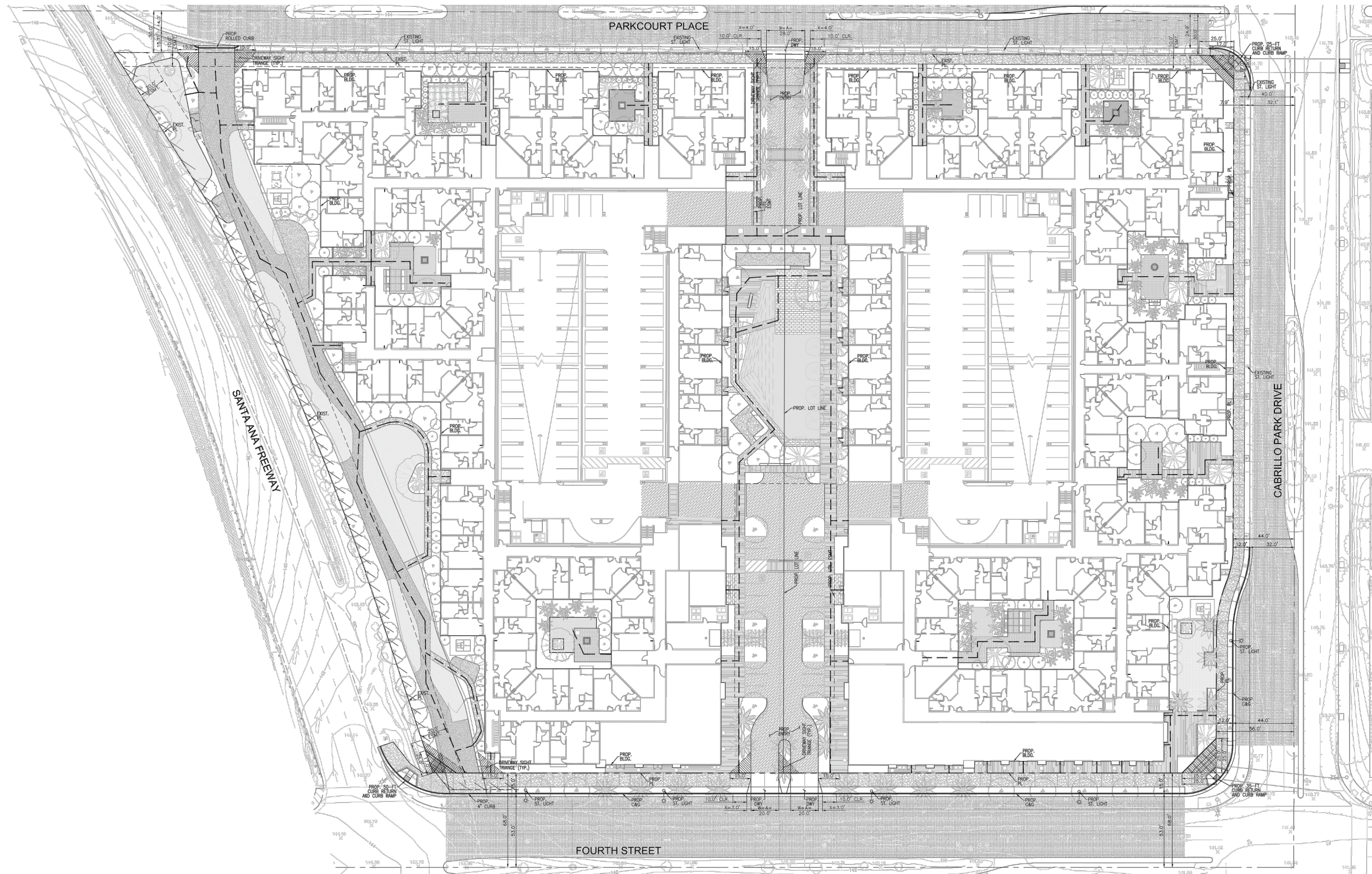
SOURCE: GOOGLE

KEY

 = PROJECT SITE

FIGURE 2-1

EXISTING AERIAL SITE PLAN
4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



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SOURCE: KTG ARCHITECTS

FIGURE 2-2

PROPOSED SITE PLAN

4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

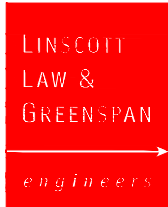


TABLE 2-1
PROJECT DEVELOPMENT SUMMARY

Land Use / Project Description	Project Development Totals ¹
<u>4th & Cabrillo Apartments</u>	
<ul style="list-style-type: none"> ❑ Building A <ul style="list-style-type: none"> ○ Studio Units ○ 1 Bedroom Units ○ 2 Bedroom Units ○ 3 Bedroom Units ❑ Building B <ul style="list-style-type: none"> ○ Studio Units ○ 1 Bedroom Units ○ 2 Bedroom Units ○ 3 Bedroom Units 	<p>19 Units (5.8%)</p> <p>162 Units (49.8%)</p> <p>121 Units (37.2%)</p> <p>23 Units (7.1%)</p> <p>20 Units (6.3%)</p> <p>164 Units (51.4%)</p> <p>127 Units (39.8%)</p> <p>8 Units (2.5%)</p>
Total Residential Units:	644 Units
<ul style="list-style-type: none"> ❑ Building A Retail ❑ Building A Restaurant ❑ Building B Retail 	<p>6,100 SF</p> <p>3,500 SF</p> <p><u>5,600 SF</u></p>
Total Retail Space:	15,200 SF
<u>Parking Supply</u>	
<ul style="list-style-type: none"> ❑ Parking Structure <ul style="list-style-type: none"> ○ Building A ○ Building B ❑ Surface Parking Lot <ul style="list-style-type: none"> ○ Retail/Leasing 	<p>650 spaces</p> <p>650 spaces</p> <p><u>18 spaces</u></p>
Total Parking Supply:	1,318 spaces

¹ Source: Conceptual Site Plan, prepared by KTGy, dated February 28, 2020.

3.0 EXISTING CONDITIONS

3.1 Existing Street System

The principal local network of streets serving the project site is First Street, 4th Street, 17th Street, Park Court Place, Cabrillo Park Drive, and Tustin Avenue. The following discussion provides a brief synopsis of these key area streets. The descriptions are based on an inventory of existing roadway conditions.

First Street a four to six-lane, divided roadway in the vicinity of the project, oriented in the east-west direction that provides two or three lanes in each direction separated by a raised median island. The posted speed limit on First Street is 35 mph. On-street parking is not permitted along this roadway. A traffic signal controls the study intersections of First Street at Mabury Street/Elk Lane, I-5 SB On Ramp, Cabrillo Park Drive, Golden Center Drive, Tustin Avenue, and Yorba Street.

4th Street is a six-lane, divided roadway oriented in the east-west direction that provides three eastbound and three westbound travel lanes separated by a raised median island. The posted speed limit on Fourth Street is 40 miles per hour (mph). On-street parking is not permitted along this roadway in the vicinity of the project. Traffic signals control the study intersections of Fourth Street at I-5 SB Off-Ramp, I-5 NB On-Ramp, Cabrillo Park Drive, Golden Circle Drive, Park Center Drive, Tustin Avenue, SR-55 SB Ramps, SR-55 NB Ramps and Yorba Street. East of the SR-55 Freeway, Fourth Street is known as Irvine Boulevard within the City of Tustin.

17th Street is a six-lane, divided roadway oriented in the east-west direction. The posted speed limit on 17th Street is 40 mph. On-street parking is not permitted on either side of this roadway in the vicinity of the Project. A traffic signal controls the study intersection of 17th Street at Cabrillo Park Drive.

Park Court Place is a two-lane, divided roadway oriented in the east-west direction. The posted speed limit on Park Court Place is 25 mph. On-street parking is not permitted on either side of this roadway in the vicinity of the Project.

Cabrillo Park Drive is a four-lane, divided roadway that borders the project site to the east, oriented in the north-south direction. The posted speed limit on Cabrillo Park Drive is 35 mph. On-street parking is not permitted along this roadway in the vicinity of the project. Traffic signals control the study intersections of Fourth Street, State Fund Access Road, Xerox Centre Access Road, and First Street.

Tustin Avenue is a six-lane, divided roadway, oriented in the north-south direction. On-street parking is not permitted along this roadway in the vicinity of the project. The posted speed limit on Tustin Avenue is 40 mph. Traffic signals control the study intersections of Tustin at Fourth Street, First Street, Wellington Avenue, and Fruit Street.

Figure 3-1 presents an inventory of the existing roadway conditions for the arterials and intersections evaluated in this report. This figure identifies the number of travel lanes for key arterials, as well as intersection configurations and controls for the key area study intersections.

3.1.1 Public Transit

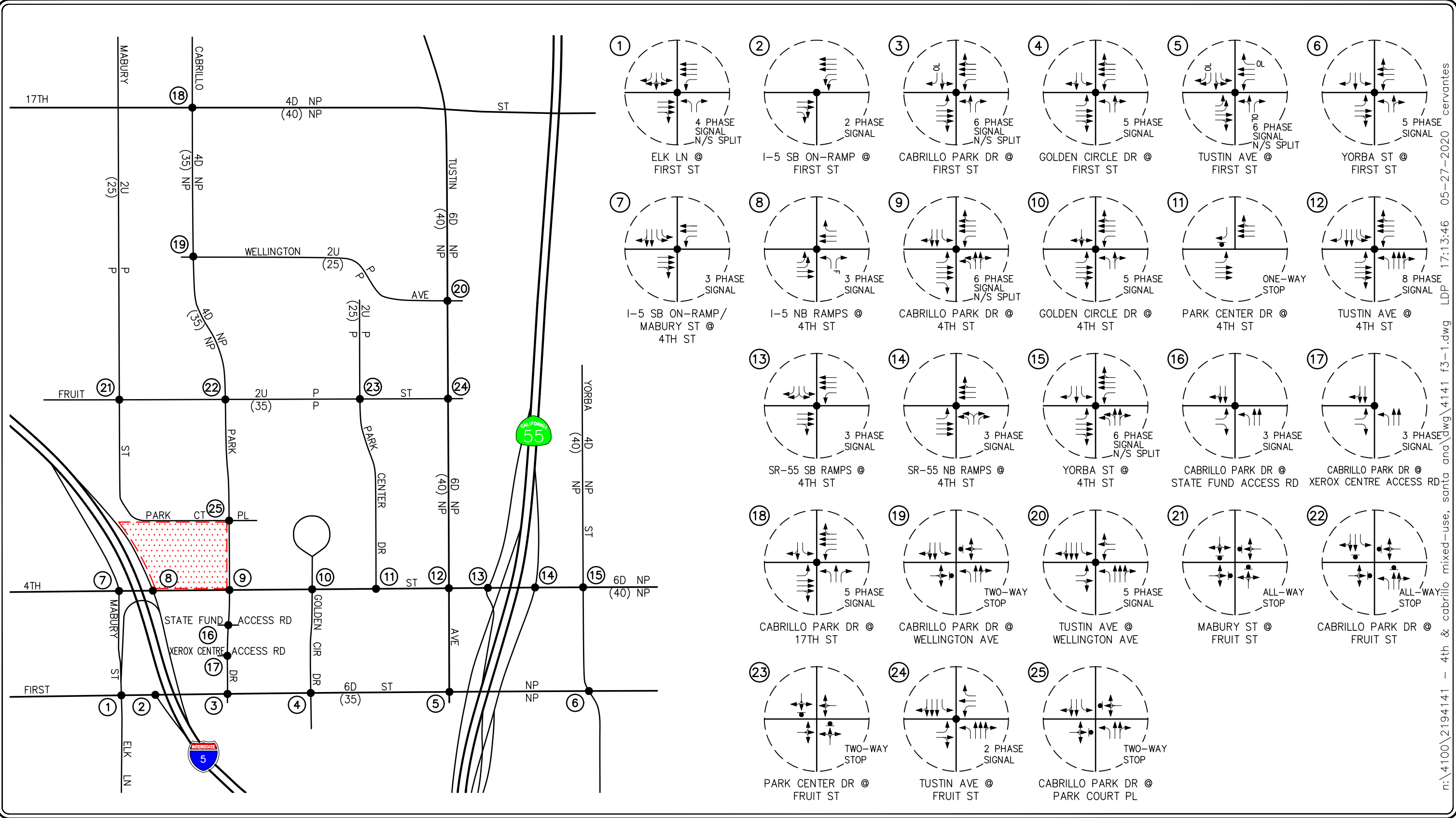
Public transit bus service is provided in the project area by the Orange County Transportation Authority (OCTA). Four (4) OCTA bus routes operate within the vicinity of the project site on First Street, 4th Street, 17th Street, and Tustin Avenue, which consists of the following:

- OCTA Route 60: The major routes of travel include 17th Street and Tustin Avenue. Nearest to the project site are bus stops located on 17th Street at Cabrillo Park Drive in the northwest and southwest corners. Route 60 operates on approximate 30-minute headways during weekdays and 20-minute headways on weekends.
- OCTA Route 64: The major route of travel is First Street. Nearest to the project site are bus stops located on First Street at Cabrillo Park Drive in the southeast and northeast corners. Route 64 operates on approximate 30-minute headways on the weekdays and 20-minutes on the weekends.
- OCTA Route 71: The major route of travel is Tustin Avenue. Nearest to the project site are bus stops located on Tustin Avenue at 4th Street in the northeast and southwest corners. Route 71 operates on approximate 30-minute headways on the weekdays and 45-minute headways on the weekends.
- OCTA Route 463: The major route of travel is 4th Street. Nearest to the project site are bus stops located on 4th Street at Cabrillo Park Drive in the northeast and southeast corners. Route 463 operates on approximate 25-minute headways on the weekdays and no bus service on the weekends.

Figure 3-2 graphically illustrates the transit routes of OCTA within the vicinity of the project. **Figure 3-3** identifies the locations of the existing bus stops in proximity to the Project site.

3.2 Bicycle Master Plan

The City of Santa Ana promotes bicycling as a means of mobility and a way in which to improve the quality of life within its community. The Bikeway Master Plan recognizes the needs of bicycle users and aims to create a complete and safe bicycle network throughout the City. Currently, not many bicycle facilities exist in the study area. However, review of **Figure 3-4**, which presents the City's Bikeway Master Plan, shows that a Class I bike path is proposed to be built along Tustin Avenue within the vicinity of the Project.



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- KEY**
- ← = APPROACH LANE ASSIGNMENT
 - = TRAFFIC SIGNAL, ▾ = STOP SIGN
 - P = PARKING, NP = NO PARKING
 - U = UNDIVIDED, D = DIVIDED
 - 2 = NUMBER OF TRAVEL LANES
 - (XX) = POSTED SPEED LIMIT (MPH)
 - F = FREE-RIGHT, OL = OVERLAP
 - [Red Hatched Box] = PROJECT SITE

FIGURE 3-1

EXISTING ROADWAY CONDITIONS AND INTERSECTION CONTROLS

4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



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LINSCOTT
LAW &
GREENSPAN
engineers



SOURCE: OCTA

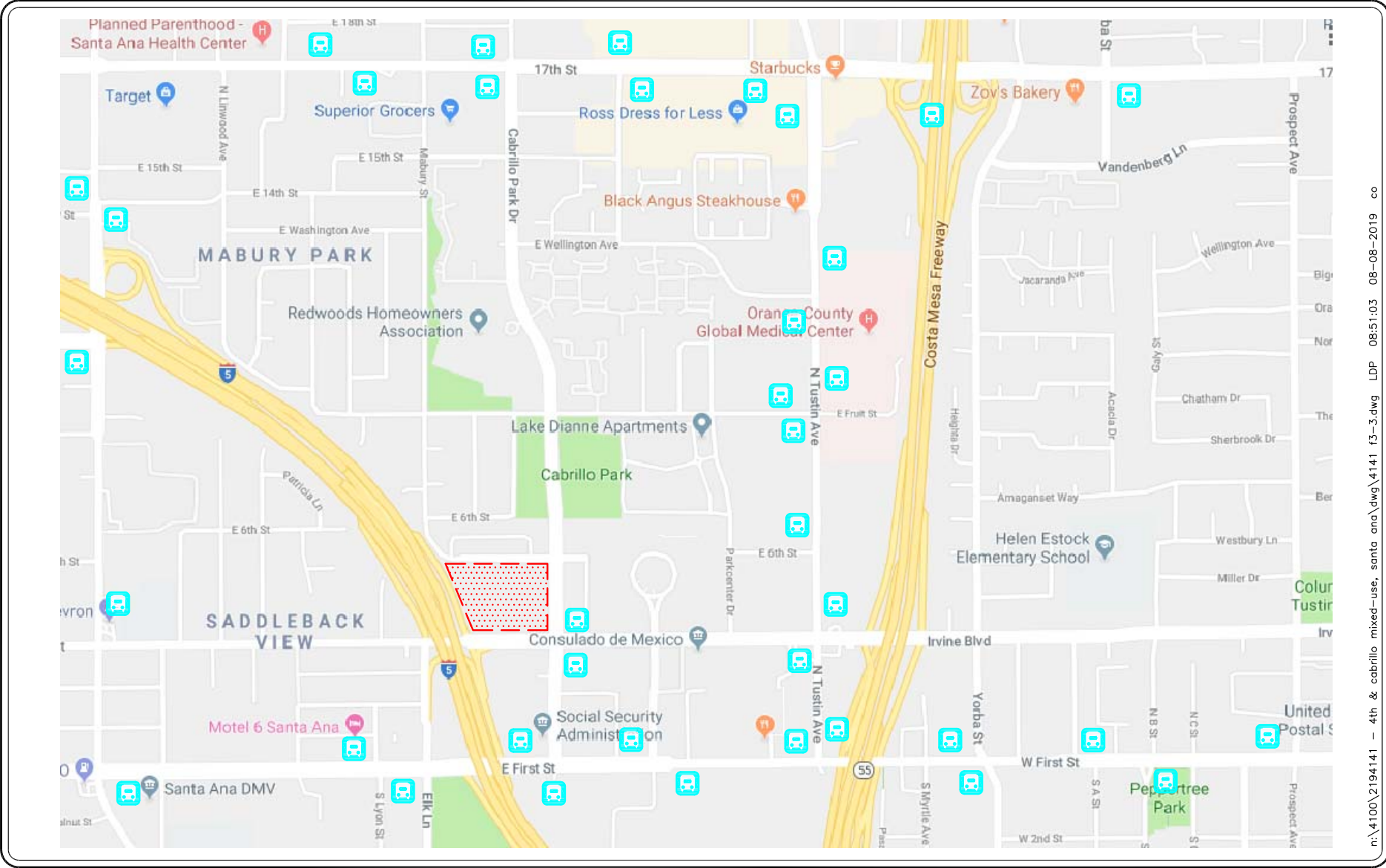
KEY

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FIGURE 3-2

OCTA TRANSIT MAP

4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



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NO SCALE

SOURCE: GOOGLE

KEY

- = PROJECT SITE
- = TRANSIT STOP

FIGURE 3-3

TRANSIT STOP LOCATIONS

4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

Exhibit 2 Bikeway Master Plan



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SOURCE: CITY OF SANTA ANA GENERAL PLAN

FIGURE 3-4

KEY

 = PROJECT SITE

LINSCOTT
LAW &
GREENSPAN
engineers



CITY OF SANTA ANA BIKEWAY MASTER PLAN
4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

3.3 Existing Traffic Volumes

Twenty-five (25) key study intersections have been identified as the locations at which to evaluate existing and future traffic operating conditions. Some portion of potential project-related traffic will pass through each of these intersections, and their analysis will reveal the expected relative impacts of the project. These key locations were selected for evaluation based on discussions with City of Santa Ana staff and in consideration of Orange County CMP requirements.

Existing daily, AM peak hour and PM peak hour traffic volumes for the twenty-five (25) key study intersections evaluated in this report were obtained from manual turning movement counts conducted by National Data and Surveying Services in May 2019.

Figures 3-5 and **3-6** illustrate the existing AM and PM peak hour traffic volumes at the twenty-five (25) key study intersections evaluated in this report, respectively. **Figure 3-6** also presents the existing average daily traffic volumes for twelve (12) key roadway segments in the vicinity of the proposed Project. **Appendix B** contains the detailed peak hour and daily traffic count sheets for the key intersections and roadway segments evaluated in this report.

3.4 Existing Intersection Conditions

Existing AM and PM peak hour operating conditions for the twenty-five (25) key study intersections were evaluated using the *Intersection Capacity Utilization (ICU)* methodology for signalized intersections and the methodology outlined in the *Highway Capacity Manual 6 (HCM 6)* for unsignalized intersections.

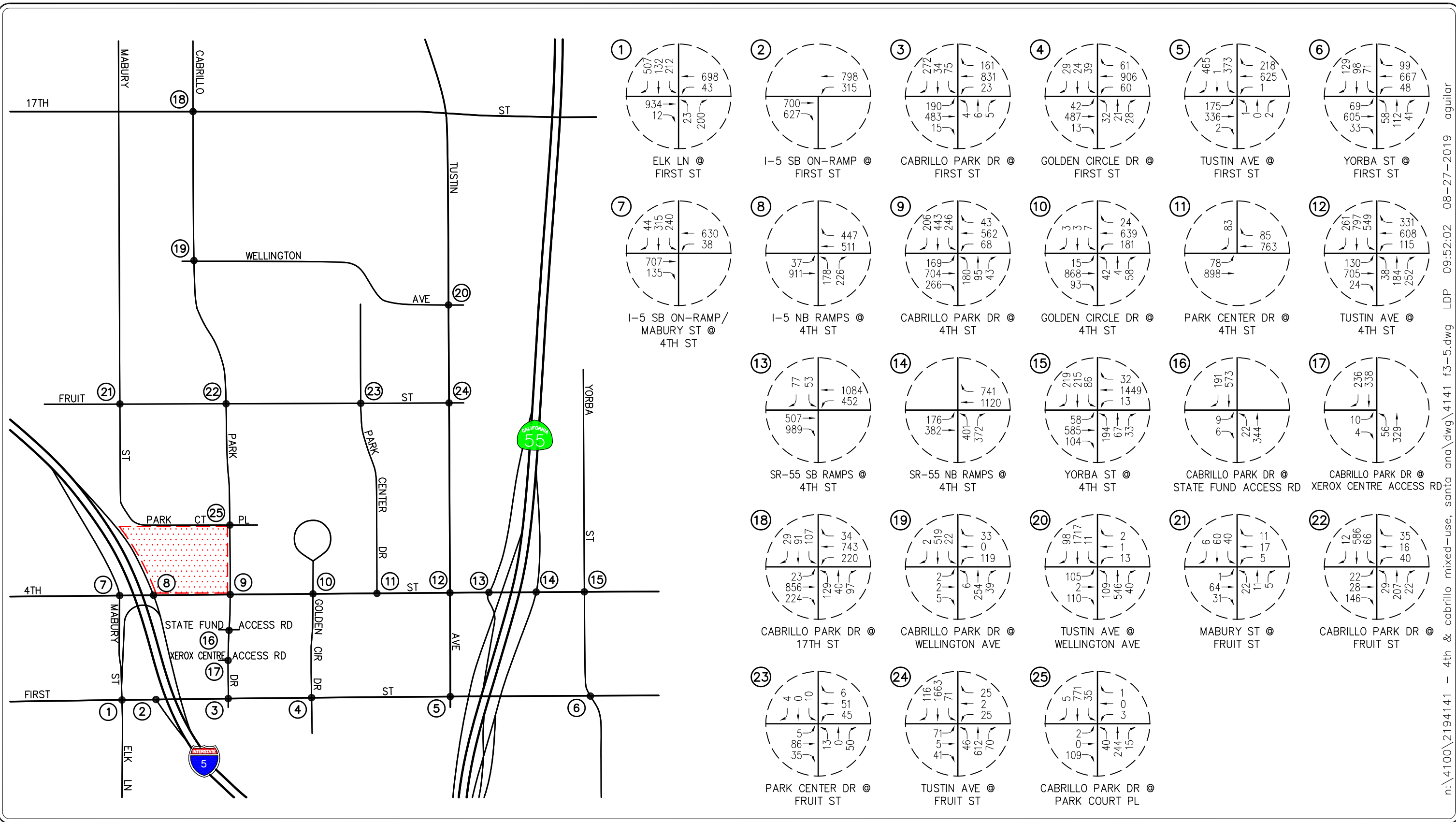
3.4.1 *Intersection Capacity Utilization (ICU) Method of Analysis*

In conformance with Cities of Santa Ana, Tustin and Orange County CMP requirements, existing AM and PM peak hour operating conditions for the key signalized study intersections were evaluated using the Intersection Capacity Utilization (ICU) method. The ICU technique is intended for signalized intersection analysis and estimates the volume to capacity (V/C) relationship for an intersection based on the individual V/C ratios for key conflicting traffic movements. The ICU numerical value represents the percent signal (green) time, and thus capacity, required by existing and/or future traffic. It should be noted that the ICU methodology assumes uniform traffic distribution per intersection approach lane and optimal signal timing.

Per City of Santa Ana requirements, the ICU calculations use a lane capacity of 1,700 vehicles per hour (vph) for through lanes and 1,600 vph for left-turn lanes and right-turn lanes. A clearance adjustment factor of 0.05 was added to each Level of Service calculation.

Per City of Tustin requirements, the ICU calculations use a lane capacity of 1,700 for through and all turn lanes. A clearance adjustment factor of 0.05 was added to each Level of Service calculation.

The ICU value translates to a Level of Service (LOS) estimate, which is a relative measure of the intersection performance. The ICU value is the sum of the critical volume to capacity ratios at an intersection; it is not intended to be indicative of the LOS of each of the individual turning



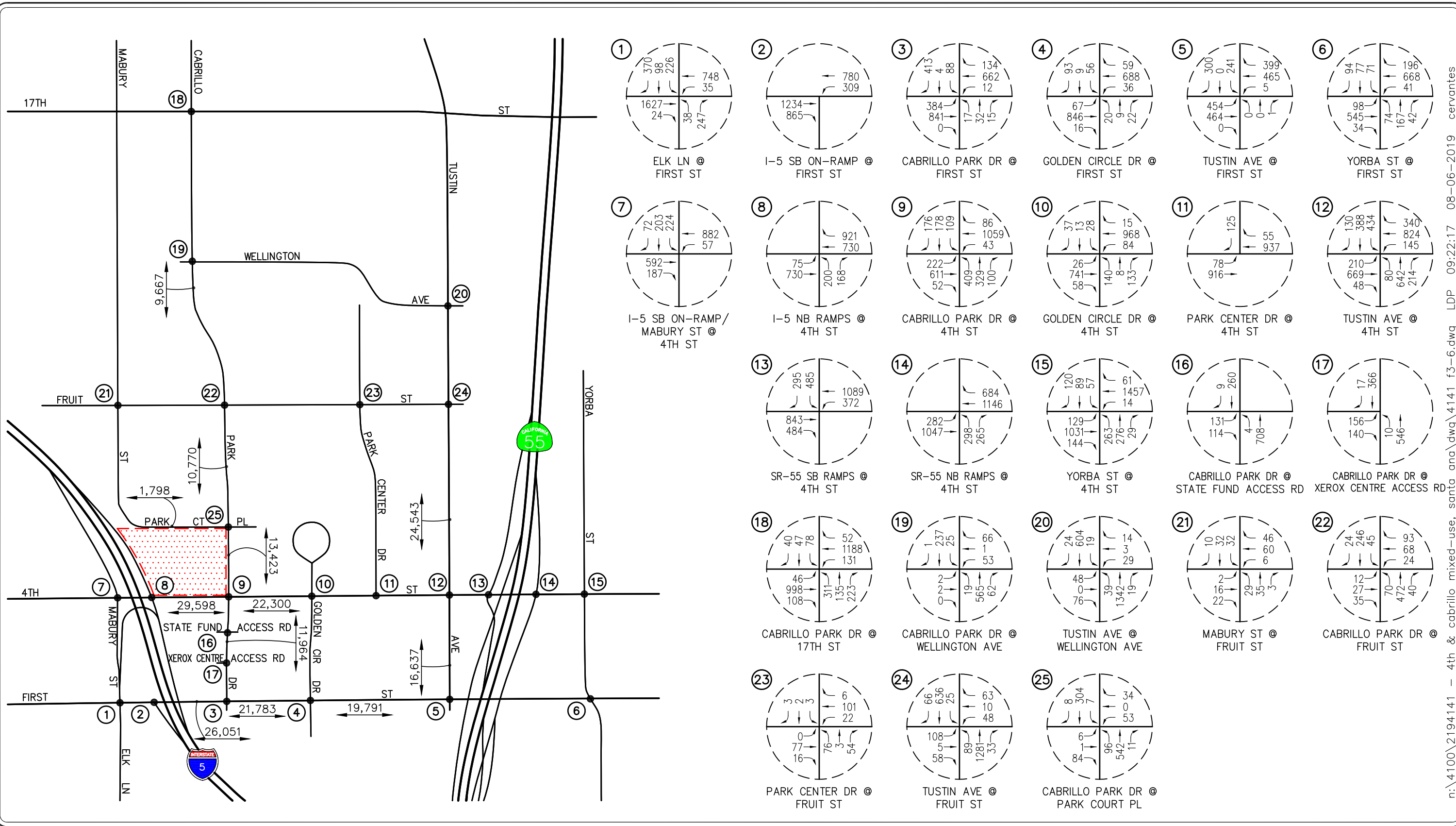
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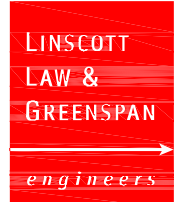
KEY
 # = STUDY INTERSECTION
 [Red Dotted Box] = PROJECT SITE

FIGURE 3-5

EXISTING AM PEAK HOUR TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



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KEY
 # = STUDY INTERSECTION
 XX,XXX = STUDY ROADWAY SEGMENT
 [Red Hatched Box] = PROJECT SITE

FIGURE 3-6

EXISTING PM PEAK HOUR AND DAILY TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

movements. The six qualitative categories of Level of Service have been defined along with the corresponding ICU value range and are shown in **Table 3-1**.

3.4.2 Highway Capacity Manual 6 (HCM 6) Method of Analysis (Unsignalized Intersections)

Two-way stop-controlled intersections are comprised of a major street, which is uncontrolled, and a minor street, which is controlled by stop signs. Level of service for a two-way stop-controlled intersection is determined by the computed or measured control delay. The control delay by movement, by approach, and for the intersection as a whole is estimated by the computed capacity for each movement. LOS is determined for each minor-street movement (or shared movement) as well as major-street left turns. The worst side street approach delay is reported. LOS is not defined for the intersection as a whole or for major-street approaches, as it is assumed that major-street through vehicles experience zero delay. The HCM control delay value range for two-way stop-controlled intersections is shown in **Table 3-2**.

TABLE 3-1
LEVEL OF SERVICE CRITERIA FOR SIGNALIZED INTERSECTIONS (ICU METHODOLOGY)

Level of Service (LOS)	Intersection Capacity Utilization Value (V/C)	Level of Service Description
A	≤ 0.60	EXCELLENT. No vehicle waits longer than one red light, and no approach phase is fully used.
B	0.61 – 0.70	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.71 – 0.80	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.81 – 0.90	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.91 – 1.00	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.00	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Potentially very long delays with continuously increasing queue lengths.

TABLE 3-2
LEVEL OF SERVICE CRITERIA FOR UNSIGNALIZED INTERSECTIONS (HCM 6 METHODOLOGY)²

Level of Service (LOS)	Highway Capacity Manual (HCM) Delay Per Vehicle (seconds/vehicle)	Level of Service Description
A	≤ 10.0	Little or no delay
B	> 10.0 and ≤ 15.0	Short traffic delays
C	> 15.0 and ≤ 25.0	Average traffic delays
D	> 25.0 and ≤ 35.0	Long traffic delays
E	> 35.0 and ≤ 50.0	Very long traffic delays
F	> 50.0	Severe congestion

² Source: *Highway Capacity Manual 6*, Chapter 20: Two-Way Stop-Controlled Intersections. The LOS criteria apply to each lane on a given approach and to each approach on the minor street. LOS is not calculated for major-street approaches or for the intersection as a whole.

3.4.3 Level of Service Criteria

According to the Cities of Santa Ana and Tustin, LOS D is the minimum acceptable condition that should be maintained during the peak commute hours. However, the City of Santa Ana has defined exceptions to this criterion at specific locations within the study area. The City of Santa Ana has defined major development areas where LOS “E” is considered acceptable.

Based on the above, the following summarizes the LOS required for each key study intersection:

➤ **LOS “D” Requirements:**

- | | |
|---|--|
| 1. Elk Lane at First Street | 15. Yorba Street at 4 th Street |
| 2. I-5 SB On-Ramp at First Street | 18. Cabrillo Park Drive at 17 th Street |
| 5. Tustin Avenue at First Street | 19. Cabrillo Park Drive at Wellington Avenue |
| 6. Yorba Street at First Street | 21. Mabury Street at Fruit Street |
| 7. I-5 SB On-Ramp/Mabury Street at 4 th Street | 22. Cabrillo Park Drive at Fruit Street |
| 8. I-5 NB Ramps at 4 th Street | 23. Park Center Drive at Fruit Street |
| 13. SR-55 SB Ramps at 4 th Street | 25. Cabrillo Park Drive at Park Court Place |
| 14. SR-55 NB Ramps at 4 th Street | |

➤ **LOS “E” Requirements:**

- | | |
|---|---|
| 3. Cabrillo Park Drive at First Street | 12. Tustin Avenue at 4 th Street |
| 4. Golden Circle Drive at First Street | 16. Cabrillo Park Drive at State Fund Access Road |
| 9. Cabrillo Park Drive at 4 th Street | 17. Cabrillo Park Drive at Xerox Center Access Road |
| 10. Golden Circle Drive at 4 th Street | 20. Tustin Avenue at Wellington Avenue |
| 11. Park Center Drive at 4 th Street | 24. Tustin Avenue at Fruit Street |

3.5 Existing Level of Service Results

Table 3-3 summarizes the existing peak hour service level calculations for the twenty-five (25) key study intersections based on existing traffic volumes and current street geometrics. Review of **Table 3-3** indicates that twenty-four (24) of the twenty-five key study intersections currently operate at an acceptable level of service during the AM and PM peak hours. The intersection of SR-55 SB Ramps/4th Street currently operates at unacceptable LOS E during the AM peak hour.

Appendix D presents the ICU/LOS and HCM/LOS calculation worksheets for the twenty-five (25) key study intersections for the AM peak hour and PM peak hour.

TABLE 3-3
EXISTING PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection		Jurisdiction	Minimum Acceptable LOS	Control Type	Time Period	ICU/HCM	LOS
1.	Elk Lane at First Street	Santa Ana	D	4Ø Traffic Signal	AM	0.599	A
					PM	0.716	C
2.	I-5 SB On Ramp at First Street	Santa Ana/ Caltrans	D	2Ø Traffic Signal	AM	0.599	A
					PM	0.716	C
3.	Cabrillo Park Drive at First Street	Santa Ana	E	6Ø Traffic Signal	AM	0.425	A
					PM	0.584	A
4.	Golden Circle Drive at First Street	Santa Ana	E	5Ø Traffic Signal	AM	0.450	A
					PM	0.544	A
5.	Tustin Avenue at First Street	Tustin	D	6Ø Traffic Signal	AM	0.331	A
					PM	0.324	A
6.	Yorba Street at First Street	Tustin	D	5Ø Traffic Signal	AM	0.396	A
					PM	0.418	A
7.	I-5 SB On Ramp/Mabury Street at 4 th street	Santa Ana/ Caltrans	D	3Ø Traffic Signal	AM	0.448	A
					PM	0.526	A
8.	I-5 NB Ramps at 4 th Street	Santa Ana/ Caltrans	D	3Ø Traffic Signal	AM	0.357	A
					PM	0.395	A
9.	Cabrillo Park Drive at 4 th Street	Santa Ana	E	6Ø Traffic Signal	AM	0.429	A
					PM	0.774	C
10.	Golden Circle Drive at 4 th Street	Santa Ana	E	5Ø Traffic Signal	AM	0.398	A
					PM	0.405	A
11.	Park Center Drive at 4 th Street	Santa Ana	E	One-Way Stop	AM	13.7 s/v	B
					PM	16.2 s/v	C
12.	Tustin Avenue at 4 th Street	Santa Ana	E	8Ø Traffic Signal	AM	0.667	B
					PM	0.738	C
13.	SR-55 SB Ramps at 4 th Street	Santa Ana/ Caltrans	D	3Ø Traffic Signal	AM	0.978	E
					PM	0.748	C
14.	SR-55 NB Ramps at 4 th Street	Tustin/ Caltrans	D	3Ø Traffic Signal	AM	0.670	B
					PM	0.689	B
15.	Yorba Street at 4 th Street	Tustin	D	6Ø Traffic Signal	AM	0.561	A
					PM	0.605	B

TABLE 3-3 (CONTINUED)
EXISTING PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection		Jurisdiction	Minimum Acceptable LOS	Control Type	Time Period	ICU/HCM	LOS
16.	Cabrillo Park Drive at State Fund Access Road	Santa Ana	E	3Ø Traffic Signal	AM	0.308	A
					PM	0.340	A
17.	Cabrillo Park Drive at Xerox Centre Access Road	Santa Ana	E	3Ø Traffic Signal	AM	0.271	A
					PM	0.308	A
18.	Cabrillo Park Drive at 17 th Street	Santa Ana	D	5Ø Traffic Signal	AM	0.568	A
					PM	0.611	B
19.	Cabrillo Park Drive at Wellington Avenue	Santa Ana	D	Two-Way Stop	AM	17.8 s/v	C
					PM	17.9 s/v	C
20.	Tustin Avenue at Wellington Avenue	Santa Ana	E	5Ø Traffic Signal	AM	0.574	A
					PM	0.411	A
21.	Mabury Street at Fruit Street	Santa Ana	D	All-Way Stop	AM	7.7 s/v	A
					PM	7.7 s/v	A
22.	Cabrillo Park Drive at Fruit Street	Santa Ana	D	All-Way Stop	AM	12.5 s/v	B
					PM	11.5 s/v	B
23.	Park Center Drive at Fruit Street	Santa Ana	D	Two-Way Stop	AM	10.3 s/v	B
					PM	10.5 s/v	B
24.	Tustin Avenue at Fruit Street	Santa Ana	E	2Ø Traffic Signal	AM	0.509	A
					PM	0.446	A
25.	Cabrillo Park Drive at Park Court Place	Santa Ana	D	Two-Way Stop	AM	18.6 s/v	C
					PM	24.3 s/v	C

4.0 TRAFFIC FORECASTING METHODOLOGY

In order to estimate the traffic impact characteristics of the proposed Project, a multi-step process has been utilized. The first step is traffic generation, which estimates the total arriving and departing traffic on a peak hour and daily basis. The traffic generation potential is forecast by applying the appropriate vehicle trip generation equations or rates to the project development tabulation.

The second step of the forecasting process is traffic distribution, which identifies the origins and destinations of inbound and outbound project traffic. These origins and destinations are typically based on demographics and existing/expected future travel patterns in the study area.

The third step is traffic assignment, which involves the allocation of project traffic to study area streets and intersections. Traffic assignment is typically based on minimization of travel time, which may or may not involve the shortest route, depending on prevailing operating conditions and travel speeds. Traffic distribution patterns are indicated by general percentage orientation, while traffic assignment allocates specific volume forecasts to individual roadway links and intersection turning movements throughout the study area.

With the forecasting process complete and project traffic assignments developed, the impact of the proposed project is isolated by comparing operational (LOS) conditions at selected key intersections using expected future traffic volumes with and without forecast project traffic. The need for site-specific and/or cumulative local area traffic improvements can then be evaluated and the significance of the project's impacts identified.

5.0 PROJECT TRAFFIC CHARACTERISTICS

5.1 Project Traffic Generation

Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Generation equations and/or rates used in the traffic forecasting procedure are found in the 10th Edition of *Trip Generation*, published by the Institute of Transportation Engineers (ITE) [Washington D.C., 2017].

Table 5-1 summarizes the trip generation rates used in forecasting the vehicular trips generated by the proposed Project and presents the project's forecast peak hour and daily traffic volumes. As shown in the upper portion of *Table 5-1*, ITE Land Use 221: Multifamily Housing (Mid-Rise), ITE Land Use 820: Shopping Center, and ITE Land Use 932: High Turnover Sit-Down Restaurant trip rates were used to forecast the trip generation potential for the proposed project.

A review of the lower portion of this table indicates that the proposed Project, after adjustment for internal capture, is forecast to generate approximately 4,121 “net” daily trips, with 264 “net” trips (82 inbound, 182 outbound) produced in the AM peak hour and 344 “net” trips (205 inbound, 139 outbound) produced in the PM peak hour on a “typical” weekday.

5.2 Project Traffic Distribution and Assignment

Figure 5-1 presents the traffic distribution pattern for the proposed Project. A tabular summary of the general directional Project trip distribution pattern is presented **Table 5-2**. Project traffic volumes both entering and exiting the project site have been distributed and assigned to the adjacent street system based on the following considerations:

- location of site access points in relation to the surrounding street system,
- the site's proximity to major traffic carriers and regional access routes,
- physical characteristics of the circulation system such as lane channelization and presence of traffic signals that affect travel patterns,
- presence of traffic congestion in the surrounding vicinity,
- ingress/egress availability at the project site (i.e. right-turn restrictions on 4th Street access and full access on Park Court Place driveway),
- distribution patterns contained within the *Traffic Impact Study for the Metro East Overlay Zone in the City of Santa Ana*, and
- input from City staff.

The anticipated AM and PM peak hour project traffic volumes associated with the proposed Project are presented in **Figures 5-2** and **5-3**, respectively. *Figure 5-3* also presents the daily Project traffic volumes. The traffic volume assignments presented in *Figures 5-2* and *5-3* reflect the traffic distribution characteristics shown in *Figure 5-1* and the traffic generation forecast presented in *Table 5-1*.

It should be noted that travel patterns are generally focused to major streets with larger roadway classifications and typically higher travel speeds. As such, it is forecast that the majority of project-related traffic will utilize 4th Street and Cabrillo Park Drive to Park Court Place to access the Project site, with Project traffic travelling to and from the north via Mabury Street for to be minimal when accessing the Project site. Based on *Table 5-1* and *Figure 5-1*, it is anticipated that approximately 4% of Project traffic will utilize Mabury Street which translates to approximately 1 cars every 8 minutes and 1 car every 4 minutes in the AM and PM peak hours, respectively. This added volume to the local residential network is considered nominal and would have little to no effect on the overall existing traffic patterns or operating conditions.

5.3 Existing Plus Project Traffic Conditions

The Existing Plus Project traffic conditions have been generated based upon existing conditions and the estimated project traffic. These forecast traffic conditions have been prepared to assess the potential impacts of a Project upon the circulation system as it currently exists. This traffic volume scenario and the related intersection capacity analyses will identify the roadway improvements necessary to mitigate the direct traffic impacts of the Project, if any.

Figures 5-4 and **5-5** present projected AM and PM peak hour traffic volumes at the twenty-five (25) key study intersections and two (2) Project driveways with the addition of the trips generated by the proposed Project to existing traffic volumes, respectively. *Figure 5-5* also presents the Existing Plus Project daily traffic volumes.

TABLE 5-1
PROJECT TRAFFIC GENERATION RATES AND FORECAST³

Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
<u>Trip Rates:</u>							
▪ 221: Multifamily Housing Mid-Rise (TE/DU)	5.44	26%	74%	0.36	61%	39%	0.44
▪ 820: Shopping Center (TE/1000 SF)	37.75	62%	38%	0.94	48%	52%	3.81
▪ 932: High Turnover Sit-Down Restaurant (TE/1000 SF)	112.18	55%	45%	9.94	62%	38%	9.77
<u>Trip Generation:</u>							
▪ 4 th & Cabrillo Apartments (644 DU)	3,503	60	172	232	173	110	283
▪ 4 th & Cabrillo Retail (11,700 SF)	442	7	4	11	22	23	45
▪ 4 th & Cabrillo Restaurant (3,500 SF)	393	19	16	35	21	13	34
Total Project Trip Generation:	4,338	86	192	278	216	146	362
Internal Trip Capture (5%)	-217	-4	-10	-14	-11	-7	-18
Total Net Project Trip Generation	4,121	82	182	264	205	139	344

Notes:

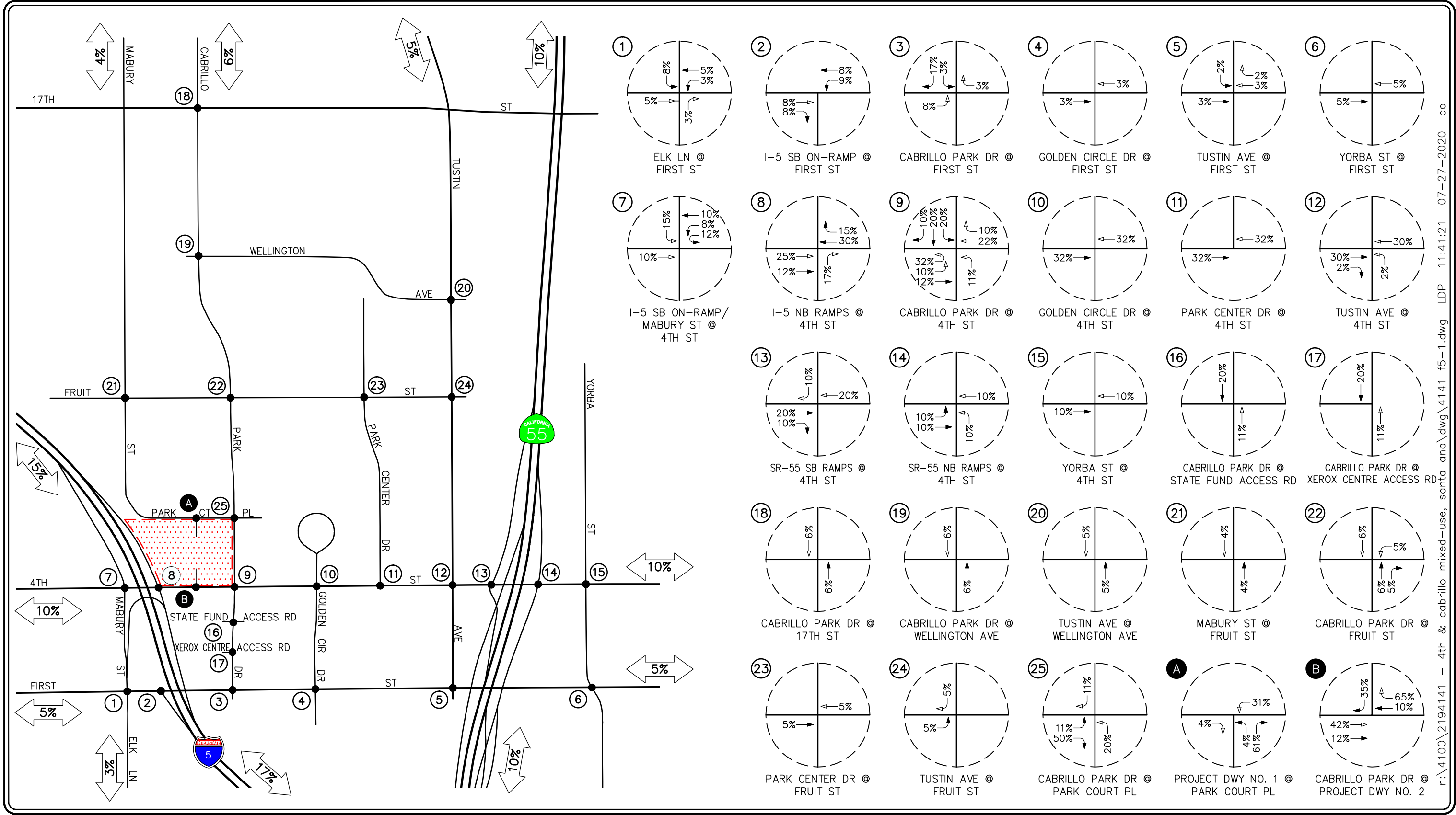
TE/1000 SF = Trip End per 1,000 Square Feet of Gross Floor Area

TE/DU = Trip End per Dwelling Unit

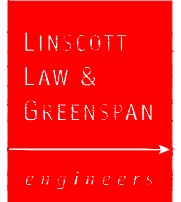
³ Source: *Trip Generation*, 10th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2017).

TABLE 5-2
PROJECT DIRECTIONAL DISTRIBUTION PATTERN

Distribution Percentage	Orientation/Direction
15%	To/from the north via I-5 Freeway
17%	To/from the south via I-5 Freeway
10%	To/from the north via SR-55 Freeway
10%	To/from the south via SR-55 Freeway
6%	To/from the north via Cabrillo Park Drive
4%	To/from the north via Parkcourt Place/Marbury Street
5%	To/from the north via Tustin Avenue
3%	To/from the south via Elk Avenue
10%	To/from the east via Fourth Street/Irvine Boulevard
10%	To/from the west via Fourth Street
5%	To/from the east via First Street
5%	To/from the west via First Street
100%	Total



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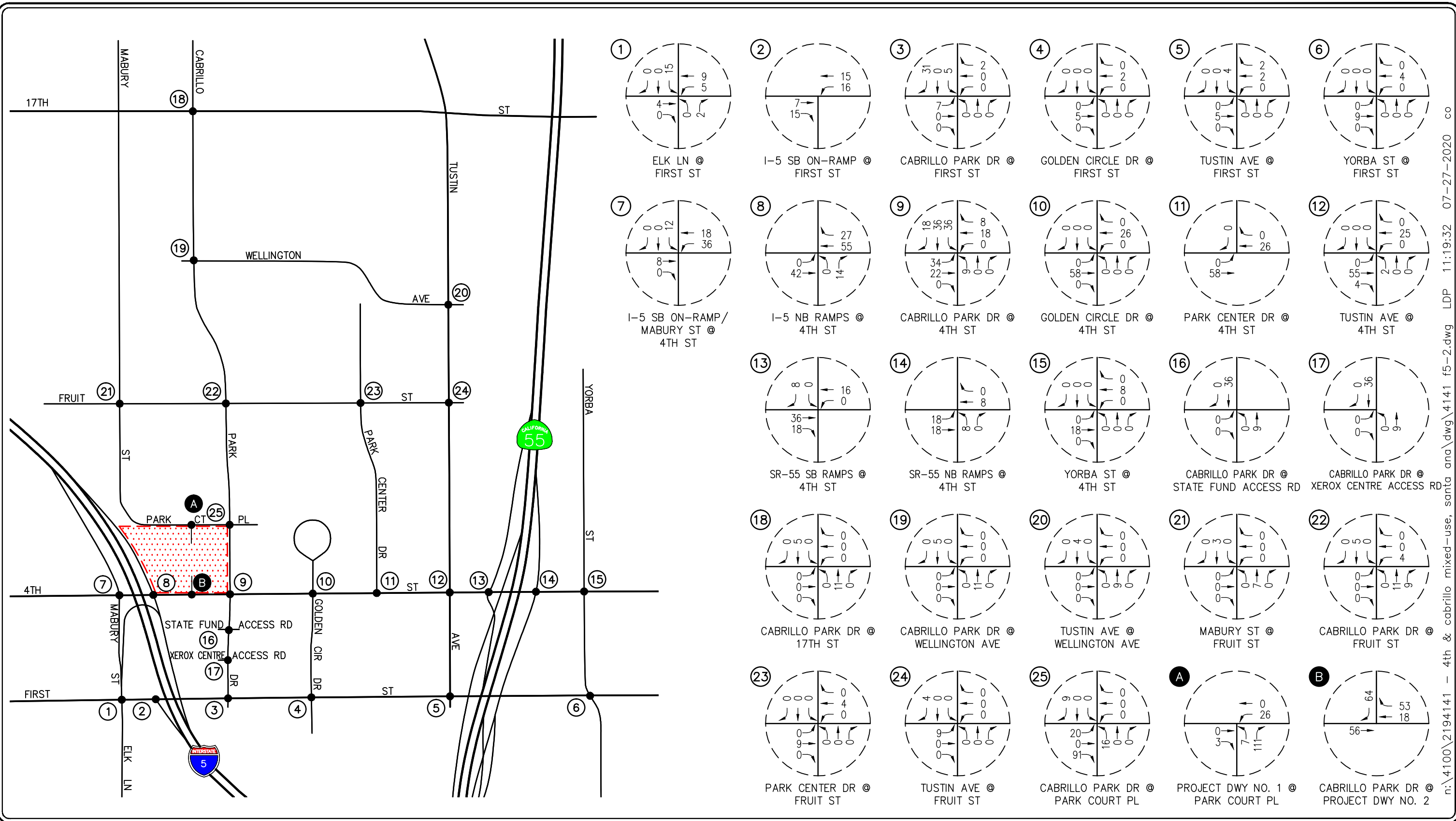


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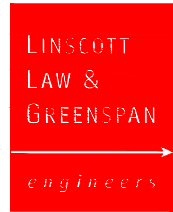
- ⊙ = STUDY INTERSECTION
- ↔ = INBOUND PERCENTAGE
- ← = OUTBOUND PERCENTAGE
- ▨ = PROJECT SITE

FIGURE 5-1

PROJECT TRIP DISTRIBUTION PATTERN
4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



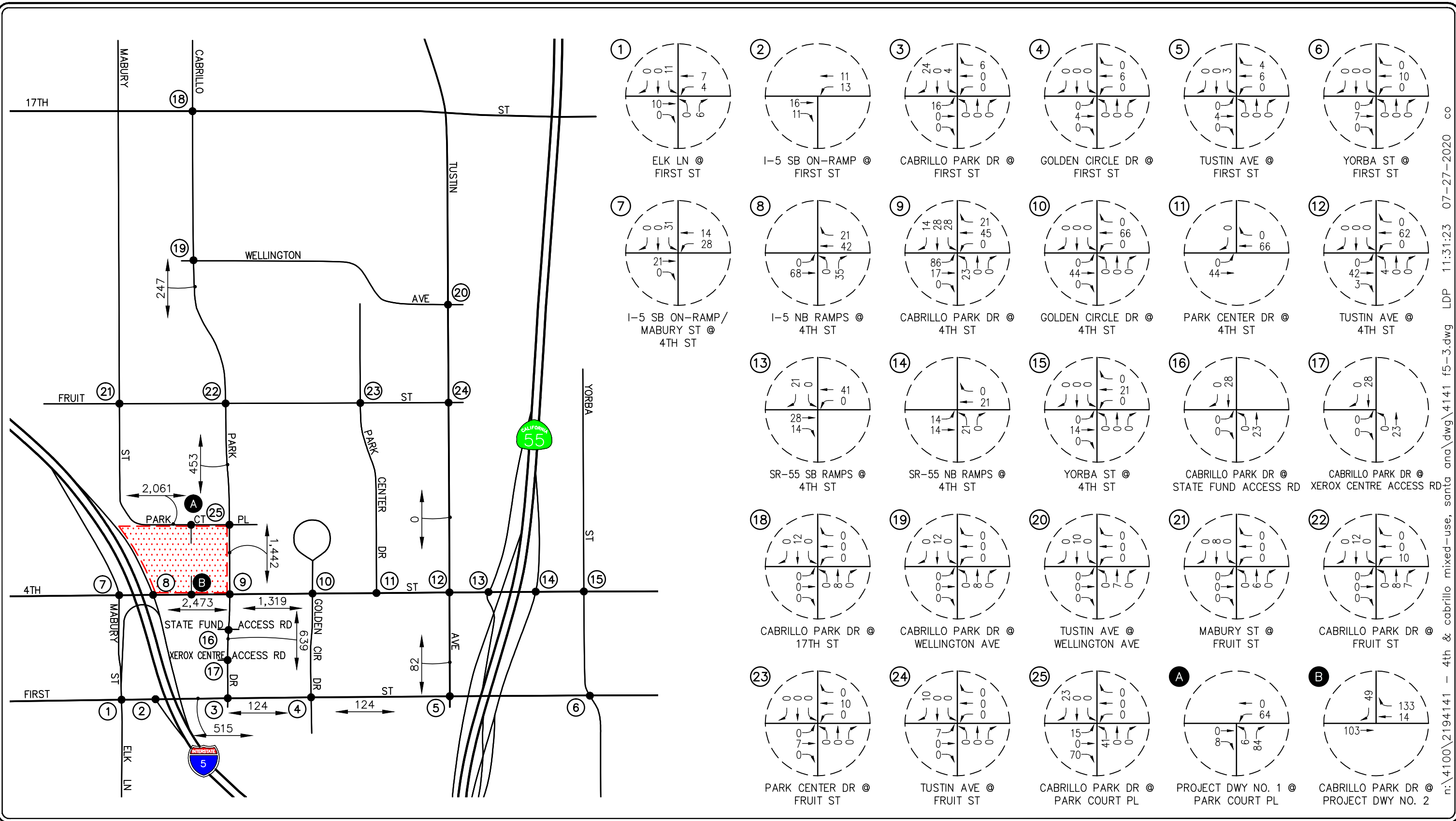
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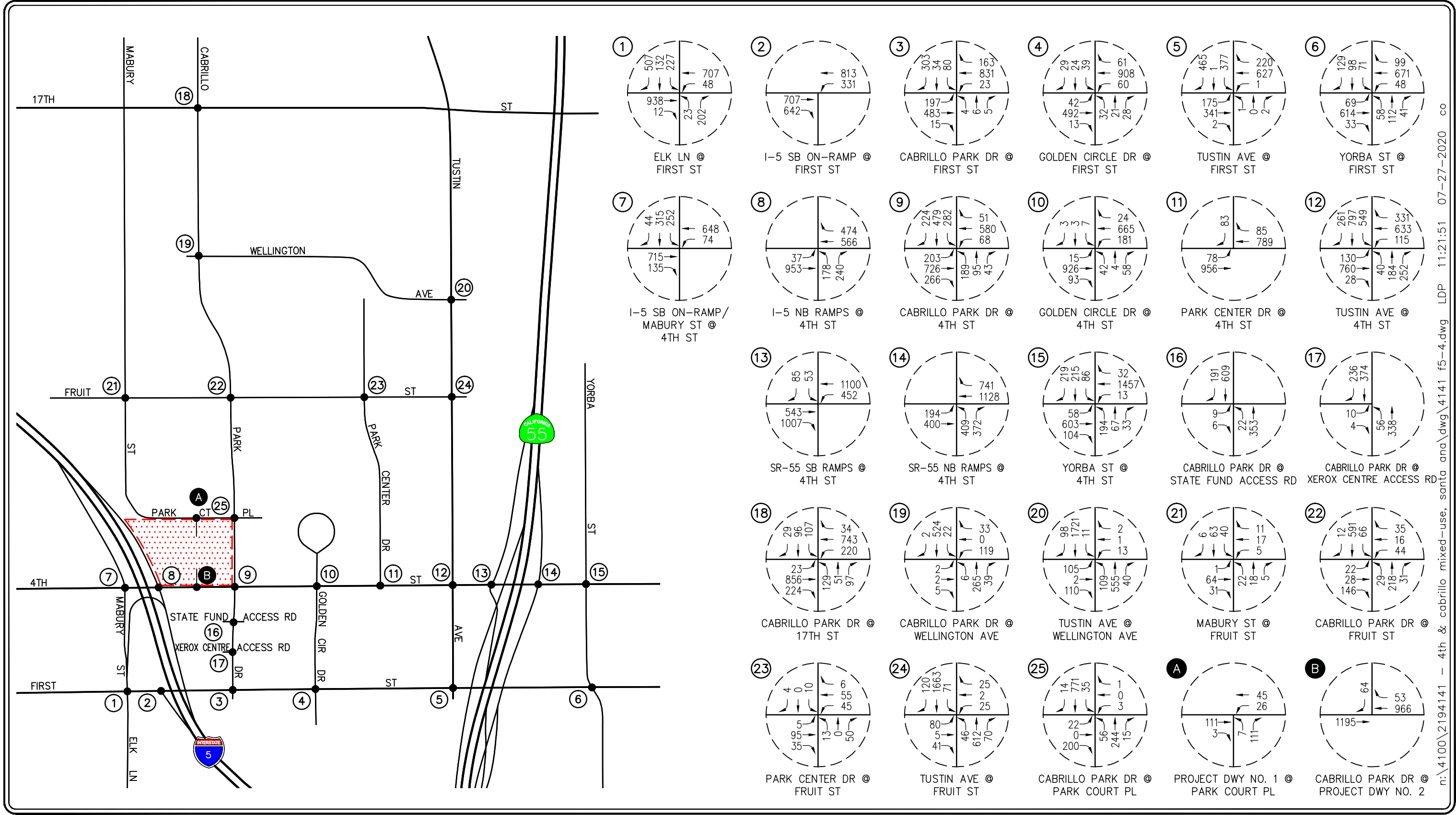
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 [Red Hatched Box] = PROJECT SITE

FIGURE 5-2

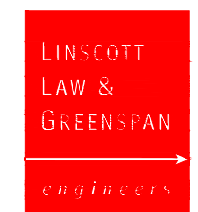
AM PEAK HOUR PROJECT TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



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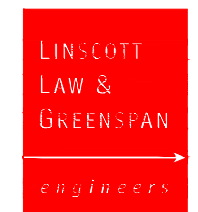
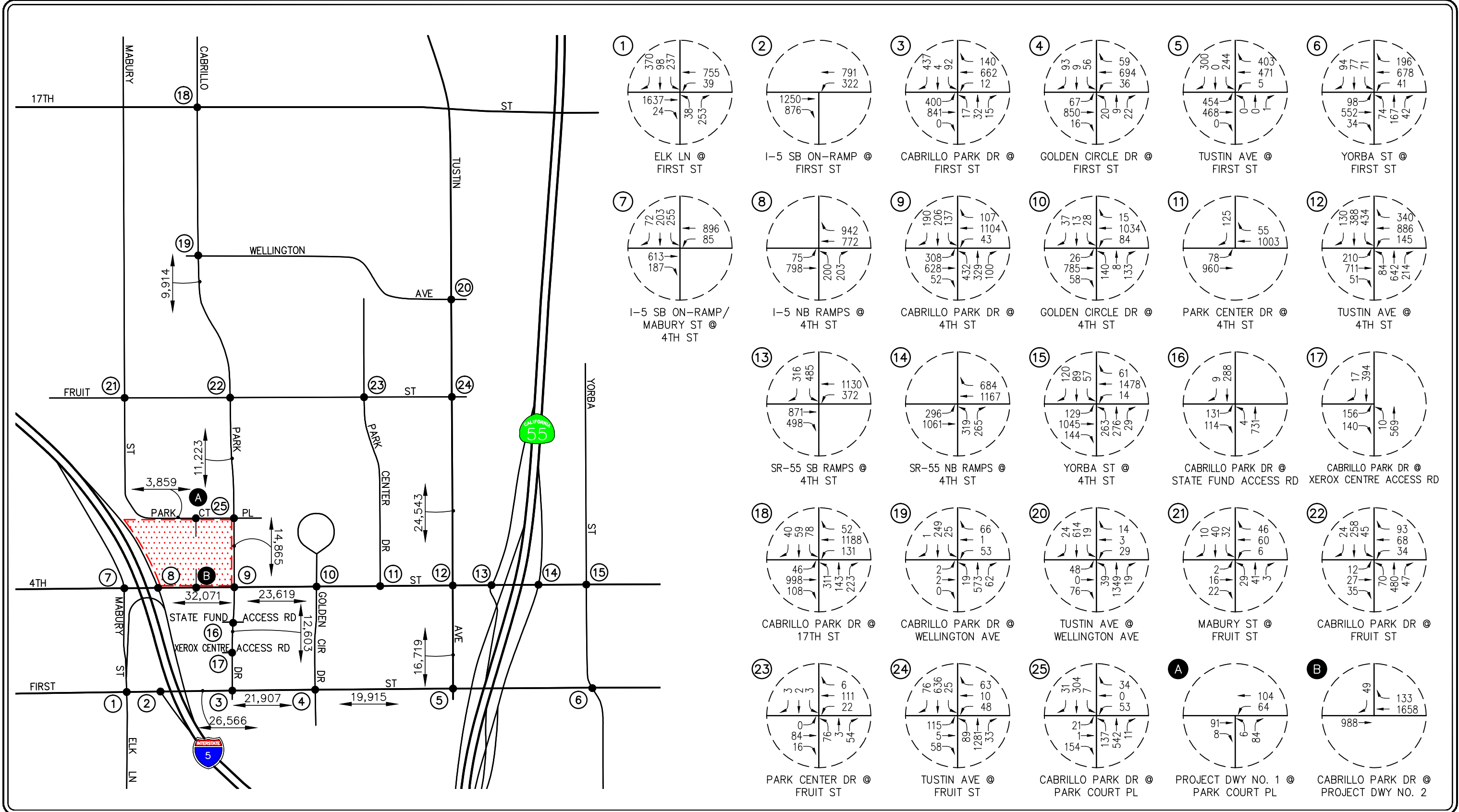
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KEY
 # = STUDY INTERSECTION
 [Red Hatched Box] = PROJECT SITE

FIGURE 5-4

EXISTING PLUS PROJECT AM PEAK HOUR TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



KEY

⊙ = STUDY INTERSECTION

XX,XXX = STUDY ROADWAY SEGMENT

▨ = PROJECT SITE

FIGURE 5-5

EXISTING PLUS PROJECT

PM PEAK HOUR AND DAILY TRAFFIC VOLUMES

4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

6.0 FUTURE TRAFFIC CONDITIONS

6.1 Ambient Traffic Growth

Horizon year, background traffic growth estimates have been calculated using an ambient traffic growth factor. The ambient traffic growth factor is intended to include unknown and future related projects in the study area, as well as account for regular growth in traffic volumes due to the development of projects outside the study area. The future growth in traffic volumes has been calculated at one percent (1.0%) per year. Applied to the Year 2019 existing traffic volumes, this factor results in a 6.0% growth in existing volumes to the near-term horizon year 2025.

6.2 Related Projects Traffic Characteristics

In order to make a realistic estimate of future on-street conditions prior to implementation of the proposed Project, the status of other known development projects (related projects) within a two-mile radius of the proposed project has been researched at the Cities of Santa Ana and Tustin. With this information, the potential impact of the proposed Project can be evaluated within the context of the cumulative impact of all ongoing development.

Based on our research during the scoping process, there are twenty-eight (28) related projects in the City of Santa Ana and two (2) related projects in the City of Tustin that are being processed for approval. These thirty (30) related projects have been included as part of the cumulative background setting.

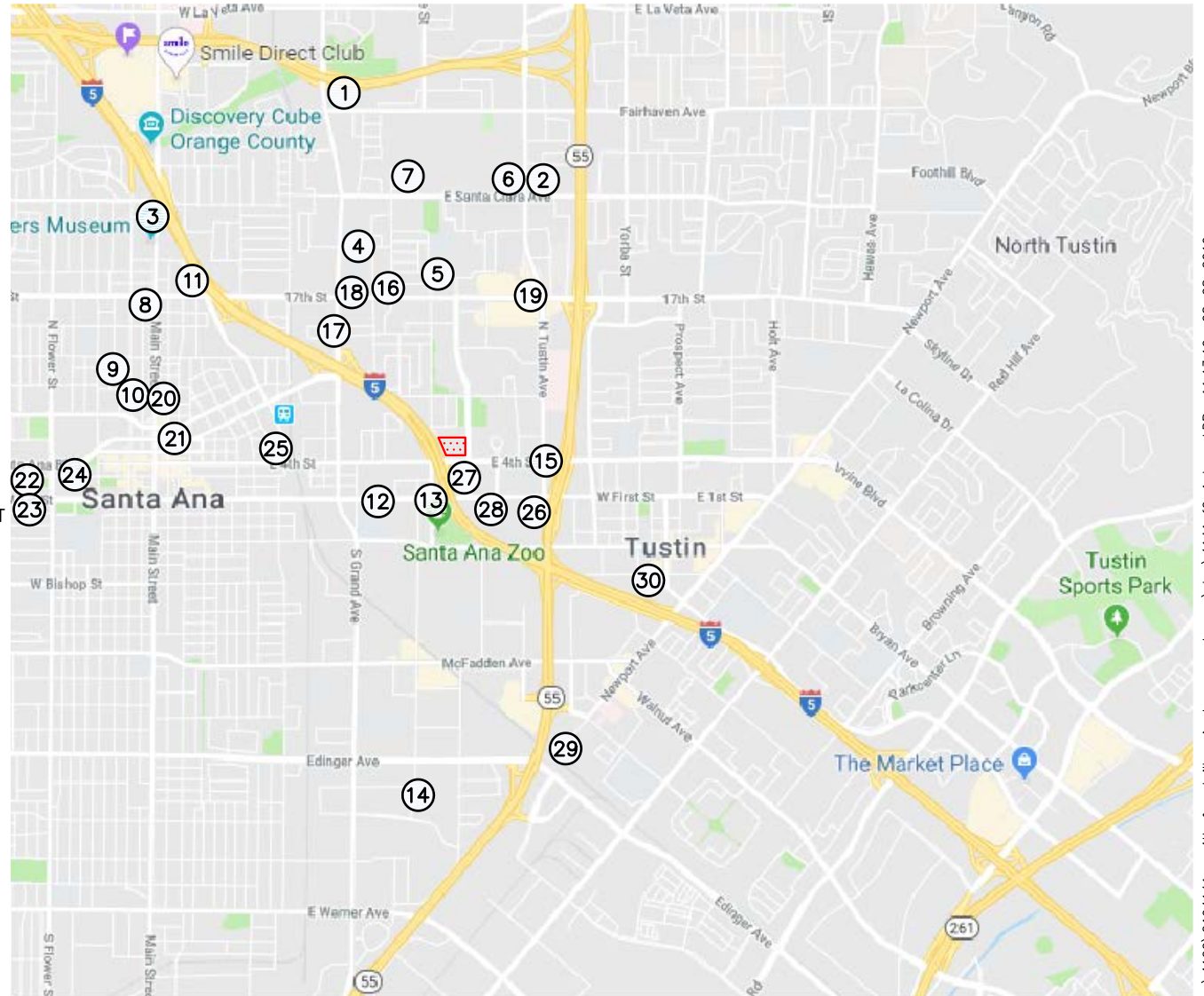
Table 6-1 provides a brief description for each of the thirty (30) related projects. **Figure 6-1** graphically illustrates the location of the thirty (30) related projects. These related projects are expected to generate vehicular traffic, which may affect the operating conditions of the key study intersections.

Table 6-2 summarizes the trip generation potential for all thirty (30) related projects on a daily and peak hour basis for a typical weekday. As shown, the related projects are expected to generate 45,942 daily trips, with 3,033 trips (1,458 inbound, 1,575 outbound) anticipated during the AM peak hour and 3,837 trips (1,927 inbound, 1,910 outbound) produced during the PM peak hour.

The AM and PM peak hour traffic volumes associated with the thirty (30) related projects in the Year 2025 are presented in **Figures 6-2** and **6-3**, respectively. **Figure 6-3** also presents the daily related project traffic volumes.

KEY

1. STARBUCKS
2. STARBUCKS WITH DRIVE THRU
3. HAMPTON INN HOTEL
4. NORTH GRAND CAR WASH
5. ROCKET EXPRESS CAR WASH
6. TUSTIN SERVICE STATION AND CAR WASH
7. SEXLINGER HOMES AND ORCHARD
8. ARTS COLLECTIVE META HOUSING ADAPTIVE REUSE
9. THE ORLEANS ADAPTIVE REUSE APARTMENTS
10. ONE BROADWAY PLAZA
11. BRIDGING THE AQUA
12. FIRST STREET FAMILY APARTMENTS
13. 1660 FIRST STREET ELKS APARTMENTS
14. ELK'S LODGE
15. RUSSELL FISHER COMMERCIAL
16. EDNOVATE CHARTER HIGH SCHOOL ADAPTIVE REUSE
17. KIDDIE ACADEMY OF SANTA ANA
18. TARGET SHOPPING CENTER
19. RAISING CANE'S RESTAURANT
20. 888 ADAPTIVE REUSE
21. LEGACY SQUARE MIXED-USE DEVELOPMENT
22. FIRST AMERICAN PLAZA
23. 4TH AND MORTIMER (BLOCK A & B)
24. 201 E 4TH STREET
25. TOM'S TRUCK RESIDENTIAL DEVELOPMENT
26. EAST FIRST STREET APARTMENTS
27. THE MADISON
28. 2114 EAST FIRST APARTMENTS
29. SERVICE STATION
30. VINTAGE



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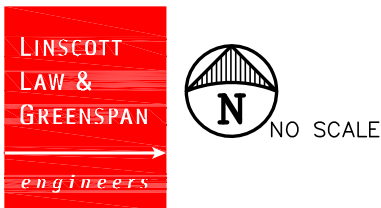
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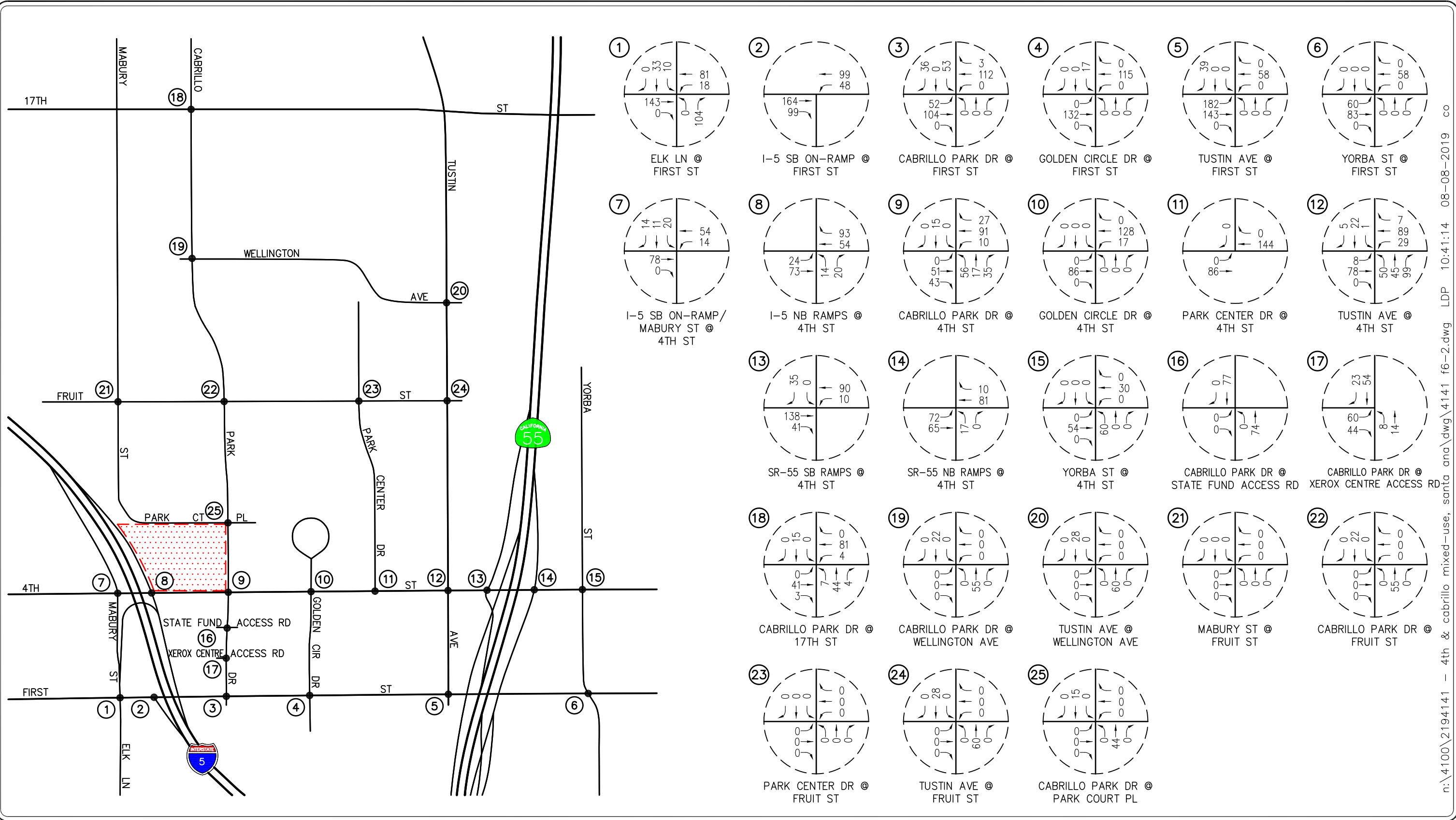
KEY

- # = CUMULATIVE PROJECTS LOCATION
- [Red Hatched Square] = PROJECT SITE

FIGURE 6-1

LOCATION OF CUMULATIVE PROJECTS
4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA





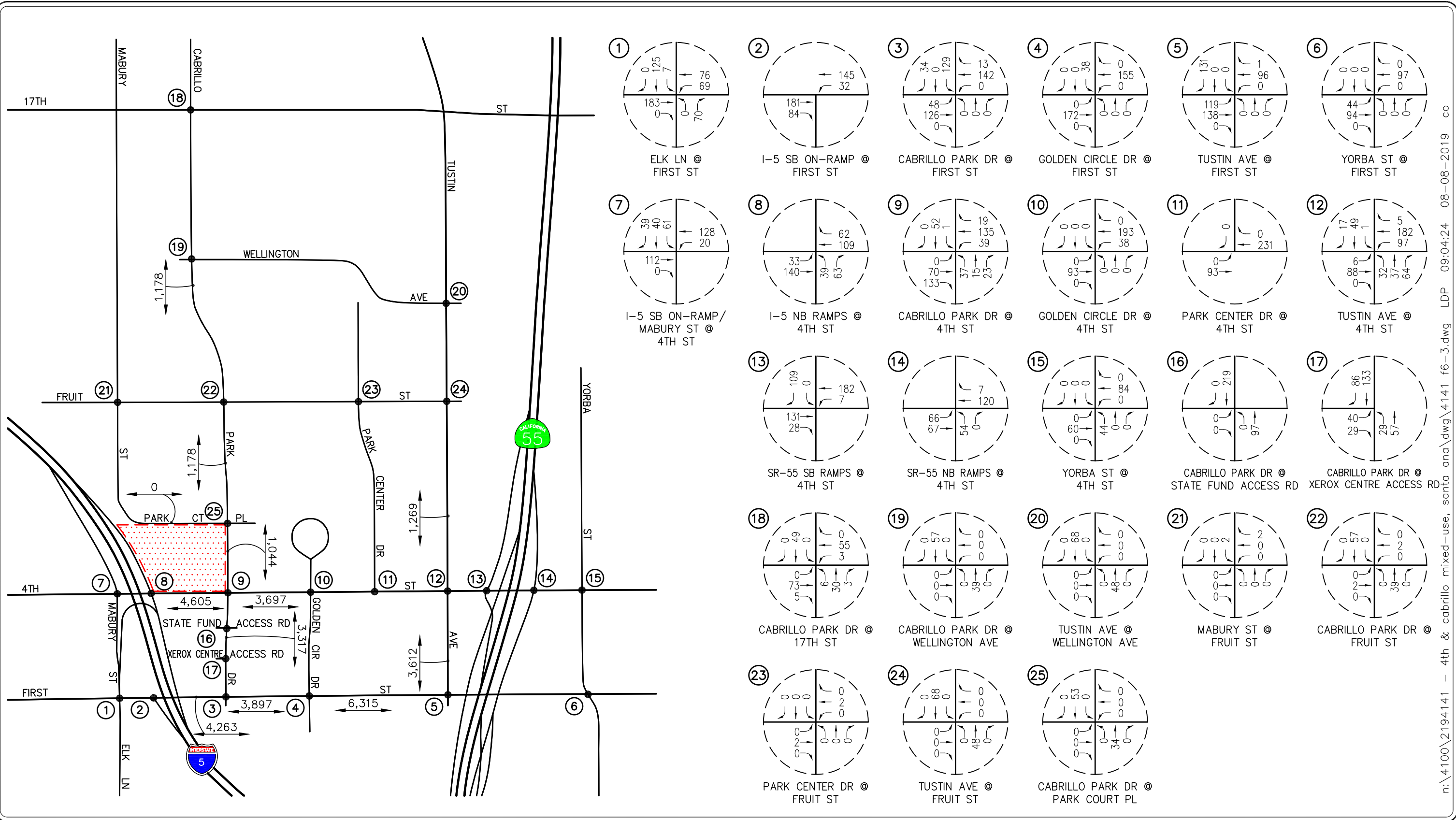
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KEY
 # = STUDY INTERSECTION
 [Red Hatched Box] = PROJECT SITE

FIGURE 6-2

AM PEAK HOUR CUMULATIVE PROJECTS TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



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KEY

- # = STUDY INTERSECTION
- XX,XXX = STUDY ROADWAY SEGMENT
- [Red Hatched Box] = PROJECT SITE

FIGURE 6-3
PM PEAK HOUR AND DAILY CUMULATIVE PROJECTS TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

TABLE 6-1
LOCATION AND DESCRIPTION OF CUMULATIVE PROJECTS⁴

No.	Cumulative Project	Location/Address	Description
<i>City of Santa Ana</i>			
1.	Starbucks	2701 North Grand Avenue	907 SF coffee shop with drive-thru
2.	Starbucks with Drive-thru	2301 North Tustin Avenue	3,567 SF coffee shop with drive-thru
3.	Hampton Inn Hotel	2056, 2058, 2115, 2129 and 2129 North Main Street	2,657 SF commercial, 135 room hotel, and 1,619 SF existing office demolition
4.	North Grand Car Wash	1821 North Grand Ave	5,243 SF carwash and 6,592 SF existing restaurant demolition
5.	Rocket Express Car Wash	1703 East 17 th Street	4,292 SF carwash
6.	Tustin Service Station and Car Wash	2230 North Tustin Avenue	3,600 SF commercial
7.	Sexlinger Homes and Orchard	1584 East Santa Clara Avenue	23 DU single-family detached
8.	Arts Collective Meta Housing Adaptive Reuse	1666 North Main Street	58 DU residential apartments
9.	The Orleans Adaptive Reuse Apartments	1212 North Broadway Avenue	24 DU residential apartments
10.	One Broadway Plaza	1109 North Broadway	518,000 SF office tower with 16,000 SF restaurant
11.	Bridging the Aqua	317 East 17 th Street	57 DU residential apartments
12.	First Street Family Apartments	1440 East 1 st Street	69 DU residential apartments, 47,040 SF existing office demolition
13.	1660 First Street Elks Apartments	1660 East 1 st Street	603 DU residential apartments and 20,671 SF retail
14.	Elk's Lodge	1751 South Lyon Street	52,453 SF commercial/lodge
15.	Russell Fisher Commercial	301-325 North Tustin Avenue	10,195 SF commercial, 1,780 SF existing carwash demolition and 3,440 SF existing restaurant demolition
16.	Ednovate Charter High School Adaptive Reuse	1450 East 17 th Street	29,368 SF charter high school
17.	Kiddie Academy of Santa Ana	1345 North Grand Avenue	7,657 SF childcare
18.	Target Shopping Center	1330 East 17 th Street	9,112 SF commercial

Notes:

- SF = Square-feet
- DU = Dwelling units

⁴ Source: City of Santa Ana and City of Tustin Planning Department.

TABLE 6-1 (CONTINUED)
LOCATION AND DESCRIPTION OF CUMULATIVE PROJECTS⁵

No.	Cumulative Project	Location/Address	Description
<i>City of Santa Ana (Continued)</i>			
19.	Raising Cane's Restaurant	2250 East 17 th Street	3,935 SF restaurant and 10,000 SF existing restaurant demolition
20.	888 Adaptive Reuse	888 North Main Street	146 Condominiums and 3,700 SF commercial
21.	Legacy Square Mixed-Use Development	609 North Spurgeon Street	93 DU residential apartments and 6,335 SF commercial
22.	First American Plaza	421 North Main Street /114 East 5 th Street	220 DU multifamily (mid-rise) and 12,350 SF retail
23.	4 th and Mortimer (Block A & B)	409/ 509 East 4 th Street	133 DU residential apartments, 105,812 SF commercial and 22,330 SF demolition of commercial building
24.	201 E 4 th Street	401 North Bush Street	24 DU residential apartments
25.	Tom's Trucks Residential Development	1008 East 4 th Street	133 DU single-family residences
26.	East First Street Apartments	2222 East 1 st Street	418 DU senior residential apartments
27.	The Madison	200 North Cabrillo Park Drive	260 DU apartments, 6,561 SF commercial and 2,507 SF retail component of live/work
28.	2114 East First Apartments	2114 East 1 st Street	552 DU affordable apartments, 10,000 SF commercial
<i>City of Tustin</i>			
29.	Service Station	1001 Edinger Avenue	6 fueling stations
30.	Vintage	420 West 6 th Street	140 DU condominiums

Notes:

- SF = Square-feet
- DU = Dwelling units

⁵ Source: City of Santa Ana and City of Tustin Planning Department.

TABLE 6-2
CUMULATIVE PROJECTS TRAFFIC GENERATION FORECAST⁶

Cumulative Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
1. Starbucks ⁷	372	20	20	40	10	9	19
2. Starbucks with Drive-thru	1,463	81	77	158	39	38	77
3. Hampton Inn Hotel ⁷	1,228	38	27	65	46	45	91
4. North Grand Car Wash ⁷	740	0	0	0	37	37	74
5. Rocket Express Car Wash	610	0	0	0	31	30	61
6. Tustin Service Station and Car Wash	3,247	64	64	128	114	114	228
7. Sexlinger Homes and Orchard	217	4	13	17	14	9	23
8. Arts Collective Meta Housing Adaptive	425	6	21	27	20	12	32
9. The Orleans Adaptive Reuse Apartments	176	3	8	11	8	5	13
10. One Broadway Plaza ⁷	6,660	595	149	744	150	535	685
11. Bridging the Aqua	417	6	20	26	20	12	32
12. First Street Family Apartments ⁸	459	7	28	35	28	15	43
13. 1660 First Street Elks Apartments ⁹	4,648	70	242	312	266	162	428
14. Elk's Lodge	1,512	61	31	92	57	64	121
15. Russell Fisher Commercial ⁷	346	5	4	9	13	13	26
16. Ednovate Charter High School Adaptive ⁷	413	70	29	99	15	13	28
17. Kiddie Academy of Santa Ana ⁷	365	45	39	84	40	45	85
18. Target Shopping Center	310	5	3	8	11	12	23
19. Raising Cane's Restaurant	926	41	40	81	33	31	64
20. 888 Adaptive Reuse ⁷	1,209	17	53	70	59	37	96
21. Legacy Square Mixed-Use Development	2,833	43	54	97	110	101	211
22. First American Plaza ⁷	1,420	26	59	85	70	52	122
23. 4th and Mortimer (Block A & B)	4,569	69	81	150	174	166	340
24. 201 E 4th Street	176	3	8	11	8	5	13
25. Tom's Trucks Residential Development ⁷	1,256	25	73	98	83	49	132

⁶ Unless otherwise noted, Source: *Trip Generation*, 10th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2017).

⁷ Source: *First American Plaza TIA*, prepared by LLG, dated April 2019.

⁸ Source: *First Street Family Apartments TIA*, prepared by LLG, dated January 2016.

⁹ Source: *1660 E. First Street Elks Apartments TIA*, prepared by LLG, dated June 2019.

TABLE 6-2 (CONTINUED)
 CUMULATIVE PROJECTS TRAFFIC GENERATION FORECAST¹⁰

Cumulative Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
26. East First Street Apartments	1,785	33	67	100	76	49	125
27. The Madison ¹¹	2,010	30	104	134	115	69	184
28. 2114 East First Apartments ¹²	4,381	63	199	262	207	127	334
29. Service Station	744	13	13	26	24	25	49
30. Vintage	1,025	15	49	64	49	29	78
Cumulative Projects Total Trip Generation Potential	45,942	1,458	1,575	3,033	1,927	1,910	3,837

¹⁰ Unless otherwise noted, Source: *Trip Generation*, 10th Edition, Institute of Transportation Engineers (ITE), Washington, D.C. (2017).

¹¹ Source: *The Madison Mixed-Use Development TIA*, prepared by LLG, dated August 2017.

¹² Source: *First American Plaza TIA*, prepared by LLG, dated April 2019.

6.3 Year 2040 Traffic Conditions

As coordinated with City staff, the Year 2040 traffic volume forecasts for this traffic study were developed via the utilization of the OCTAM 4.0 Year 2040 traffic model provided by OCTA. Specifically, daily, AM peak period and PM peak period link traffic volumes were provided by OCTA for the existing base year (i.e. Year 2012) and for the Year 2040 year. The AM peak period corresponds to a three-hour morning commute period while the PM peak period corresponds to a four-hour afternoon commute period. Using the peak period model runs and the OCTA approved peak hour factors (i.e. AM = 0.3566 and PM = 0.2662), the one-hour peak hour link traffic volumes were determined. These future year 2040 link traffic volumes were post-processed based on the relationship of the base year validation model run output to the base year ground traffic counts resulting in Year 2040 without project daily traffic volumes for the AM peak hour/PM peak hour turning movements for the key study intersections. Copies of the model post-processing worksheets are contained in *Appendix C*.

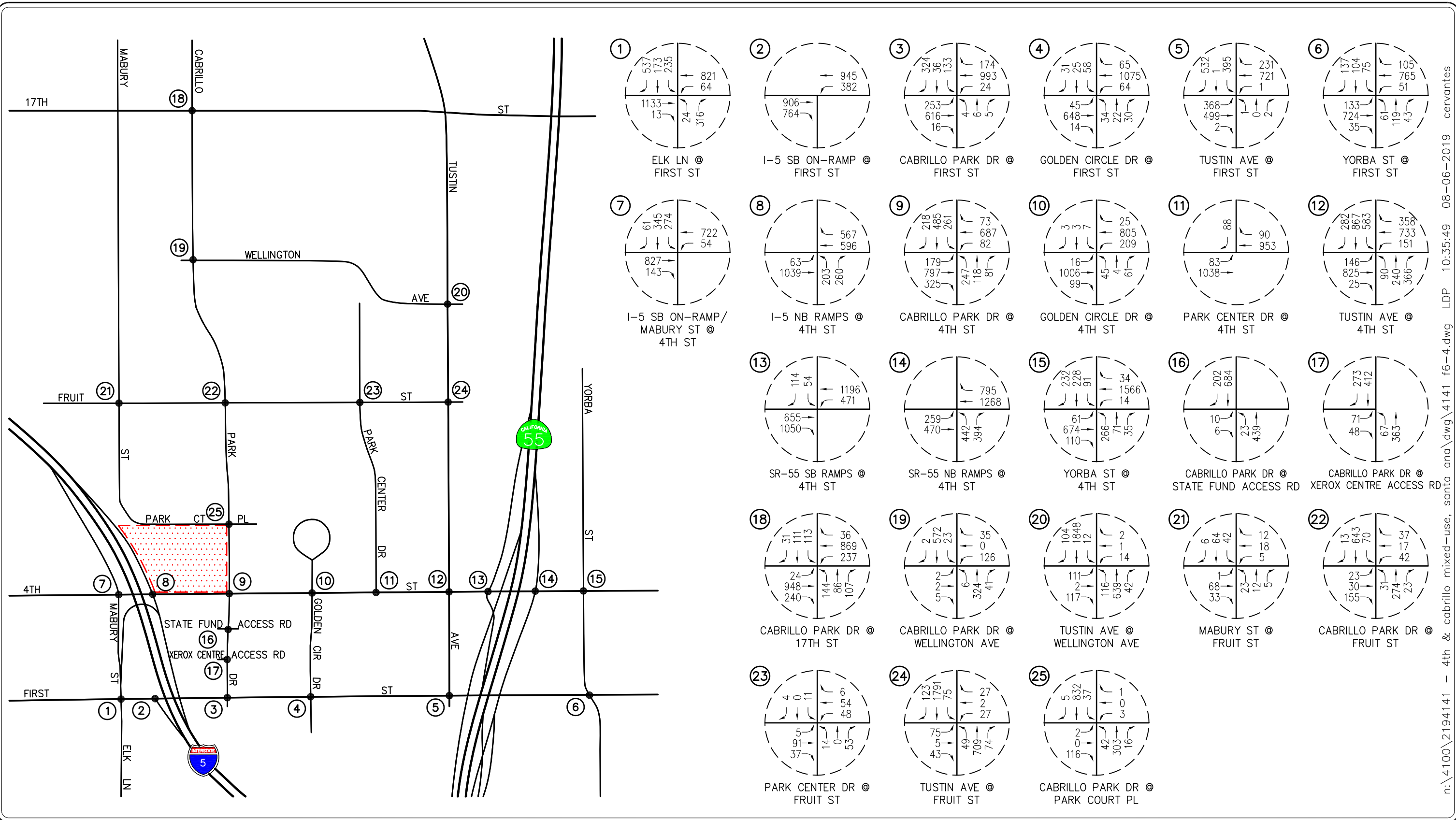
6.4 Year 2025 and Year 2040 Traffic Volumes

6.4.1 Year 2025 Traffic Volumes

Figures 6-4 and **6-5** present the AM and PM peak hour cumulative traffic volumes (existing traffic + ambient growth + related projects) at twenty-five (25) key study intersections for the Year 2025, respectively. *Figure 6-5* also presents the Year 2025 daily cumulative traffic volumes. **Figures 6-6** and **6-7** illustrate the Year 2025 forecast AM and PM peak hour traffic volumes, with the inclusion of the trips generated by the proposed Project, respectively. *Figure 6-7* also presents the Year 2025 cumulative plus project daily traffic volumes.

6.4.2 Year 2040 Traffic Volumes

Figures 6-8 and **6-9** present the Year 2040 AM and PM peak hour cumulative traffic volumes at the twenty-five (25) key study intersections, respectively. *Figure 6-9* also presents the Year 2040 daily cumulative traffic volumes. **Figures 6-10** and **6-11** illustrate the Year 2040 forecast AM and PM peak hour traffic volumes, with the inclusion of the trips generated by the proposed Project, respectively. *Figure 6-11* also presents the Year 2040 buildout plus project daily traffic volumes.



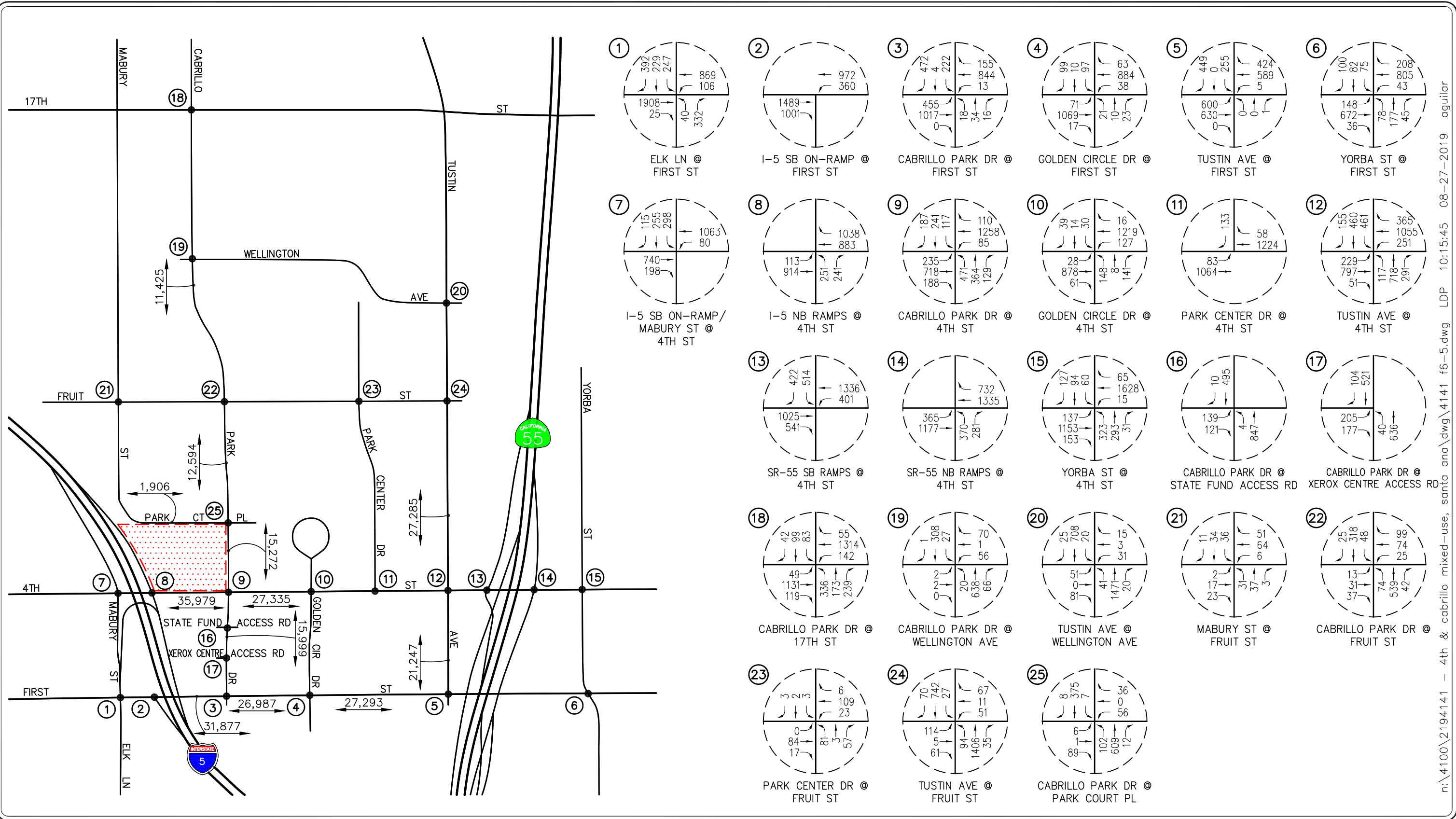
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KEY
 # = STUDY INTERSECTION
 [Red Hatched Box] = PROJECT SITE

FIGURE 6-4

YEAR 2025 CUMULATIVE AM PEAK HOUR TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



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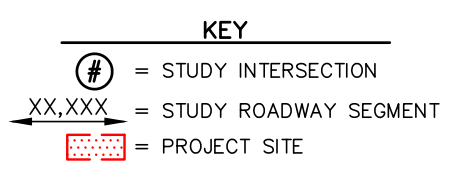
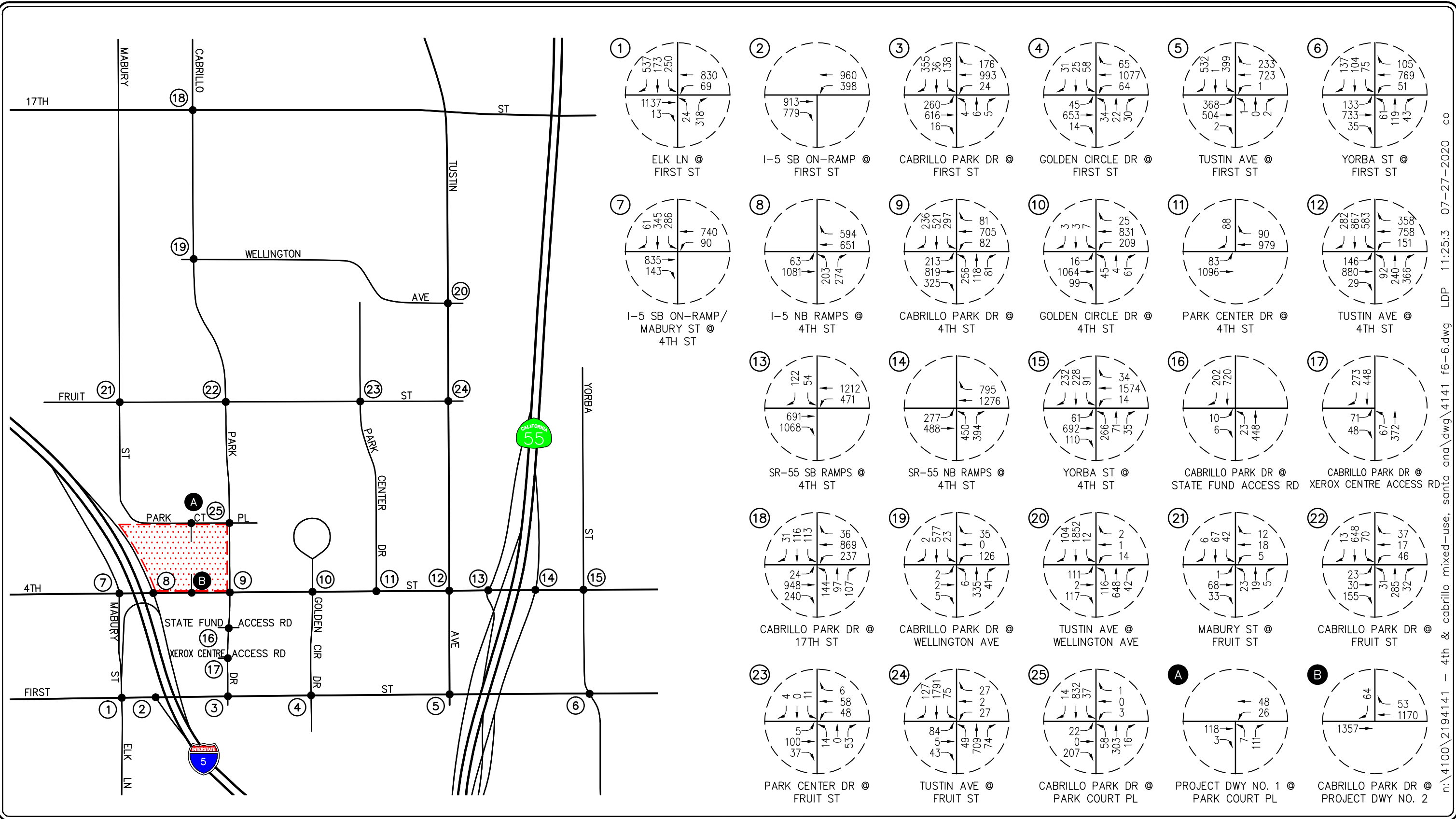
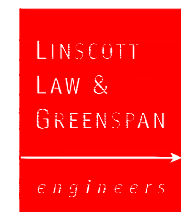
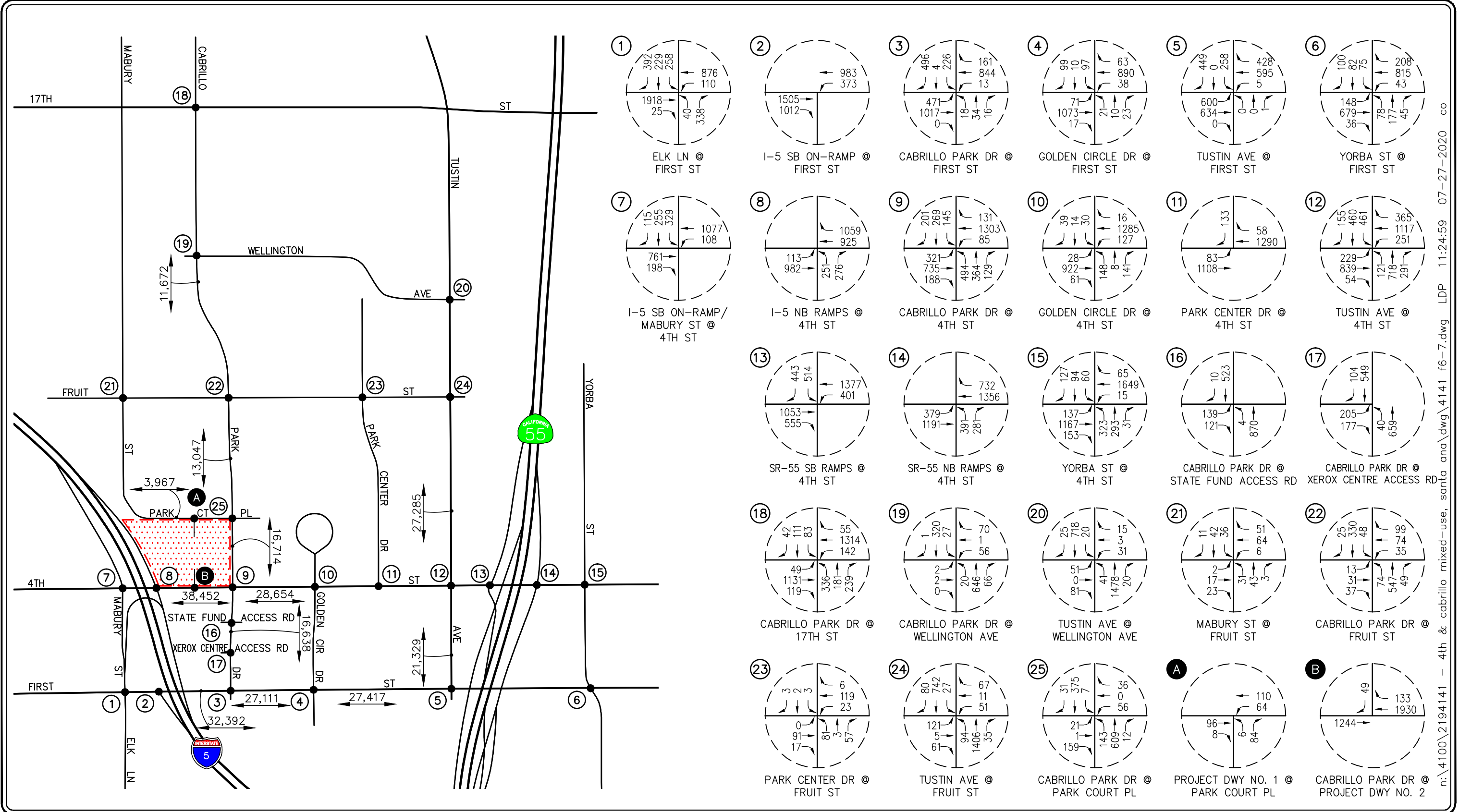


FIGURE 6-5
YEAR 2025 CUMULATIVE PM PEAK HOUR AND DAILY TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



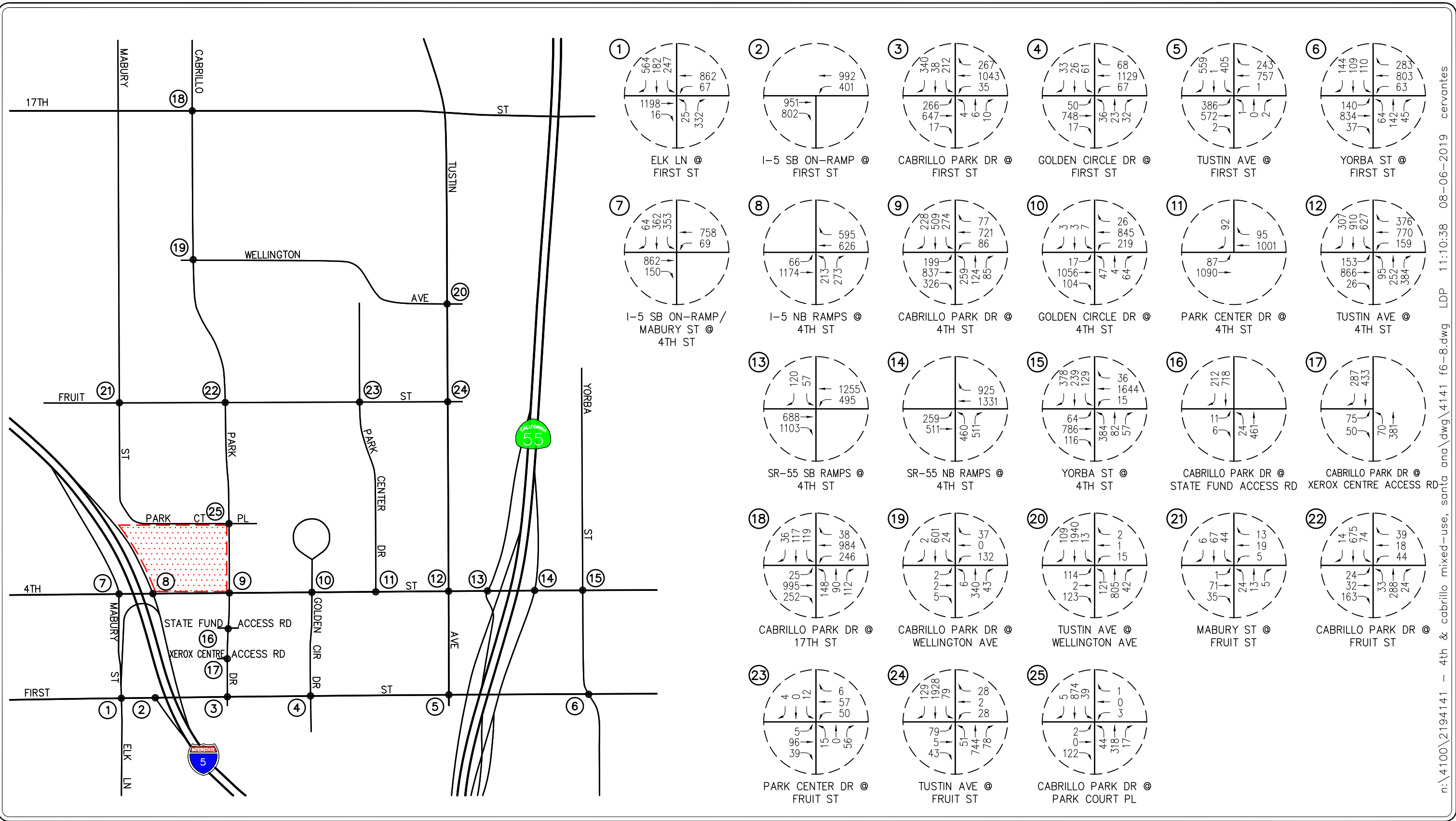


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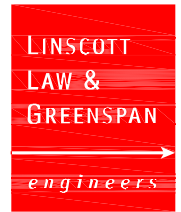
- # = STUDY INTERSECTION
- XX,XXX = STUDY ROADWAY SEGMENT
- [Red Hatched Box] = PROJECT SITE

FIGURE 6-7
YEAR 2025 CUMULATIVE PLUS PROJECT
PM PEAK HOUR AND DAILY TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

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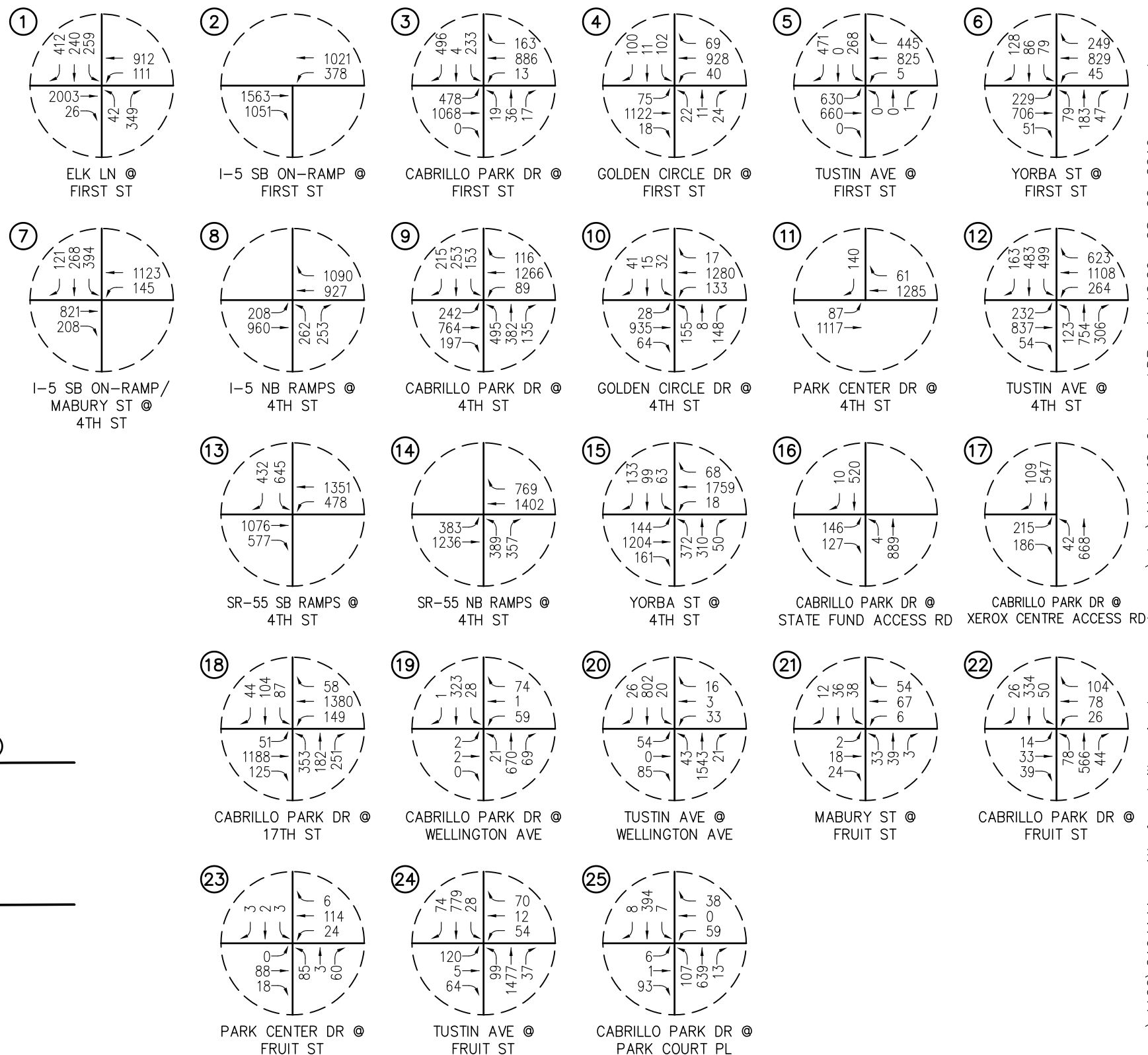
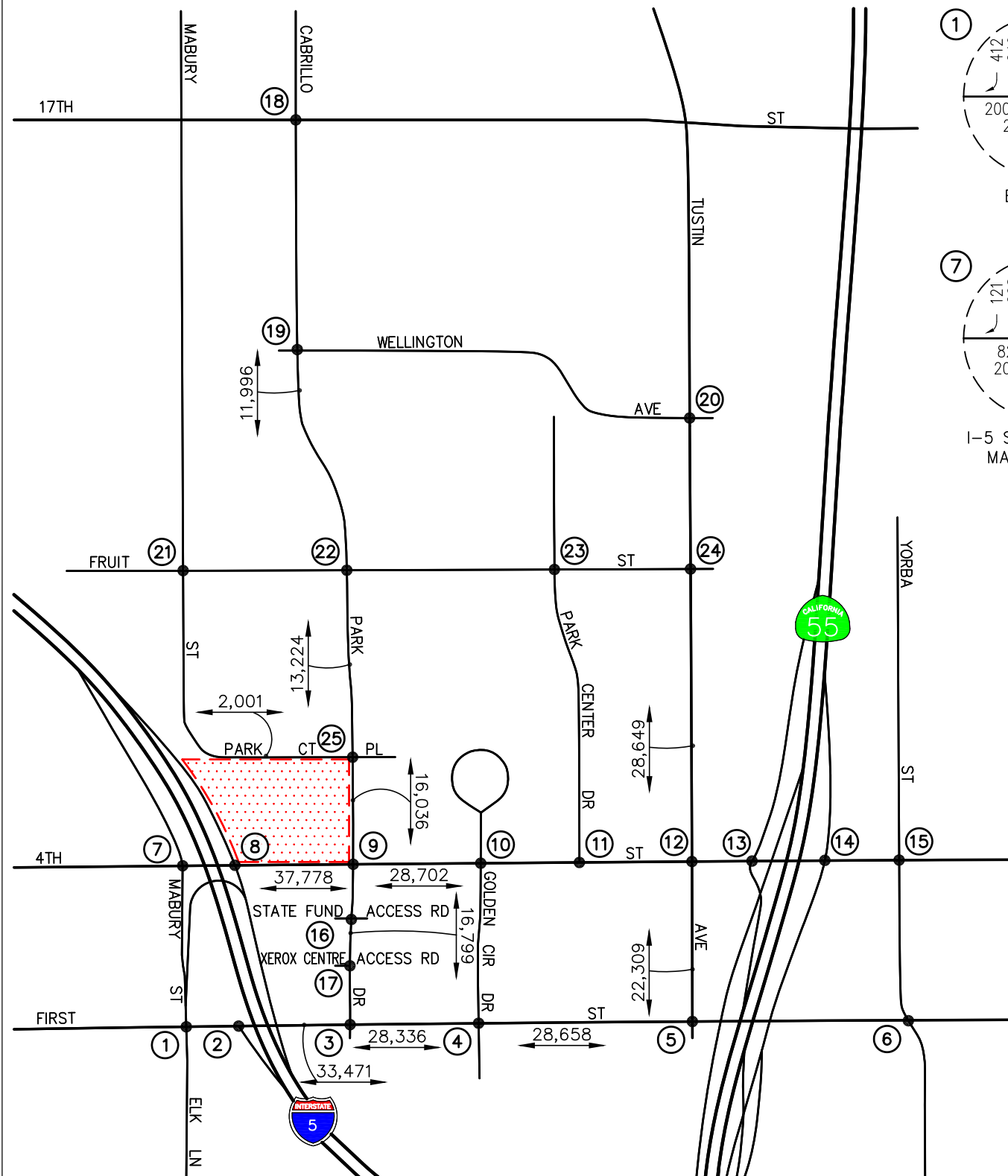
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KEY
 # = STUDY INTERSECTION
 [Red Hatched Box] = PROJECT SITE

FIGURE 6-8

YEAR 2040 BUILDOUT AM PEAK HOUR TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

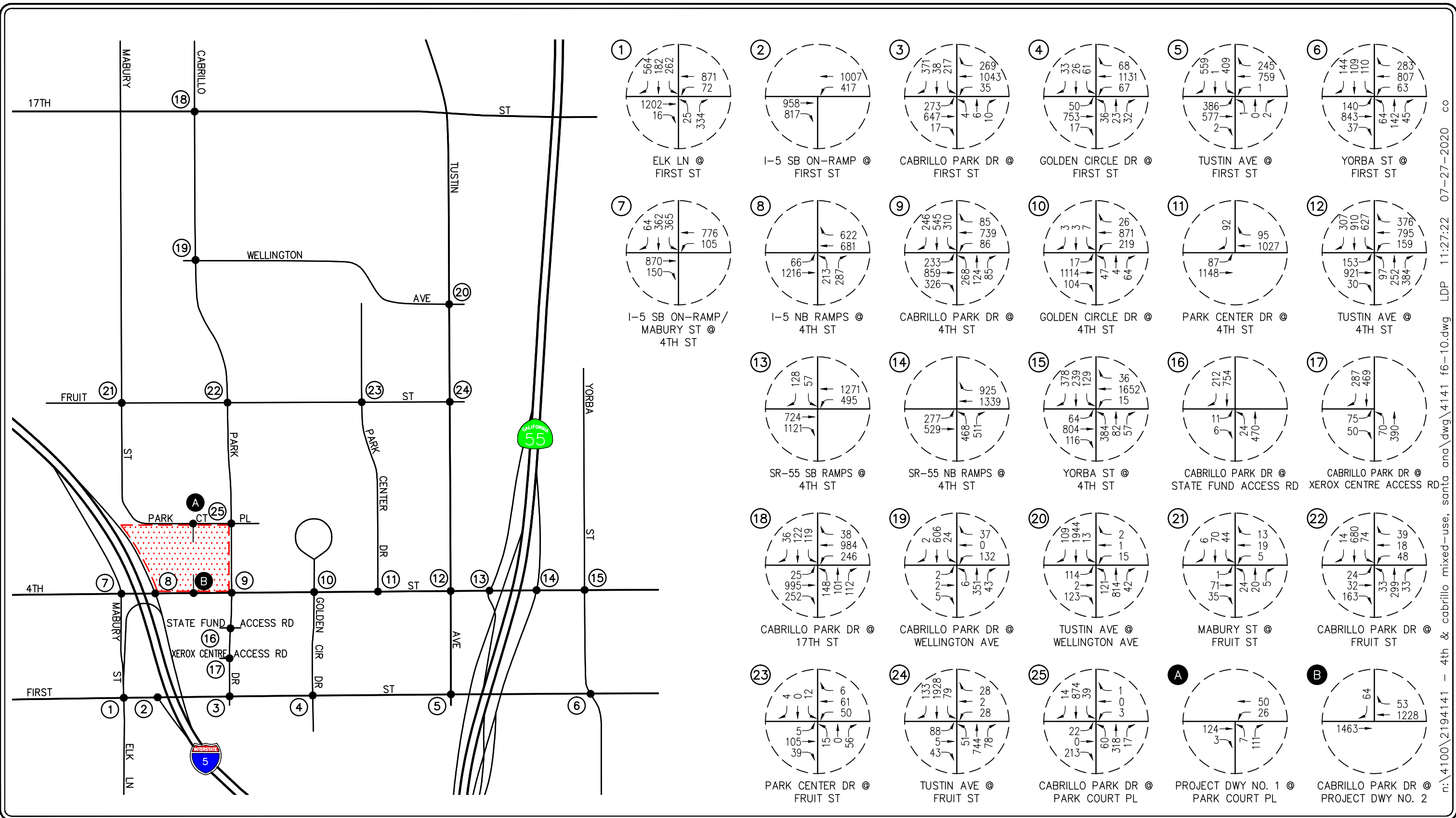


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KEY
 # = STUDY INTERSECTION
 XX,XXX = STUDY ROADWAY SEGMENT
 [Red Hatched Box] = PROJECT SITE

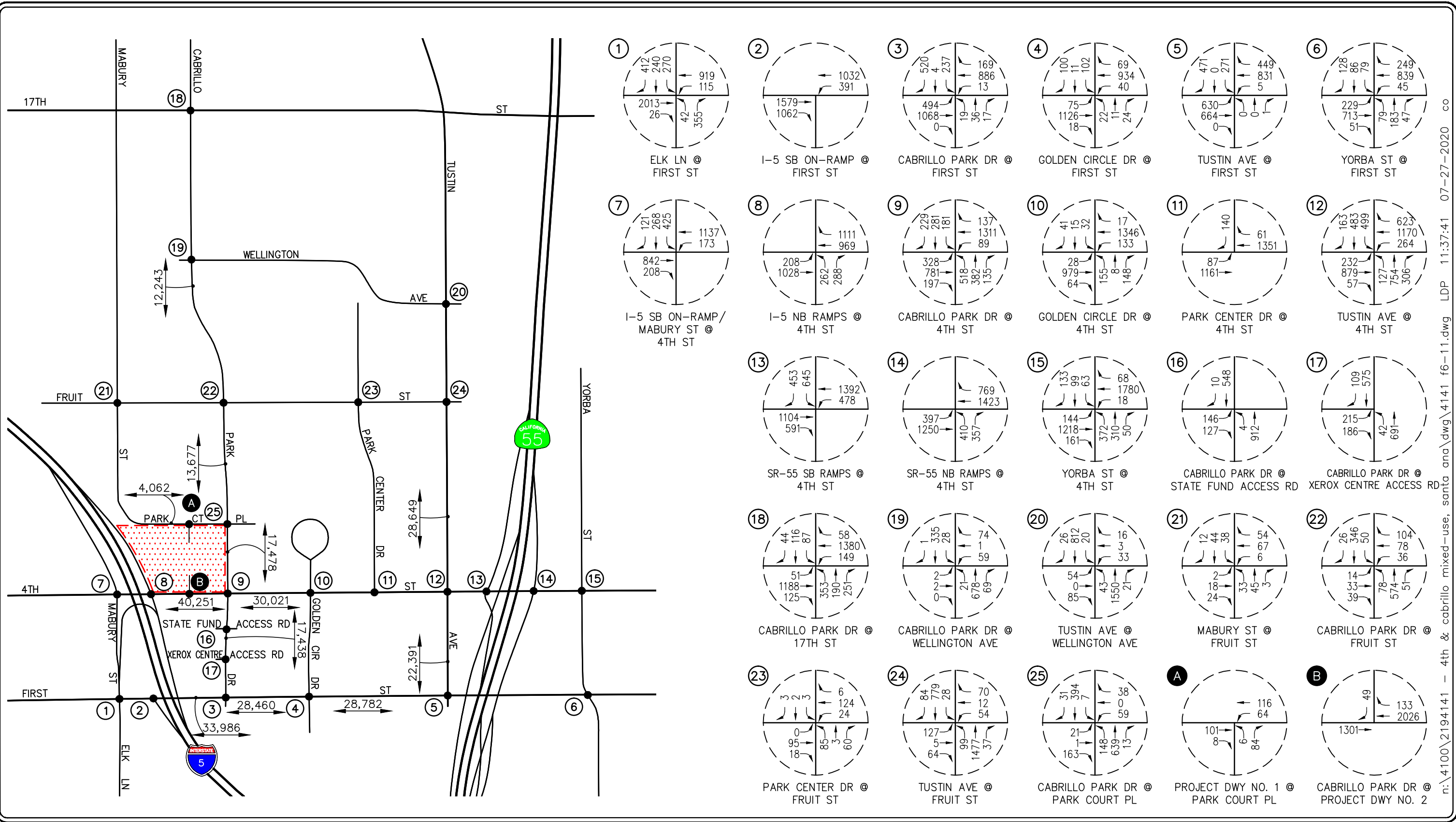
FIGURE 6-9
YEAR 2040 BUILDOUT PM PEAK HOUR
AND DAILY TRAFFIC VOLUMES
 4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA



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 LAW &
 GREENSPAN
 engineers



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7.0 TRAFFIC IMPACT ANALYSIS METHODOLOGY

The relative impact of the proposed Project during the AM peak hour and PM peak hour was evaluated based on analysis of future operating conditions at the twenty-five (25) key study intersections, without, then with, the proposed Project. The previously discussed capacity analysis procedures were utilized to investigate the future volume-to-capacity relationships and service level characteristics at each study intersection. The significance of the potential impacts of the Project at each key intersection was then evaluated using the following traffic impact criteria.

7.1 Impact Criteria and Thresholds

7.1.1 City of Santa Ana

Based on the City of Santa Ana, impacts to local and regional transportation systems are considered significant if any of the following would occur:

- Project traffic would cause an intersection currently operating at an acceptable peak hour Level of Service (LOS) to operate at an unacceptable peak hour LOS. The City of Santa Ana considers LOS D to be the minimum acceptable LOS for all intersections, except for those locations located within the City's defined major development areas, where LOS E is considered acceptable. Based on the above, the following summarizes the LOS required for each key study intersection:
 - **LOS "D" Requirements:**

1. Elk Lane at First Street	19. Cabrillo Park Drive at Wellington Avenue
2. I-5 SB On-Ramp at First Street	21. Mabury Street at Fruit Street
7. I-5 SB On-Ramp/Mabury Street at 4 th Street	22. Cabrillo Park Drive at Fruit Street
8. I-5 NB Ramps at 4 th Street	23. Park Center Drive at Fruit Street
13. SR-55 SB Ramps at 4 th Street	25. Cabrillo Park Drive at Park Court Place
18. Cabrillo Park Drive at 17 th Street	
 - **LOS "E" Requirements:**

3. Cabrillo Park Drive at First Street	12. Tustin Avenue at 4 th Street
4. Golden Circle Drive at First Street	16. Cabrillo Park Drive at State Fund Access Road
9. Cabrillo Park Drive at 4 th Street	17. Cabrillo Park Drive at Xerox Center Access Road
10. Golden Circle Drive at 4 th Street	20. Tustin Avenue at Wellington Avenue
11. Park Center Drive at 4 th Street	24. Tustin Avenue at Fruit Street
- The project increases traffic demand by 1% of capacity (ICU increase ≥ 0.01) at a signalized study intersection forecast to operate at an acceptable LOS.
- At unsignalized intersections, an impact is considered to be significant if the project causes an intersection at LOS D or better to degrade to LOS E or F and the traffic signal warrant analysis determines that a signal is justified.

7.1.2 City of Tustin

For those study intersections within the jurisdiction of the City of Tustin, impacts to local and regional transportation systems are considered significant if:

- An unacceptable peak hour Level of Service (LOS) at any of the key intersections is projected. The City of Tustin considers LOS D to be the minimum acceptable condition that should be maintained during the peak commute hours. For this analysis, if the project increases traffic demand at the study intersection by 1% of capacity (ICU increase ≥ 0.010), causing or worsening LOS E or F (ICU > 0.901), the impact is considered significant.

7.2 Traffic Impact Analysis Scenarios

The following scenarios are those for which volume/capacity calculations have been performed at the twenty-five (25) key intersections for existing plus project, near-term (Year 2025) and long-term (Year 2040) traffic conditions:

- A. Existing Traffic Conditions;
- B. Existing Plus Project Traffic Conditions;
- C. Scenario (B) with Improvements, if necessary;
- D. Near-Term (Year 2025) Cumulative Traffic Conditions,
- E. Near-Term (Year 2025) Cumulative plus Project Traffic Conditions;
- F. Scenario (E) with Improvements, if necessary;
- G. Long-Term (Year 2040) Future Traffic Conditions;
- H. Long-Term (Year 2040) Future Traffic Conditions plus Project Traffic; and
- I. Scenario (H) with Improvements, if necessary.

8.0 PEAK HOUR INTERSECTION CAPACITY ANALYSIS

8.1 Existing Plus Project Analysis

Table 8-1 summarizes the peak hour Level of Service results at the twenty-five (25) key study intersections for existing plus project traffic conditions. The first column (1) of ICU/LOS values and HCM/LOS values in *Table 8-1* presents a summary of existing AM and PM peak hour traffic conditions (which were also presented in *Table 3-3*). The second column (2) lists existing plus project traffic conditions. The third column (3) shows the increase in ICU value and/or HCM value due to the added peak hour Project trips and indicates whether the traffic associated with the Project will have a significant impact based on the LOS standards and significant impact criteria defined in this report. The fourth column (4) presents the resultant level of service with the inclusion of recommended traffic improvements, where needed, to achieve an acceptable level of service.

8.1.1 Existing Plus Project Traffic Conditions

Review of columns (2) and (3) of *Table 8-1* indicates that traffic associated with the proposed Project will significantly impact one (1) of the twenty-five study intersections, when compared to the LOS standards and significant impact criteria specified in this report. The impacted intersection of SR-55 SB Ramps/4th Street is forecast to operate at LOS E during the AM peak hour. The remaining study intersections are forecast to operate at acceptable level of service during the AM and PM peak hours.

Review of column (4) of *Table 8-1* indicates that the implementation of recommended improvements at the intersection will help offset the Project's impact. Planned and recommended improvements are discussed in Section 11.0.

Appendix D presents the existing plus project ICU/LOS and HCM/LOS calculations for the twenty-five (25) key study intersections.

TABLE 8-1
EXISTING PLUS PROJECT PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Existing Plus Project Traffic Conditions		(3) Significant Impact		(4) Existing Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
1. Elk Lane at First Street	D	AM	0.599	A	0.604	B	0.005	No	--	--
		PM	0.716	C	0.725	C	0.009	No	--	--
2. I-5 SB On Ramp at First Street	D	AM	0.425	A	0.434	A	0.009	No	--	--
		PM	0.584	A	0.594	A	0.010	No	--	--
3. Cabrillo Park Drive at First Street	E	AM	0.450	A	0.458	A	0.008	No	--	--
		PM	0.544	A	0.558	A	0.014	No	--	--
4. Golden Circle Drive at First Street	E	AM	0.331	A	0.331	A	0.000	No	--	--
		PM	0.324	A	0.325	A	0.001	No	--	--
5. Tustin Avenue at First Street	D	AM	0.396	A	0.398	A	0.002	No	--	--
		PM	0.418	A	0.421	A	0.003	No	--	--
6. Yorba Street at First Street	D	AM	0.448	A	0.449	A	0.001	No	--	--
		PM	0.526	A	0.529	A	0.003	No	--	--
7. I-5 SB On Ramp/Mabury Street at 4 th Street	D	AM	0.357	A	0.382	A	0.025	No	--	--
		PM	0.395	A	0.399	A	0.004	No	--	--
8. I-5 NB Ramps at 4 th Street	D	AM	0.429	A	0.442	A	0.013	No	--	--
		PM	0.774	C	0.787	C	0.013	No	--	--
9. Cabrillo Park Drive at 4 th Street	E	AM	0.551	A	0.547	A	-0.004 ¹³	No	--	--
		PM	0.714	C	0.793	C	0.079	No	--	--

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

¹³ Negative V/C increase is due to Project-specific improvements as detailed in Section 11.0.

TABLE 8-1 (CONTINUED)
EXISTING PLUS PROJECT PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Existing Plus Project Traffic Conditions		(3) Significant Impact		(4) Existing Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
10. Golden Circle Drive at 4 th Street	E	AM	0.398	A	0.410	A	0.012	No	--	--
		PM	0.405	A	0.421	A	0.016	No	--	--
11. Park Center Drive at 4 th Street	E	AM	13.7 s/v	B	14.0 s/v	B	0.3 s/v	No	--	--
		PM	16.2 s/v	C	17.0 s/v	C	0.8 s/v	No	--	--
12. Tustin Avenue at 4 th Street	E	AM	0.667	B	0.667	B	0.000	No	--	--
		PM	0.738	C	0.751	C	0.013	No	--	--
13. SR-55 SB Ramps at 4 th Street	D	AM	0.978	E	0.991	E	0.013	Yes	0.521	A
		PM	0.748	C	0.761	C	0.013	No	0.706	C
14. SR-55 NB Ramps at 4 th Street	D	AM	0.670	B	0.684	B	0.014	No	--	--
		PM	0.689	B	0.705	C	0.016	No	--	--
15. Yorba Street at 4 th Street	D	AM	0.561	A	0.563	A	0.002	No	--	--
		PM	0.605	B	0.610	B	0.005	No	--	--
16. Cabrillo Park Drive at State Fund Access Road	E	AM	0.308	A	0.319	A	0.011	No	--	--
		PM	0.340	A	0.347	A	0.007	No	--	--
17. Cabrillo Park Drive at Xerox Centre Access Road	E	AM	0.271	A	0.282	A	0.011	No	--	--
		PM	0.308	A	0.315	A	0.007	No	--	--
18. Cabrillo Park Drive at 17 th Street	D	AM	0.568	A	0.571	A	0.003	No	--	--
		PM	0.611	B	0.619	B	0.008	No	--	--

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

TABLE 8-1 (CONTINUED)
EXISTING PLUS PROJECT PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Existing Plus Project Traffic Conditions		(3) Significant Impact		(4) Existing Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
19. Cabrillo Park Drive at Wellington Avenue	D	AM	17.8 s/v	C	18.2 s/v	C	0.4 s/v	No	--	--
		PM	17.9 s/v	C	18.3 s/v	C	0.4 s/v	No	--	--
20. Tustin Avenue at Wellington Avenue	E	AM	0.574	A	0.575	A	0.001	No	--	--
		PM	0.411	A	0.412	A	0.001	No	--	--
21. Mabury Street at Fruit Street	D	AM	7.7 s/v	A	7.7 s/v	A	0.0 s/v	No	--	--
		PM	7.7 s/v	A	7.7 s/v	A	0.0 s/v	No	--	--
22. Cabrillo Park Drive at Fruit Street	D	AM	12.5 s/v	B	12.7 s/v	B	0.2 s/v	No	--	--
		PM	11.5 s/v	B	11.9 s/v	B	0.4 s/v	No	--	--
23. Park Center Drive at Fruit Street	D	AM	10.3 s/v	B	10.4 s/v	B	0.1 s/v	No	--	--
		PM	10.5 s/v	B	10.6 s/v	B	0.1 s/v	No	--	--
24. Tustin Avenue at Fruit Street	E	AM	0.509	A	0.516	A	0.007	No	--	--
		PM	0.446	A	0.451	A	0.005	No	--	--
25. Cabrillo Park Drive at Park Court Place	D	AM	18.6 s/v	C	22.6 s/v	C	4.0 s/v	No	--	--
		PM	24.3 s/v	C	32.4 s/v	D	8.1 s/v	No	--	--

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

8.2 Year 2025 Traffic Conditions

Table 8-2 summarizes the peak hour Level of Service results at the twenty-five (25) key study intersections for the Year 2025 horizon year. The first column (1) of ICU/LOS and HCM/LOS values in *Table 8-2* presents a summary of existing AM and PM peak hour traffic conditions. The second column (2) lists projected cumulative traffic conditions (existing plus ambient plus related projects traffic) based on existing intersection geometry, but without any traffic generated from the proposed Project. The third column (3) presents forecast Year 2025 near-term traffic conditions with the addition of Project traffic. The fourth column (4) shows the increase in ICU value and/or HCM value due to the added peak hour Project trips and indicates whether the traffic associated with the Project will have a significant impact based on the LOS standards and significant impact criteria defined in this report. The fifth column (5) presents the resultant level of service with the inclusion of recommended traffic improvements, where needed, to achieve an acceptable level of service.

8.2.1 Year 2025 Cumulative Traffic Conditions

Review of column (2) of *Table 8-2* indicates that the addition of ambient traffic growth and related projects traffic will adversely impact two (2) of the twenty-five key study intersections. The remaining study intersections are forecast to operate at acceptable level of service during the AM and PM peak hours. The intersections forecast to operate adversely consist of the following:

<u>Key Intersection</u>	<u>AM Peak Hour</u>		<u>PM Peak Hour</u>	
	<u>ICU/HCM</u>	<u>LOS</u>	<u>ICU/HCM</u>	<u>LOS</u>
1. Elk Lane at First Street	--	--	0.921	E
13. SR-55 SB Ramps at 4 th Street	1.063	F	--	--

8.2.2 Year 2025 Cumulative Plus Project Conditions

Review of columns (3) of *Table 8-2* indicates that four (4) of the twenty-five study intersections are forecast to operate at unacceptable level of service during the AM and/or PM peak hours, based on the LOS standards and impact criteria specified in this report, with the addition of project traffic. The remaining study intersections are forecast to operate at acceptable level of service during the AM and PM peak hours. The intersections forecast to operate adversely consist of the following:

<u>Key Intersection</u>	<u>AM Peak Hour</u>		<u>PM Peak Hour</u>	
	<u>ICU/HCM</u>	<u>LOS</u>	<u>ICU/HCM</u>	<u>LOS</u>
1. Elk Lane at First Street	--	--	0.929	E
8. I-5 NB Ramps at 4 th Street	--	--	0.904	E
13. SR-55 SB Ramps at 4 th Street	1.074	F	--	--
25. Cabrillo Park Drive at Park Court Place	--	--	45.9 s/v	E

Review of column (4) of *Table 8-2* indicates that two (2) intersections are significantly impacted by the Project under Year 2025 Cumulative Plus Project traffic conditions, which include I-5 NB Ramps/4th Street and SR-55 SB Ramps/4th Street. Review of column (5) indicates that the implementation of planned and/or recommended improvements at the intersections will help offset the Project's impact. Planned and recommended improvements are discussed in Section 11.0.

Although the intersection of Elk Lane/First Street operates adversely during the PM peak hour, the proposed Project adds less than 0.010 increment to the ICU value and is therefore not considered significantly impacted based on the LOS standards and impact criteria specified in this report.

Although Cabrillo Park Drive/Park Court Place operates adversely during the PM peak hour, a traffic signal is not warranted during the PM peak hour and therefore the intersection is not considered significantly impacted based on the LOS standards and impact criteria specified in this report. However, a traffic signal is warranted during the AM peak hour and therefore it is recommended to implement improvements at the intersection to help achieve acceptable level of service. Review of column (5) indicates that the installation of a two-phase traffic signal at this intersection would help improve the intersection and result in an acceptable level of service. It should be noted that the installation of a two-phase traffic signal would be in place of previously identified improvements at the intersection (i.e. median diverters to prohibit cross-traffic) as documented in the *Traffic Impact Study for the Metro East Overlay Zone in the City of Santa Ana*.

Appendix D also presents the near-term ICU/LOS and HCM/LOS calculations for the twenty-five (25) key study intersections. *Appendix H* presents the signal warrant worksheets for the intersection of Cabrillo Park Drive/Park Court Place.

TABLE 8-2
YEAR 2025 CUMULATIVE PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Year 2025 Cumulative Traffic Conditions		(3) Year 2025 Cumulative Plus Project Traffic Conditions		(4) Significant Impact		(5) Year 2025 Cumulative Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
1. Elk Lane at First Street	D	AM	0.599	A	0.748	C	0.753	C	0.005	No	--	--
		PM	0.716	C	0.921	E	0.929	E	0.008	No	--	--
2. I-5 SB On Ramp at First Street	D	AM	0.425	A	0.517	A	0.527	A	0.010	No	--	--
		PM	0.584	A	0.681	B	0.691	B	0.010	No	--	--
3. Cabrillo Park Drive at First Street	E	AM	0.450	A	0.563	A	0.571	A	0.008	No	--	--
		PM	0.544	A	0.716	C	0.730	C	0.014	No	--	--
4. Golden Circle Drive at First Street	E	AM	0.331	A	0.384	A	0.385	A	0.001	No	--	--
		PM	0.324	A	0.381	A	0.382	A	0.001	No	--	--
5. Tustin Avenue at First Street	D	AM	0.396	A	0.487	A	0.489	A	0.002	No	--	--
		PM	0.418	A	0.476	A	0.478	A	0.002	No	--	--
6. Yorba Street at First Street	D	AM	0.448	A	0.524	A	0.525	A	0.001	No	--	--
		PM	0.526	A	0.610	B	0.613	B	0.003	No	--	--
7. I-5 SB On Ramp/Mabury Street at 4 th Street	D	AM	0.357	A	0.413	A	0.437	A	0.024	No	--	--
		PM	0.395	A	0.478	A	0.482	A	0.004	No	--	--
8. I-5 NB Ramps at 4 th Street	D	AM	0.429	A	0.482	A	0.495	A	0.013	No	0.495	A
		PM	0.774	C	0.891	D	0.904	E	0.013	Yes	0.573	A
9. Cabrillo Park Drive at 4 th Street	E	AM	0.551	A	0.633	B	0.620	B	-0.013 ¹⁴	No	--	--
		PM	0.714	C	0.817	D	0.881	D	0.064	No	--	--

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

¹⁴ Negative V/C increase is due to Project-specific improvements as detailed in Section 11.0.

TABLE 8-2 (CONTINUED)
YEAR 2025 CUMULATIVE PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Year 2025 Cumulative Traffic Conditions		(3) Year 2025 Cumulative Plus Project Traffic Conditions		(4) Significant Impact		(5) Year 2025 Cumulative Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
10. Golden Circle Drive at 4 th Street	E	AM	0.398	A	0.447	A	0.459	A	0.012	No	--	--
		PM	0.405	A	0.469	A	0.483	A	0.014	No	--	--
11. Park Center Drive at 4 th Street	E	AM	13.7 s/v	B	15.6 s/v	C	15.8 s/v	C	0.2 s/v	No	--	--
		PM	16.2 s/v	C	20.9 s/v	C	22.2 s/v	C	1.3 s/v	No	--	--
12. Tustin Avenue at 4 th Street	E	AM	0.667	B	0.779	C	0.785	C	0.006	No	--	--
		PM	0.738	C	0.843	D	0.856	D	0.013	No	--	--
13. SR-55 SB Ramps at 4 th Street	D	AM	0.978	E	1.063	F	1.074	F	0.011	Yes	0.610	B
		PM	0.748	C	0.834	D	0.847	D	0.013	No	0.810	D
14. SR-55 NB Ramps at 4 th Street	D	AM	0.670	B	0.771	C	0.785	C	0.014	No	--	--
		PM	0.689	B	0.802	D	0.818	D	0.016	No	--	--
15. Yorba Street at 4 th Street	D	AM	0.561	A	0.614	B	0.616	B	0.002	No	--	--
		PM	0.605	B	0.664	B	0.668	B	0.004	No	--	--
16. Cabrillo Park Drive at State Fund Access Road	E	AM	0.308	A	0.347	A	0.359	A	0.012	No	--	--
		PM	0.340	A	0.386	A	0.393	A	0.007	No	--	--
17. Cabrillo Park Drive at Xerox Centre Access Road	E	AM	0.271	A	0.350	A	0.362	A	0.012	No	--	--
		PM	0.308	A	0.398	A	0.400	A	0.002	No	--	--
18. Cabrillo Park Drive at 17 th Street	D	AM	0.568	A	0.624	B	0.628	B	0.004	No	--	--
		PM	0.611	B	0.697	B	0.705	C	0.008	No	--	--

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

TABLE 8-2 (CONTINUED)
YEAR 2025 CUMULATIVE PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Year 2025 Cumulative Traffic Conditions		(3) Year 2025 Cumulative Plus Project Traffic Conditions		(4) Significant Impact		(5) Year 2025 Cumulative Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
19. Cabrillo Park Drive at Wellington Avenue	D	AM	17.8 s/v	C	22.0 s/v	C	22.6 s/v	C	0.6 s/v	No	--	--
		PM	17.9 s/v	C	21.7 s/v	C	22.2 s/v	C	0.5 s/v	No	--	--
20. Tustin Avenue at Wellington Avenue	E	AM	0.574	A	0.612	B	0.613	B	0.001	No	--	--
		PM	0.411	A	0.443	A	0.445	A	0.002	No	--	--
21. Mabury Street at Fruit Street	D	AM	7.7 s/v	A	7.8 s/v	A	7.8 s/v	A	0.0 s/v	No	--	--
		PM	7.7 s/v	A	7.7 s/v	A	7.8 s/v	A	0.1 s/v	No	--	--
22. Cabrillo Park Drive at Fruit Street	D	AM	12.5 s/v	B	13.9 s/v	B	14.2 s/v	B	0.3 s/v	No	--	--
		PM	11.5 s/v	B	12.9 s/v	B	13.3 s/v	B	0.4 s/v	No	--	--
23. Park Center Drive at Fruit Street	D	AM	10.3 s/v	B	10.5 s/v	B	10.6 s/v	B	0.1 s/v	No	--	--
		PM	10.5 s/v	B	10.7 s/v	B	10.8 s/v	B	0.1 s/v	No	--	--
24. Tustin Avenue at Fruit Street	E	AM	0.509	A	0.543	A	0.550	A	0.007	No	--	--
		PM	0.446	A	0.480	A	0.485	A	0.005	No	--	--
25. Cabrillo Park Drive at Park Court Place	D	AM	18.6 s/v	C	21.4 s/v	C	26.6 s/v	D	5.9 s/v	No	0.487	A ¹⁵
		PM	24.3 s/v	C	31.7 s/v	D	45.9 s/v	E	6.6 s/v	No	0.414	A ¹⁵

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

¹⁵ Although the intersection is not considered significantly impacted, it is forecast to operate at unacceptable level of service. Therefore, recommended mitigation measures have been included in this analysis for informational purposes. Recommended mitigation includes the installation of a two-phase traffic signal.

8.3 Year 2040 Traffic Conditions

Table 8-3 summarizes the peak hour Level of Service results at the twenty-five (25) key study intersections for the Year 2040. The first column (1) of ICU/LOS and HCM/LOS values in *Table 8-3* presents a summary of existing AM and PM peak hour traffic conditions. The second column (2) lists projected Year 2040 long-term traffic conditions based on existing intersection geometry, but without any traffic generated from the proposed Project. The third column (3) presents forecast Year 2040 long-term traffic conditions with the addition of Project traffic. The fourth column (4) shows the increase in ICU value and/or HCM value due to the added peak hour Project trips and indicates whether the traffic associated with the Project will have a significant impact based on the LOS standards and significant impact criteria defined in this report. The fifth column (5) presents the resultant level of service with the inclusion of recommended traffic improvements, where needed, to achieve an acceptable level of service.

8.3.1 Year 2040 Traffic Conditions

Review of column (2) of *Table 8-3* indicates that projected long-term (Year 2040) without project traffic will adversely impact four (4) of the twenty-five key study intersections. The remaining study intersections are forecast to operate at acceptable level of service during the AM and PM peak hours. The intersections forecast to operate adversely consist of the following:

<u>Key Intersection</u>	<u>AM Peak Hour</u>		<u>PM Peak Hour</u>	
	<u>ICU/HCM</u>	<u>LOS</u>	<u>ICU/HCM</u>	<u>LOS</u>
1. Elk Lane at First Street	--	--	0.964	E
8. I-5 NB Ramps at 4 th Street	--	--	0.960	E
13. SR-55 SB Ramps at 4 th Street	1.111	F	0.934	E
25. Cabrillo Park Drive at Park Court Place	--	--	37.2 s/v	E

8.3.2 Year 2040 Plus Project Traffic Conditions

Review of columns (3) of *Table 8-3* indicates that four (4) of the twenty-five study intersections are forecast to operate at unacceptable level of service during the AM and/or PM peak hours, based on the LOS standards and impact criteria specified in this report, with the addition of project traffic. The remaining study intersections are forecast to operate at acceptable level of service during the AM and PM peak hours. The intersections forecast to operate adversely consist of the following:

<u>Key Intersection</u>	<u>AM Peak Hour</u>		<u>PM Peak Hour</u>	
	<u>ICU/HCM</u>	<u>LOS</u>	<u>ICU/HCM</u>	<u>LOS</u>
1. Elk Lane at First Street	--	--	0.972	E
8. I-5 NB Ramps at 4 th Street	--	--	0.973	E
13. SR-55 SB Ramps at 4 th Street	1.123	F	0.948	E
25. Cabrillo Park Drive at Park Court Place	--	--	56.9 s/v	F

Review of column (4) of *Table 8-3* indicates that two (2) intersections are significantly impacted by the Project under Year 2040 Buildout Plus Project traffic conditions, which include I-5 NB Ramps/4th Street and SR-55 SB Ramps/4th Street. Review of column (5) indicates that the implementation of planned and/or recommended improvements at the intersections will help offset the Project's impact. Planned and recommended improvements are discussed in Section 11.0.

Although the intersection of Elk Lane/First Street operates adversely during the PM peak hour, the proposed Project adds less than 0.010 increment to the ICU value and is therefore not considered significantly impacted based on the LOS standards and impact criteria specified in this report.

Although Cabrillo Park Drive/Park Court Place operates adversely during the PM peak hour, a traffic signal is not warranted during the PM peak hour and therefore the intersection is not considered significantly impacted based on the LOS standards and impact criteria specified in this report. However, a traffic signal is warranted during the AM peak hour and therefore it is recommended to implement improvements at the intersection to help achieve acceptable level of service. Review of column (5) indicates that the installation of a two-phase traffic signal at this intersection would help improve the intersection and result in an acceptable level of service. It should be noted that the installation of a two-phase traffic signal would be in place of previously identified improvements at the intersection (i.e. median diverters to prohibit cross-traffic) as documented in the *Traffic Impact Study for the Metro East Overlay Zone in the City of Santa Ana*.

Appendix D also presents the long-term ICU/LOS and HCM/LOS calculations for the twenty-five (25) key study intersections. *Appendix H* presents the signal warrant worksheets for the intersection of Cabrillo Park Drive/Park Court Place.

TABLE 8-3
YEAR 2040 BUILDOUT PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Year 2040 Buildout Traffic Conditions		(3) Year 2040 Buildout Plus Project Traffic Conditions		(4) Significant Impact		(5) Year 2040 Buildout Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
1. Elk Lane at First Street	D	AM	0.599	A	0.785	C	0.791	A	0.006	No	--	--
		PM	0.716	C	0.964	E	0.972	E	0.008	No	--	--
2. I-5 SB On Ramp at First Street	D	AM	0.425	A	0.541	A	0.550	A	0.009	No	--	--
		PM	0.584	A	0.713	C	0.722	C	0.009	No	--	--
3. Cabrillo Park Drive at First Street	E	AM	0.450	A	0.652	B	0.660	B	0.008	No	--	--
		PM	0.544	A	0.750	C	0.764	C	0.014	No	--	--
4. Golden Circle Drive at First Street	E	AM	0.331	A	0.403	A	0.404	A	0.001	No	--	--
		PM	0.324	A	0.390	A	0.391	A	0.001	No	--	--
5. Tustin Avenue at First Street	D	AM	0.396	A	0.506	A	0.508	A	0.002	No	--	--
		PM	0.418	A	0.557	A	0.559	A	0.002	No	--	--
6. Yorba Street at First Street	D	AM	0.448	A	0.626	B	0.628	B	0.002	No	--	--
		PM	0.526	A	0.684	B	0.686	B	0.002	No	--	--
7. I-5 SB On Ramp/Mabury Street at 4 th Street	D	AM	0.357	A	0.432	A	0.457	A	0.025	No	--	--
		PM	0.395	A	0.503	A	0.517	A	0.014	No	--	--
8. I-5 NB Ramps at 4 th Street	D	AM	0.429	A	0.528	A	0.541	A	0.013	No	0.541	A
		PM	0.774	C	0.960	E	0.973	E	0.013	Yes	0.626	B
9. Cabrillo Park Drive at 4 th Street	E	AM	0.551	A	0.669	B	0.661	B	-0.008 ¹⁶	No	--	--
		PM	0.714	C	0.846	D	0.915	E	0.069	No	--	--

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

¹⁶ Negative V/C increase is due to Project-specific improvements as detailed in Section 11.0.

TABLE 8-3 (CONTINUED)
YEAR 2040 BUILDOUT PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Year 2040 Buildout Traffic Conditions		(3) Year 2040 Buildout Plus Project Traffic Conditions		(4) Significant Impact		(5) Year 2040 Buildout Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
10. Golden Circle Drive at 4 th Street	E	AM	0.398	A	0.466	A	0.478	A	0.012	No	--	--
		PM	0.405	A	0.490	A	0.503	A	0.013	No	--	--
11. Park Center Drive at 4 th Street	E	AM	13.7 s/v	B	16.2 s/v	C	16.5 s/v	C	0.3 s/v	No	--	--
		PM	16.2 s/v	C	22.7 s/v	C	24.3 s/v	C	1.6 s/v	No	--	--
12. Tustin Avenue at 4 th Street	E	AM	0.667	B	0.820	D	0.826	D	0.006	No	--	--
		PM	0.738	C	0.961	E	0.961	E	0.000	No	--	--
13. SR-55 SB Ramps at 4 th Street	D	AM	0.978	E	1.111	F	1.123	F	0.012	Yes	0.635	B
		PM	0.748	C	0.934	E	0.948	E	0.014	Yes	0.903	E
14. SR-55 NB Ramps at 4 th Street	D	AM	0.670	B	0.835	D	0.849	D	0.014	No	--	--
		PM	0.689	B	0.851	D	0.890	D	0.039	No	--	--
15. Yorba Street at 4 th Street	D	AM	0.561	A	0.752	C	0.754	C	0.002	No	--	--
		PM	0.605	B	0.715	C	0.719	C	0.004	No	--	--
16. Cabrillo Park Drive at State Fund Access Road	E	AM	0.308	A	0.362	A	0.374	A	0.012	No	--	--
		PM	0.340	A	0.403	A	0.409	A	0.006	No	--	--
17. Cabrillo Park Drive at Xerox Centre Access Road	E	AM	0.271	A	0.366	A	0.377	A	0.011	No	--	--
		PM	0.308	A	0.408	A	0.417	A	0.009	No	--	--
18. Cabrillo Park Drive at 17 th Street	D	AM	0.568	A	0.652	B	0.655	B	0.003	No	--	--
		PM	0.611	B	0.730	C	0.737	C	0.007	No	--	--

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

TABLE 8-3 (CONTINUED)
YEAR 2040 BUILDOUT PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Minimum Acceptable LOS	Time Period	(1) Existing Traffic Conditions		(2) Year 2040 Buildout Traffic Conditions		(3) Year 2040 Buildout Plus Project Traffic Conditions		(4) Significant Impact		(5) Year 2040 Buildout Plus Project Plus Improvements Traffic Conditions	
			ICU/HCM	LOS	ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No	ICU/HCM	LOS
19. Cabrillo Park Drive at Wellington Avenue	D	AM	17.8 s/v	C	24.4 s/v	C	25.2 s/v	D	0.8 s/v	No	--	--
		PM	17.9 s/v	C	24.1 s/v	C	24.7 s/v	C	0.6 s/v	No	--	--
20. Tustin Avenue at Wellington Avenue	E	AM	0.574	A	0.640	B	0.641	B	0.001	No	--	--
		PM	0.411	A	0.462	A	0.464	A	0.002	No	--	--
21. Mabury Street at Fruit Street	D	AM	7.7 s/v	A	7.8 s/v	A	7.8 s/v	A	0.0 s/v	No	--	--
		PM	7.7 s/v	A	7.8 s/v	A	7.9 s/v	A	0.1 s/v	No	--	--
22. Cabrillo Park Drive at Fruit Street	D	AM	12.5 s/v	B	14.9 s/v	B	15.2 s/v	C	0.3 s/v	No	--	--
		PM	11.5 s/v	B	13.6 s/v	B	14.0 s/v	B	0.4 s/v	No	--	--
23. Park Center Drive at Fruit Street	D	AM	10.3 s/v	B	10.7 s/v	B	10.8 s/v	B	0.1 s/v	No	--	--
		PM	10.5 s/v	B	10.8 s/v	B	12.0 s/v	B	1.2 s/v	No	--	--
24. Tustin Avenue at Fruit Street	E	AM	0.509	A	0.577	A	0.584	A	0.007	No	--	--
		PM	0.446	A	0.502	A	0.506	A	0.004	No	--	--
25. Cabrillo Park Drive at Park Court Place	D	AM	18.6 s/v	C	23.0 s/v	C	29.2 s/v	D	7.2 s/v	No	0.514	A ¹⁷
		PM	24.3 s/v	C	37.2 s/v	E	56.9 s/v	F	9.1 s/v	No	0.423	A ¹⁷

Note:

- **Bold ICU/LOS or HCM/LOS** values indicate adverse service levels based on the Cities LOS standards.
- s/v = seconds per vehicle (delay)

¹⁷ Although the intersection is not considered significantly impacted, it is forecast to operate at unacceptable level of service. Therefore, recommended mitigation measures have been included in this analysis for informational purposes. Recommended mitigation includes the installation of a two-phase traffic signal.

9.0 STATE OF CALIFORNIA (CALTRANS) ANALYSIS

In conformance with the current Caltrans *Guide for the Preparation of Traffic Impact Studies, dated December 2002*, existing and projected peak hour operating conditions at the five (5) state-controlled study intersections within the study area have been evaluated using the *Highway Capacity Manual* operations method of analysis. These state-controlled locations include the following study intersections:

2. I-5 SB On-Ramp at First Street (City of Santa Ana/Caltrans)
7. I-5 SB On-Ramp/Mabury Street at 4th Street (City of Santa Ana/Caltrans)
8. I-5 NB Ramps at 4th Street (City of Santa Ana/Caltrans)
13. SR-55 SB Ramps at 4th Street (City of Santa Ana/Caltrans)
14. SR-55 NB Ramps at 4th Street (City of Tustin/Caltrans)

Caltrans “endeavors to maintain a target LOS at the transition between LOS “C” and LOS “D” on State highway facilities”; it does not require that LOS “D” (shall) be maintained. However, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. For this analysis, LOS D is the target level of service standard and will be utilized to assess the project impacts at the state-controlled study intersections.

The Caltrans *Guide for the Preparation of Traffic Impact Studies, dated December 2002* states that if an existing State-owned facility operates at less than the target LOS (i.e. LOS D); the existing service level should be maintained. Based on Caltrans Criteria, a Project’s impact is considered significant if the Project causes the LOS to change from an acceptable LOS (i.e., LOS D or better) to a deficient LOS (i.e. LOS E or F).

9.1 Highway Capacity Manual (HCM) Method of Analysis (Signalized Intersections)

Based on the HCM 6th Edition operations method of analysis, level of service for signalized intersections is defined in terms of control delay, which is a measure of driver discomfort, frustration, fuel consumption and lost travel time. The delay experienced by a motorist is made up of a number of factors that relate to control, geometries, traffic and incidents. Total delay is the difference between the travel time actually experienced and the reference travel time that would result during ideal conditions: in the absence of traffic control, in the absence of geometric delay, in the absence of any incidents and when there are no other vehicles on the road.

In the HCM, only the portion of total delay attributed to the control facility is quantified. This delay is called *control delay*. Control delay includes initial deceleration delay, queue move-up time, stopped delay and final acceleration delay. Specifically, LOS criteria for traffic signals are stated in terms of the average control delay per vehicle. The six qualitative categories of Level of Service that have been defined along with the corresponding HCM control delay value range for signalized intersections are shown in **Table 9-1**.

TABLE 9-1
LEVEL OF SERVICE CRITERIA FOR SIGNALIZED INTERSECTIONS (HCM)¹⁸

Level of Service (LOS)	Control Delay Per Vehicle (seconds/vehicle)	Level of Service Description
A	≤ 10.0	This level of service occurs when progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.
B	> 10.0 and ≤ 20.0	This level generally occurs with good progression, short cycle lengths, or both. More vehicles stop than with LOS A, causing higher levels of average delay.
C	> 20.0 and ≤ 35.0	Average traffic delays. These higher delays may result from fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear at this level. The number of vehicles stopping is significant at this level, though many still pass through the intersection without stopping.
D	> 35.0 and ≤ 55.0	Long traffic delays. At level D, the influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high v/c ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.
E	> 55.0 and ≤ 80.0	Very long traffic delays. This level is considered by many agencies (i.e. SANBAG) to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high v/c ratios. Individual cycle failures are frequent occurrences.
F	≥ 80.0	Severe congestion. This level, considered to be unacceptable to most drivers, often occurs with over saturation, that is, when arrival flow rates exceed the capacity of the intersection. It may also occur at high v/c ratios below 1.0 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing factors to such delay levels.

¹⁸ Source: *Highway Capacity Manual (Signalized Intersections)*.

9.2 Existing Plus Project Traffic Conditions

Table 9-2 summarizes the peak hour Level of Service results at the five (5) state-controlled study intersections for existing plus project traffic conditions. The first column (1) of HCM/LOS values in *Table 9-2* presents a summary of existing AM and PM peak hour traffic. The second column (2) lists existing plus project traffic conditions with current intersection geometry/lane configurations. The third column (3) shows the increase in delay value due to the added peak hour project trips and indicates whether the traffic associated with the Project will have a significant impact based on the significant impact criteria defined in this report. The fourth column (4) indicates the anticipated level of service with improvements, if any.

9.2.1 Existing Traffic Conditions

Review of column (1) of *Table 9-2* indicates that the intersection of SR-55 SB Ramps/4th Street currently operates at unacceptable LOS F in the AM peak hour. The remaining state-controlled study intersections currently operate at LOS C or better during the weekday AM and PM peak hours.

9.2.2 Existing Plus Project Traffic Conditions

Review of columns (2) and (3) of *Table 9-2* indicates that the intersection of SR-55 SB Ramps/4th Street will continue to operate at unacceptable LOS F in the AM peak hour with the addition of project traffic. The remaining state-controlled study intersections are forecast to operate at acceptable LOS C or better during the weekday AM and PM peak hours, with the addition of project traffic.

Although the intersection of SR-55 SB Ramps/4th Street is forecast to operate at unacceptable LOS F in the AM peak hour, the intersection is not considered significantly impacted when compared to the LOS standards and significant impact criteria specified in this report.

Appendix E presents the existing plus project HCM/LOS calculations for the state-controlled study intersections.

TABLE 9-2
EXISTING PLUS PROJECT PEAK HOUR INTERSECTION CAPACITY ANALYSIS SUMMARY - CALTRANS

Key Intersection	Time Period	(1) Existing Traffic Conditions		(2) Existing Plus Project Traffic Conditions		(3) Significant Impact	(4) Existing Plus Project Traffic Conditions with Improvements	
		HCM	LOS	HCM	LOS	Yes/No	HCM	LOS
2. I-5 SB On Ramp at First Street	AM	7.2 s/v	A	7.4 s/v	A	No	--	--
	PM	7.2 s/v	A	7.4 s/v	A	No	--	--
7. I-5 SB On Ramp/Mabury Street at 4 th street	AM	15.2 s/v	B	16.1 s/v	B	No	--	--
	PM	13.3 s/v	B	14.3 s/v	B	No	--	--
8. I-5 NB Ramps at 4 th Street	AM	8.7 s/v	A	8.6 s/v	A	No	--	--
	PM	14.2 s/v	B	14.4 s/v	B	No	--	--
13. SR-55 SB Ramps at 4 th Street	AM	147.9 s/v	F	151.8 s/v	F	No	26.8 s/v	C ¹⁹
	PM	27.2 s/v	C	27.6 s/v	C	No	24.8 s/v	C ¹⁹
14. SR-55 NB Ramps at 4 th Street	AM	24.8 s/v	C	25.6 s/v	C	No	--	--
	PM	20.0 s/v	B	20.7 s/v	C	No	--	--

Note:

- **Bold HCM/LOS** values indicate adverse service levels based on the Caltrans LOS standards.
- s/v = seconds per vehicle (delay)

¹⁹ Although the intersection is not considered a significant impact based on Caltrans criteria, level of service results at the intersection with the implementation of improvements discussed in Section 11.0 have been included for informational purposes.

9.3 Year 2025 Traffic Conditions

Table 9-3 summarizes the peak hour Level of Service results at the at the five (5) state-controlled study intersections for the Year 2025 horizon year. The first column (1) of HCM/LOS values in *Table 9-3* presents a summary of existing AM and PM peak hour traffic conditions. The second column (2) lists future Year 2025 cumulative traffic conditions (existing plus ambient growth traffic plus cumulative projects traffic), without any traffic generated by the proposed Project. The third column (3) presents future forecast traffic conditions with the addition of traffic generated by the proposed Project. The fourth column (4) shows the increase in delay value due to the added peak hour project trips and indicates whether the traffic associated with the Project will have a significant impact based on the LOS standards and significant impact criteria defined in this report. The fifth column (5) indicates the anticipated level of service with improvements, if any.

9.3.1 Year 2025 Cumulative Traffic Conditions

Review of Column (2) of *Table 9-3* indicates that the intersection of SR-55 SB Ramps/4th Street is forecast to operate at unacceptable LOS F in the AM peak hour. The remaining state-controlled study intersections are forecast to operate at LOS C or better during the weekday AM and PM peak hours.

9.3.2 Year 2025 Cumulative Plus Project Traffic Conditions

Review of columns (3) and (4) of *Table 9-3* indicates that the intersection of SR-55 SB Ramps/4th Street will continue to operate at unacceptable LOS F in the AM peak hour with the addition of project traffic. The remaining state-controlled study intersections are forecast to operate at acceptable LOS C or better during the weekday AM and PM peak hours, with the addition of project traffic.

Although the intersection of SR-55 SB Ramps/4th Street is forecast to operate at unacceptable LOS F in the AM peak hour, the intersection is not considered significantly impacted when compared to the LOS standards and significant impact criteria specified in this report.

Appendix E presents the Year 2025 HCM/LOS calculations for the state-controlled study intersections.

TABLE 9-3

YEAR 2025 CUMULATIVE PEAK HOUR INTERSECTION CAPACITY ANALYSIS SUMMARY - CALTRANS

Key Intersection	Time Period	(1) Existing Traffic Conditions		(2) Year 2025 Cumulative Traffic Conditions		(3) Year 2025 Cumulative Plus Project Traffic Conditions		(4) Significant Impact Yes/No	(5) Year 2025 Cumulative Plus Project Traffic Conditions with Improvements	
		HCM	LOS	HCM	LOS	HCM	LOS		HCM	LOS
2. I-5 SB On Ramp at First Street	AM	7.2 s/v	A	7.7 s/v	A	8.0 s/v	A	No	--	--
	PM	7.2 s/v	A	8.3 s/v	A	8.6 s/v	A	No	--	--
7. I-5 SB On Ramp/Mabury Street at 4 th street	AM	15.2 s/v	B	15.6 s/v	B	16.4 s/v	B	No	--	--
	PM	13.3 s/v	B	14.8 s/v	B	15.6 s/v	B	No	--	--
8. I-5 NB Ramps at 4 th Street	AM	8.7 s/v	A	10.0 s/v	A	9.9 s/v	A	No	9.2 s/v	A ²⁰
	PM	14.2 s/v	B	20.6 s/v	C	21.2 s/v	C	No	11.9 s/v	B ²⁰
13. SR-55 SB Ramps at 4 th Street	AM	147.9 s/v	F	156.9 s/v	F	160.7 s/v	F	No	25.7 s/v	C ²⁰
	PM	27.2 s/v	C	31.4 s/v	C	32.8 s/v	C	No	26.0 s/v	C ²⁰
14. SR-55 NB Ramps at 4 th Street	AM	24.8 s/v	C	34.7 s/v	C	36.2 s/v	D	No	--	--
	PM	20.0 s/v	B	26.8 s/v	C	29.4 s/v	C	No	--	--

Note:

- **Bold HCM/LOS** values indicate adverse service levels based on the Caltrans LOS standards.
- s/v = seconds per vehicle (delay)

²⁰ Although the intersection is not considered a significant impact based on Caltrans criteria, level of service results at the intersection with the implementation of improvements discussed in Section 11.0 have been included for informational purposes.

9.4 Year 2040 Traffic Conditions

Table 9-4 summarizes the peak hour Level of Service results at the at the five (5) state-controlled study intersections for the Year 2040 buildout year. The first column (1) of HCM/LOS values in *Table 9-4* presents a summary of existing AM and PM peak hour traffic conditions. The second column (2) lists future Year 2040 buildout traffic conditions, without any traffic generated by the proposed Project. The third column (3) presents future forecast traffic conditions with the addition of traffic generated by the proposed Project. The fourth column (4) shows the increase in delay value due to the added peak hour project trips and indicates whether the traffic associated with the Project will have a significant impact based on the LOS standards and significant impact criteria defined in this report. The fifth column (5) indicates the anticipated level of service with improvements, if any.

9.4.1 Year 2040 Buildout Traffic Conditions

Review of Column (2) of *Table 9-4* indicates that the intersection of SR-55 SB Ramps/4th Street is forecast to operate at unacceptable LOS F in the AM peak hour. The remaining state-controlled study intersections are forecast to operate at LOS C or better during the weekday AM and PM peak hours.

9.4.2 Year 2040 Buildout Plus Project Traffic Conditions

Review of columns (3) and (4) of *Table 9-4* indicates that the intersection of SR-55 SB Ramps/4th Street will continue to operate at unacceptable LOS F in the AM peak hour with the addition of project traffic. The remaining state-controlled study intersections are forecast to operate at acceptable LOS C or better during the weekday AM and PM peak hours, with the addition of project traffic.

Although the intersection of SR-55 SB Ramps/4th Street is forecast to operate at unacceptable LOS F in the AM peak hour, the intersection is not considered significantly impacted when compared to the LOS standards and significant impact criteria specified in this report.

Appendix E presents the Year 2040 HCM/LOS calculations for the state-controlled study intersections.

TABLE 9-4
YEAR 2040 BUILDOUT PEAK HOUR INTERSECTION CAPACITY ANALYSIS SUMMARY - CALTRANS

Key Intersection	Time Period	(1) Existing Traffic Conditions		(2) Year 2040 Buildout Traffic Conditions		(3) Year 2040 Buildout Plus Project Traffic Conditions		(4) Significant Impact Yes/No	(5) Year 2040 Buildout Plus Project Traffic Conditions with Improvements	
		HCM	LOS	HCM	LOS	HCM	LOS		HCM	LOS
2. I-5 SB On Ramp at First Street	AM	7.2 s/v	A	7.9 s/v	A	8.1 s/v	A	No	--	--
	PM	7.2 s/v	A	8.9 s/v	A	9.2 s/v	A	No	--	--
7. I-5 SB On Ramp/Mabury Street at 4 th street	AM	15.2 s/v	B	16.6 s/v	B	17.6 s/v	B	No	--	--
	PM	13.3 s/v	B	16.8 s/v	B	17.4 s/v	B	No	--	--
8. I-5 NB Ramps at 4 th Street	AM	8.7 s/v	A	10.2 s/v	B	10.2 s/v	B	No	9.4 s/v	A ²¹
	PM	14.2 s/v	B	28.1 s/v	C	29.1 s/v	C	No	13.8 s/v	B ²¹
13. SR-55 SB Ramps at 4 th Street	AM	147.9 s/v	F	170.3 s/v	F	174.1 s/v	F	No	25.4 s/v	C ²¹
	PM	27.2 s/v	C	39.7 s/v	D	41.7 s/v	D	No	32.2 s/v	C ²¹
14. SR-55 NB Ramps at 4 th Street	AM	24.8 s/v	C	48.2 s/v	D	50.6 s/v	D	No	--	--
	PM	20.0 s/v	B	34.7 s/v	C	37.0 s/v	D	No	--	--

Note:

- **Bold HCM/LOS** values indicate adverse service levels based on the Caltrans LOS standards.
- s/v = seconds per vehicle (delay)

²¹ Although the intersection is not considered a significant impact based on Caltrans criteria, level of service results at the intersection with the implementation of improvements discussed in Section 11.0 have been included for informational purposes.

10.0 SITE ACCESS AND INTERNAL CIRCULATION EVALUATION

10.1 Site Access

Access to the proposed Project will be provided via one (1) full access unsignalized driveway along Park Court Place and one (1) right in/out only driveway located along 4th Street.

Table 10-1 summarizes the intersection level of service results for the two (2) proposed Project driveways under near-term (Year 2025) and long-term (Year 2040) traffic conditions at completion and full occupancy of the proposed Project. As shown, these key study intersections are forecast to operate at LOS D or better during the AM peak hour and PM peak hour.

Appendix F presents the near-term and long-term HCM/LOS calculations for the two (2) Project driveways.

10.2 Queuing Analysis

A queuing assessment has been completed to validate the driveway locations and egress from the site. In addition, as a result of the recommended improvements in Section 11.0, which identifies a second westbound right turn lane at I-5 NB Ramps/4th Street, the queueing analysis includes additional recommended improvements to help with existing congestion at Cabrillo Park Drive/4th Street. This evaluation is based on *Synchro 10.0 SimTraffic* 95th Percentile methodology.

10.2.1 Year 2040 Buildout Plus Project Traffic Conditions

Table 10-2 presents the queueing analyses results for the AM and PM peak hours for Year 2040 Buildout Plus Project traffic conditions. Column (1) presents results for Year 2040 Buildout project traffic conditions and column (2) presents results for Year 2040 Buildout Plus Project traffic conditions with recommended improvements.

Based on field observation it is apparent that congestion occurs at Cabrillo Park Drive/4th Street as a result of vehicles trying to enter the westbound right-turn lane along 4th Street. Due to the recommended second westbound right-turn lane along 4th Street, additional improvements are recommended for the northbound approach at Cabrillo Park Drive/4th Street. The additional recommended improvements consist of the following:

- Add signage to the northbound direction along with lane line extensions to direct the motorist in the left turn lane that they can enter the inner right-turn lane for access to the I-5 NB Ramp. The northbound left/thru lane should have signage and lane extensions to direct the motorist to use the outer right-turn lane for access to the I-5 NB Ramp. These improvements are subject to the review and approval of the City of Santa Ana.

Review of Column (1) of *Table 10-2* indicates that the queues are generally adequate under Year 2040 Buildout Plus Project traffic conditions during both the AM and PM peak hours. However, the southbound right-turn lane at Cabrillo Park Drive/4th Street may exceed the storage provided. As an alternative, subject to review and approval of City staff, an option southbound through/right lane in

addition to the proposed southbound right-turn lane can be striped to provide additional queuing storage.

Review of Column (2) of *Table 10-2* indicates that with the implementation of improvements, the queues are generally adequate under Year 2040 Buildout Plus Project traffic conditions during both the AM and PM peak hours. However, the southbound right-turn lane at Cabrillo Park Drive/4th Street may exceed the storage provided. As an alternative, subject to review and approval of City staff, an option southbound through/right lane in addition to the proposed southbound right-turn lane can be striped to provide additional queuing storage. The implementation of the recommended improvements also helps to improve congestion and limit unnecessary weaving/merging of vehicles that need to enter the I-5 NB Ramp²².

However, in the event that Fourth Street experiences “spikes” in congestion during the weekday AM and PM peak hours, residents will very likely re-route themselves (self-monitor) and utilize the northern Driveway on Park Court Place instead of the driveway on Fourth Street. The intersections of Cabrillo Park Drive/Park Court Place and Cabrillo Park Drive/Fourth Street have enough capacity to accommodate the additional trips.

Appendix G presents the queuing worksheets for Year 2040 Buildout Plus Project traffic conditions.

²² Level of service results at Cabrillo Park Drive/4th Street with Improvements:
Year 2040 Buildout Plus Project: AM Peak Hour: ICU 0.674, LOS B; PM Peak Hour: ICU 0.915, LOS E

TABLE 10-1
PROJECT DRIVEWAY PEAK HOUR INTERSECTION CAPACITY ANALYSIS

Key Intersection	Intersection Control	Time Period	(1) Year 2025 Cumulative Plus Project Traffic Conditions		(2) Year 2040 Buildout Plus Project Traffic Conditions	
			HCM	LOS	HCM	LOS
A. Project Driveway 1 at Park Court Place	One-Way Stop	AM	9.5 s/v	A	9.5 s/v	A
		PM	9.3 s/v	A	9.4 s/v	A
B. Project Driveway 2 at 4 th Street	One-Way Stop	AM	16.6 s/v	C	17.2 s/v	C
		PM	29.1 s/v	D	31.6 s/v	D

Notes:

- s/v = seconds per vehicle (delay)

TABLE 10-2
YEAR 2040 BUILDOUT PEAK HOUR QUEUING ANALYSIS²³

Key Study Intersection	Storage Provided (feet)	(1) Year 2040 Buildout Plus Project Traffic Conditions				(2) Year 2040 Buildout Plus Project Traffic Conditions with Improvements			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		Max. Queue/Min. Storage Required	Adequate Storage (Yes/No)	Max. Queue/Min. Storage Required	Adequate Storage (Yes/No)	Max. Queue/Min. Storage Required	Adequate Storage (Yes/No)	Max. Queue/Min. Storage Required	Adequate Storage (Yes/No)
8. I-5 NB Ramps at 4 th Street <i>Westbound Through</i>	555'/215' ²⁴	196'	Yes	189'	Yes	204'	Yes	184'	Yes
	<i>Westbound Right-Turn</i>	555'/215' ²⁴	134'	Yes	171'	Yes	137'	Yes	188'
9. Cabrillo Park Drive at 4 th Street <i>Southbound Right-Turn</i>	100'	210'	No ²⁵	162'	No	176'	No ²⁵	126'	No ²⁵
A. Project Driveway 1 at Park Court Place <i>Northbound Left/Right-Turn</i>	90'	58'	Yes	56'	Yes	61'	Yes	60'	Yes
B. Project Driveway 2 at 4 th Street <i>Southbound Right-Turn</i>	185'	68'	Yes	79'	Yes	61'	Yes	60'	Yes

²³ Queues are based on *SimTraffic* 95th Percentile methodology.

²⁴ A storage of 555-feet is provided under existing traffic conditions while a storage of 215-feet represents the distance between the limit line and the proposed project driveway.

²⁵ Please note that a right-turn storage is 100-feet with a 60-foot transition. Alternatively, subject to review and approval of City staff, an option southbound through/right lane in addition to the proposed southbound right-turn lane can be striped to provide additional queuing storage.

10.3 Internal Circulation Evaluation

Access to the site is proposed via a right-turn in/out driveway along 4th Street. Access for small service/delivery trucks (i.e. UPS, FedEx, and trash trucks) and passenger vehicles for the Project site have been evaluated. Our evaluation of the on-site circulation shown on the Project site plan was performed using the *Turning Vehicle Templates*, developed by Jack E. Leisch & Associates and *AutoTURN for AutoCAD* computer software that simulates turning maneuvers for various types of vehicles. **Figure 10-1** illustrates the turning movements required of a small delivery truck (SU-30) as it accesses the site from 4th Street. Review of *Figure 10-1* shows overall the turning movements are considered adequate.

After reviewing the design of Project Driveway 2 along 4th Street, it has been determined that the driveway throating is considered adequate.

10.4 Sight Distance Evaluation

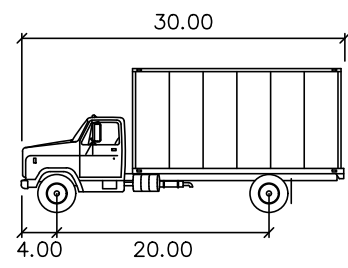
At intersections and/or project driveways, a substantially clear line of sight should be maintained between the driver of a vehicle waiting at the crossroad and the driver of an approaching vehicle. Adequate time must be provided for the waiting vehicle to either cross all lanes of through traffic, cross the near lanes and turn left, or turn right, without requiring through traffic to radically alter their speed. A sight distance evaluation has been performed for both project driveways.

The Sight Distance Evaluation prepared for the project driveways are based on the criteria and procedures set forth by the California Department of Transportation (Caltrans) in the State's *Highway Design Manual (HDM)*. Corner sight distance was utilized for the evaluation. Corner sight distance is defined in the Caltrans HDM to be the distance required by the driver of a vehicle, traveling at a given speed, to maneuver their vehicle and avoid an object without radically altering their speed. Line of sight for corner sight distance is to be determined from a 3½ foot height at the location of the driver of a vehicle on a minor road to a 4¼ foot object height in the center of the approaching lane of the major road.

Based on the criteria set forth in Table 405.1A of the Caltrans HDM and a posted speed limit of 25 mph on Park Court Place, a corner sight distance of 275 feet is required for left-turn at Project Driveway 1 and 239 feet for right-turn at Project Driveway 1.

Based on the criteria set forth in Table 405.1A of the Caltrans HDM and a posted speed limit of 40 mph on 4th Street, a corner sight distance of 382 feet is required for right-turn at Project Driveway 2.

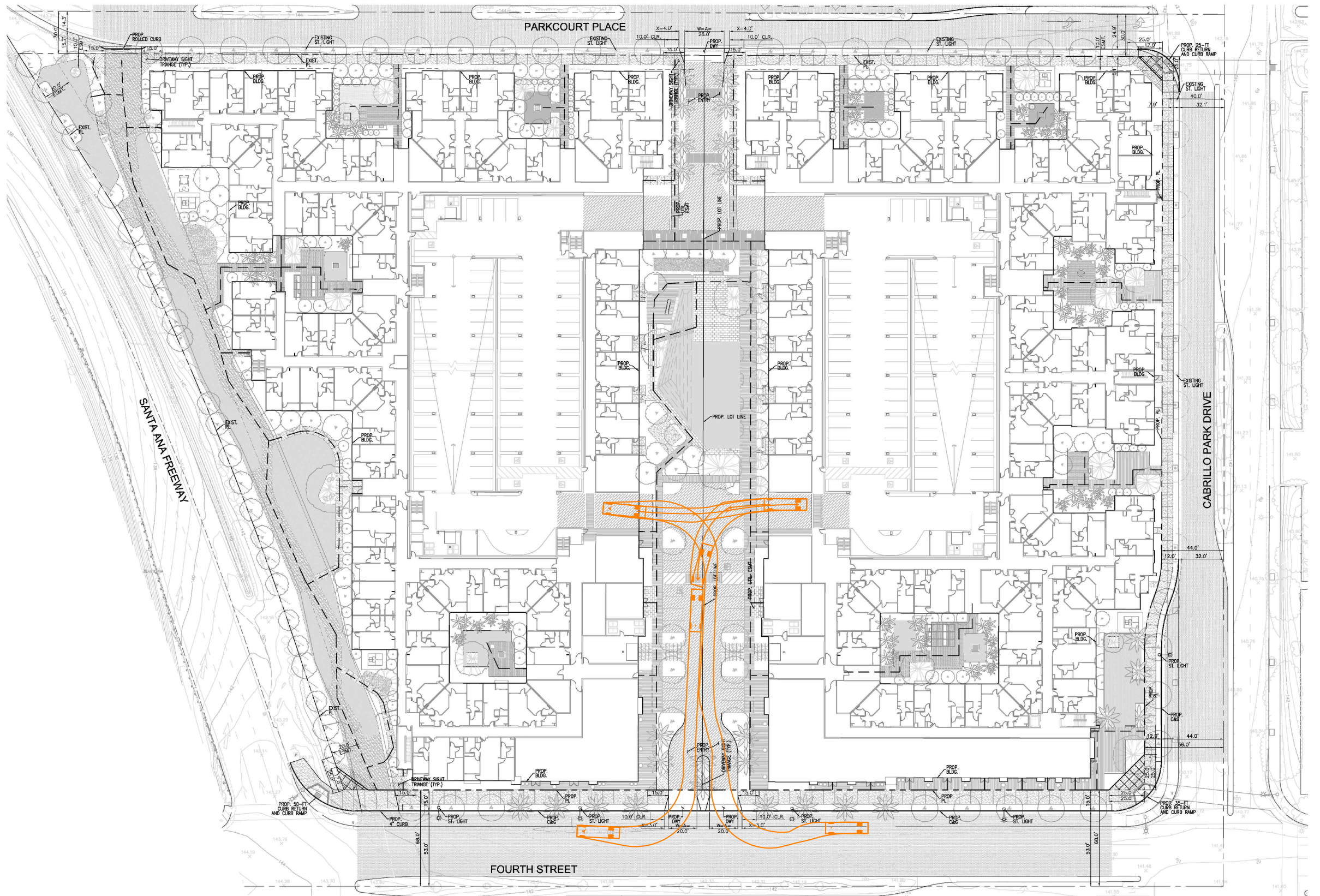
Figure 10-2 presents the results of the sight distance evaluation for the Project driveways based on the application of the corner sight distance criteria. The figure illustrates the limited use areas. As shown, the sight lines at the proposed Project driveways are expected to be adequate as long as obstructions within the sight triangles are minimized.



SU

feet

- Width : 8.00
- Track : 8.00
- Lock to Lock Time : 6.0
- Steering Angle : 31.8



SOURCE: KTG ARCHITECTS

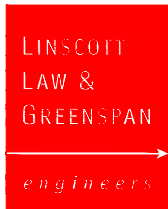



FIGURE 10-1

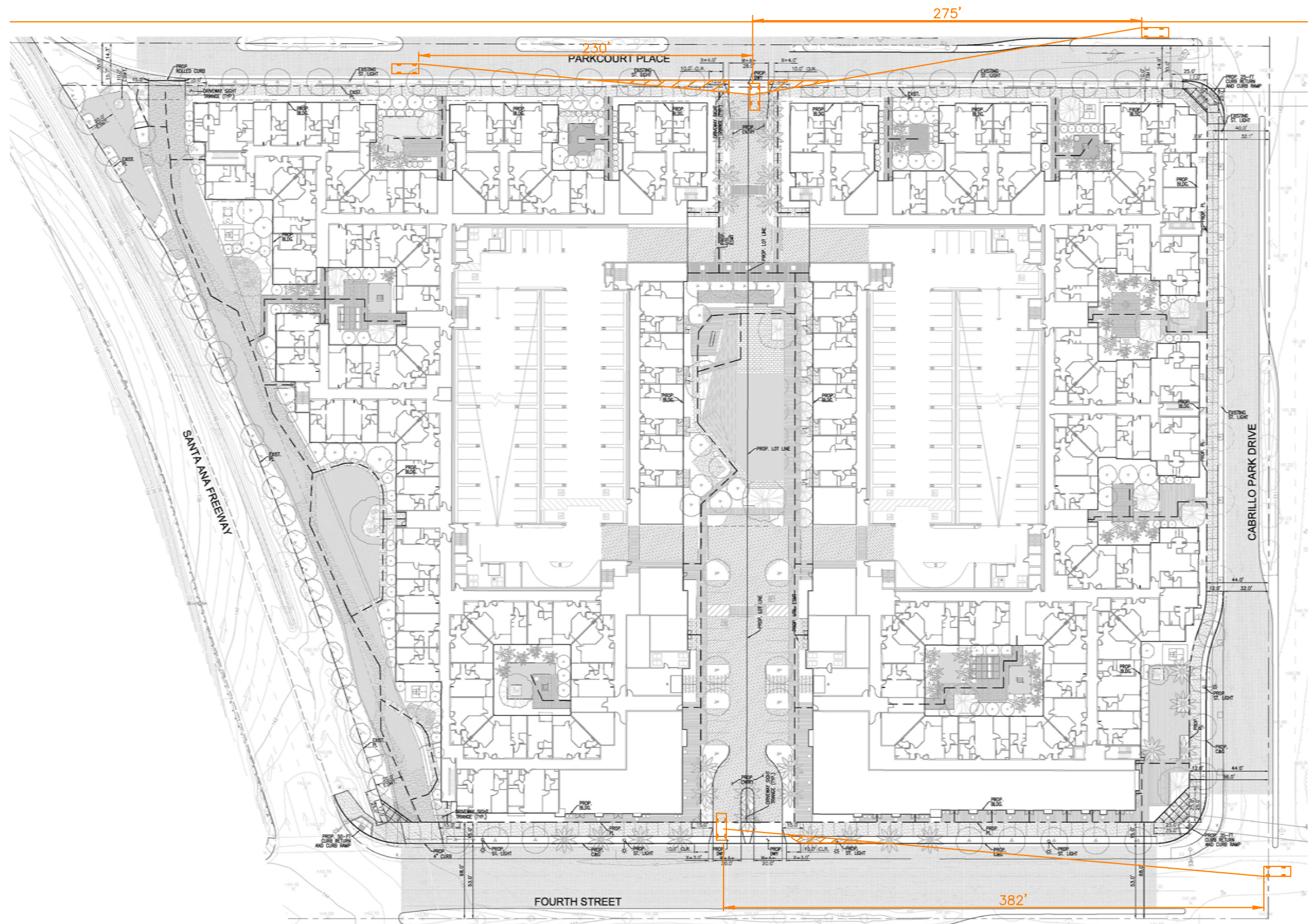
SU-30 TRUCK TURNING ANALYSIS
4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

CORNER SIGHT DISTANCE

DESIGN SPEED LIMIT:	25 MPH
REQUIRED CORNER SIGHT DISTANCE:	239 FEET
RIGHT TURN MOVEMENT	
DESIGN SPEED LIMIT:	25 MPH
REQUIRED CORNER SIGHT DISTANCE:	275 FEET
LEFT TURN MOVEMENT	
DESIGN SPEED LIMIT:	40 MPH
REQUIRED CORNER SIGHT DISTANCE:	382 FEET
RIGHT TURN MOVEMENT	

LEGEND

 LIMITED USE AREA: TO ENSURE ADEQUATE SIGHT DISTANCE, HARDSCAPE AND/OR LANDSCAPE SHALL NOT BE HIGHER THAN 30 INCHES. NO FENCES OR WALLS IN LIMITED USE AREA.



SOURCE: KTG ARCHITECTS



FIGURE 10-2

PROJECT DRIVEWAYS SIGHT DISTANCE ANALYSIS
4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

11.0 RECOMMENDED INTERSECTION IMPROVEMENTS

For those intersections where projected traffic volumes are expected to result in unacceptable operating conditions, this report recommends (identifies) improvement measures that change the intersection geometry to increase capacity. These capacity improvements involve roadway widening and/or re-striping to reconfigure (add lanes) to specific approaches of a key intersection. The identified improvements are expected to:

- mitigate the impact of existing traffic, Project traffic and future non-project (ambient traffic growth and cumulative project) traffic and
- improve Levels of Service to an acceptable range and/or to pre-project conditions.

11.1 Planned and/or Recommended Improvements

11.1.1 Existing Plus Project Traffic Conditions

The results of the intersection capacity analyses presented previously in *Table 8-1* shows that the proposed Project is expected to have a significant impact at one (1) of the twenty-five (25) key study intersections under Existing Plus Project traffic conditions. As such, the following intersection improvements are recommended to mitigate the impacts of the proposed Project under these conditions.

- **No. 13 – SR-55 SB Ramps at Fourth Street:** Modify the eastbound shared through/right-turn lane to construct a free-right turn lane. Modify the existing traffic signal as necessary. This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. Per City requirements, the Project may be expected to pay a fair-share/local fee to cover the Project's fair share of the full construction costs needed to implement these mitigation measures.

11.1.2 Year 2025 Cumulative Plus Project Traffic Conditions

The results of the intersection capacity analyses presented previously in *Table 8-2* shows that the proposed Project is expected to have a significant impact at two (2) of the twenty-five (25) key study intersections under Year 2025 Cumulative Plus Project traffic conditions. As such, the following intersection improvements are recommended to mitigate the impacts of the proposed Project under these conditions.

No. 8 – I-5 NB Ramps at Fourth Street: Construct an additional westbound right-turn lane. Modify the existing traffic signal as necessary, inclusive any modifications to the traffic signal phasing. This improvement is consistent with the *Traffic Impact Study for the Metro East Overlay Zone in the City of Santa Ana*. This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. The proposed Project is expected to pay the full construction cost needed to implement these mitigation measures, which are reflected in the Project site plan and is considered a “design feature”.

- **No. 13 – SR-55 SB Ramps at Fourth Street:** Same as those identified in Section 11.1.1 – Modify the eastbound shared through/right-turn lane to construct a free-right turn lane. Modify the existing traffic signal as necessary. This improvement is subject to the review and

approval of the City of Santa Ana and Caltrans. Per City requirements, the Project may be expected to pay a fair-share/local fee to cover the Project's fair share of the full construction costs needed to implement these mitigation measures.

11.1.3 Year 2040 Buildout Plus Project Traffic Conditions

The results of the intersection capacity analyses presented previously in *Table 8-3* shows that the proposed Project is expected to have a significant impact at two (2) of the twenty-five (25) key study intersections under Year 2040 Buildout Plus Project traffic conditions. As such, the following intersection improvements are recommended to mitigate the impacts of the proposed Project under these conditions.

- **No. 8 – I-5 NB Ramps at Fourth Street:** *Same as those identified in Section 11.1.2* – Construct an additional westbound right-turn lane. Modify the existing traffic signal as necessary inclusive any modifications to the traffic signal phasing. This improvement is consistent with the *Traffic Impact Study for the Metro East Overlay Zone in the City of Santa Ana*. This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. The proposed Project is expected to pay the full construction cost needed to implement these mitigation measures which are reflected in the Project site plan and is considered a “design feature”.
- **No. 13 – SR-55 SB Ramps at Fourth Street:** *Same as those identified in Sections 11.1.1 and 11.1.2* – Modify the eastbound shared through/right-turn lane to construct a free-right turn lane. Modify the existing traffic signal as necessary. This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. Per City requirements, the Project may be expected to pay a fair-share/local fee to cover the Project's fair share of the full construction costs needed to implement these mitigation measures.

11.2 Project-Specific Improvements

The following improvements are being implemented as part of the proposed Project, which the Project is expected to pay the full construction costs:

- **No. 9 – Cabrillo Park Drive at Fourth Street:** Construct an exclusive southbound right-turn lane. Modify the existing traffic signal as necessary. This improvement, which has been incorporated in the Project site plan as a Project “design feature” is subject to the review and approval of the City of Santa Ana.

As an alternative to the above mentioned improvement, subject to review and approval of City staff, an option southbound through/right lane in addition to the proposed southbound right-turn lane is proposed to minimize the southbound right-turning vehicles from impeding the through traffic.

11.3 Recommended Circulation Enhancement

The following improvements are recommended to be implemented to enhance circulation within the Project Vicinity, thereby maintaining acceptable operating conditions:

- **No. 25 – Cabrillo Park Drive at Park Court Place:** Install two-phase traffic signal and implement all necessary signing and striping improvements. This improvement is subject to the review and approval of the City of Santa Ana.

Figure 11-1 graphically illustrates the recommended and project specific improvements, as well as recommended circulation enhancements. *Figure 11-2* presents a conceptual improvement plan for 4th Street between the I-5 NB Ramps and Cabrillo Park Drive that illustrates recommended signage and striping to inform motorists of availability of lanes to access the I-5 NB ramps and/or continue on 4th Street. The improvements are consistent with those recommended in Section 10.2 of this report. Please note that the proposed Project may be expected to pay the full construction cost needed to implement the signage and striping for the proposed freeway wayfinding at 4th Street and Cabrillo Park Drive. However, it is assumed that the City and/or Caltrans will provide maintenance of these improvements.

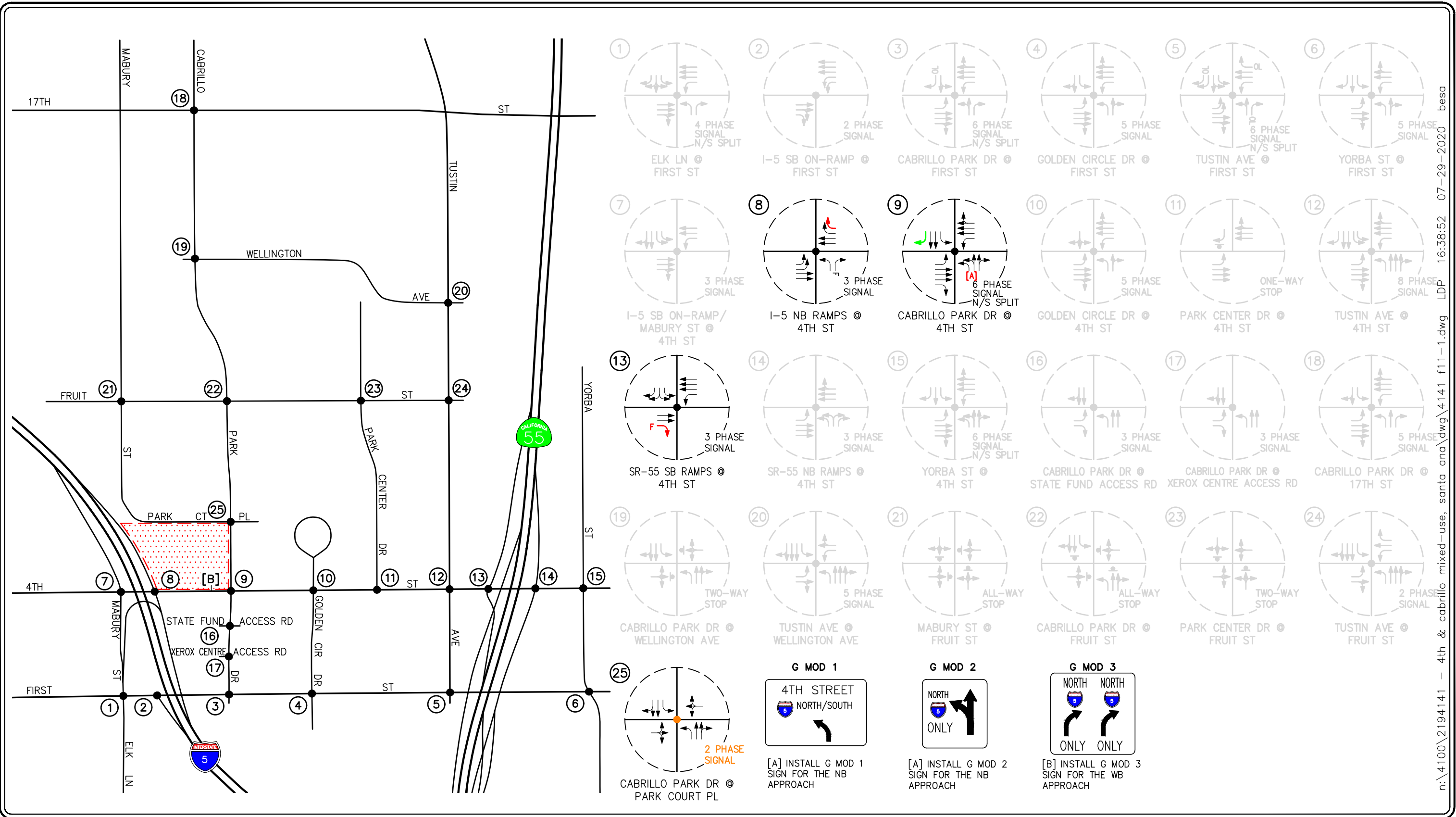
11.4 Project-Related Fair-Share Contribution

The transportation impacts associated with the development of the Project were determined based on the Existing Plus Project, Year 2025 and Year 2040 Buildout traffic analyses. As summarized in *Tables 8-1, 8-2 and 8-3*, the development of the Project is anticipated to have a significant impact at two (2) locations. While the proposed Project is expected to pay the full construction costs for the intersection of I-5 NB Ramps/Fourth Street, the Project can be expected to pay its fair share of the improvement costs at the intersection of SR-55 SB Ramps/Fourth Street to offset the Project’s incremental traffic impact at these intersections.

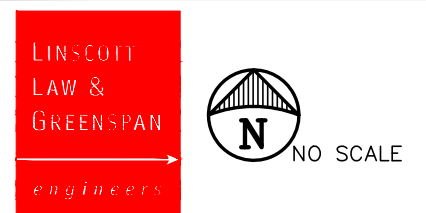
Although the intersection of Cabrillo Park Drive/Park Court Place is not considered significantly impacted, it was determined that the implementation of improvements at this location would help improve the level of service at this location, thereby enhancing access and circulation through this intersection for local area traffic as well as Project-related traffic. Therefore, based on collaboration with City staff, the proposed Project is expected to pay the full construction cost or install a traffic signal at this location.

Table 11-1 presents the Project’s fair-share contribution to construct the recommended improvements at the two (2) study intersections. As presented in this *Table 11-1*, the first column (1) presents a total of all intersection peak hour movements for existing conditions. The second column (2) presents Project-related added traffic volumes during AM peak hour and PM peak hour. The third column (3) presents Year 2040 Buildout traffic conditions with Project traffic. The fourth column (4) represents what percentage of total added intersection peak hour traffic is Project-related traffic.

Review of *Table 11-1* shows that the proposed Project’s percentage of net traffic impact ranges from **12.30%** to **100.00%**. This percentage represents the Project’s “fair-share” cost responsibility associated with the implementation of the recommended mitigation measures.



n:\41100\2194141 - 4th & cabrillo mixed-use, santa ana\dwg\4141 f11-1.dwg LDP 16:38:52 07-29-2020 besa



KEY

- = RECOMMENDED IMPROVEMENT
- = PROJECT SPECIFIC IMPROVEMENT
- = RECOMMENDED CIRCULATION ENHANCEMENT
- ▨ = PROJECT SITE

FIGURE 11-1

PLANNED AND RECOMMENDED IMPROVEMENTS
4TH AND CABRILLO MIXED-USE PROJECT, SANTA ANA

TABLE 11-1
YEAR 2040 BUILDOUT PROJECT FAIR-SHARE COST CONTRIBUTION

Key Intersection		City/ Jurisdiction	Time Period	(1) Existing Traffic	(2) Project Traffic	(3) Year 2040 Buildout Plus Project Traffic	(4) Project Fair-Share Percent²⁶
13.	SR-55 SB Ramps at 4 th Street	Santa Ana/ Caltrans	AM	3163	78	3,797	12.30%
			PM	--	--	--	--
25.	Cabrillo Park Drive at Park Court Place	Santa Ana	AM	--	--	--	--
			PM	--	--	--	100.00% ²⁷

²⁶ Project fair-share percentage Column (4) = [Column (2)] / [Column (3) – Column (1)].

²⁷ As the intersection is not considered significantly impacted, the installation of the two-phase traffic signal shall be fully paid by the Project or the Project will implement the improvement. →

12.0 CONGESTION MANAGEMENT PROGRAM (CMP) COMPLIANCE ASSESSMENT

This analysis is consistent with the requirements and procedures outlined in the current *Orange County Congestion Management Program (CMP)*. The CMP requires that a traffic impact analysis be conducted for any project generating 2,400 or more daily trips, or 1,600 or more daily trips for projects that directly access the CMP Highway System (HS). As noted in Section 5.0 of this traffic study, the proposed Project is forecast to generate approximately 4,121 daily trip-ends and thus meets the criteria requiring a CMP TIA.

The CMPHS includes specific roadways, which include State Highways and Super Streets, which are now known as Smart Streets. Therefore, the CMP TIA analysis requirements relate to the potential impacts only on the specified CMPHS, which in this case includes First Street west of the I-5 SB On-Ramp. As described in the "Radius of Development Influence" section of the CMP TIA, the study area (i.e. CMP intersections) is recommended to be defined by the CMP links which have a project impact of three percent, or more, of their daily LOS "E" capacity.

There is one (1) CMP intersection in close proximity to the site which is as follows:

<u>Study Intersection</u>	<u>Location</u>
13	I-5 SB On-Ramps at First Street

Table 12-1 summarizes the Project percentage impact CMP analysis for three (3) key roadway segments in the vicinity of the proposed Project along First Street. Column one (1) of *Table 12-1* shows the CMP LOS "E" Capacity for each roadway segment, column two (2) shows the Project ADT for each roadway segment, column three (3) shows the Project ADT LOS "E" capacity percentages for each roadway segment and column (4) shows whether or not added project traffic meets or exceeds the "three percent" limit.

Review of *Table 12-1* shows that the three percent limit is not exceeded at any of the three (3) key roadway segments and therefore a CMP analysis is not required.

TABLE 12-1
PROJECT PERCENTAGE RADIUS OF INFLUENCE CMP ANALYSIS

Roadway Segment	(1) CMP LOS "E" Capacity	(2) Project ADT	(3) Percentage (3) = (2) ÷ (1)	(4) Radius of Influence (Yes/No)
1. First Street, west of Elk Lane/Mabury Street	56,300	206	0.4%	No
2. First Street, between Elk Lane/Mabury Street and I-5 SB On-Ramp	56,300	495	0.9%	No
3. First Street, between I-5 SB On-Ramp and Cabrillo Park Drive	56,300	515	0.9%	No

13.0 SUMMARY OF FINDINGS AND CONCLUSIONS

- **Project Description** – The Project site is an 8.35-acre vacant parcel of land within the Metro East Mixed Use Overlay Zone that is generally located north of 4th Street, east of the Santa Ana (I-5) freeway, and west of Cabrillo Park Drive.

The proposed Project includes the development of up to 644 apartment units, 3,500 SF restaurant uses and 11,700 SF of retail space. The proposed Project will provide a total of 1,300 parking spaces within two buildings along with 18 surface parking spaces. “Building A” is proposed as a five-story apartment podium with up to 325 apartment homes consisting of approximately 19 (±5.8%) studio units, 162 (±49.8%) one-bedroom units, 121 (±37.2%) two-bedroom units and 23 (±7.1%) three-bedroom units and approximately 6,100 SF of ground floor retail/commercial space and 3,500 SF restaurant space “wrapped” around an eight-level partial subterranean parking structure with a total of approximately 650 spaces along with 9 ground floor spaces for retail/leasing. “Building B” is proposed as a five-story apartment podium with up to 319 apartment homes consisting of approximately 20 (±6.3%) studio units, 164 (±51.4%) one-bedroom units, 127 (±39.8%) two-bedroom units and 8 (±2.5%) three-bedroom units and approximately 5,600 SF of ground floor retail/commercial space “wrapped” around an eight-level partial subterranean parking structure with a total of approximately 650 spaces along with 9 ground floor spaces for retail/leasing. On-site facilities/amenities of the proposed Project include a leasing office, a lounge/lobby, business center, pool/spa, and a fitness center for residents.

Vehicular access to the proposed Project will be provided via one (1) full access unsignalized driveway along Park Court Place and one (1) right in/out only driveway located along 4th Street. As part of the proposed Project, an exclusive southbound right-turn lane will be constructed at the intersection of Cabrillo Park Drive/4th Street. Additionally, the project’s curb face is planned to be set back far enough to accommodate improvements at I-5 NB Ramps/4th Street, which include the construction of an additional right-turn lane.

- **Study Scope** – The following twenty-five (25) key study intersections were selected for detailed peak hour level of service analyses under Existing Traffic Conditions, Existing Plus Project Traffic Conditions, Year 2025 Cumulative Traffic Conditions, Year 2025 Cumulative plus Project, Year 2040 Buildout Traffic Conditions, and Year 2040 Buildout Plus Project Traffic Conditions.

Key Study Intersections

- | | |
|--|---|
| 1. Elk Lane at First Street (Santa Ana) | 14. SR-55 NB Ramps at 4 th Street (Tustin/Caltrans) |
| 2. I-5 SB On-Ramp at First Street (Santa Ana/Caltrans) | 15. Yorba Street at 4 th Street (Tustin) |
| 3. Cabrillo Park Drive at First Street (Santa Ana) | 16. Cabrillo Park Drive at State Fund Access Road (Santa Ana) |
| 4. Golden Circle Drive at First Street (Santa Ana) | 17. Cabrillo Park Drive at Xerox Center Access Road (Santa Ana) |
| 5. Tustin Avenue at First Street (Tustin) | 18. Cabrillo Park Drive at 17 th Street (Santa Ana) |
| 6. Yorba Street at First Street (Tustin) | 19. Cabrillo Park Drive at Wellington Avenue (Santa Ana) |

- | | |
|--|---|
| 7. I-5 SB On-Ramp/Mabury Street at 4 th Street (Santa Ana/Caltrans) | 20. Tustin Avenue at Wellington Avenue (Santa Ana) |
| 8. I-5 NB Ramps at 4 th Street (Santa Ana/Caltrans) | 21. Mabury Street at Fruit Street (Santa Ana) |
| 9. Cabrillo Park Drive at 4 th Street (Santa Ana) | 22. Cabrillo Park Drive at Fruit Street (Santa Ana) |
| 10. Golden Circle Drive at 4 th Street (Santa Ana) | 23. Park Center Drive at Fruit Street (Santa Ana) |
| 11. Park Center Drive at 4 th Street (Santa Ana) | 24. Tustin Avenue at Fruit Street (Santa Ana) |
| 12. Tustin Avenue at 4 th Street (Santa Ana) | 25. Cabrillo Park Drive at Park Court Place (Santa Ana) |
| 13. SR-55 SB Ramps at 4 th Street (Santa Ana/Caltrans) | |

- **Existing Traffic Conditions** – Twenty-four (24) of the twenty-five key study intersections currently operate at an acceptable level of service during the AM and PM peak hours. The intersection of SR-55 SB Ramps/4th Street currently operates at unacceptable LOS E during the AM peak hour.
- **Project Trip Generation** – The proposed Project, after adjustment for internal capture, is forecast to generate approximately 4,121 “net” daily trips, with 264 “net” trips (82 inbound, 182 outbound) produced in the AM peak hour and 344 “net” trips (205 inbound, 139 outbound) produced in the PM peak hour on a “typical” weekday.
- **Related Projects Traffic Characteristics** – Thirty (30) related projects were considered as part of the cumulative background setting. The thirty (30) related projects are forecast to generate 45,942 daily trips, with 3,033 trips (1,458 inbound, 1,575 outbound) anticipated during the AM peak hour and 3,837 trips (1,927 inbound, 1,910 outbound) produced during the PM peak hour.
- **Existing Plus Project Traffic Conditions** – Traffic associated with the proposed Project will significantly impact one (1) of the twenty-five study intersections, when compared to the LOS standards and significant impact criteria specified in this report. The impacted intersection of SR-55 SB Ramps/4th Street is forecast to operate at LOS E during the AM peak hour. The remaining study intersections are forecast to operate at acceptable level of service during the AM and PM peak hours. The implementation of recommended improvements at the intersection will help offset the Project’s impact
- **Year 2025 Cumulative Traffic Conditions Plus Project** – Traffic associated with the proposed Project will significantly impact two (2) of the twenty-five study intersections, when compared to the LOS standards and significant impact criteria specified in this report, which include I-5 NB Ramps/4th Street and SR-55 SB Ramps/4th Street. The remaining study intersections are forecast to operate at acceptable level of service during the AM and PM peak hours. The implementation of recommended improvements at the intersection will help offset the Project’s impact.
- **Year 2040 Buildout Traffic Conditions Plus Project** – Traffic associated with the proposed Project will significantly impact two (2) of the twenty-five study intersections, when compared to the LOS standards and significant impact criteria specified in this report, which include I-5 NB Ramps/4th Street and SR-55 SB Ramps/4th Street. The remaining study intersections are

forecast to operate at acceptable level of service during the AM and PM peak hours. The implementation of recommended improvements at the intersection will help offset the Project's impact.

- **Caltrans Existing Traffic Conditions** – The intersection of SR-55 SB Ramps/4th Street currently operates at unacceptable LOS F in the AM peak hour. The remaining state-controlled study intersections currently operate at LOS C or better during the weekday AM and PM peak hours.
- **Caltrans Existing Plus Project Traffic Conditions** – The intersection of SR-55 SB Ramps/4th Street will continue to operate at unacceptable LOS F in the AM peak hour with the addition of project traffic. The remaining state-controlled study intersections are forecast to operate at acceptable LOS C or better during the weekday AM and PM peak hours, with the addition of project traffic.

Although the intersection of SR-55 SB Ramps/4th Street is forecast to operate at unacceptable LOS F in the AM peak hour, the intersection is not considered significantly impacted when compared to the LOS standards and significant impact criteria specified in this report.

- **Caltrans Year 2025 Cumulative Plus Project Traffic Conditions** – The intersection of SR-55 SB Ramps/4th Street will continue to operate at unacceptable LOS F in the AM peak hour with the addition of project traffic. The remaining state-controlled study intersections are forecast to operate at acceptable LOS C or better during the weekday AM and PM peak hours, with the addition of project traffic.

Although the intersection of SR-55 SB Ramps/4th Street is forecast to operate at unacceptable LOS F in the AM peak hour, the intersection is not considered significantly impacted when compared to the LOS standards and significant impact criteria specified in this report.

- **Caltrans Year 2040 Buildout Plus Project Traffic Conditions** – The intersection of SR-55 SB Ramps/4th Street will continue to operate at unacceptable LOS F in the AM peak hour with the addition of project traffic. The remaining state-controlled study intersections are forecast to operate at acceptable LOS C or better during the weekday AM and PM peak hours, with the addition of project traffic.

Although the intersection of SR-55 SB Ramps/4th Street is forecast to operate at unacceptable LOS F in the AM peak hour, the intersection is not considered significantly impacted when compared to the LOS standards and significant impact criteria specified in this report.

- **Queuing Analysis** – Based on field observation it is apparent that congestion occurs at Cabrillo Park Drive/4th Street as a result of vehicles trying to enter the westbound right-turn lane along 4th Street. Due to the recommended second westbound right-turn lane along 4th Street, additional improvements are recommended for the northbound and southbound approaches at Cabrillo Park Drive/4th Street. The additional recommended improvements consist of the following:

- Add signage to the northbound direction along with lane line extensions to direct the motorist in the left turn lane that they can enter the inner right-turn lane for access to the I-5 NB Ramp. The northbound left/thru lane should have signage and lane extensions to direct the motorist to use the outer right-turn lane for access to the I-5 NB Ramp. These improvements are subject to the review and approval of the City of Santa Ana.

With the implementation of improvements, the queues are generally adequate under Year 2040 Buildout Plus Project traffic conditions during both the AM and PM peak hours. However, the southbound right-turn lane at Cabrillo Park Drive/4th Street may exceed the storage provided. As an alternative, subject to review and approval of City staff, an option southbound through/right lane in addition to the proposed southbound right-turn lane can be striped to provide additional queuing storage. The implementation of the recommended improvements also helps to improve congestion and limit unnecessary weaving/merging of vehicles that need to enter the I-5 NB Ramp.

However, in the event that Fourth Street experiences “spikes” in congestion during the weekday AM and PM peak hours, residents will very likely re-route themselves (self-monitor) and utilize the northern Driveway on Park Court Place instead of the driveway on Fourth Street. The intersections of Cabrillo Park Drive/Park Court Place and Cabrillo Park Drive/Fourth Street have enough capacity to accommodate the additional trips.

- ***Existing Plus Project Recommended Improvements*** – The following intersection improvements are recommended to mitigate the impacts of the proposed Project under these conditions.
 - **No. 13 – SR-55 SB Ramps at Fourth Street:** Modify the eastbound shared through/right-turn lane to construct a free-right turn lane. Modify the existing traffic signal as necessary. This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. Per City requirements, the Project may be expected to pay a fair-share/local fee to cover the Project’s fair share of the full construction costs needed to implement these mitigation measures.
- ***Year 2025 Cumulative Plus Project Recommended Improvements*** – The following intersection improvements are recommended to mitigate the impacts of the proposed Project under these conditions.
 - **No. 8 – I-5 NB Ramps at Fourth Street:** Construct an additional westbound right-turn lane. Modify the existing traffic signal as necessary inclusive any modifications to the traffic signal phasing. This improvement is consistent with the *Traffic Impact Study for the Metro East Overlay Zone in the City of Santa Ana*. This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. The proposed Project is expected to pay the full construction cost needed to implement these mitigation measures.
 - **No. 13 – SR-55 SB Ramps at Fourth Street:** Modify the eastbound shared through/right-turn lane to construct a free-right turn lane. Modify the existing traffic signal as necessary.

This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. Per City requirements, the Project may be expected to pay a fair-share/local fee to cover the Project's fair share of the full construction costs needed to implement these mitigation measures.

- ***Year 2040 Buildout Plus Project Recommended Improvements*** – The following intersection improvements are recommended to mitigate the impacts of the proposed Project under these conditions.
 - **No. 8 – I-5 NB Ramps at Fourth Street:** Construct an additional westbound right-turn lane. Modify the existing traffic signal as necessary inclusive any modifications to the traffic signal phasing. This improvement is consistent with the *Traffic Impact Study for the Metro East Overlay Zone in the City of Santa Ana*. This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. The proposed Project is expected to pay the full construction cost needed to implement these mitigation measures.
 - **No. 13 – SR-55 SB Ramps at Fourth Street:** Modify the eastbound shared through/right-turn lane to construct a free-right turn lane. Modify the existing traffic signal as necessary. This improvement is subject to the review and approval of the City of Santa Ana and Caltrans. Per City requirements, the Project may be expected to pay a fair-share/local fee to cover the Project's fair share of the full construction costs needed to implement these mitigation measures.
- ***Project Specific Improvements*** – The following improvements are being implemented as part of the proposed Project, which the Project is expected to pay the full construction costs:
 - **No. 9 – Cabrillo Park Drive at Fourth Street:** Construct an exclusive southbound right-turn lane. Modify the existing traffic signal as necessary. This improvement is subject to the review and approval of the City of Santa Ana.

As an alternative to the above mentioned improvement, subject to review and approval of City staff, an option southbound through/right lane in addition to the proposed southbound right-turn lane is proposed to minimize the southbound right-turning vehicles from impeding the through traffic.

- ***Recommended Circulation Enhancement:*** The following improvements, which are expected to be implemented or paid for by the Project, are recommended to be implemented to enhance circulation within the Project Vicinity, thereby maintaining acceptable operating conditions:
 - **No. 25 – Cabrillo Park Drive at Park Court Place:** Install two-phase traffic signal and implement all necessary signing and striping improvements. This improvement is subject to the review and approval of the City of Santa Ana.

- ***Project-Related Fair-Share Contribution*** – The proposed Project’s percentage of net traffic impact ranges from **12.30%** to **100.00%**. This percentage represents the Project’s “fair-share” cost responsibility associated with the implementation of the recommended mitigation measures.
- ***CMP Compliance Assessment*** – The three percent limit is not exceeded at any of the three (3) key roadway segments and therefore a CMP analysis is not required.

EXHIBIT **13**

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MARKET & FISCAL IMPACT ANALYSES
FOR A MIXED-USE DEVELOPMENT IN
SANTA ANA, CA (4TH & CABRILLO PARK DRIVE)

SPR No. 2020-04
1801 East Fourth Street
Central Pointe Mixed-Use Development
Exhibit 13 – Market and Fiscal Analysis

PREPARED FOR:
ARNEL DEVELOPMENT CO.



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EXECUTIVE SUMMARY



To: Arnel Development Co.
From: The Concord Group
Date: August 2020
Re: Market & Fiscal Impact Analyses for a Mixed-Use Development in Santa Ana, CA (4th & Cabrillo Park Dr)

Arnel Development Co. (“Arnel”) is evaluating the development potential of a mixed-use project in the central Orange County community of Santa Ana. The project site is located at the eastern edge of the city, immediately opposite Interstate 5. The project is planned for 644 upscale apartment units and 15,200 square feet of commercial space, in a five-story building. In support of strategic planning and underwriting due diligence, Arnel required market and fiscal impact input to identify the highest and best use of the project under the current MEMU zoning and demonstrate the financial viability of the development. To this end, The Concord Group (“TCG”) and RSG were engaged to conduct market and fiscal feasibility analyses for the project. The following text highlights the key findings and conclusions generated by the analysis, supported by an exhibit package of tables, maps and graphs.

Project Overview

- The project is well located near Interstate 5, Southern California’s primary north / south connector, and is just over a mile from the city’s Downtown and associated food, dining, service and employment amenities (*Exhibit 4*).
- A total of 644 apartments are planned in a five-story building with 15,200 square feet of ground floor retail, located at the northwest corner of 4th Street and Cabrillo Park Drive (*Exhibits 1 and 5*).
- The project’s elevated regional accessibility, close proximity to Downtown’s cultural amenities and major County job nodes, combined with a top-of-market community amenity and interior unit specification package, merits a near top-of-market multi-family rent positioning strategy (*Exhibit 2*).
- The scale of the commercial retail planned within the project’s mixed-use context is in alignment with other multi-family focused mixed-use projects in Orange County, who’s commercial retail footprints range from 8,500 to 14,000 SF (*Exhibit 11*).

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Marketability

The project's marketing strengths are as follows:

- *Regional Accessibility* – the project site is easily accessible to the target renter and consumer base, with freeway and rail access each less than a mile away (*Exhibit 4C*).
- *Proximity to Jobs* – several major Orange County office employment nodes are within a five-mile radius of the project, including Downtown Santa Ana, South Coast Metro, Irvine Business Complex and Town and Country, driving demand for both apartments and commercial space.
- *Cultural and Entertainment Amenities* – the Project is located proximate to the city's Downtown and Artists Village, home to numerous galleries and popular restaurants that possess regional draws (*Exhibit 4C*).
- *Shortage of State-of-the-Art Apartments* – Santa Ana is under-supplied with Class A rental apartment product, evidenced by high rates of occupancies and rapid rent growth over the past five years (*Exhibit 7*).

The project's marketing challenges are as follows:

- *Distressed Retail Environment* – the rise of e-commerce has had a significant negative impact on “brick- and-mortar” retailers, leading to store closures across the retail landscape. The negative effects of e-commerce have been especially apparent during the current pandemic which has served to accelerate store closings and overall retail contraction (*Appendix C*).

Apartment Market Performance

- TCG surveyed eight comparable rental projects in the CMA, representing best-in-class product in the cities of Santa Ana, Costa Mesa, Irvine, Tustin, Orange and Anaheim (*Exhibit 8A*).
- The average base rent (ie. an average of the lowest listed rent for each floorplan, excluding premiums for views, orientation and elevation) of the eight comparables surveyed is \$2,606, or \$2.88 per square foot (“PSF”) – top of market rents include Skyloft (average base rent of \$3,024, \$3.32 PSF) and Eleven 10 (\$2,571, \$3.12).

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- The overall rental apartment market is performing strongly, evidenced by:
 - Surveyed occupancy of 94% in stabilized projects (ie. not in lease-up), slightly below 95% stabilization, but high relative the Covid-19 market environment (*Exhibit 8A*).
 - Elevated rent growth – rents in Santa Ana have increased an average of 4.0% per year since 2014 (*Exhibit 7B*).

Commercial Market Performance

- Neither 4th Street nor Cabrillo Park Drive are established retail corridors in the project’s neighborhood around I-5 (*Exhibit 4D*).
- The local 3-mile radius trade area is in general equilibrium, with 44 SF of retail per capital, a ratio on par with the County average (also 44, per *Exhibit 6*).
- There has been limited demand for new retail in the site’s 3-mile radius trade area. While the trade area has added only 100,000 SF of new retail 10-years (current inventory of 12.2M SF), occupancy has not changed during the timeframe (*Exhibit 9*).
- The mixed-use character of the multi-family driven projects is limiting to the overall scale of retail opportunity. Successful, large-scale commercial retail projects require anchor tenancy (grocery, department store, etc), a characteristic that cannot be met within the mixed-us context of the site.
 - Two of the three analog mixed-use multi-family / commercial projects surveyed suffer from poor occupancy, each below 50% (*Exhibit 11*).
 - The two low occupancy analogs share both a similar walk score as the subject (60-69 range) and overall scale (13,000 SF average) (*Exhibit 11*).
- Without a critical mass of retail near the site, the project will be challenged to attract a significant scale of retail tenancy.
- The 15,200 SF of commercial retail planned is at the upper end of the range supportable on site
 - Target tenant types will require smaller unit footprints, ranging from 500 to 2,500 SF.
 - Target tenant types include hairdressers, dry cleaners, craft food store, small professional service businesses, etc.

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Apartment Rent Recommendations

Floorplan	Arnel Program						TCG Recommended Rents					
	Unit Mix		Beds	Den/ Loft	Bath	Unit Size	Base Rent		Avg. Premium		Average Rent	
	Num.	Perc.					\$	\$/sf	\$	%	\$	\$/sf
S1	19	3%	0	---	1	518	\$2,080	\$4.02	\$62	3.0%	\$2,142	\$4.14
S2	20	3%	0	---	1	543	\$2,120	\$3.90	\$64	3.0%	\$2,184	\$4.02
1B - 1	122	19%	1	---	1	683	\$2,425	\$3.55	\$73	3.0%	\$2,498	\$3.66
1B - 2	176	27%	1	---	1	726	\$2,485	\$3.42	\$75	3.0%	\$2,560	\$3.53
1B - 3	3	0%	1	---	1	728	\$2,590	\$3.56	\$78	3.0%	\$2,668	\$3.66
1B - 5	5	1%	1	---	1	750	\$2,545	\$3.39	\$76	3.0%	\$2,621	\$3.50
1B - 4	20	3%	1	---	1	752	\$2,550	\$3.39	\$77	3.0%	\$2,627	\$3.49
2B - 1	140	22%	2	---	2	1,066	\$3,061	\$2.87	\$92	3.0%	\$3,153	\$2.96
2B - 3	68	11%	2	---	2	1,071	\$3,069	\$2.87	\$92	3.0%	\$3,162	\$2.95
2B - 2	40	6%	2	---	2	1,148	\$3,195	\$2.78	\$96	3.0%	\$3,291	\$2.87
3B - 1	25	4%	3	---	3	1,274	\$3,400	\$2.67	\$102	3.0%	\$3,502	\$2.75
3B - 2	6	1%	3	---	3	1,339	\$3,680	\$2.75	\$110	3.0%	\$3,790	\$2.83
Total	644	100%				560,650	\$1,758,803				\$1,811,567	
Average						871	\$2,731	\$3.14	\$82		\$2,813	\$3.23
Studio	39	6%				531	\$2,101	\$3.96	\$63		\$2,164	\$4.08
1-Bed	326	51%				712	\$2,468	\$3.47	\$74		\$2,542	\$3.57
2-Bed	248	39%				1,081	\$3,085	\$2.85	\$93		\$3,178	\$2.94
3-Bed	31	5%				1,287	\$3,454	\$2.68	\$104		\$3,558	\$2.77

- TCG recommends an average base rent of \$2,731, or \$3.14 PSF, placing the project at the near the top of the CMA (*Exhibit 2B*).
- Rent premium garners for elevation, courtyard and views generate an additional \$82 in premium revenue for an average project rent of \$2,813 (\$3.23 PSF).

Commercial Rent Recommendations

- In-line commercial tenancy will achieve rents ranging from \$28 to \$32 PSF per year (NNN), in line with mixed-use analogs (Appendix B) and at the top of the local 4th Street / Irvine Boulevard commercial corridor.

Market Conclusions

- The current development plan represents the highest and best use for the project.
- Multi-family residential possesses the greatest level of marketability of the MEMU permitted land uses. A regional under-supply of Class A residences is evidenced by high rates of occupancy and rent growth within the product type (*Exhibit 7B*). The project location, just off I-5 and proximate to Downtown Santa Ana, will be highly desirable to prospective residents seeking convenient access to both jobs and entertainment.
- The modest scale of commercial land uses planned is appropriate for the mixed-use orientation of the project. The scale of commercial (15,200) is in alignment with similar scope, multi-family anchored projects elsewhere in Orange County (*Exhibit 11*).

Fiscal Impact Findings (RSG)

- The multi-family / commercial mixed-use development at the site will provide significantly more fee and tax revenue to the City of Santa Ana as compared to the existing office land use:
 - Approximately \$41.3 million (\$23.1 million in net present value [2020 dollars], discounted at four percent) in additional City General Fund Revenue, including construction period revenues, recurring site-specific tax and other project revenues
 - Approximately \$541,400 in property tax revenue per year, as opposed to the current \$11,700. The site development would generate approximately \$10.3 million after 25 years (discounted)
 - Over the same 25-year period, the City General Fund expenditures associated with the project total \$7.0 million (discounted)
 - As a result, the net new General Fund revenue is projected to be approximately \$28.1 million (\$16.1 million in 2020 dollars) from the acquisition and development of the project
- The Development will generate more revenue to the City in one year than the existing use is projected to generate over the next 25 years

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Net New Recurring General Fund Fiscal Impacts

Revenue Category	25-Year Recurring	
	Nominal	NPV 4.0%
Property Tax	\$ 18,505,380	\$ 10,333,353
Property Tax In-Lieu	12,096,754	6,756,731
Utility User Tax	3,537,877	1,884,715
Sales Tax	3,479,170	1,853,440
Measure X (2018) Sales Tax Increase	2,753,009	1,786,920
Business Tax	927,121	493,901
Total Revenues	\$ 41,299,312	\$ 23,109,059
Less City Expenditures	\$(13,214,039)	\$(7,026,724)
NET NEW REVENUE TOTAL	\$ 28,085,273	\$ 16,082,335

Sources: City of Santa Ana, County of Orange, California State Board of Equalization, ESRI Business Analyst Online, and RSG, Inc.

The entire fiscal impact study, in detail, is available for review in Section II of this report.

* * * *

This assignment was completed by Michael Reynolds in association with RSG. We have enjoyed working with you on this assignment and look forward to our continued involvement.

MARKET ANALYSIS

EXHIBIT 1
RECOMMENDATIONS
SANTA ANA - CENTRAL POINTE
MAY 2020

Project Summary

- Location:**
- Central Orange County, in the City of Santa Ana
 - Santa Ana is the County seat, with county, state and federal offices all located in Downtown
 - Eastern edge of the city, just east of I-5, at the northwest corner of 4th Street and Cabrillo Park Drive
 - I-5, the West Coast's primary north/south connector, directly fronts the site, connecting renters to major job centers throughout Orange and LA Counties
 - Santa Ana Metrolink Station is just under a mile northeast of the property, linking the site to Southern California's growing rail hub
 - Downtown Santa Ana, a major regional food and entertainment destination, is just over a mile west of the project
- Description:**
- 644 apartment units and 15,200 of street level retail in two 5 story, wrap style buildings
 - 7 stories of parking (with semi-sub); some street front surface parking for retail
 - 8.35-acre site - 80.9 dwelling units per acre
 - Extensive community amenity program include two roof top courtyards with pools and large community park central to the project
 - Interior unit specifications on par with best-in-class, Orange County Class "A" rental market

Marketability Metrics

- Market Strengths:**
- *Regional Accessibility*
 - I-5 and the Santa Ana Metrolink Station are both proximate to the site
 - *Proximity to White Collar Jobs*
 - In addition to downtown Santa Ana, multiple major Orange County employment cores are located within a five-mile radius, including South Coast Metro, Irvine Business Complex and Anaheim/Orange
 - *Arts and Dining Destination*
 - Project is located proximate to the city's Artists Village, home to numerous galleries and popular restaurants that possess regional draws
 - *Lack of Class A Institutional Supply*
 - The city is under-supplied with luxury, "Class A" apartment product
 - Santa Ana's gentrification to date has focused primarily on retail and office redevelopment
 - Indicative of the City's housing shortage, the City boasts a jobs to housing ratio of 1.2, higher than the County average of 1.1
- Market Challenges:**
- *Distressed Retail Environment*
 - The rise of e-commerce has had a significant negative impact on "brick- and-mortar" retailers, leading to store closures across the retail landscape. The negative effects of e-commerce have been especially apparent during the current pandemic which has served to accelerate store closings

Multi-Family Program & Recommended Rents

- Positioning Thesis:**
- Subject site base rents are positioned slightly below the top of upscale, low-rise competitive set in Central Orange County
 - Top-of-market positioning is merited by the project's downtown Santa Ana location, Orange County's only authentic, walkable Downtown neighborhood, accessibility to the 5 freeway, planned high level of amenities, and interior unit specifications
 - Average base rent of \$3.14 PSF positions the project generally in line with Eleven 10 (\$3.12), a project with a superior location in the Platinum Triangle in Orange

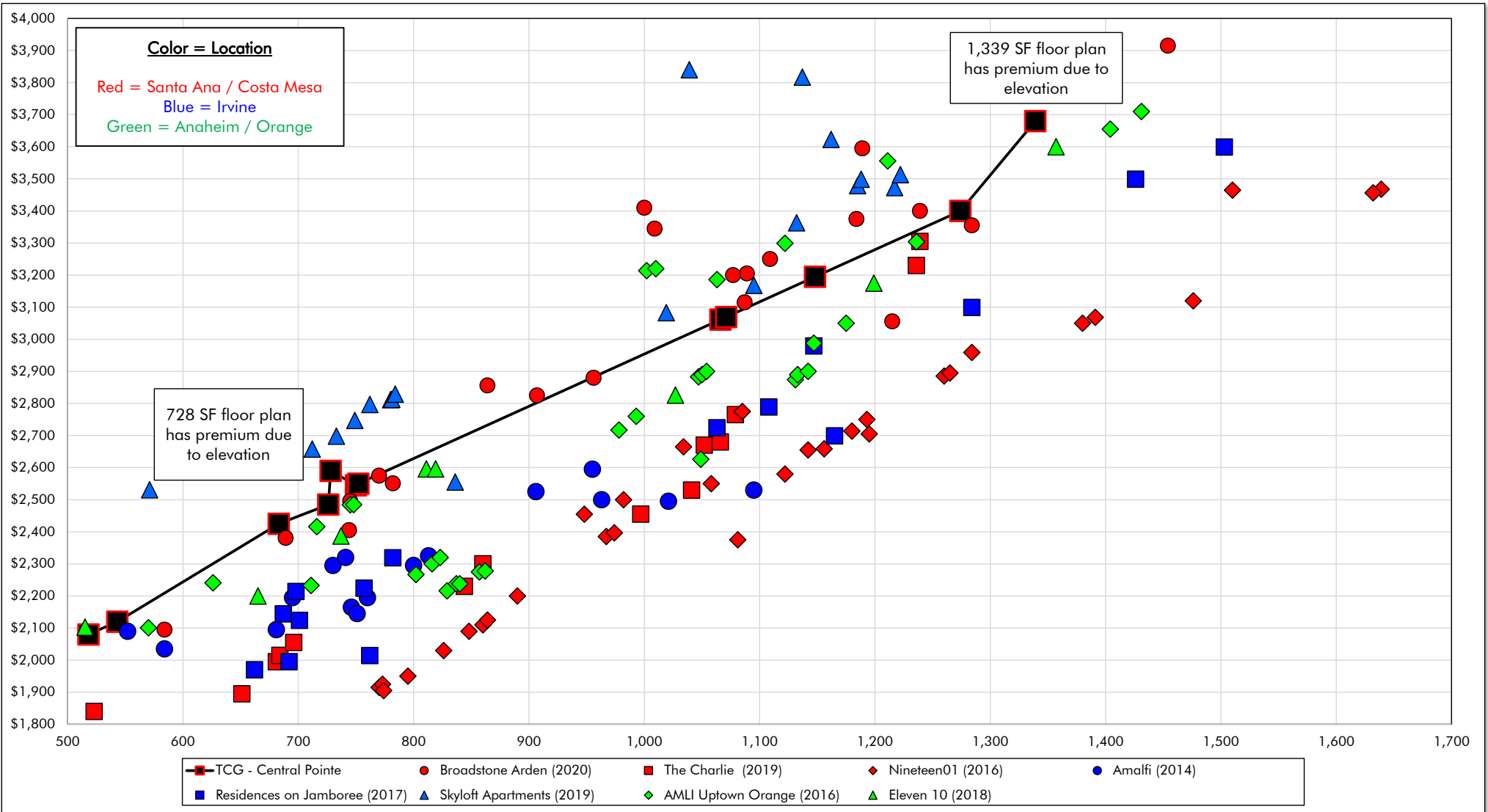
MF Program:	Arnel Program						TCG Recommended Rents						
	Floorplan	Unit Mix		Beds	Den/Loft	Bath	Unit Size	Base Rent		Avg. Premium		Average Rent	
		Num.	Perc.					\$	\$/sf	\$	%	\$	\$/sf
S1	19	3%	0	---	1	518	\$2,080	\$4.02	\$62	3.0%	\$2,142	\$4.14	
S2	20	3%	0	---	1	543	\$2,120	\$3.90	\$64	3.0%	\$2,184	\$4.02	
1B - 1	122	19%	1	---	1	683	\$2,425	\$3.55	\$73	3.0%	\$2,498	\$3.66	
1B - 2	176	27%	1	---	1	726	\$2,485	\$3.42	\$75	3.0%	\$2,560	\$3.53	
1B - 3	3	0%	1	---	1	728	\$2,590	\$3.56	\$78	3.0%	\$2,668	\$3.66	
1B - 5	5	1%	1	---	1	750	\$2,545	\$3.39	\$76	3.0%	\$2,621	\$3.50	
1B - 4	20	3%	1	---	1	752	\$2,550	\$3.39	\$77	3.0%	\$2,627	\$3.49	
2B - 1	140	22%	2	---	2	1,066	\$3,061	\$2.87	\$92	3.0%	\$3,153	\$2.96	
2B - 3	68	11%	2	---	2	1,071	\$3,069	\$2.87	\$92	3.0%	\$3,162	\$2.95	
2B - 2	40	6%	2	---	2	1,148	\$3,195	\$2.78	\$96	3.0%	\$3,291	\$2.87	
3B - 1	25	4%	3	---	3	1,274	\$3,400	\$2.67	\$102	3.0%	\$3,502	\$2.75	
3B - 2	6	1%	3	---	3	1,339	\$3,680	\$2.75	\$110	3.0%	\$3,790	\$2.83	
Total	644	100%				560,650	\$1,758,803				\$1,811,567		
Average						871	\$2,731	\$3.14	\$82		\$2,813	\$3.23	

Commercial Program and Recommended Rents

- Commercial Program:**
- TCG recommends an average rent of \$30 PSF per year (NNN) for the 15,200 SF of retail
 - Rent recommendations are in line with mixed-use analogs in Orange County - namely Pinnacle at MacArthur Place (local to Santa Ana) and Pinnacle at Fullerton (downtown Fullerton address)
 - Recommended rents are positioned at the top of the 4th Street / Irvine Boulevard corridor
 - TCG projects a slow to moderate paced lease-up, based primarily on the relative low rate of occupancy at the Pinnacle at MacArthur Place project

EXHIBIT 2A

MF RENT POSITIONING - RENT TO SIZE GRAPH
 SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
 MAY 2020



Source: Appendix A

EXHIBIT 2B

MF RENT POSITIONING - ABSOLUTE RENT
SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
MAY 2020

Rents listed are "base" - an average of the lowest listed rents per floorplan

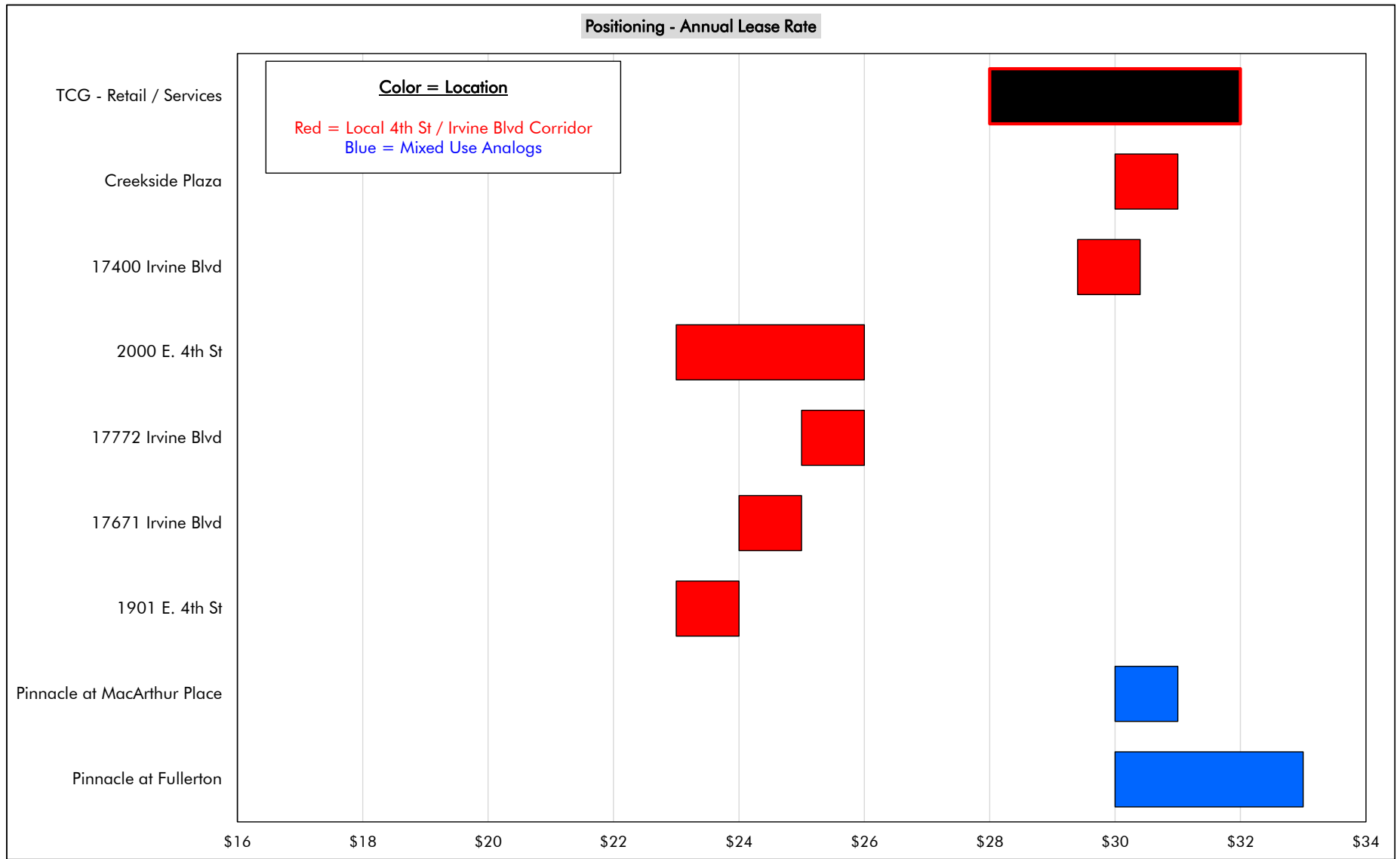
Color = Location
Red = Santa Ana / Costa Mesa
Blue = Irvine / Tustin
Green = Anaheim / Orange

Map Key	Project Name	Units	Year Built	Occ.	Unit Mix (by Bed Count)			Overall			Project Averages (Size and List Rent)								
					0	1	2	Unit Size	Base Rent		Studios		One-Bedrooms			Two-Bedrooms			
									\$	\$/sf	Unit Size	\$	\$/sf	Unit Size	\$	\$/sf	Unit Size	\$	\$/sf
1-Bed Sort																			
A	Broadstone Arden	335	2020	26%	26%	19%	53%	1,023	\$3,063	\$2.99	800	\$2,676	\$3.34	881	\$2,769	\$3.14	1,157	\$3,312	\$2.86
F	Skyloft Apartments	388	2019	19%	8%	54%	36%	910	\$3,024	\$3.32	571	\$2,531	\$4.43	768	\$2,713	\$3.53	1,165	\$3,513	\$3.02
	TCG - Central Pointe							871	\$2,731	\$3.14	531	\$2,101	\$3.96	712	\$2,468	\$3.47	1,081	\$3,085	\$2.85
H	Eleven 10	260	2018	93%	21%	51%	28%	825	\$2,571	\$3.12	515	\$2,103	\$4.08	764	\$2,463	\$3.22	1,167	\$3,118	\$2.67
G	AMLl Uptown Orange	334	2016	93%	3%	45%	51%	930	\$2,663	\$2.86	570	\$2,101	\$3.69	782	\$2,307	\$2.95	1,071	\$2,986	\$2.79
D	Amalfi	542	2014	95%	12%	69%	19%	785	\$2,268	\$2.89	584	\$2,035	\$3.48	748	\$2,242	\$3.00	1,046	\$2,510	\$2.40
E	Residences on Jamboree	381	2017	96%	18%	43%	33%	897	\$2,447	\$2.73	690	\$1,994	\$2.89	724	\$2,132	\$2.95	1,134	\$2,906	\$2.56
B	The Charlie	228	2019	13%	10%	40%	42%	875	\$2,373	\$2.71	542	\$1,848	\$3.41	708	\$2,060	\$2.91	1,048	\$2,633	\$2.51
C	Nineteen01	261	2016	90%	0%	46%	50%	1,072	\$2,495	\$2.33	---	---	---	831	\$2,056	\$2.47	1,235	\$2,804	\$2.27
	Total/Average:	2,729	2017	68%	12%	48%	37%	904	\$2,606	\$2.88	645	\$2,236	\$3.47	765	\$2,329	\$3.04	1,130	\$3,010	\$2.66
	<i>Excluding Lease-Ups:</i>	<i>1,778</i>		<i>94%</i>															
2-Bed Sort																			
F	Skyloft Apartments	388	2019	19%	8%	54%	36%	910	\$3,024	\$3.32	571	\$2,531	\$4.43	768	\$2,713	\$3.53	1,165	\$3,513	\$3.02
A	Broadstone Arden	335	2020	26%	26%	19%	53%	1,023	\$3,063	\$2.99	800	\$2,676	\$3.34	881	\$2,769	\$3.14	1,157	\$3,312	\$2.86
H	Eleven 10	260	2018	93%	21%	51%	28%	825	\$2,571	\$3.12	515	\$2,103	\$4.08	764	\$2,463	\$3.22	1,167	\$3,118	\$2.67
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G	AMLl Uptown Orange	334	2016	93%	3%	45%	51%	930	\$2,663	\$2.86	570	\$2,101	\$3.69	782	\$2,307	\$2.95	1,071	\$2,986	\$2.79
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B	The Charlie	228	2019	13%	10%	40%	42%	875	\$2,373	\$2.71	542	\$1,848	\$3.41	708	\$2,060	\$2.91	1,048	\$2,633	\$2.51
D	Amalfi	542	2014	95%	12%	69%	19%	785	\$2,268	\$2.89	584	\$2,035	\$3.48	748	\$2,242	\$3.00	1,046	\$2,510	\$2.40
Studio Sort																			
A	Broadstone Arden	335	2020	26%	26%	19%	53%	1,023	\$3,063	\$2.99	800	\$2,676	\$3.34	881	\$2,769	\$3.14	1,157	\$3,312	\$2.86
F	Skyloft Apartments	388	2019	19%	8%	54%	36%	910	\$3,024	\$3.32	571	\$2,531	\$4.43	768	\$2,713	\$3.53	1,165	\$3,513	\$3.02
H	Eleven 10	260	2018	93%	21%	51%	28%	825	\$2,571	\$3.12	515	\$2,103	\$4.08	764	\$2,463	\$3.22	1,167	\$3,118	\$2.67
	TCG - Central Pointe							871	\$2,731	\$3.14	531	\$2,101	\$3.96	712	\$2,468	\$3.47	1,081	\$3,085	\$2.85
G	AMLl Uptown Orange	334	2016	93%	3%	45%	51%	930	\$2,663	\$2.86	570	\$2,101	\$3.69	782	\$2,307	\$2.95	1,071	\$2,986	\$2.79
D	Amalfi	542	2014	95%	12%	69%	19%	785	\$2,268	\$2.89	584	\$2,035	\$3.48	748	\$2,242	\$3.00	1,046	\$2,510	\$2.40
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B	The Charlie	228	2019	13%	10%	40%	42%	875	\$2,373	\$2.71	542	\$1,848	\$3.41	708	\$2,060	\$2.91	1,048	\$2,633	\$2.51

Source: Appendix A

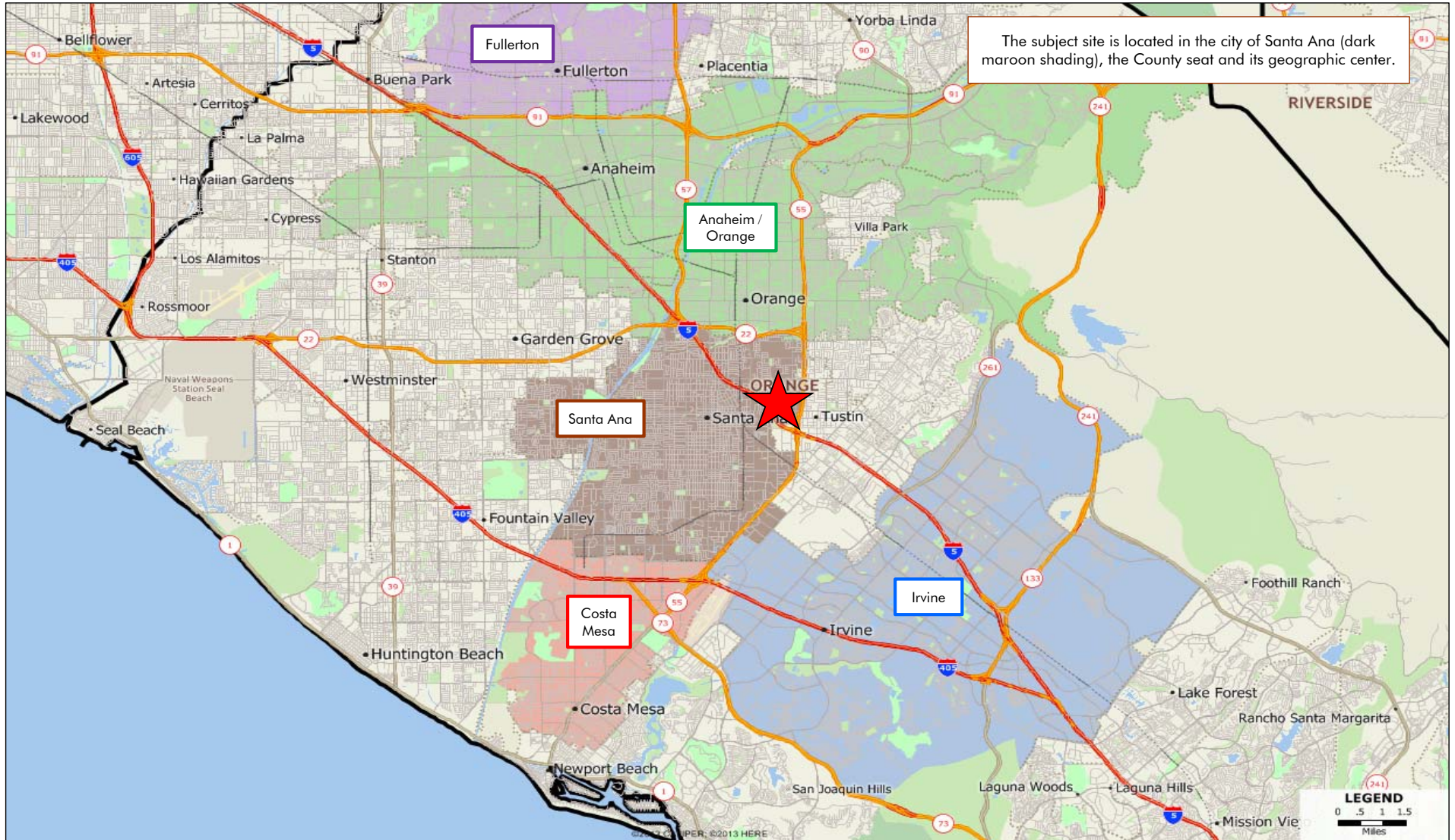
EXHIBIT 3

RETAIL / OFFICE RENT POSITIONING
 ORANGE COUNTY AND LOCAL THREE-MILE TRADE AREA
 JANUARY 2017 THROUGH JULY 2020 - 3.5-YEARS



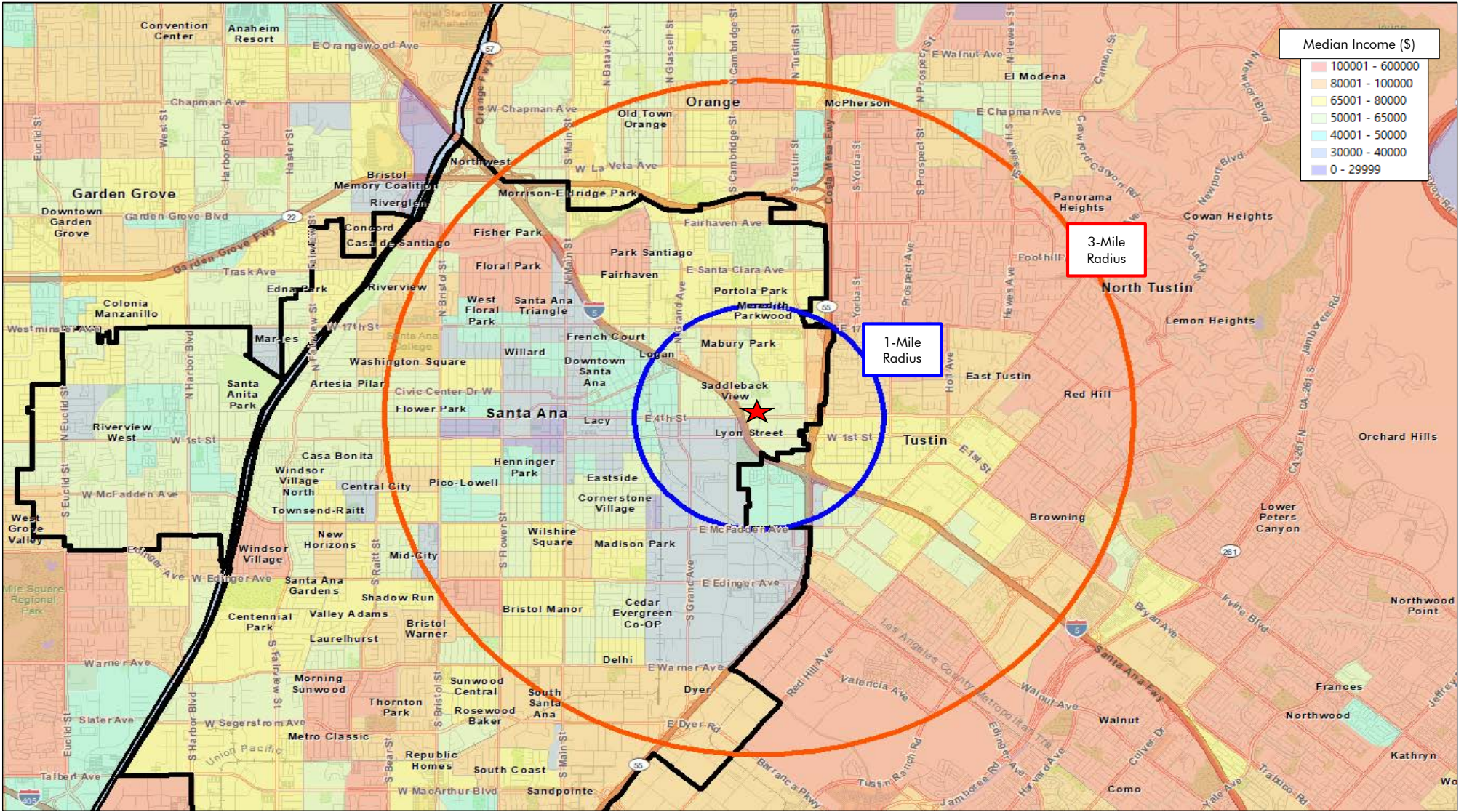
Source: Appendix B

EXHIBIT 4A
PROJECT LOCATION - REGIONAL
ORANGE COUNTY
MAY 2020



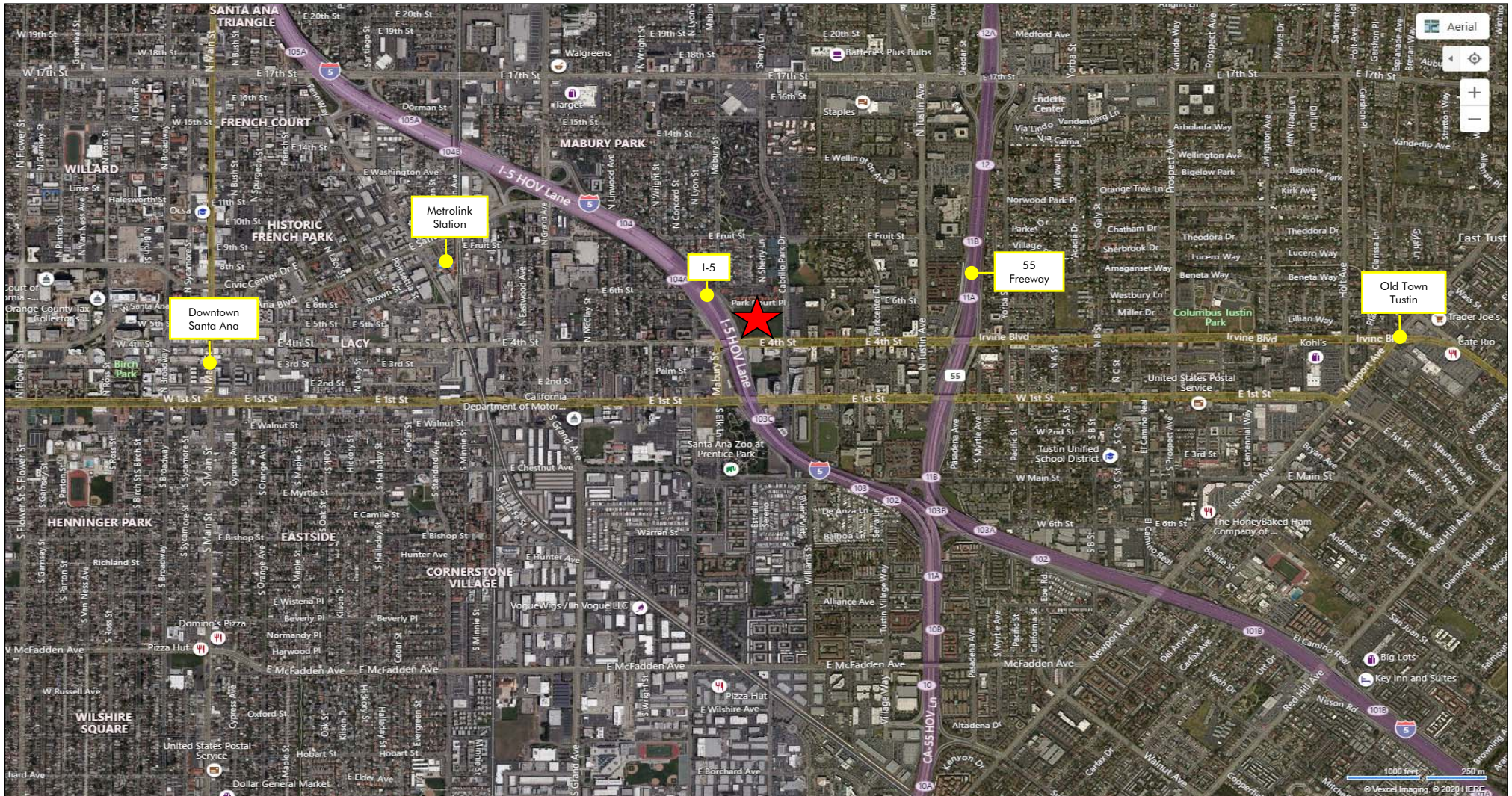
Map: Mapitude

EXHIBIT 4B
PROJECT LOCATION - MEDIAN INCOME
ORANGE COUNTY
MAY 2020



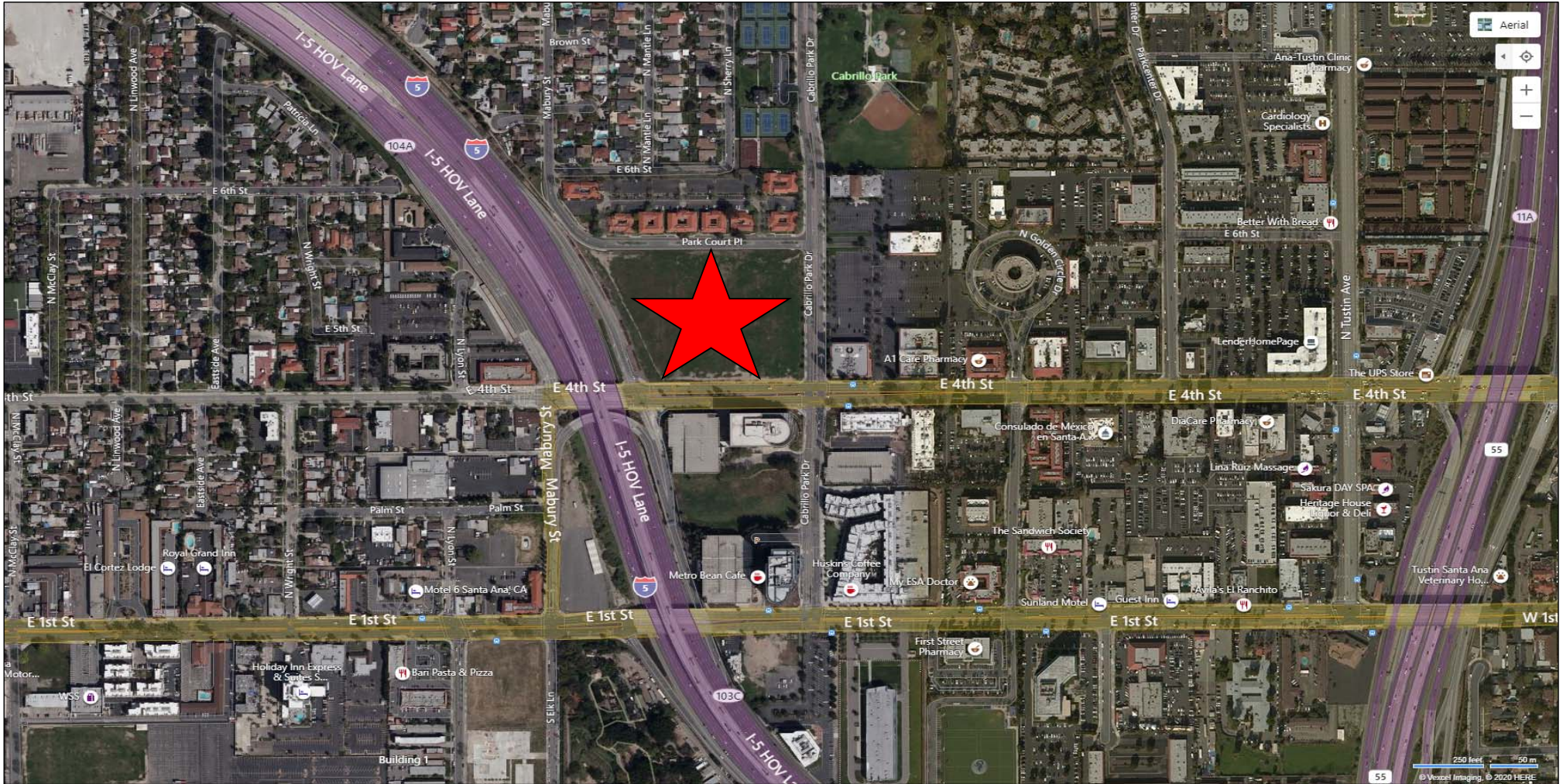
Source: ESRI

EXHIBIT 4C
PROJECTION LOCATION - LOCAL SETTING
SANTA ANA / TUSTIN
MAY 2020



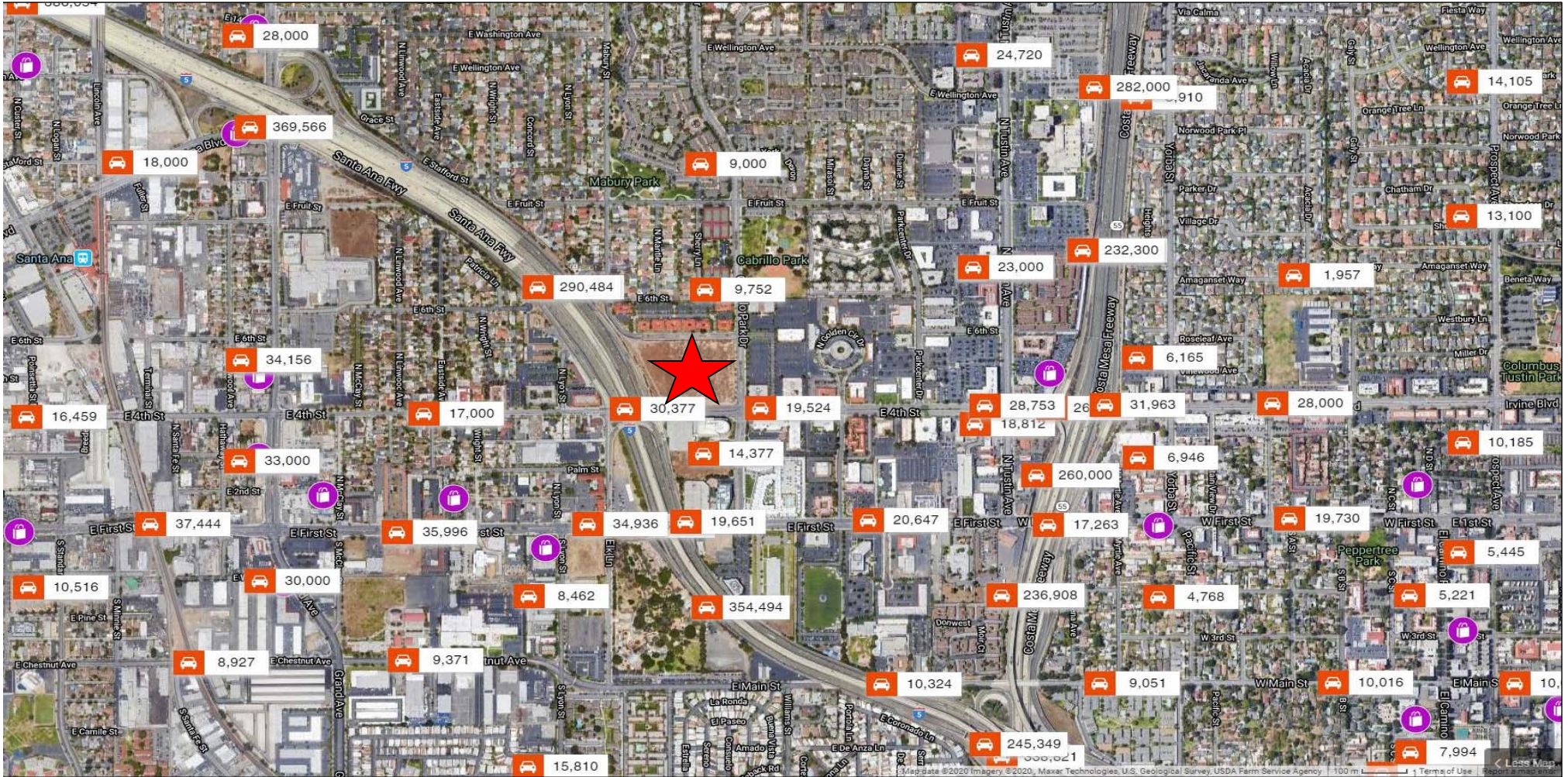
Map: BingMaps

EXHIBIT 4D
PROJECTION LOCATION - SURROUNDING LAND USES
SANTA ANA
MAY 2020



Map: BingMaps

EXHIBIT 4E
PROJECTION LOCATION - TRAFFIC COUNTS
SANTA ANA
MAY 2020



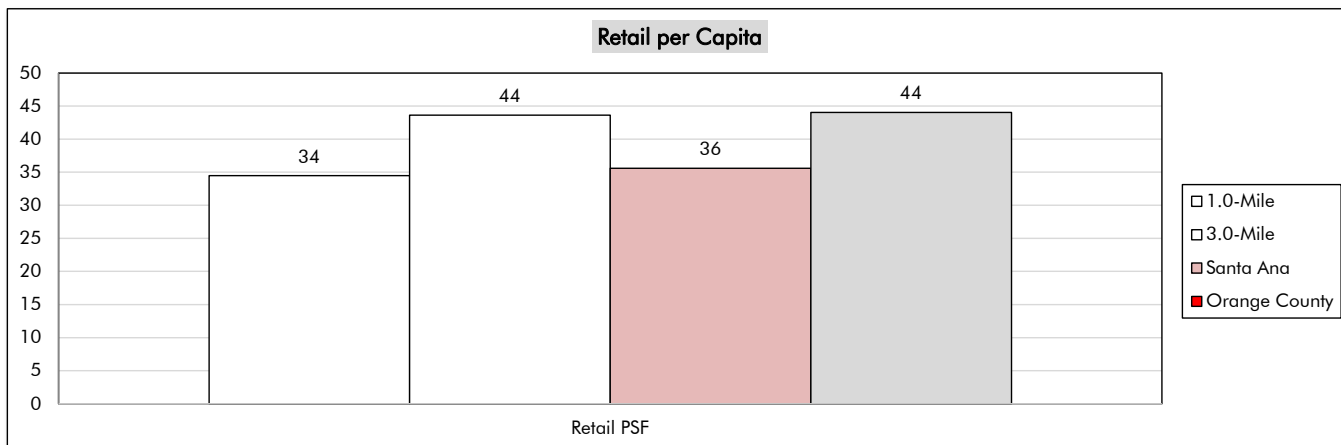
Map: CoStar

EXHIBIT 5
SITE PLAN
4TH AND CABRILLO - SANTA ANA
MAY 2020



**EXHIBIT 6
DEMOGRAPHICS
ORANGE COUNTY
2019**

Geography:	Local Radii								U.S.	
	1.0-Mile		3.0-Mile		Santa Ana		Orange County		Num.	Perc.
	Num.	Perc.	Num.	Perc.	Num.	Perc.	Num.	Perc.		
Population										
2019	34,761		280,411		340,347		3,252,459		332,417,793	
2024	35,921		287,653		349,390		3,368,861		345,487,602	
Gr./ Yr.	232	0.7%	1,448	0.5%	1,809	0.5%	23,280	0.7%	2,613,962	0.8%
Households										
2010	9,395		71,438		73,123		992,781		116,716,292	
2019	9,853		73,769		75,607		1,060,886		125,168,557	
Gr./ Yr.	51	0.5%	259	0.4%	276	0.4%	7,567	0.7%	939,141	0.8%
2024	10,107		75,335		77,346		1,095,455		129,922,162	
Gr./ Yr.	51	0.5%	313	0.4%	348	0.5%	6,914	0.6%	950,721	0.7%
Renters ('19)	6,615	67%	41,031	56%	41,674	55%	458,189	43%	45,709,279	37%
HH Size ('19)	3.5		3.8		4.5		3.1		2.7	
1 Person	2,026	21%	12,535	17%	9,533	13%	222,107	21%	33,464,681	27%
1-2 Persons	4,178	42%	29,106	39%	22,207	29%	532,561	50%	74,476,732	60%
3+ Persons	5,675	58%	44,663	61%	53,400	71%	528,325	50%	50,691,825	40%
Family HHs	7,128	72%	56,102	76%	61,665	82%	757,094	71%	83,153,401	66%
Median Income (000s)										
2019	\$53		\$67		\$60		\$88		\$61	
2024	\$60		\$78		\$71		\$103		\$69	
Gr./ Yr.	\$1.2	2.2%	\$2.3	3.3%	\$2.2	3.5%	\$2.9	3.0%	\$1.7	2.7%
Income Profile ('19)										
Over \$50K	5,396	55%	46,846	64%	45,254	60%	771,621	73%	73,892,464	59%
Over \$75K	3,124	32%	33,370	45%	29,958	40%	614,698	58%	51,974,116	42%
Over \$100K	1,732	18%	23,171	31%	19,230	25%	475,348	45%	36,152,986	29%
Over \$150K	706	7%	11,239	15%	7,697	10%	269,674	25%	17,309,482	14%
Over \$200K	299	3%	5,690	8%	3,201	4%	156,471	15%	9,153,435	7%
Age Profile ('19)										
Median - Pop.	30		32		31		37		39	
Householder										
Under 25	462	5%	2,556	3%	2,435	3%	30,673	3%	5,004,274	4%
25-34	2,032	21%	12,762	17%	13,551	18%	153,712	14%	19,381,040	15%
35-44	2,305	23%	15,575	21%	16,632	22%	190,990	18%	20,976,243	17%
45-54	1,984	20%	15,337	21%	16,677	22%	209,921	20%	22,103,882	18%
55-64	1,493	15%	12,785	17%	12,992	17%	207,275	20%	24,301,863	19%
65 Plus	1,576	16%	14,754	20%	13,321	18%	268,296	25%	33,399,611	27%
Retail Inventory										
SF (000s) (QTD)	1,198		12,231		12,117		143,250			
SF per Person	34		44		36		44			

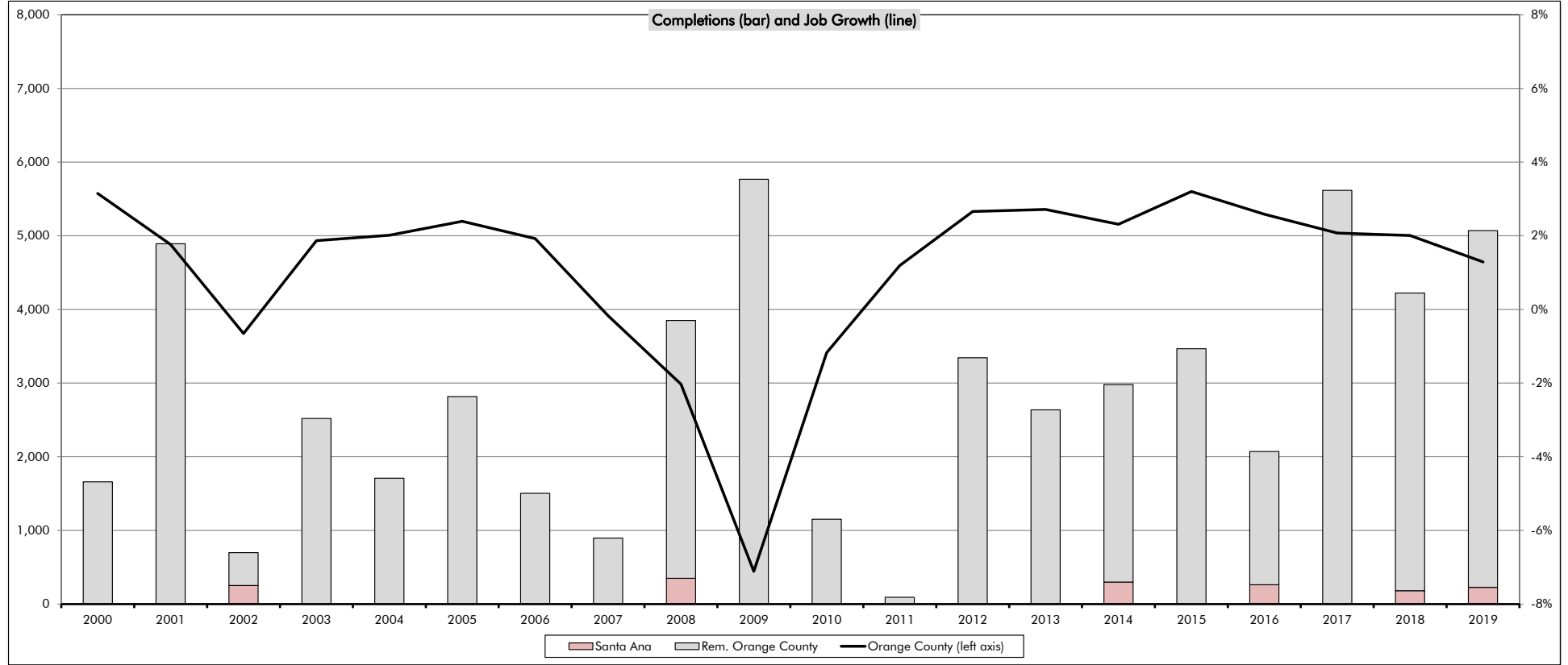


Source: ESRI

EXHIBIT 7A

MF MACRO-MARKET PERFORMANCE - INVENTORY & DELIVERIES
ORANGE COUNTY
2000 THROUGH FIRST QUARTER 2020

Values in 000s	Annual																				Annual Average			YTD - Apr-20		
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	5-Yr	10-Yr	15-Yr	1Q20	Num.	%Inv
Job Growth																										
Orange County	3.1%	1.8%	-0.7%	1.9%	2.0%	2.4%	1.9%	-0.2%	-2.0%	-7.1%	-1.2%	1.2%	2.7%	2.7%	2.3%	3.2%	2.6%	2.1%	2.0%	1.3%				0.9%		
Inventory (000s)																										
Orange County	204.6	207.7	210.5	212.3	214.1	216.7	218.9	219.4	222.0	225.9	229.6	230.1	232.2	234.6	237.4	240.6	243.4	248.5	252.6	256.1				260.4		
Santa Ana	19.7	19.7	19.9	19.9	19.9	19.9	19.9	19.7	19.8	20.1	20.1	20.1	20.1	20.0	20.3	20.3	20.5	20.6	20.8	20.8				22.2		
% County	9.6%	9.5%	9.5%	9.4%	9.3%	9.2%	9.1%	9.0%	8.9%	8.9%	8.7%	8.7%	8.6%	8.5%	8.6%	8.4%	8.4%	8.3%	8.2%	8.1%				8.5%		
Completions (000s)																										
Orange County	1.66	4.89	0.70	2.52	1.71	2.82	1.51	0.90	3.85	5.77	1.15	0.09	3.34	2.64	2.98	3.47	2.07	5.62	4.22	5.07	4.09	3.28	3.03	1.65	3.22	1.2%
Santa Ana	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.35	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.26	0.00	0.18	0.23	0.13	0.11	0.09	1.22	0.22	1.0%
% County	0%	0%	36%	0%	0%	0%	0%	0%	9%	0%	0%	0%	0%	0%	10%	0%	13%	0%	4%	4%	3%	3%	3%	74%	7%	



Source: Jobs - BLS; Apartment - CoStar (for projects that are 5+ units)

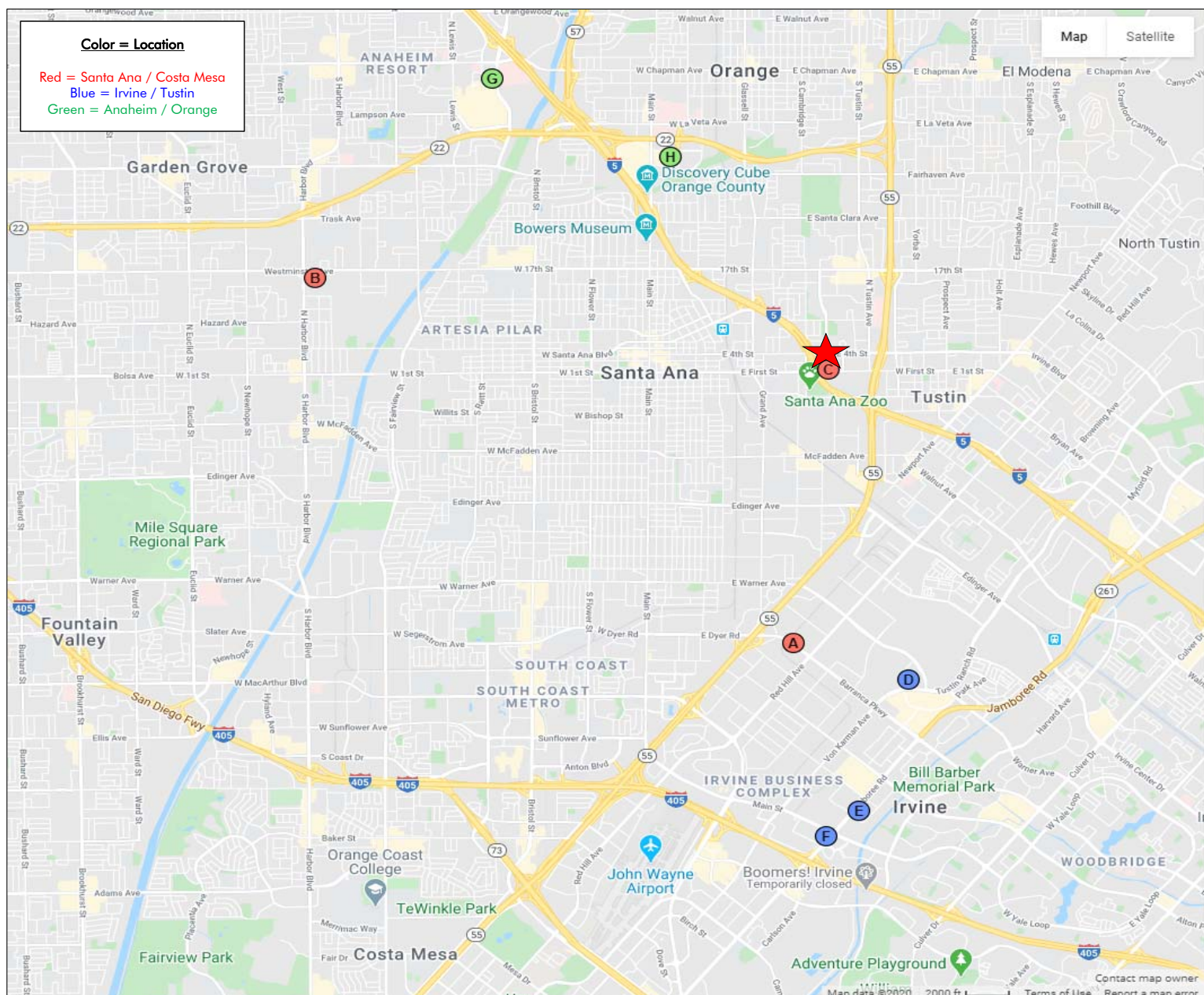
Note: "U/C" - under construction

EXHIBIT 8A

MF INVENTORY - LOCATION & PERFORMANCE
SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
MAY 2020

Rents listed are "base" - an average of the lowest listed rents per floorplan

Map Key	Project Name	Units	Year Built	Occ.	Unit Mix (by Bed Count)			Overall			Project Averages (Size and List Rent)								
					0	1	2	Unit Size	Base Rent		Studios		One-Bedrooms		Two-Bedrooms				
									\$	\$/sf	Unit Size	Base Rent	\$/sf	Unit Size	Base Rent	\$/sf	Unit Size	Base Rent	\$/sf
F	Skyloft Apartments	388	2019	19%	8%	54%	36%	910	\$3,024	\$3.32	571	\$2,531	\$4.43	768	\$2,713	\$3.53	1,165	\$3,513	\$3.02
H	Eleven 10	260	2018	93%	21%	51%	28%	825	\$2,571	\$3.12	515	\$2,103	\$4.08	764	\$2,463	\$3.22	1,167	\$3,118	\$2.67
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D	Amalfi	542	2014	95%	12%	69%	19%	785	\$2,268	\$2.89	584	\$2,035	\$3.48	748	\$2,242	\$3.00	1,046	\$2,510	\$2.40
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Total/Average:		2,729	2017	68%	12%	48%	37%	904	\$2,606	\$2.88	645	\$2,236	\$3.47	765	\$2,329	\$3.04	1,130	\$3,010	\$2.66
Excluding Lease-Ups:		1,778		94%															



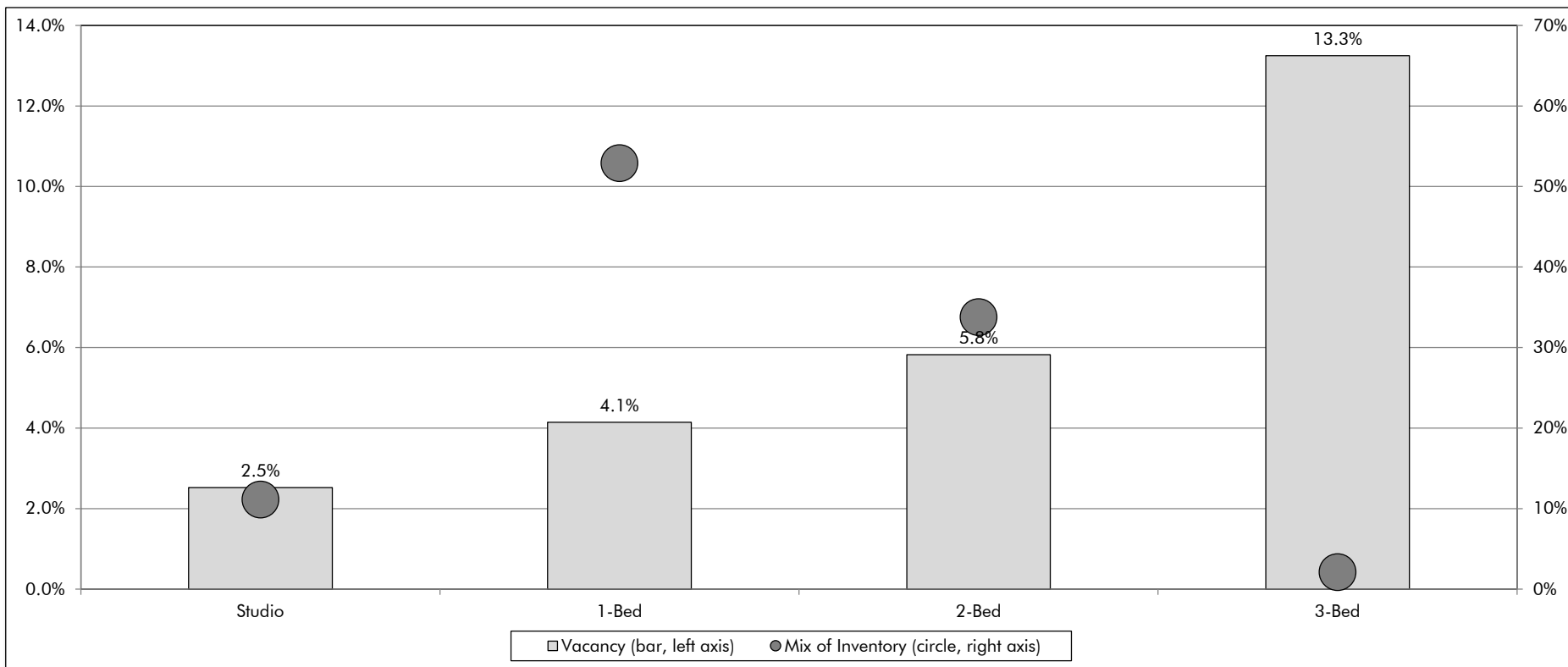
Source: Appendix A

EXHIBIT 8B

MF INVENTORY - VACANCY BY UNIT TYPE
SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
MAY 2020

Color = Location
Red = Santa Ana / Costa Mesa
Blue = Irvine / Tustin
Green = Anaheim / Orange

Project Name	Year Built	1B \$/SF	Units	Unit Sizes				Unit Count				Unit Mix				Vacancy	Vacancy Rate By Unit Type			
				0	1	2	3	0	1	2	3	0	1	2	3		0	1	2	3
Eleven 10	2018	\$3.22	260	515	764	1,167	---	55	133	73	0	21%	51%	28%	0%	7%	4%	1%	0%	---
Amalfi	2014	\$3.00	542	584	748	1,046	---	65	374	103	0	12%	69%	19%	0%	5%	0%	5%	13%	---
Residences on Jamboree	2017	\$2.95	381	690	724	1,134	1,452	69	164	126	23	18%	43%	33%	6%	4%	3%	2%	4%	13%
AMLI Uptown Orange	2016	\$2.95	334	570	782	1,071	1,418	10	150	170	4	3%	45%	51%	1%	7%	10%	8%	5%	0%
Nineteen01	2016	\$2.47	261	---	831	1,235	1,799	0	121	130	11	0%	46%	50%	4%	10%	---	3%	7%	18%
Total/Average:	2016	\$2.88	1,778	601	762	1,127	1,092	198	941	601	38	11%	53%	34%	2%	6%	3%	4%	6%	13%

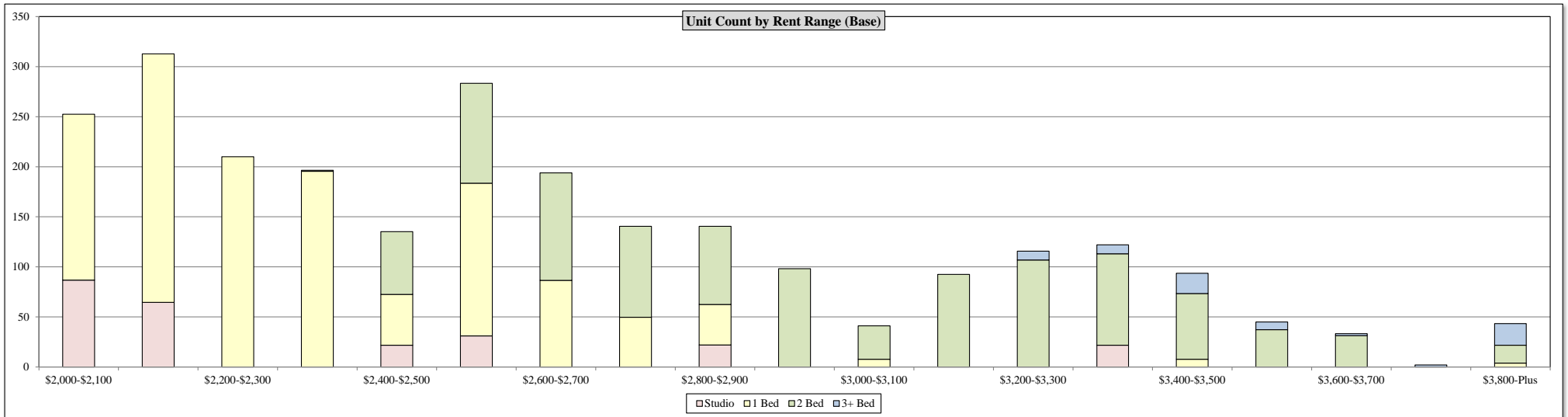


(1) Excludes projects in Lease-up
(2) Represents availability of units as per leasing agents and community websites
Source: Appendix A

EXHIBIT 8C
MF INVENTORY - FLOOR PLAN MIX
SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
MAY 2020

Units by Rent Range (Base)																					Total	
Bed Count	Under \$2,000	\$2,000 - \$2,100	\$2,100 - \$2,200	\$2,200 - \$2,300	\$2,300 - \$2,400	\$2,400 - \$2,500	\$2,500 - \$2,600	\$2,600 - \$2,700	\$2,700 - \$2,800	\$2,800 - \$2,900	\$2,900 - \$3,000	\$3,000 - \$3,100	\$3,100 - \$3,200	\$3,200 - \$3,300	\$3,300 - \$3,400	\$3,400 - \$3,500	\$3,500 - \$3,600	\$3,600 - \$3,700	\$3,700 - \$3,800	\$3,800 Plus	Num.	Share
0	92	87	65	0	0	22	31	0	0	22	0	0	0	0	22	0	0	0	0	0	340	12%
Share	27%	26%	19%	0%	0%	6%	9%	0%	0%	6%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	1,304	48%
1	85	166	248	210	196	51	153	87	50	40	0	8	0	0	0	8	0	0	0	0	1,014	37%
Share	7%	13%	19%	16%	15%	4%	12%	7%	4%	3%	0%	1%	0%	0%	0%	1%	0%	0%	0%	0%	71	3%
2	0	0	0	0	1	63	100	107	91	78	98	33	92	107	91	66	37	31	0	0	18	0%
Share	0%	0%	0%	0%	0%	6%	10%	11%	9%	8%	10%	3%	9%	11%	9%	6%	4%	3%	0%	0%	22	2%
3	0	0	0	0	0	0	0	0	0	0	0	0	0	9	9	20	8	2	2	2	22	0%
Share	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	12%	12%	28%	11%	3%	3%	30%	22	0%
Total	177	252	313	210	197	135	283	194	141	141	98	41	92	116	122	94	45	33	2	43	2,729	100%
Cumulative	6%	16%	27%	35%	42%	47%	57%	65%	70%	75%	78%	80%	83%	88%	92%	95%	97%	98%	98%	100%		

Units by Floor Plan Size Range																					Total	
Bed Count	Under 600	600 - 650	650 - 700	700 - 750	750 - 800	800 - 850	850 - 900	900 - 950	950 - 1,000	1,000 - 1,050	1,050 - 1,100	1,100 - 1,150	1,150 - 1,200	1,200 - 1,250	1,250 - 1,300	1,300 - 1,350	1,350 - 1,400	1,400 - 1,450	1,450 - 1,500	1,500 Plus	Num.	Share
0	203	0	72	22	0	0	22	0	0	22	0	0	0	0	0	0	0	0	0	0	340	12%
Share	60%	0%	21%	6%	0%	0%	6%	0%	0%	6%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1,304	48%
1	27	10	194	414	285	244	42	37	31	12	0	0	0	8	0	0	0	0	0	0	1,014	37%
Share	2%	1%	15%	32%	22%	19%	3%	3%	2%	1%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	71	3%
2	0	0	0	0	0	0	0	0	54	146	249	231	197	54	47	0	22	0	2	13	18	0%
Share	0%	0%	0%	0%	0%	0%	0%	0%	5%	14%	25%	23%	19%	5%	5%	0%	2%	0%	0%	1%	22	0%
3	0	0	0	0	0	0	0	0	0	0	0	0	0	18	0	0	0	28	3	22	22	0%
Share	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	25%	0%	0%	0%	40%	5%	31%	22	0%
Total	230	10	266	435	285	244	64	37	85	179	249	231	197	79	47	0	22	28	5	35	2,729	100%
Cumulative	8%	9%	19%	34%	45%	54%	56%	58%	61%	67%	76%	85%	92%	95%	97%	97%	98%	99%	99%	100%		



Source: Appendix A

EXHIBIT 8D

MF INVENTORY - AMENITIES
SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
MAY 2020

Project:

Nineteen01

Broadstone Arden

Eleven 10

Community Summary

City	Santa Ana	Santa Ana	Orange
Address	1901 E 1st St	1951 E Dyer Road	1110 W. Town and Country Rd
Year Built	2016	2020	2018
Elevation	5	5	5
Units	261	335	260
Average Rent (\$)	\$2,495	\$3,063	\$2,571
Average Rent (\$/sf)	\$2.33	\$2.99	\$3.12
% 1-Beds	46%	19%	51%
% 2-Beds	50%	53%	28%

Community Amenities

Concierge Service	No	Yes	Yes
Business Center	Yes	Yes	Yes
Conference Room	No	Yes	Yes
Fitness Center	Yes	Yes	Yes + Outdoor Athletic Terrace
Cardio Room	Combined	Spin Studio	Combined
Weight Room	Combined	Yes	Combined
Yoga/Stretch Room	---	Yes	Outdoor Area
Game Room	Yes	Outdoor, Ping Pong / Billiards	Billiards / Shuffleboard
Kitchen/Clubhouse	Catering Kitchen / Games	Large, Catering Kitchen	Catering Kitchen
Pool	Rooftop / Cabanas	Resort Pool, Salt Room	Resort-Style Pool and Spa
Theater	TV Room	Outdoor Pool Theatre	No
Wi-Fi	Yes	Yes	Yes
Other Areas	Car Wash Station	Golf Simulator	Pet Spa and Dog Park
	Pet Spa and Dog Park	Coffee Lounge	Amazon parcel locker system
	Outdoor Cabanas w/ TVs	Day Spa	Outdoor Cabanas
	Bike Storage	Storage Units	

Interior Spec

Kitchen			
Appliance	Stainless Steel	Stainless Steel	Stainless Steel
Counters	Quartz/Marble	Quartz	Quartz
Floor	Wood-Grain Finish	Wood Plank Style	Wood-Style
Cabinets	Contemporary	Contemporary	Contemporary
Backsplash	Full	Full	Full
Washer/Dryer In Unit	Stacked	Stacked	Stacked
Flooring (common)	Wood-Grain Finish	Wood Plank Style	Wood-Style
Balcony/Patio	In most units	Private Patios	In most units

Pictures

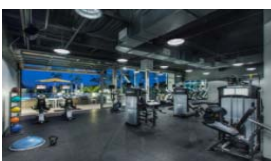
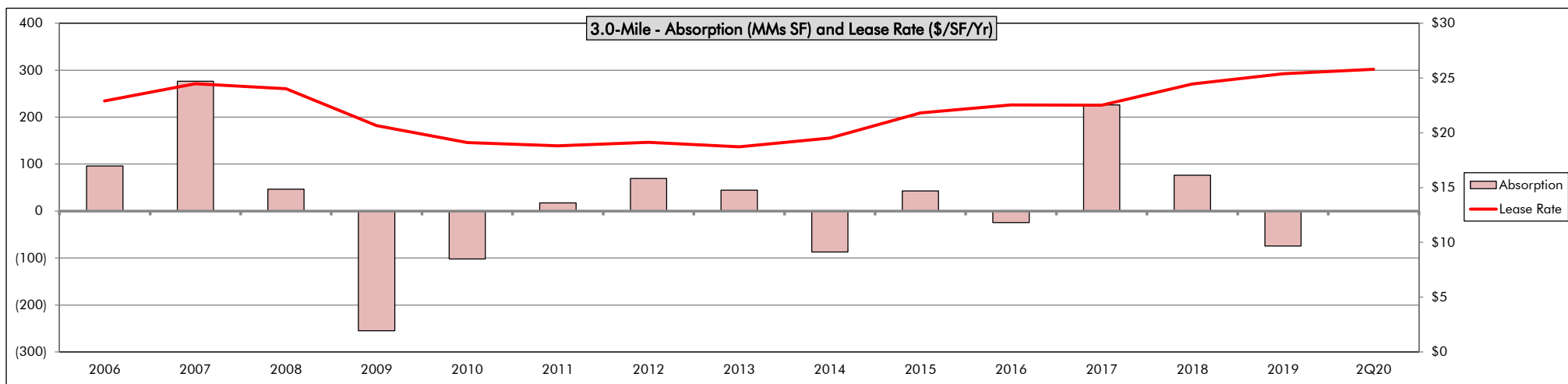


EXHIBIT 9
RETAIL PERFORMANCE
ORANGE COUNTY
2006 THROUGH SECOND QUARTER 2020

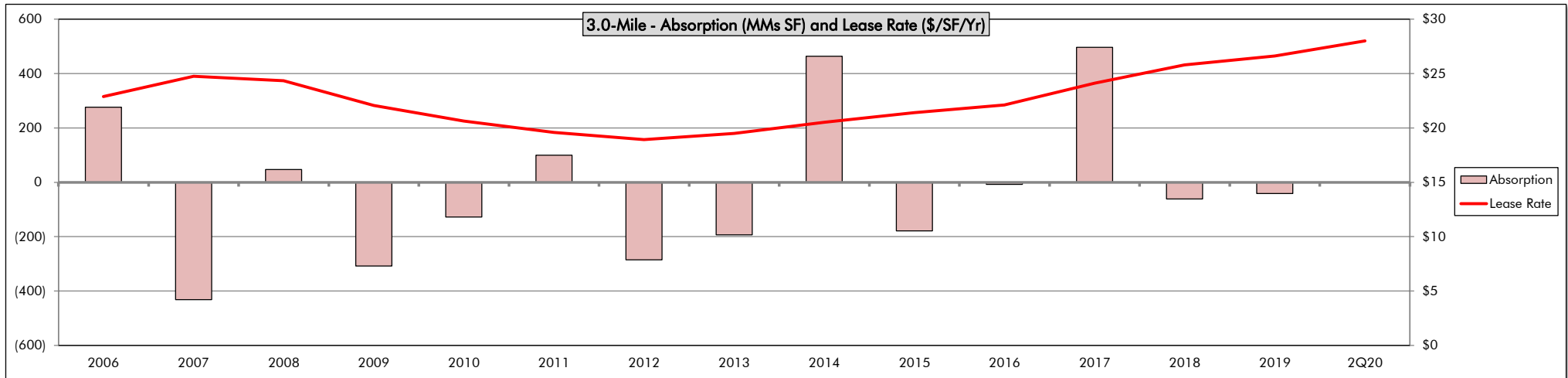
Period:	Annual														Annual Average		Quarterly		Under Const.	
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	5-Yr	10-Yr	1Q20	2Q20	Num.	%Inv
Inventory SF (MMs)															<i>Growth (#)</i>					
Orange County	138.6	139.8	141.3	142.1	142.3	141.8	141.8	141.5	141.6	142.1	142.6	143.0	143.2	143.3	0.33	0.11	143.3	143.3	0.16	0.1%
Santa Ana	12.0	12.1	12.2	12.2	12.2	12.2	12.2	12.1	12.1	12.1	12.1	12.1	12.1	12.1	(0.00)	(0.01)	12.1	12.1	0.1	0.5%
3.0-Mile	12.0	12.0	12.1	12.1	12.1	12.1	12.1	12.1	12.1	12.1	12.1	12.1	12.2	12.2	0.03	0.01	12.2	12.2	0.01	0.0%
1.0-Mile	1.1	1.1	1.1	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	0.01	0.00	1.2	1.2	0.00	0.0%
% Santa Ana	9%	9%	9%	10%	10%	9%	10%	10%	10%	10%	10%	10%	10%	10%	-187%	-24%	10%	10%	0%	
Occupancy																				
Orange County	96.3%	96.6%	96.0%	94.2%	93.6%	94.0%	93.9%	94.4%	95.4%	96.0%	96.2%	95.9%	96.2%	96.2%	96.1%	95.2%	96.0%	95.8%		
Santa Ana	96.3%	96.8%	96.3%	95.4%	94.1%	94.2%	93.9%	93.4%	94.9%	95.6%	95.8%	95.7%	96.6%	96.3%	96.0%	95.0%	95.9%	96.3%		
3.0-Mile	95.0%	96.7%	97.2%	95.8%	94.0%	93.8%	94.3%	94.1%	94.9%	94.7%	94.6%	95.3%	96.6%	96.1%	95.4%	94.8%	95.8%	95.8%		
1.0-Mile	97.9%	97.6%	96.1%	92.4%	91.6%	92.0%	94.2%	94.9%	92.7%	93.3%	96.1%	96.7%	97.7%	97.1%	96.1%	94.6%	97.3%	97.1%		
Absorption SF (000s)																				
Orange County	987	1,965	(97)	(2,323)	(312)	100	295	790	1,206	1,685	47	145	716	(394)	440	428				
Santa Ana	134	64	60	(227)	3	(94)	(5)	27	52	111	(43)	(44)	134	(67)	18	7				
3.0-Mile	96	276	46	(255)	(102)	17	69	45	(87)	43	(24)	226	76	(74)	49	19				
1.0-Mile	18	(12)	(7)	(0)	(18)	7	46	(6)	(42)	46	15	28	(1)	3	18	8				
Lease Rate															<i>Growth (%)</i>					
Orange County	\$24	\$27	\$29	\$26	\$23	\$22	\$22	\$22	\$23	\$24	\$25	\$26	\$26	\$27	3.8%	0.6%	\$28.26	\$28.62		
Santa Ana	\$25	\$26	\$25	\$22	\$19	\$19	\$19	\$18	\$20	\$22	\$21	\$23	\$24	\$26	4.8%	1.7%	\$26.97	\$27.11		
3.0-Mile	\$23	\$24	\$24	\$21	\$19	\$19	\$19	\$19	\$20	\$22	\$23	\$23	\$24	\$25	5.4%	2.1%	\$26.37	\$25.80		
1.0-Mile	\$16	\$37	\$31	\$27	\$22	\$22	\$22	\$21	\$23	\$26	\$25	\$26	\$26	\$27	3.0%	0.1%	\$27.11	\$30.23		



Source: CoStar

**EXHIBIT 10
OFFICE PERFORMANCE
ORANGE COUNTY
2006 THROUGH SECOND QUARTER 2020**

Period:	Annual														Annual Average		Quarterly		Under Const.	
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	5-Yr	10-Yr	1Q20	2Q20	Num.	%Inv
Inventory SF (MMs)															<i>Growth (#)</i>					
Orange County	146.3	149.8	153.2	153.9	153.9	154.0	154.4	154.0	154.7	154.9	155.4	156.5	158.1	158.9	0.83	0.50	159.1	159.1	1.38	0.9%
Santa Ana	19.6	19.6	19.7	19.7	19.7	19.8	19.8	19.6	19.5	19.5	19.5	19.5	19.5	19.4	(0.02)	(0.03)	19.4	19.4	0.0	0.0%
3.0-Mile	21.6	21.7	21.8	21.9	22.0	22.0	22.0	21.8	21.7	21.8	21.8	21.9	21.9	21.9	0.03	(0.01)	21.8	21.8	0.19	0.9%
1.0-Mile	5.4	5.4	5.4	5.4	5.5	5.5	5.5	5.4	5.4	5.4	5.4	5.4	5.4	5.4	0.00	(0.01)	5.4	5.4	0.00	0.0%
% Santa Ana	27%	27%	27%	28%	28%	28%	28%	28%	28%	28%	28%	28%	28%	28%	0%	20%	28%	28%		
Occupancy																				
Orange County	93.1%	91.1%	87.8%	86.0%	84.5%	85.8%	87.0%	88.5%	89.1%	90.5%	91.4%	91.2%	90.5%	90.4%	90.8%	88.9%	90.4%	90.3%		
Santa Ana	93.8%	92.3%	90.0%	87.8%	87.5%	88.0%	87.4%	86.9%	87.0%	87.5%	87.6%	89.8%	90.1%	89.2%	88.8%	88.1%	88.5%	88.0%		
3.0-Mile	94.4%	93.6%	91.6%	90.5%	89.2%	89.3%	88.6%	88.4%	89.5%	89.8%	88.8%	90.2%	91.0%	90.7%	90.1%	89.5%	90.7%	90.4%		
1.0-Mile	95.7%	93.5%	89.1%	87.3%	85.0%	86.2%	85.0%	86.5%	88.1%	88.6%	89.1%	88.4%	89.2%	88.4%	88.7%	87.4%	87.7%	87.0%		
Absorption SF (000s)																				
Orange County	700	(852)	(1,001)	(3,581)	(472)	2,900	2,054	1,193	2,880	1,572	1,582	243	620	245	852	1,282				
Santa Ana	86	(586)	(167)	(338)	33	58	(25)	(487)	244	(162)	393	333	(115)	(392)	12	(12)				
3.0-Mile	276	(432)	47	(308)	(128)	99	(285)	(193)	463	(179)	(8)	497	(61)	(42)	41	16				
1.0-Mile	154	(267)	(43)	(99)	(4)	40	(55)	1	85	(43)	160	(77)	(15)	(53)	(5)	4				
Lease Rate															<i>Growth (%)</i>					
Orange County	\$28	\$30	\$29	\$26	\$24	\$23	\$22	\$22	\$24	\$26	\$27	\$29	\$31	\$32	5.9%	2.0%	\$32.26	\$32.76		
Santa Ana	\$24	\$25	\$25	\$22	\$21	\$20	\$19	\$19	\$20	\$21	\$22	\$23	\$25	\$27	6.1%	1.9%	\$28.13	\$27.82		
3.0-Mile	\$23	\$25	\$24	\$22	\$21	\$20	\$19	\$20	\$21	\$21	\$22	\$24	\$26	\$27	5.3%	1.9%	\$27.30	\$28.01		
1.0-Mile	\$23	\$23	\$23	\$23	\$21	\$19	\$19	\$19	\$20	\$21	\$20	\$22	\$24	\$26	5.2%	1.3%	\$28.24	\$28.69		

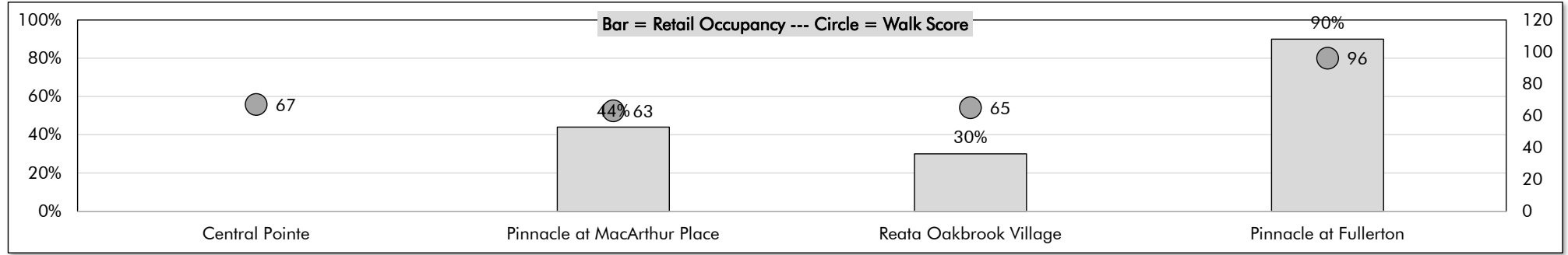


Source: CoStar

EXHIBIT 11
MIXED-USE ANALOGS
SANTA ANA, LAGUNA HILLS AND FULLERTON
MAY 2020

Project Name City Street	Central Pointe Santa Ana 4th & Cabrillo Park Dr	Pinnacle at MacArthur Place Santa Ana 31 E. MacArthur Cres	Reata Oakbrook Village Laguna Hills 24391 Avenida de la Carlota	Pinnacle at Fullerton Fullerton 229 E. Commonwealth Ave
Project Description				
Year Built	TBD	2001	2016	2004
Elevation	5-stories	4-stories	4-stories	4-stories
Apartments	644	253	289	192
Retail (SF)	15,200	14,000	12,000	8,500
Parking				
Garage	Wrap - 7-stories	Semi-Sub Podium	Semi-Sub Podium	Semi-Sub Podium
Street	20-spaces	25-spaces	Unlimited Spaces	8-spaces
Retail Performance				
Occupancy	TBD	44%	30%	90%
Visibility				
Primary Frontage Street	4th Street	MacArthur Boulevard	Avenida de la Carlota	Commonwealth Avenue
Walk Score	67	63	65	96
Traffic Count	23,000	36,000	15,000	24,000

Picture



Source: CoStar; OCTA; TCG

FISCAL IMPACT ANALYSIS



17872 GILLETTE AVE.
SUITE 350
IRVINE, CA 92614

714 541 4585
INFO@WEBRSG.COM
WEBRSG.COM

June 3, 2020

Via Electronic Mail

Michael D. Reynolds, Principal
THE CONCORD GROUP
369 San Miguel Drive, Suite 265
Newport Beach, CA 92660

**DEVELOPMENT FISCAL IMPACT ANALYSIS
CENTRAL POINTE MIXED-USE PROJECT, SANTA ANA**

Dear Mr. Reynolds:

RSG, Inc. (“RSG”) was retained by The Concord Group (“TCG”) to perform a fiscal and economic impact analysis for the development of a proposed mixed-use apartment and retail project (“Project”) in Santa Ana, California. TCG obtained this analysis on behalf of the property owner/developer, Arnel & Waterford Property Company (“Developer”), which recently submitted an application for redevelopment of the subject property with the City of Santa Ana’s (“City”) Planning and Building Services Department.

The Project site sits along 4th Street, between the Santa Ana (Interstate 5) Freeway (“I-5”) and Cabrillo Park Drive. The gross site area is approximately 8.35 acres, and is made up of four vacant parcels. If approved, the Project would consist of two five-story mixed-used buildings divided by a central park and open walk space. Attached to the buildings would be two seven-story parking structures. On the ground floor of each building would be a total 15,200 square feet of retail space.

This letter describes our analysis, methodology, and anticipated recurring fiscal impacts resulting from development of the Project. As is typical at this stage, our conclusions could evolve as the application moves forward through the design and environmental review process.

As is consistent with other Santa Ana projects analyzed by RSG, the construction period was assumed to be over three years. Part of the work would begin in 2021 (36 percent), with a majority taking place in 2022 (51 percent), leading to the remainder in 2023 (13 percent). The Project would open in the third construction year. Fiscal impacts from that year are reduced to reflect a partial year.

Overall, RSG anticipates the following fiscal outcomes over a 25-year forecast period:

- Gross General Fund revenues of approximately \$23.1 million, (net present value, discounted at 4 percent), including:
 - \$10.3 million (net present value, discounted at 4 percent) in net new property tax revenues to the City General Fund.
 - A combined \$3.6 million in sales taxes that includes \$1.8 million from the City’s base rate, as well as an additional \$1.8 million from the City’s Measure X additional tax rate through the sunset in 2039 (net present value, discounted at 4 percent).

- A total of \$23.1 million (net present value, discounted at 4 percent) in additional City General Fund revenue, including construction period revenues, recurring site-specific tax, and other Project impacts.
- City General Fund expenditures associated with the Project total \$7 million (net present value, discounted at 4 percent)
- As a result, the net new General Fund revenue (revenues less expenditures) is projected to be approximately \$16.1 million (net present value, discounted at 4 percent) if the Project were developed as proposed.

Table 1 summarizes the 25-year fiscal impact of the Project. Table 2 provides the corresponding forecast of the same impacts on the following page.

Table 1

NET NEW RECURRING GENERAL FUND FISCAL IMPACTS

Central Pointe, Santa Ana

Revenue Category	25-Year Recurring	
	Nominal	NPV 4.0%
Property Tax	\$ 18,505,380	\$ 10,333,353
Property Tax In-Lieu	12,096,754	6,756,731
Utility User Tax	3,537,877	1,884,715
Sales Tax	3,479,170	1,853,440
Measure X (2018) Sales Tax Increase	2,753,009	1,786,920
Business Tax	927,121	493,901
Total Revenues	\$ 41,299,312	\$ 23,109,059
Less City Expenditures	\$(13,214,039)	\$(7,026,724)
NET NEW REVENUE TOTAL	\$ 28,085,273	\$ 16,082,335

Sources: City of Santa Ana, County of Orange, California State Board of Equalization, ESRI Business Analyst Online, and RSG, Inc.

Table 2

25-YEAR NET NEW RECURRING FISCAL IMPACT PROJECTIONS
 Central Pointe, Santa Ana

Year	Net New Property Tax	Property Tax In-Lieu	Utility User Tax	Sales Tax	Measure X (2018) Additional Sales Tax	Business Tax	Gross Revenue	City Expenditures	Net New Total
CY1 2021	\$ 205,735	\$ 138,575	\$ -	\$ -	\$ -	\$ -	\$ 344,309	\$ -	\$ 344,309
CY2 2022	462,569	302,985	-	-	-	-	765,554	-	765,554
CY3 2023	529,747	346,150	91,766	90,244	135,366	24,048	1,217,321	(307,968)	909,354
1 2024	540,342	353,073	94,519	92,951	139,427	24,769	1,245,082	(353,986)	891,096
2 2025	551,149	360,135	97,355	95,740	143,609	25,512	1,273,500	(364,606)	908,895
3 2026	562,172	367,337	100,276	98,612	147,918	26,278	1,302,593	(375,544)	927,049
4 2027	573,416	374,684	103,284	101,570	152,355	27,066	1,332,375	(386,810)	945,565
5 2028	584,884	382,178	106,383	104,617	156,926	27,878	1,362,866	(398,414)	964,451
6 2029	596,582	389,821	109,574	107,756	161,634	28,715	1,394,081	(410,367)	983,714
7 2030	608,513	397,618	112,861	110,988	149,668	29,576	1,409,225	(422,678)	986,547
8 2031	620,684	405,570	116,247	114,318	154,158	30,463	1,441,440	(435,358)	1,006,082
9 2032	633,097	413,682	119,734	117,748	158,783	31,377	1,474,421	(448,419)	1,026,002
10 2033	645,759	421,955	123,326	121,280	163,546	32,318	1,508,186	(461,872)	1,046,314
11 2034	658,674	430,394	127,026	124,918	168,453	33,288	1,542,754	(475,728)	1,067,026
12 2035	671,848	439,002	130,837	128,666	173,506	34,287	1,578,146	(489,999)	1,088,147
13 2036	685,285	447,782	134,762	132,526	178,711	35,315	1,614,382	(504,699)	1,109,682
14 2037	698,990	456,738	138,805	136,502	184,073	36,375	1,651,483	(519,840)	1,131,642
15 2038	712,970	465,873	142,969	140,597	189,595	37,466	1,689,470	(535,436)	1,154,034
16 2039	727,230	475,190	147,258	144,815	195,283	38,590	1,728,366	(551,499)	1,176,867
17 2040	741,774	484,694	151,676	149,159	-	39,748	1,567,051	(568,044)	999,007
18 2041	756,610	494,388	156,226	153,634	-	40,940	1,601,798	(585,085)	1,016,713
19 2042	771,742	504,276	160,913	158,243	-	42,168	1,637,342	(602,638)	1,034,704
20 2043	787,177	514,361	165,740	162,990	-	43,433	1,673,702	(620,717)	1,052,985
21 2044	802,920	524,648	170,713	167,880	-	44,736	1,710,898	(639,338)	1,071,559
22 2045	818,979	535,141	175,834	172,916	-	46,078	1,748,949	(658,518)	1,090,431
23 2046	835,358	545,844	181,109	178,104	-	47,461	1,787,876	(678,274)	1,109,602
24 2047	852,066	556,761	186,542	183,447	-	48,885	1,827,700	(698,622)	1,129,078
25 2048	869,107	567,896	192,139	188,950	-	50,351	1,868,443	(719,581)	1,148,862
TOTAL	\$ 18,505,380	\$ 12,096,754	\$ 3,537,877	\$ 3,479,170	\$ 2,753,009	\$ 927,121	\$ 41,299,312	\$ (13,214,039)	\$ 28,085,273
NPV 4.00%	\$ 10,333,353	\$ 6,756,731	\$ 1,884,715	\$ 1,853,440	\$ 1,786,920	\$ 493,901	\$ 23,109,059	\$ (7,026,724)	\$ 16,082,335
Inflation Rate	2.0%	2.0%	3.0%	3.0%	3.0%	3.0%	3.0%	3.0%	

PROJECT DESCRIPTION

The Project site is situated just east of the I-5 Freeway on 4th Street at Cabrillo Park Drive, south of Parkcourt Place. The Project sits at the northern border of the MEMU zone. It is 1.7 miles east of Downtown Santa Ana. Santa Ana's Saddleback View neighborhood lies across I-5 to the west while Marbury Park neighborhood is to the north. Office/professional uses are located to the east, and located south across 4th Street is the California Department of Transportation (Caltrans) District 12 office building and other uses. The Project is also one block away from the relatively new Nineteen01 multifamily project at the corner of First Street and Cabrillo Park Drive.

Figure 1 shows the location of the Project Site.

Figure 1: Project Site



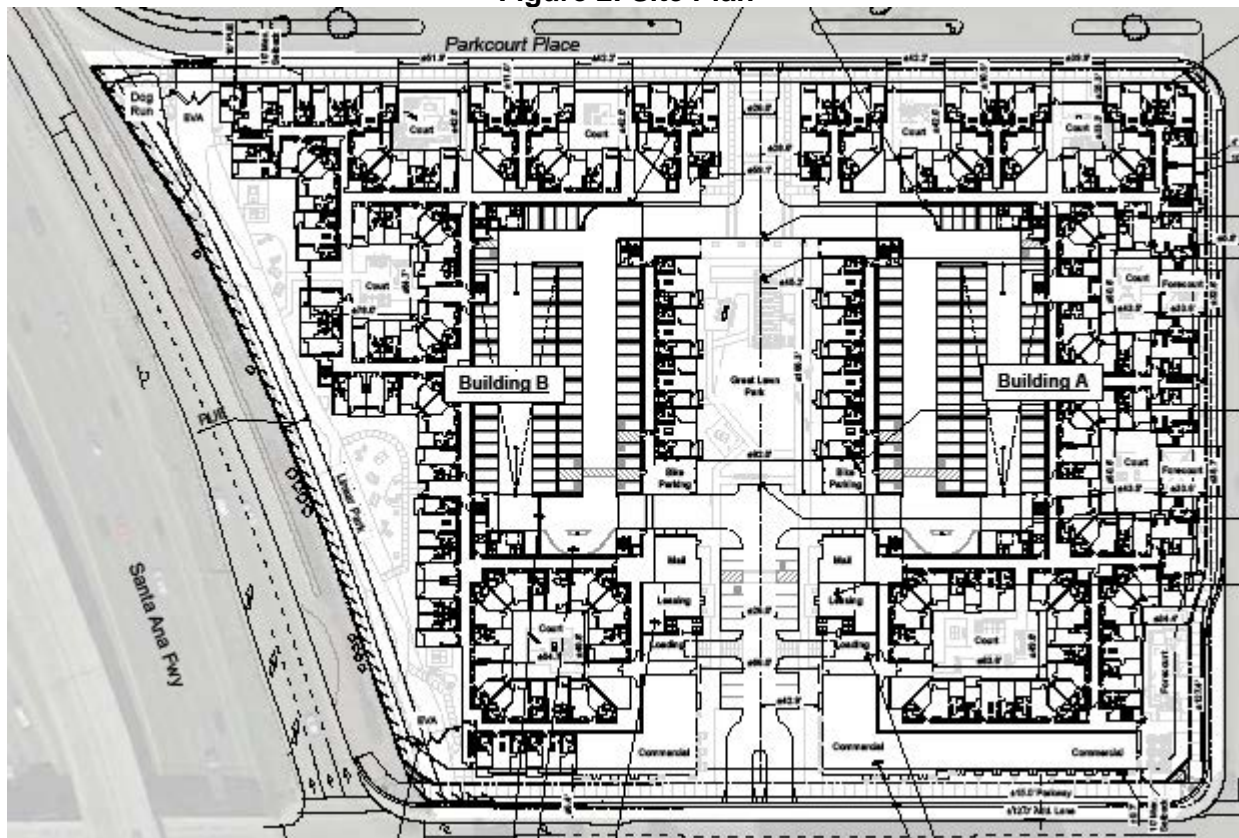
Source: Google Maps

According to the Developer this is the City's Metro East Mixed-Use ("MEMU") Overlay Zone, as well as its Active Urban District. The MEMU zone was created in 2007 by the Santa Ana Planning Commission to foster the development of more active commercial and residential projects. The zone encourages the construction of modern and urban architecture, with plentiful open space.

As shown in Figure 2, the 576,000 square foot (gross building area) Project would result in the construction of 644 market rate multifamily units, 15,200 square feet of ground floor retail space, and two seven-story parking structures with a combined 1,318 spaces.

Both buildings contain similar amenities. The eastern structure, building A, would host 318 units, 580 parking spaces, and retail space of 9,600 square feet. Five courtyards checker this building's outdoor open space. The western structure (building B) would host 319 units and 638 parking spaces. The building would also have 5,600 square feet for retail on the ground floor. Just outside of the building would be open space divided into four courtyards, an Emergency Vehicle Access lane ("EVA"), a small dog run, and a park looking out on the I-5 Freeway. Between both buildings would be a resident park and paved pedestrian walkways leading to 4th Street and Parkcourt Place.

Figure 2: Site Plan



Source: KTG Group Inc., Arnel & Waterford Property Co.

Figure 3 presents a rendering of the project as currently proposed:

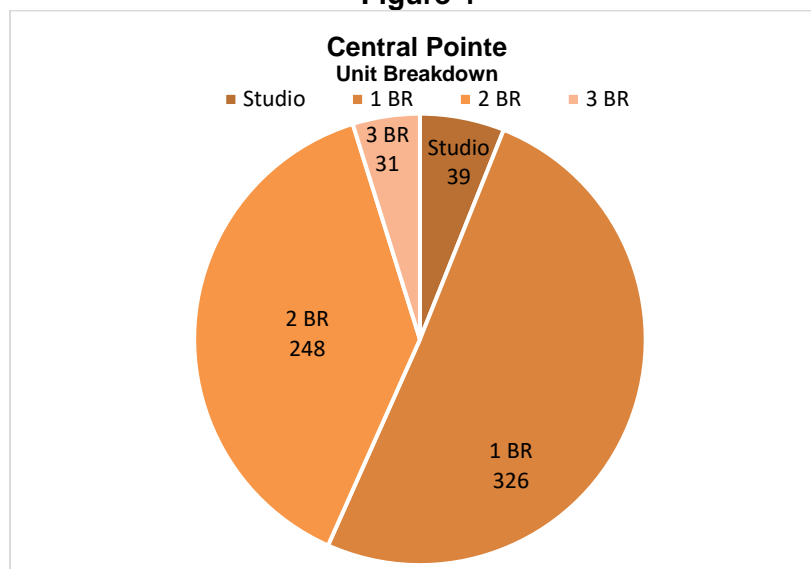
Figure 3



The proposed 644 unit market-rate project includes 39 studios (6 percent of all units), 326 one-bedroom (51 percent), 284 two-bedroom (39 percent), and 31 three-bedroom (5 percent) units.

Figure 4 exhibits the unit mix:

Figure 4



Source: KTG Group Inc., Arnel & Waterford Property Co.

RECURRING FISCAL IMPACTS

Property Tax Revenue

All property taxes in the state of California are levied at a rate of 1 percent. The City's share of the 1 percent property tax levy is 19.4%, as provided by the County of Orange ("County") Auditor-Controller. The Developer provided RSG with the Project costs that consisted of \$42 million for land, and \$203 million for hard and soft costs. This \$245 million adjusted for inflation over the construction period, would amount to an assessed valuation of \$279 million at buildout.

To accurately portray the effect of the Project to the City, property tax revenues presented in this report are net of any existing revenues. The existing site is currently valued at \$5.5 million. When adjusted for inflation over the construction period the value is \$6 million, providing the City an estimated \$11,691 in year 2023 absent the construction of the Project. The new development would provide \$541,438 to the City in that same year. Therefore, the net new property tax revenues to the City would be **\$529,747** at buildout.

Table 3

NET NEW PROPERTY TAX REVENUE		
Central Pointe, Santa Ana		
At Buildout		
Existing Assessed Value	\$	6,026,240
Proposed Project Assessed Valuation ¹		279,091,931
Net New Value	\$	273,065,691
City Property Tax Rate		19.4%
		<i>Annual Estimate</i>
Existing Property Tax Revenues	\$	11,691
New Property Tax Revenues	\$	541,438
Net New Property Tax Revenues	\$	529,747

Source: County of Orange Auditor Controller, RSG, Inc.

¹ Inflated pursuant to the construction schedule

To project future property taxes, RSG assumed 2 percent inflation on property tax revenues over the 25-year projection period, resulting in **\$10.3 million** (net present value, discounted at 4 percent) in net new property tax revenues for the City General Fund.

Property Tax in-lieu of Motor Vehicle License Fee Revenue

Established in 1935, the Motor Vehicle License Fee ("MVLFF") was essentially a tax on vehicle ownership. It is collected by the State annually when vehicles are registered and was historically allocated to cities and counties based upon a statutory formula. In 2004, during the State's budget crisis, about 90 percent of each city's MVLFF revenue was replaced with property tax revenue, and cities in particular began to receive an allocation of property tax from the Educational Revenue

Augmentation Fund (“ERAF”) in an amount equal to what they would have received in MVLF under an older MVLF allocation formula. Under current law, the property tax in-lieu of MVLF revenue increases based on assessed value growth in a jurisdiction, so estimated revenues are based on changes in assessed value created by the Project.

Based on the City’s 2019-20 secured property tax roll, the total assessed value of all Property in the City is \$26.3 billion. When adjusting for inflation during the construction period, the Project’s net new assessed valuation (\$273 million) increases the City’s assessed value by 1.06 percent. The MVLF increase from the Project is calculated from the percent increase in assessed value. This gives us **\$346,150** in estimated In-Lieu MVLF revenues at build-out (see Table 4). As depicted above, the City is expected to receive **\$6.8 million** (net present value, discounted at 4 percent) in In-Lieu MVLF revenues through 2048.

Table 4

PROPERTY TAX IN-LIEU OF MOTOR VEHICLE LICENSE FEES		
Central Pointe, Santa Ana		
2019-20 City Assessed Value	\$	26,369,891,977
Project Assessed Value ¹		279,091,931
<u>City Assessed Value with Project</u>		<u>26,648,983,908</u>
<u>Increase in Assessed Value</u>		<u>1.06%</u>
Santa Ana 2019-20 VLF		32,705,877
<u>Santa Ana VLF with Project</u>		<u>33,052,028</u>
Property Tax In-lieu Revenue	<i>Annual Estimate</i> \$	346,150

Source: County of Orange Auditor Controller, RSG, Inc.

¹ Inflated pursuant to the construction schedule

Utility User Tax

The City assesses a utility user tax of 5.5 percent on electricity, gas, water, and telephone revenues generated within Santa Ana. Utility costs were estimated by RSG based on a review of similar projects and utility costs in Orange County. Residential utility expenditures were assumed to be: \$104 per month for phone, \$75 for electricity, \$23 for gas, and \$38 for water. This amounts to \$3,260 annually in 2020 dollars. From the Developer’s estimates of 15,200 square feet of retail, RSG was able to use US Energy Information Administration (“EIA”) estimates to extrapolate commercial utility expenses. Retail establishments average around \$1.50 per square foot in energy expenses, amounting to \$22,797 annually for the Project.

Based on these assumptions, RSG estimates that utility user tax revenues generated by the Project, reduced to account for a partial year, would be an estimated **\$91,766** at buildout. This adds up to **\$1.9 million** (net present value, discounted at 4 percent) over the 25-year projection period (see Table 2).

Table 5 showcases the Utility User Tax at buildout below.

Table 5

UTILITY USER TAX REVENUE		
Central Pointe, Santa Ana		
Energy Expenditures per Household	\$	3,260
Occupied Households		581
Total Residential Energy Expenses	\$	1,894,998
Total Commercial Energy Expenses¹	\$	22,797
City Tax Rate		5.5%
Full-Year Buildout Revenues	\$	105,479
Partial-Year Buildout Revenues	\$	91,766

Sources: US Energy Information Administration, RSG, Inc., ESRI BAO

¹EIA estimates of \$1.50 per SF for Retail

Sales Taxes

The Project is expected to increase sales taxes through both the new businesses and new residents. The methodology and assumptions for both differ but are necessary for accuracy.

Resident-Derived Sales Tax

To determine the resident share, RSG obtained average annual household expenditures for households within a 1-mile radius of the Project from ESRI Business Analyst. By adjusting the household expenditures based on taxable and non-taxable sales, RSG estimates that each household would spend an average of \$17,836 at buildout. Based on experience with previous projects in the City, an estimated 60 percent of those expenditures would be subject to Santa Ana's sales tax.

The State and County sales tax receive 6 percent and 0.75 percent of taxable sales, respectively. In addition, the City levies its own sales tax at a rate of 1 percent. In 2018, Santa Ana voters approved an additional sales tax of 1.5 percent that would then decrease to 1 percent in 2029 until sunseting in 2039. RSG took this increase into consideration when analyzing the affects the new residents would have on the City's General Fund.

Using ESRI's Business Analyst Online software, RSG was able to estimate the amount of taxable expenditures the average new household would make in the City. That number was then multiplied by the number of occupied households (581). This provided an estimate of total taxable sales of \$6.2 million. From there, the taxable sales were multiplied by both the City's base tax rate and the Measure X additional rates (1 percent and 1.5 percent). Therefore, the residential derived sales tax revenue from the base tax rate is an estimated **\$62,205** at buildout. The

additional tax from Measure X would yield **\$93,307** at buildout and decrease to **\$74,276** in 2029 (adjusted for 3% inflation) before ceasing in 2039.

Table 6
RESIDENT-DERIVED SALES TAX REVENUE
 Central Pointe, Santa Ana

Households and Sales at Buildout		
Average Household Taxable Expenditures	\$	17,836
Occupied Households		581
Percent within Santa Ana		60%
<hr/>		
Total Taxable Sales	\$	6,220,479
City Share of Sales Tax		1%
Measure X (2018) Additional Sales Tax ¹		1.5%
<hr/>		
Resident-Derived Sales Tax Revenues		<i>Annual Estimate</i>
(Base Rate)	\$	62,205
(2018 Addition)	\$	93,307
(2029 Decrease to 1%)	\$	74,276

Source: ESRI BAO, City of Santa Ana
¹Measure X additional sales tax decreases from 1.5% to 1% in 2029

Business-Derived Sales Tax

The Project includes 15,200 square feet of retail space. The new businesses would generate sales taxes separate from the new residents. Since the Developer does not yet know the exact tenants that would fill the space, RSG estimated an average of \$250 of sales per square foot for the space. As a result, the retail businesses would generate taxable sales of \$3.8 million at buildout.

RSG estimates the base sales tax revenues at buildout to be **\$41,524**. Table 7 below presents this information. In addition, Measure X would generate **\$62,285** for that year as well. However, in 2029 Measure X revenues would decrease to **\$51,069** before being eliminated altogether in 2039.

Table 7**BUSINESS-DERIVED SALES TAX REVENUE**

Central Pointe, Santa Ana

Sales at Buildout		
General Retail	\$	3,800,000
<hr/>		
City Share of Sales Tax		1%
Measure X (2018) Additional Sales Tax ¹		1.5%
<hr/>		
Business-Derived Sales Tax Revenues	<i>Annual Estimate</i>	
(Base Rate)	\$	41,524
(2018 Addition)	\$	62,285
(2029 Decrease to 1%)	\$	51,069

Source: California State Board of Equalization, RSG, Inc.

¹Measure X additional sales tax decreases from 1.5% to 1% in 2029

For the City base rate, combined resident and business sales taxes at buildout would be an estimated \$90,244. Measure X combined taxes would be \$135,366. Both are adjusted for inflation during the construction period and for the partial year at opening. This provides for a 25-year total of \$1.8 million from the base rate and \$1.8 million from Measure X (net present value, discounted at 4 percent).

Business Tax

The City assesses a business tax on retail stores and residential property management companies. Table 8 below showcases the new revenues from the Project. Retail business taxes are assessed based on annual sales while management company business taxes are assessed based on unit count. The combined business tax revenues are an estimated **\$24,048** at buildout, or **\$493,901** over 25 years (net present value, discounted at 4 percent).

Table 8**BUSINESS TAX REVENUES**

Central Pointe, Santa Ana

Multifamily Residential Tax	\$	24,739
Retail Tax		2,902
<hr/>		
Full-Year Business Taxes at Buildout	\$	28,786
Partial-Year Business Taxes at Buildout	\$	24,048

Sources: City of Santa Ana, RSG, Inc

CITY EXPENDITURES

RSG estimated the additional population that would move into the Project to estimate the total added expenditures to the City General Fund for servicing the new residents. Consistent with other recent analyses prepared by RSG on projects in Santa Ana, RSG assumed that each studio would house 1.25 residents, each one-bedroom unit would house 1.75 residents, each two-bedroom unit would house 3.25 residents, and each three-bedroom unit would house 4 residents. Overall, this works out to an average household size of 2.41 residents per unit, which RSG considers reasonable for this particular Project.

RSG estimates at full occupancy the Project could hold 1,550 residents. Taking into account that a small percentage of the units will normally be vacant due to turnover, we estimate the fiscal impacts based on residents' time spent in the City. This is done by calculating the full-time equivalent (FTE) residents, defined as those who spend a vast majority of their daily consumption in Santa Ana. The assumption being that new residents who work out of the City, do not consume products in the City during the time they are gone.

RSG gathered data from the US Census and ESRI Business Analyst Online to estimate the FTE residents of the Project. Approximately 13 percent of Santa Ana residents work within Santa Ana, which, in effect means that the City is servicing these resident-employees 100 percent of the time. Another 37 percent of Santa Ana residents work outside the city. Assuming the residents that work outside of the city are outside City limits from 9 am to 5 pm, Santa Ana is servicing these residents approximately 73 percent of the time. The city's remaining residential population (about 51 percent), is serviced by the City 100 percent of the time. Accounting for all residents and employees based on the percent of time spent in the city, the Project would generate a daily (24/7) population of 1,399 persons.

RSG identified variable costs, as opposed to fixed costs, by department in the City of Santa Ana FY 2019-20 Adopted Budget. Variable costs are City expenditures that increase or decrease based on the resident and employee population. The City Manager and City Attorney offices, for example, are fixed costs that would not vary based on population, but the Police and Fire departments would vary based on population. With that said, RSG estimates expenditure increases of **\$353,986** during the first full year of operations. Over a 25-year projection period, the Project would add **\$7 million** in City expenditures (net present value, discounted at 4 percent).

Table 9

SUMMARY OF RECURRING CITY EXPENDITURES¹

CITY OF SANTA ANA
Central Pointe, Santa Ana

City Department	Current City Expenditures²	Project-derived City Expenditures	Total City Expenditures³	Percent Increase
City Manager's Office	\$ 2,708,440	\$ -	\$ 2,708,440	0.00%
Non-Departmental & Interfund Transfers	61,098,660	-	61,098,660	0.00%
Clerk of the Council Office	1,682,560	50	1,682,610	0.00%
City Attorney's Office	3,219,780	-	3,219,780	0.00%
Personnel Services	2,490,360	148	2,490,508	0.01%
Finance & Management Services	9,671,190	671	9,671,861	0.01%
Bowers Museum Corporation	1,473,430	-	1,473,430	0.00%
Parks, Recreation and Community Services	26,836,790	4,560	26,841,350	0.02%
Police Department	131,568,820	223,291	131,792,111	0.17%
Fire Services	45,640,920	95,156	45,736,076	0.21%
Planning & Building Agency	13,227,380	71	13,227,451	0.00%
Public Works Agency	13,155,830	-	13,155,830	0.00%
Community Development Agency	3,353,520	-	3,353,520	0.00%
Total in FY 2020-21	\$ 316,127,681	\$ 323,947	\$ 316,451,627	0.10%
Total in 2023-24		\$ 353,986		

¹ For this analysis, RSG identified departmental costs in the City of Santa Ana FY 2019-20 Budget that are variable costs, as opposed to fixed costs. Variable costs are expenditures by the City that increase or decrease based on the residential and employee population in the City. For example, City Council and Human Resources salaries and wages generally are fixed costs that do not vary based on population. Meanwhile, the Fire Services and Parks & Community Services departments will likely experience service cost increases due to the added population.

² Current expenditures are based on adopted expenditures in the City of Santa Ana's FY 2019-20 Budget.

³ Sum of current City expenditures and project-derived City expenditures. Assuming project opened in 2020-21.

Sources: City of Santa Ana, RSG, Inc., US Census Bureau

EMPLOYMENT

Development and ongoing operation of the Project would generate employment opportunities, add labor income to the market area, and add value to the gross regional product. For this analysis, RSG used the IMPLAN model to measure the economic impacts of the Project using County-wide data. IMPLAN is an input-output analysis software tool that tracks the interdependence among various producing and consuming sectors of the economy. According to MIG, Inc., the creators of IMPLAN, the software measures the relationship between a given set of demands for final goods and services and the inputs required to satisfy those demands. IMPLAN publishes countywide data on an annual basis; this analysis utilized the most recent available County of Orange dataset (2018) to calculate direct, indirect, and induced impacts.

The IMPLAN inputs are investment (development costs) and gross business operating income of the Project and the resulting outputs are economic impacts, including employment generation, labor income, and gross regional product. Jobs are the primary impacts calculated by IMPLAN.

RSG analyzed both temporary and permanent economic impacts. For temporary construction impacts the Developer's Project costs exclusive of land costs were used (\$203 million). From there construction costs were divided based on the gross building area for the between multi-

family (97 percent) and non-residential (3 percent) components. For permanent impacts, the estimated sales from the residential complex, and the retail space were used. IMPLAN breaks down the resulting employment and other effects into three categories: direct, indirect, and induced:

- Direct Effects – Refers to the direct effects that occur on the Project site may result from development costs and operational sales revenue.
- Indirect Effects – Changes in sales, jobs, and/or income within the businesses that may supply goods and services to the Project. Indirect effects do not occur directly on the Project-site but are an indirect effect to surrounding or related businesses.
- Induced Effects – Regional changes resulting from additional spending that may be earned either directly or indirectly from the Project.

RSG utilizes the FTE conversion of total employment generally preferred in Public Policy. FTE employment numbers, as opposed to residents, present total employment through the lens of hours worked; summarizing then dividing by how many 40-hour work weeks are generated by the investment. The IMPLAN analysis concludes that the temporary construction component of the Project would result in 1,300 direct FTE jobs, 117 indirect FTE jobs, and 544 induced FTE jobs the majority of which would be in Santa Ana.

The permanent impacts attributed to the Project are 69 FTE jobs related to the operations of both the residential building itself, as well as the retail component of the Project. This includes 48 direct, 8 indirect, and 13 induced jobs to the region.

Table 10 outlines the aforementioned FTE jobs generated by the Project.

Table 10**PROJECTED EMPLOYMENT (FTE)**

4th and Cabrillo

Temporary (Construction) Jobs	
Direct	1300
Indirect	117
Induced	544
Subtotal	1961
Permanent Jobs	
Direct	48
Indirect	8
Induced	13
Subtotal	69
Total Temporary & Permanent Jobs	
Direct	1349
Indirect	125
Induced	556
Total	2030

Source: IMPLAN

In closing, it is our privilege to assist The Concord Group and your client Arnel & Waterford Property Company with predevelopment activities on this project. Please let us know if you have any questions or comments pertaining to the findings of this report.

Sincerely,



James Simon, Principal

APPENDIX

APPENDIX A
 SURVEY - APARTMENTS
 SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
 MAY 2020

Project Name/ Manager/ Address	Units/ Elev.	Occ./ Year Built/ Reno.	Floorplans				Base Rent	
			Units		Bed/ Bath	Unit Size	\$	\$/sf
			Mix	Vac.				
Santa Ana / Costa Mesa								
Broadstone Arden	335	26%	7%	5	0 / 1.0	584	\$2,095	\$3.59
<i>Alliance</i>	5	2020	7%	1	0 / 1.0	744	\$2,405	\$3.23
1951 E Dyer Road			7%		0 / 1.0	864	\$2,856	\$3.31
Santa Ana			7%	2	0 / 2.0	1,009	\$3,345	\$3.32
92705			2%	4	1 / 1.0	1,000	\$3,410	\$3.41
			2%	5	1 / 1.0	907	\$2,825	\$3.11
			2%	2	1 / 1.0	956	\$2,880	\$3.01
			2%	5	1 / 1.0	689	\$2,381	\$3.46
			2%	5	1 / 1.0	745	\$2,496	\$3.35
			3%	2	1 / 1.0	770	\$2,575	\$3.34
			2%	2	1 / 1.0	782	\$2,551	\$3.26
			2%		1 / 2.0	1,215	\$3,056	\$2.52
			7%	5	2 / 2.0	1,089	\$3,205	\$2.94
			7%	5	2 / 2.0	1,087	\$3,115	\$2.87
			7%	3	2 / 2.0	1,109	\$3,250	\$2.93
			7%	5	2 / 2.0	1,077	\$3,200	\$2.97
			7%	2	2 / 2.0	1,184	\$3,375	\$2.85
			7%		2 / 2.0	1,189	\$3,595	\$3.02
			7%	4	2 / 2.0	1,239	\$3,400	\$2.74
			7%	3	2 / 2.0	1,284	\$3,355	\$2.61
			1%	5	3 / 2.0	1,454	\$3,915	\$2.69
			1%		3 / 2.0	1,956	\$4,631	\$2.37
The Charlie	228	13%	9%	5	0 / 1.0	523	\$1,840	\$3.52
<i>Alliance</i>	4	2019	2%	2	0 / 1.0	651	\$1,895	\$2.91
3630 Westminster Avenue			11%		1 / 1.0	681	\$1,995	\$2.93
Santa Ana			3%	1	1 / 1.0	684	\$2,015	\$2.95
92703			22%	6	1 / 1.0	696	\$2,055	\$2.95
			2%	5	1 / 1.0	844	\$2,230	\$2.64
			2%	3	1 / 1.0	860	\$2,300	\$2.67
			6%	5	2 / 2.0	997	\$2,455	\$2.46
			6%	5	2 / 2.0	1,041	\$2,530	\$2.43
			18%	8	2 / 2.0	1,052	\$2,670	\$2.54
			6%	4	2 / 2.0	1,066	\$2,680	\$2.51
			6%	2	2 / 2.0	1,079	\$2,765	\$2.56
			4%	5	3 / 2.0	1,236	\$3,230	\$2.61
			4%	5	3 / 2.0	1,239	\$3,305	\$2.67

APPENDIX A

SURVEY - APARTMENTS
 SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
 MAY 2020

Project Name/ Manager/ Address	Units/ Elev.	Occ./ Year Built/ Reno.	Units		Bed/ Bath	Unit Size	Base Rent	
			Mix	Vac.			\$	\$/sf
			Floorplans					
Nineteen01	261	90%	3%	1	1 / 1.0	770	\$1,915	\$2.49
<i>Greenwood & McKenzie</i>	5	2016	3%		1 / 1.0	773	\$1,925	\$2.49
1901 E 1st St			16%	2	1 / 1.0	774	\$1,905	\$2.46
Santa Ana			3%		1 / 1.0	795	\$1,950	\$2.45
92705			6%		1 / 1.0	826	\$2,030	\$2.46
			2%		1 / 1.0	848	\$2,090	\$2.46
			2%		1 / 1.0	860	\$2,110	\$2.45
			2%		1 / 1.0	864	\$2,125	\$2.46
			2%	1	1 / 1.0	890	\$2,200	\$2.47
			3%		1 / 1.0	948	\$2,455	\$2.59
			3%		1 / 1.0	967	\$2,385	\$2.47
			2%		1 / 1.0	974	\$2,397	\$2.46
			3%	1	2 / 2.0	982	\$2,500	\$2.55
			0%		2 / 2.0	1,034	\$2,665	\$2.58
			2%	1	2 / 2.0	1,058	\$2,550	\$2.41
			0%		2 / 2.0	1,081	\$2,375	\$2.20
			0%	1	2 / 2.0	1,085	\$2,775	\$2.56
			7%	1	2 / 2.0	1,122	\$2,580	\$2.30
			6%		2 / 2.0	1,380	\$3,050	\$2.21
			4%	1	2 / 2.0	1,142	\$2,655	\$2.32
			9%		2 / 2.0	1,156	\$2,659	\$2.30
			5%		2 / 2.0	1,180	\$2,714	\$2.30
			0%	1	2 / 2.0	1,193	\$2,750	\$2.31
			2%	1	2 / 2.0	1,195	\$2,705	\$2.26
			2%		2 / 2.0	1,260	\$2,885	\$2.29
			2%	1	2 / 2.0	1,265	\$2,895	\$2.29
			1%		2 / 2.0	1,284	\$2,959	\$2.30
			0%		2 / 2.0	1,391	\$3,068	\$2.21
			1%		2 / 2.0	1,476	\$3,120	\$2.11
			2%		2 / 2.0	1,639	\$3,468	\$2.12
			2%	1	2 / 2.0	1,712	\$3,415	\$1.99
			2%		2 / 2.5	1,760	\$3,663	\$2.08
			2%	1	3 / 2.0	1,510	\$3,465	\$2.29
			0%		3 / 2.0	1,632	\$3,456	\$2.12
			2%	1	3 / 2.5	2,020	\$3,865	\$1.91

APPENDIX A

SURVEY - APARTMENTS
SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
MAY 2020

Project Name/ Manager/ Address	Units/ Elev.	Occ./ Year Built/ Reno.	Units		Floorplans		Base Rent	
			Mix	Vac.	Bed/ Bath	Unit Size	\$	\$/sf
Irvine / Tustin								
Amalfi	542	95%	12%		0 / 1.0	584	\$2,035	\$3.48
<i>Irvine Company</i>	3	2014	5%		1 / 1.0	552	\$2,090	\$3.79
16000 Legacy Rd			4%	3	1 / 1.0	681	\$2,095	\$3.08
Tustin			3%	1	1 / 1.0	695	\$2,195	\$3.16
92782			5%	2	1 / 1.0	730	\$2,295	\$3.14
			12%		1 / 1.0	741	\$2,320	\$3.13
			8%	2	1 / 1.0	746	\$2,165	\$2.90
			12%	5	1 / 1.0	751	\$2,145	\$2.86
			7%	3	1 / 1.0	760	\$2,195	\$2.89
			5%		1 / 1.0	800	\$2,295	\$2.87
			3%		1 / 1.0	813	\$2,325	\$2.86
			4%		1 / 1.0	906	\$2,525	\$2.79
			2%	2	1 / 1.0	955	\$2,595	\$2.72
			2%		2 / 2.0	963	\$2,500	\$2.60
			9%	4	2 / 2.0	1,021	\$2,495	\$2.44
			8%	9	2 / 2.0	1,095	\$2,530	\$2.31
Residences on Jamboree	381	96%	1%	1	0 / 1.0	662	\$1,970	\$2.98
<i>UDR</i>	5	2017	17%	1	0 / 1.0	692	\$1,995	\$2.88
2801 Kelvin Ave			10%		1 / 1.0	687	\$2,144	\$3.12
Irvine			3%		1 / 1.0	698	\$2,214	\$3.17
92614			11%	1	1 / 1.0	701	\$2,124	\$3.03
https://www.udr.com/orange-county-apartments/irvine/the-1			8%		1 / 1.0	757	\$2,224	\$2.94
			10%	3	1 / 1.0	762	\$2,014	\$2.64
			1%		1 / 1.0	782	\$2,319	\$2.97
			7%	1	2 / 2.0	1,063	\$2,724	\$2.56
			3%		2 / 2.0	1,108	\$2,789	\$2.52
			20%	2	2 / 2.0	1,147	\$2,979	\$2.60
			1%	2	2 / 2.0	1,165	\$2,699	\$2.32
			2%		2 / 2.0	1,284	\$3,099	\$2.41
			4%	3	3 / 2.0	1,426	\$3,499	\$2.45
			2%		3 / 2.0	1,503	\$3,599	\$2.39

APPENDIX A

SURVEY - APARTMENTS
 SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
 MAY 2020

Project Name/ Manager/ Address	Units/ Elev.	Occ./ Year Built/ Reno.	Floorplans					Base Rent	
			Units		Bed/ Bath	Unit Size	\$	\$/sf	
			Mix	Vac.					
Skyloft Apartments	388	19%	8%		0 / 1.0	571	\$2,531	\$4.43	
<i>Legacy Partners</i>	5	2019	1%		1 / 1.0	690	\$2,628	\$3.81	
2700 Main St			4%		1 / 1.0	712	\$2,658	\$3.73	
Irvine			17%		1 / 1.0	733	\$2,698	\$3.68	
92614			10%		1 / 1.0	749	\$2,747	\$3.67	
			3%		1 / 1.0	762	\$2,797	\$3.67	
			1%		1 / 1.0	780	\$2,812	\$3.61	
			3%		1 / 1.0	781	\$2,813	\$3.60	
			3%		1 / 1.0	784	\$2,829	\$3.61	
			11%		1 / 1.0	836	\$2,555	\$3.06	
			1%		1 / 2.0	1,039	\$3,840	\$3.70	
			1%		2 / 2.0	1,019	\$3,083	\$3.03	
			2%		2 / 2.0	1,095	\$3,168	\$2.89	
			11%		2 / 2.0	1,132	\$3,363	\$2.97	
			1%		2 / 2.0	1,137	\$3,817	\$3.36	
			6%		2 / 2.0	1,162	\$3,623	\$3.12	
			5%		2 / 2.0	1,185	\$3,479	\$2.94	
			3%		2 / 2.0	1,188	\$3,499	\$2.95	
			1%		2 / 2.0	1,217	\$3,473	\$2.85	
			3%		2 / 2.0	1,222	\$3,513	\$2.87	
			2%		2 / 2.0	1,248	\$4,100	\$3.29	
			1%		2 / 2.0	1,296	\$4,212	\$3.25	
			2%		3 / 3.0	1,438	\$4,391	\$3.05	

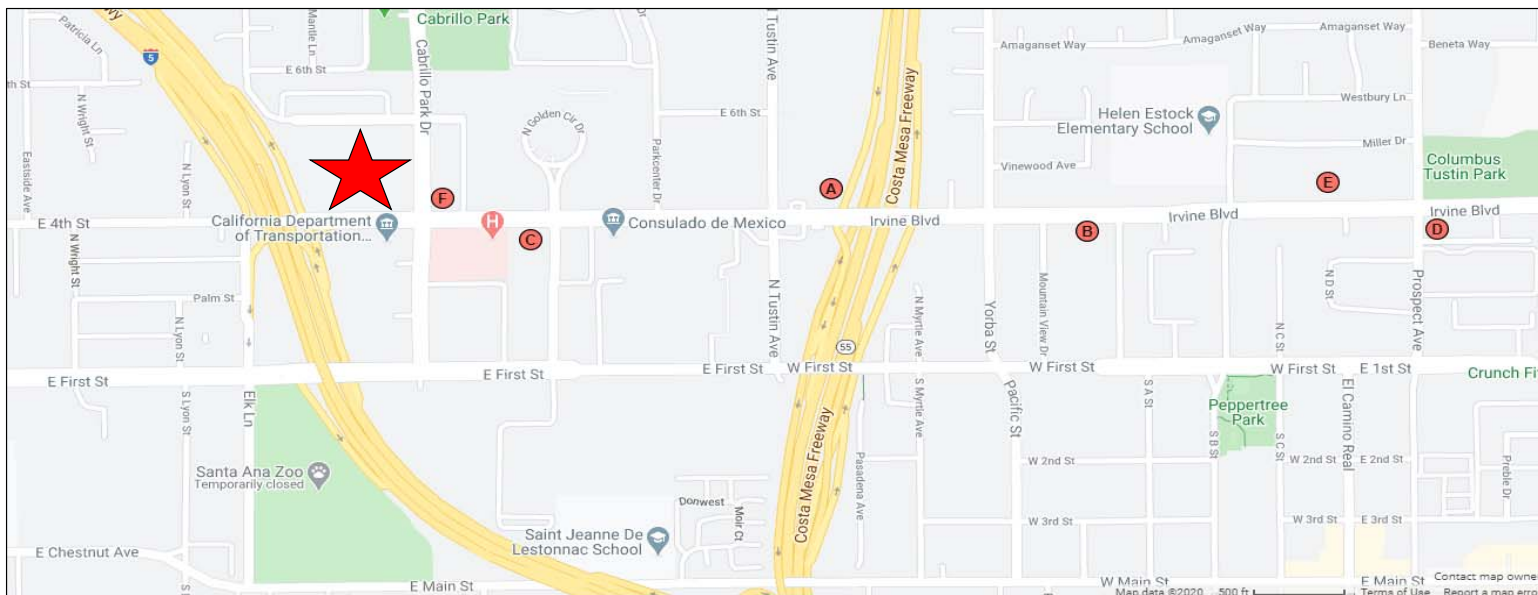
APPENDIX A

SURVEY - APARTMENTS
SANTA ANA, COSTA MESA, ORANGE AND TUSTIN
MAY 2020

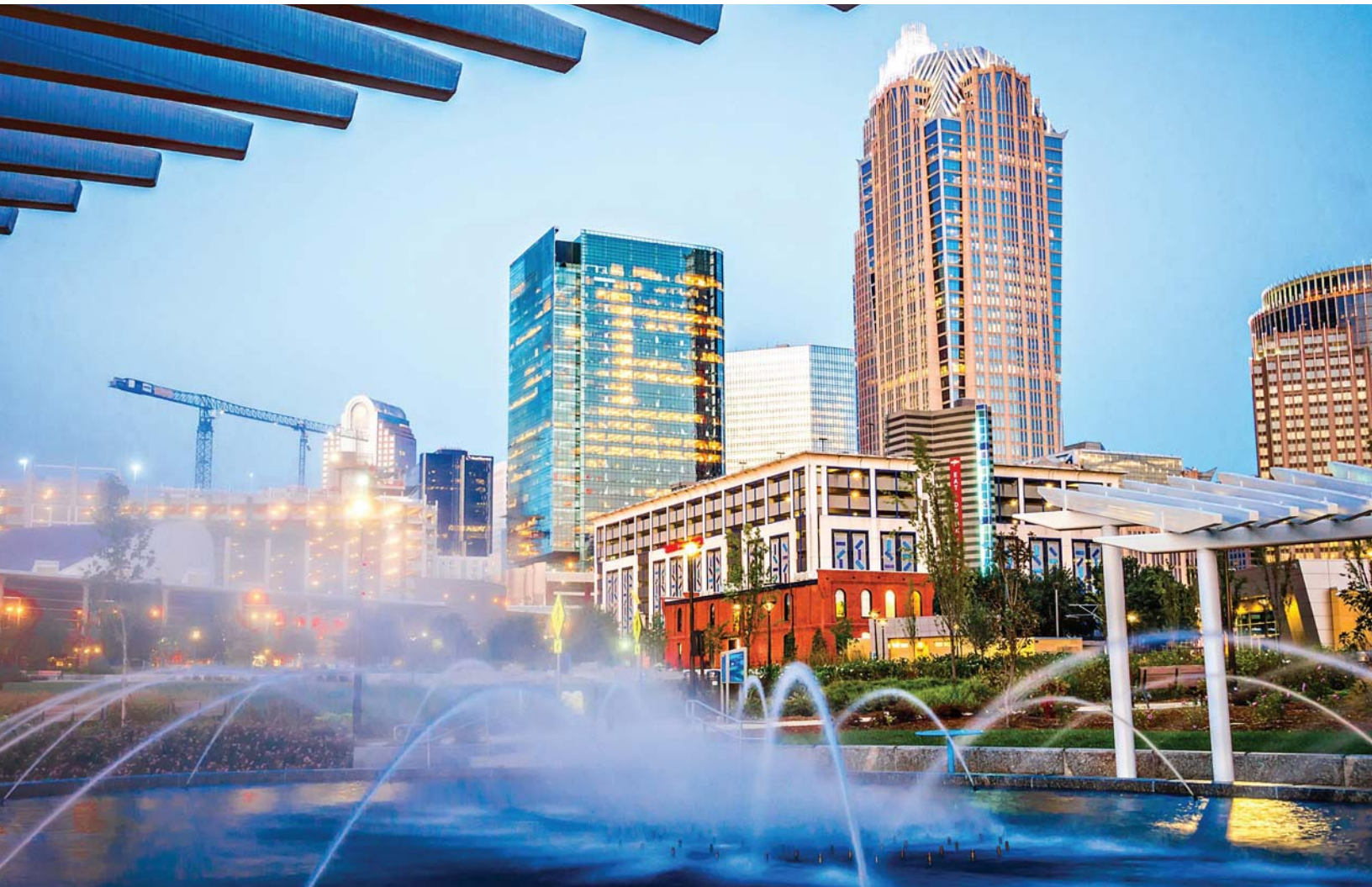
Project Name/ Manager/ Address	Units/ Elev.	Occ./ Year Built/ Reno.	Units		Bed/ Bath	Unit Size	Base Rent	
			Mix	Vac.			\$	\$/sf
			Floorplans					
Anaheim / Orange								
AMLI Uptown Orange	334	93%	3%	1	0 / 1.0	570	\$2,101	\$3.69
AMLI	4	2016	3%	2	1 / 1.0	626	\$2,241	\$3.58
385 S. Manchester Ave			4%	1	1 / 1.0	711	\$2,233	\$3.14
Orange			4%		1 / 1.0	716	\$2,416	\$3.37
92868			3%	1	1 / 1.0	745	\$2,484	\$3.33
			3%		1 / 1.0	748	\$2,485	\$3.32
			4%	4	1 / 1.0	802	\$2,267	\$2.83
			4%		1 / 1.0	816	\$2,300	\$2.82
			3%		1 / 1.0	823	\$2,320	\$2.82
			3%	4	1 / 1.0	829	\$2,216	\$2.67
			3%		1 / 1.0	837	\$2,238	\$2.67
			3%		1 / 1.0	840	\$2,238	\$2.66
			3%		1 / 1.0	857	\$2,275	\$2.65
			3%		1 / 1.0	862	\$2,278	\$2.64
			3%	1	2 / 2.0	978	\$2,717	\$2.78
			3%		2 / 2.0	993	\$2,760	\$2.78
			4%	1	2 / 2.0	1,002	\$3,214	\$3.21
			4%		2 / 2.0	1,010	\$3,220	\$3.19
			4%	1	2 / 2.0	1,047	\$2,883	\$2.75
			4%		2 / 2.0	1,049	\$2,626	\$2.50
			3%	1	2 / 2.0	1,050	\$2,890	\$2.75
			3%		2 / 2.0	1,054	\$2,900	\$2.75
			3%		2 / 2.0	1,063	\$3,186	\$3.00
			3%		2 / 2.0	1,122	\$3,299	\$2.94
			4%	3	2 / 2.0	1,131	\$2,874	\$2.54
			3%		2 / 2.0	1,133	\$2,890	\$2.55
			1%		2 / 2.0	1,142	\$2,900	\$2.54
			1%	1	2 / 2.0	1,147	\$2,988	\$2.61
			1%		2 / 2.0	1,175	\$3,050	\$2.60
			1%		2 / 2.0	1,211	\$3,556	\$2.94
			1%		2 / 2.0	1,236	\$3,304	\$2.67
			1%		3 / 2.0	1,404	\$3,655	\$2.60
			1%		3 / 2.0	1,431	\$3,710	\$2.59
Eleven 10	260	93%	21%	2	0 / 1.0	515	\$2,103	\$4.08
Piceme Residential	5	2018	5%		1 / 1.0	665	\$2,200	\$3.31
1110 W. Town and Country Rd			23%	0	1 / 1.0	737	\$2,387	\$3.24
Orange			20%		1 / 1.0	811	\$2,596	\$3.20
92868			7%	0	2 / 2.0	1,027	\$2,826	\$2.75
			2%		2 / 2.0	1,357	\$3,600	\$2.65
			3%	1	1 / 1.0	819	\$2,596	\$3.17
			19%	0	2 / 2.0	1,199	\$3,175	\$2.65

APPENDIX B
SURVEY - RETAIL LEASES
ORANGE COUNTY AND LOCAL THREE-MILE TRADE AREA
JANUARY 2017 THROUGH JULY 2020 - 3.5-YEARS

Map Key	Shopping Center	City	Street Address	Building			Suite / Tenant	Lease			
				Year Built	Elev.	GLA		SF	Sign Date	Type	Rate Rent
4th Street / Irvine Blvd Corridor - Grand Ave to Prospect Ave											
A	Creskide Plaza	Santa Ana	2321 E. 4th St	2003	1s	8,818	Country Café (#A) Suite D	1,200	Dec-18	NNN	\$30
								1,500	Oct-17	NNN	\$30
								Average:			
B	17400 Irvine Blvd	Tustin	17400 Irvine Blvd	1968	1s	17,600	Medical (#M) Medical (#F)	1,100	Aug-20	FSG	\$29
								2,256	Aug-20	FSG	\$29
								Average:			
C	2000 E. 4th St	Santa Ana	2000 E. 4th St	1982	3s	34,080	Suite 350 Suite 110 Suite 202 Suite 304 Suite 320	1,663	Oct-19	FSG	\$26
								1,327	Apr-19	FSG	\$25
								1,470	Feb-19	FSG	\$25
								2,074	Nov-18	FSG	\$25
								2,270	Sep-18	FSG	\$23
								Average:			
D	17772 Irvine Blvd	Tustin	17772 Irvine Blvd	1973	2s	16,325	Suite 102-8 Suite 102-1	145	Sep-19	FSG	\$25
								245	Dec-19	FSG	\$25
								Average:			
E	17671 Irvine Blvd	Tustin	17671 Irvine Blvd	1972	2s	32,777	Suite 112	237	Sep-17	FSG	\$24
F	1901 E. 4th St	Santa Ana	1901 E. 4th St	1974	3s	39,699	Suite 312 Suite 350	1,622	Dec-19	FSG	\$23
								1,572	Aug-19	FSG	\$23
								Average:			
Mixed-Use Analogs											
<i># Apts</i>											
Pinnacle at MacArthur Place	Santa Ana	31 E. MacArthur Crescent Dr	2001	4s	253 MF	Suite 107 Suite 105 Suite 101 Suite 106B 9Round (#108) Braizen Sandwiches (#102)	1,714	Nov-19	NNN	\$30	
							941	Jul-19	NNN	\$30	
							1,143	Apr-19	NNN	\$30	
							869	Oct-18	NNN	\$30	
							1,428	May-18	NNN	\$30	
							1,126	Aug-17	NNN	\$30	
Average:						\$30					
Pinnacle at Fullerton	Fullerton	229 E. Commonwealth Ave	2004	4s	192 MF	End Cap Suite A Heere Tea (#E)	875	May-19	NNN	\$33	
							2,526	May-19	NNN	\$30	
							1,888	Jul-18	NNN	\$30	
							Average:				



Source: CoStar



Emerging Trends in Real Estate[®]

United States and Canada 2020

early innings.” But we can see the potential impact. Robotics will likely reduce the size of organizations and reduce the amount and type of real estate required. “Businesses will continue to get smaller due to technology and robotics. The most desirable talent in the future will be knowledge based and will need ‘omni-channels’ to work across an organization and drive alignment across functions.”

We need to better understand how people are using space to really make a difference. AI will allow continual learning of how we use space, resulting in increased use of space. In the words of one interviewee, “Place plus space drives human behavior. We know this can enhance people’s lives, improve productivity, improve mental states, improve health, and improve happiness.” In the future, “space will shift from reacting to predicting work patterns,” such as where to park based on your first meeting location of the day, or automatic desk reservations, both based on your digital calendar, or even voice-activated or sensor technology noting whether your meeting is over in the reserved conference room and now available to the next user.

Despite excitement surrounding integrated technology and interconnected building systems and big data, one interviewee pointed out that “there is a continued disconnect of focusing on the long-term possibilities before solving today’s realities.” People are still challenged “to get the technology that we already have to work—to start a video conference call, share content, or collaborate virtually,” but acknowledged that office environments that are responsive and predictive will inevitably be in our future as technology continues to be developed.

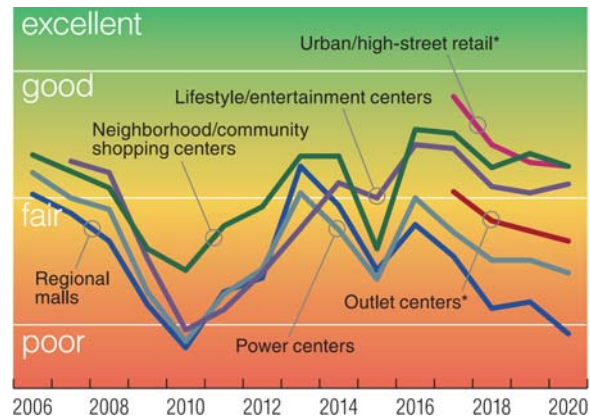
Retail

“When you’re in the middle of a storm, you’re not quite sure when it’s going to end,” said one interviewee who oversees leasing for a large portfolio of regional shopping centers, continuing, “Turning on a dime is tough when undergoing the kind of shift this industry faces.”

The shifting retail picture is notably more complex than other property types. The integration of new concepts, formats, channels, and inventory management systems all cloud retail’s future, as does a broader economy-wide shift from goods to services. As a result, traditional shopping centers are transforming into “**consumer centers**” with a new mixture of uses. Another consumer need met: Kohl’s announced this summer that its stores will be Amazon return centers—and they will package and send back items for free.

The era of “one size fits all” seems to be ending. Shopping centers now have the ability to become hyper-customized, due in

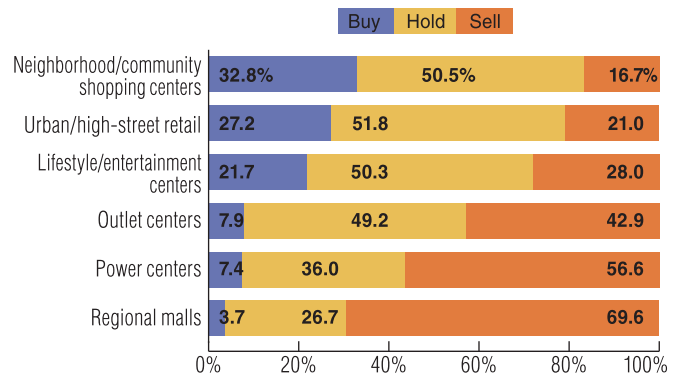
Exhibit 3-13 Retail Investment Prospect Trends



Source: Emerging Trends in Real Estate surveys.

*Fourth year in survey.

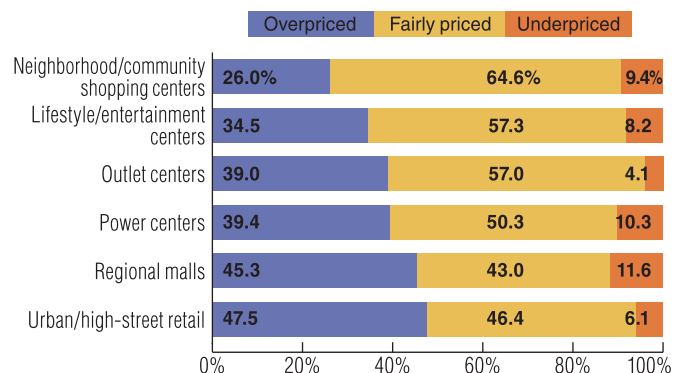
Retail Buy/Hold/Sell Recommendations



Source: Emerging Trends in Real Estate 2020 survey.

Note: Based on U.S. respondents only.

Opinion of Current Retail Pricing



Source: Emerging Trends in Real Estate 2020 survey.

Note: Based on U.S. respondents only.

part to advances in technology. These make it possible to tailor merchandising and engage with brands, uniquely targeting individual and local preferences.

The Good News

There are bright spots within the sector: some interviewees are noticing stabilized rents and strong leasing activity across a wide spectrum. Some see retailers at an expansionary inflection point. As one respondent representing research services at a large commercial brokerage firm indicated, “Over the past several years, many retailers have directed their capital investments toward digital platforms. . . . Now, with more competitive omni-channel strategies, they could be poised to proceed with needed reinvestment in their physical footprint.”

Shopping center owners have also become more creative about filling spaces and taking opportunities to creatively remake centers into hybrid formats that incorporate new elements and experiences. As one interviewee involved in research services noted, “We’ve gotten through a ‘use evolution’ where landlords are no longer simply seeking to fill plain-white-vanilla boxes.” A commercial real estate investment adviser noted, “This was not the case just two to four years ago.” Said another involved retail market researcher, “This is creative destruction, or rationalization, where the death of one use brings about the rebirth of another.”

This rebirth responds to generational shifts in spending. As baby boomers edge closer to retirement, they are spending less on goods and directing more of their purchases toward medical needs, dining, and experiences. And millennials, as one real estate adviser noted, “also seem to be looking for less ‘stuff’ and more experiences.” On the other hand, generation X consumers have entered “full-on family mode,” spending more like past generations on children and homes. One expert indicated that “while this increase in spending has been delayed compared to previous generations, they are one of the stronger cohorts right now.”

What’s Growing

Tenant turnover requires shopping center owners to learn about whole **new classes of tenants**. Never before have there been as much appetite and need to experiment with new uses to build traffic. Even the best-performing assets will require significant future capital investment to reach a stabilized mix with a broader array of uses.

A new crop of retailers have recognized the importance of physical stores and they are slowly building out a brick-and-mortar footprint. Within top-tier assets, **online brands** are expanding further into brick-and-mortar spaces while legacy brands waver. As one representative of a large REIT indicated, “They are coming in a meaningful way and expanding beyond their initial ‘high street locations.’ But, diversifying our mix from weaker stores into a new collection of brands takes time.” It was also noted that the process for deal-making has become longer and property net operating income (NOI) can lag in the interim.

New **experiential and entertainment uses**, centered on one-of-a-kind activities, such as art, amusements, or food, are continuing to push the boundaries of what is supportable in shopping centers. CoStar Group reports that the share of space devoted to restaurants, fitness centers, and entertainment has doubled over the past 10 years, while the share of apparel space continues to decline. “Ever-higher thresholds seem to be achievable, especially where there is a substantial influx from tourism,” said one respondent in real estate services.

Related to the trend toward experiential and entertainment uses is an ever-growing **food and beverage category**. There have been noticeable increases in food uses across retail venues, including food halls, which now seem ubiquitous in some areas. Not surprisingly, several respondents pointed to a potential glut in the food category (and more specifically food halls). However, there seems to be consensus that increases in food uses are likely. A trend toward healthier and more convenient food options also is evident as an alternative to conventional fast food.

A third and growing component within shopping centers today is the increasing presence of **fitness, health, and wellness uses**. They may take the form of gyms (both boutique and value), but also high-end workout equipment dealers. Related to health and wellness, medical offices and clinics also are rapidly expanding their presence.

A last area attracting widespread attention has been the introduction of **coworking and shared office space** within malls. Despite a flurry of fairly recent announcements over the past year or two, this phenomenon is still considered to be in its infancy and shows signs of strong growth potential. As one developer contact noted, “The idea is here to stay, although there could be a shakeout.” Shopping centers have built-in amenities to support them, including unused space, parking, complementary food uses, and perhaps even a gym or workout facility. “It’s a win/win,” said one mall operator.

Promising Subsectors

Certain classes of assets continue to capture interest, most notably class A super-regional centers, grocery-anchored neighborhood centers, and urban high street locations.

As a real estate investment analyst noted, malls are a “mixed bag,” with the field essentially divided between top **class A malls** and “everything else.” The top assets tend to be better occupied, providing more favorable returns. “The ‘flight to quality’ continues where ‘must-have’ assets are becoming stronger.” These are the centers where almost all categories perform well, and not only luxury brands.

There also are opportunities in owning **daily needs–driven** neighborhood and community centers. These can be anchored by food-and-beverage or service uses, particularly in walkable neighborhoods and well-located infill projects. Many interviewees see strong prospects for future growth, especially with grocery anchors that are visibly making investments in their businesses and building an online platform. That platform can help keep centers relevant despite **online grocery sales**. While online grocery sales currently represent a very low share of total grocery sales in the United States (thought to be only 1 to 2 percent), one real estate services consultant stated, “This is an overlooked risk in the U.S.,” suggesting that we not be complacent about the potential impact. Said another retailer contact, “This is a thing. It’s the future. But, it’s almost impossible to make money at it at this point.”

Most believe that it still will be several years before a meaningful proportion of grocery sales move online, and physical stores will continue to play a role in distribution. Grocers in the United States do appear to be approaching it in a disciplined way, and the severe disruption that has occurred that has in other channels seems less likely to occur in grocery.

The Clouds

As in previous years, retail real estate lies at the bottom in comparison with other property types, both in terms of investment and development prospects (exhibit 3-1). Retail real estate remains challenged as the sector continues through a transformation.

Most interviewees concur that reducing the number of physical stores is a “good thing” and alleviates the overabundance of retail space in the United States, which needs to be rationalized or absorbed by future population growth.

More closings and a “tough slog” appear to be on the horizon: according to data from Coresight Research as of June 2019, U.S. retailers have announced over 7,000 store closures this year, more than all of 2018 (which saw about 5,900 closings). The net effects are mitigated by store openings (approximately 3,000 so far in 2019, compared with just over 3,200 openings in 2018), but the result is a reduction in the number of physical stores.

What’s Declining

Several conversations discussed an “expanding **void in the middle**,” noting that consumers are trading up to luxury goods and experiences, or down to value and off-price. Said one expert, “The middle is getting smaller. At the lower end is a value play, and higher end a luxury play. The gap between the ‘haves’ and ‘have nots’ is growing.”

Another important factor repeatedly mentioned was a lack of reinvestment by many retailers. Whether brought on by high debt loads after corporate buyouts or a general lack of capital, companies have been unable to reinvest in aging assets and maintain competitiveness.

The greatest disruption is in mall-based retail, particularly lower-tier class B and class C assets. Many agree that a good number of regional malls will disappear entirely, and that this is needed: one expert in commercial real estate services suggested that this is not as much a “decline of malls” as a “decline in **‘super-fluous’ malls**.” Still, suggestions that as many as three-fourths of shopping malls (roughly 900 of today’s approximately 1,200 malls) could close seem highly exaggerated.

A few experts suggest that **department store** mainstays are now all but obsolete. Their one-time role as a source for discovery and product research has been replaced by online browsing. Other interviewees still see relevance in the department store sector; however, it will be much smaller in size and number of units.

Similarly, inline **apparel** shops are weakening as other sectors strengthen. The exhibit on page 72 illustrates a notable shift away from apparel toward other uses: over a 10-year period, apparel’s share of gross leasable area (shown along with general retail, including department stores) has declined from 36 percent in 2007 to less than 29 percent in 2017.

These categories’ weakness may extend across price points. One retailer interviewee pointed out, “The overabundance of

space extends across channels and even discounters could experience 'rightsizing' and future consolidation."

Virtually every retailer will be required to adapt and change, resulting in both winners and losers. This fundamental shift needs to occur, although we cannot overlook the importance of physical stores in providing opportunities to discover and interact with retail brands.

Technology and Flexibility

One universal theme among interviewees is the unrealized opportunity that landlords and tenants have to share information about their business, including the vast amount of **customer data** each is now able to collect. Observed one shopping center investment adviser, "Technology will be a differentiator that further reshapes retail in the future, especially in how 'big data' will help retailers understand their customers and their behavior." Using analytics to enhance customer experiences will define winners and losers in the coming years. Increasingly, retailers are relying on technology to anticipate consumer needs, fine-tune selections, and smooth pain points in the purchase process, thereby creating differentiating guest experiences.

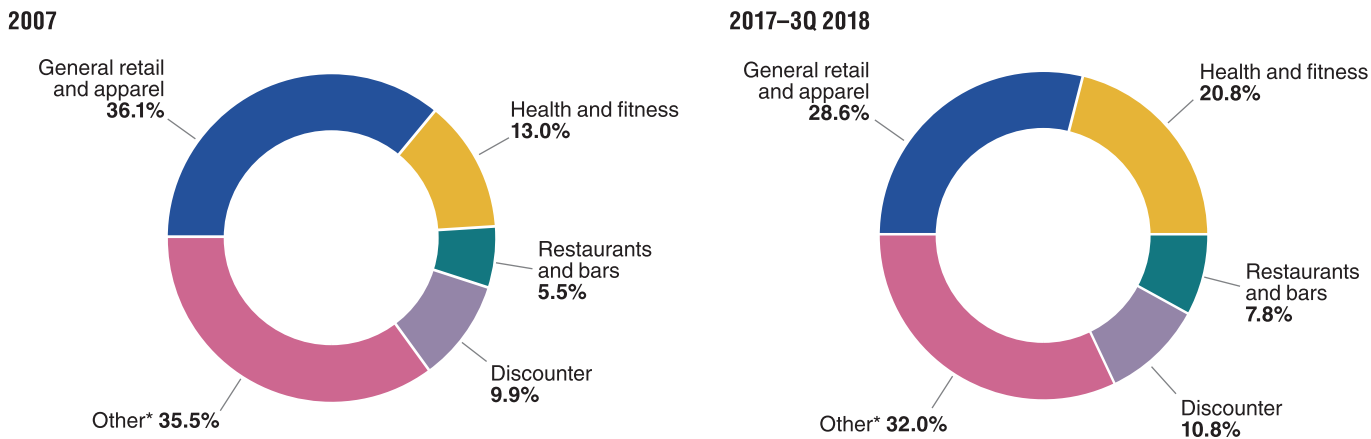
Some have suggested that the digitally native online retailers have more to give here and, thus far, have been more transparent. There remains a perception that more traditional "legacy

retailers" are more guarded about sharing insights. All believe that it is in our best interest to be more transparent and look for new mechanisms to better value physical stores and the role they play in a consumer's path to purchasing.

"Clearly, the old metrics don't work anymore," noted one interviewee working in leasing for a developer. "We need to find other ways to value the importance of physical stores." A retail insights researcher said, "The era of percentage rent is dead." There also is evidence that we may be seeing progress in terms of lease flexibility. As one interviewee from a real estate services firm noted, "Landlords seem much more willing to accept shorter and more flexible contracts now."

One specific future trend is unfolding in digital payments, rapidly moving toward an era of **frictionless retail**. As Amazon Go pioneered the experience of shopping without checkouts, it is considered to be only a matter of time before other retailers follow suit (and customers come to expect it). It will likely become the norm in a relatively short period of time, moving us closer to where, as one retailer noted, "Shoppers will be able to get what they want, where they want it, and how they want it, regardless of channel or format."

Exhibit 3-14 Share of Shopping Center Gross Leasable Area Leased by Tenant Type, 2007 versus 2017-3Q 2018



Source: CoStar Realty Information Inc.
 *Includes entertainment as well as drug and other miscellaneous retail stores.

EXHIBIT 14

1 - 274

City of Santa Ana Review of Market & Fiscal Impact Analyses for Mixed- Use Development on 4th and Cabrillo

Final Report

October 22, 2020

SPR No. 2020-04
1801 East Fourth Street
Central Pointe Mixed-Use Development
Exhibit 142-75COM Peer Review

Economics General Limiting Conditions

AECOM devoted the level of effort consistent with (i) the level of diligence ordinarily exercised by competent professionals practicing in the area under the same or similar circumstances, and (ii) consistent with the time and budget available for the Services to develop the Deliverables. The Deliverables are based on estimates, assumptions, information developed by AECOM from its independent research effort, general knowledge of the industry, and information provided by and consultations with Client and Client's representatives. No responsibility is assumed for inaccuracies in data provided by the Client, the Client's representatives, or any third-party data source used in preparing or presenting the Deliverables. AECOM assumes no duty to update the information contained in the Deliverables unless such additional services are separately retained pursuant to a written agreement signed by AECOM and Client.

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Prepared for: City of Santa Ana

Prepared by: AECOM

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1. Summary of Findings

At the request of the City of Santa Ana (“City”), AECOM has conducted an independent review of a report (“Report”) prepared for Arnel Development Co. by The Concord Group (“TCG”) titled *Market & Fiscal Impact Analyses for a Mixed-Use Development in Santa Ana, CA (4th & Cabrillo Park Dr)*.

Arnel Development Co. (the “Developer”) has proposed a mixed-use project (“Project”) for a site in the City with 644 apartment units and 15,200 square feet of commercial space. The Project, located at 4th & Cabrillo Park Drive, is to be located in the MEMU (Metro East Mixed-Use) Overlay District in the City of Santa Ana. The Developer engaged TCG (in association with a second firm RSG) to “conduct market and fiscal feasibility analyses for the project” in order to “identify the highest and best use for the site” and “demonstrate the financial viability of the development.”

AECOM’s findings are summarized below.

1. The Report presents strong evidence for the market feasibility and fiscal impacts of the Project, but it does not clearly establish the highest and best use or financial viability of the Project.
2. The Report’s conclusions about support for multi-family residential Market are substantiated by market data. The rents represent the higher end of the potential range but are reasonable based on location, proposed amenities, and unit mix.
3. The Report’s retail market analysis concludes that 15,200 retail square feet is supportable in the market based on an assessment of three comparable mixed-use developments. AECOM supplemented this analysis and found further evidence to validate the potential range of supportable retail for the Project. However, neither the Report nor AECOM’s analysis can fully forecast whether long-term retail demand patterns may fundamentally change as a result of the pandemic.
4. The estimates for potential property tax, utility users’ tax, and business taxes apply commonly accepted methodology, and the estimates are validated in the Report’s analysis.
5. In estimating potential sales taxes, the Report assumes different retail capture rates and retail sales yields than used in comparable studies. However, an alternate analysis prepared by AECOM using the adjusted input assumptions validates the Report’s estimates, which are slightly lower—and therefore more defensibly conservative—than those calculated in the alternative.¹
6. The Report’s estimate of City fiscal expenditures that would result from the Project appears low. The Report estimates that on a pro-rata basis, the fiscal expenditure for each member of the service population is approximately \$250, while AECOM in a separate report recently estimated such costs at \$480 per service population member. Applying the AECOM pro-rata measure results in an estimated 104 percent increase of fiscal expenditures resulting from the Project.
7. Net fiscal revenue is the difference between estimated fiscal revenues and fiscal expenditures. Applying AECOM’s adjusted input assumptions for calculating fiscal revenues and fiscal expenditures results in a net present value net fiscal revenue estimate of \$10.3 million, which represents a decrease of \$5.7 million from the \$16 million estimated provided by the TCG Report.
8. The Report’s estimate of the Project’s economic impacts on employment in the Region use IMPLAN input-output modelling for both the construction and stabilized buildout stages of the project. AECOM reconstructed the model and found no significant deviations in results.

¹ While not material to overall sale tax estimate, the TCG Report, in Tables 2, 6, and 7 show an inconsistency that should be explained if intended or corrected if in error. This inconsistency is discussed further in the analysis below.

2. Assessment

Appropriateness of Methodology

In the preamble, the Report states as its goal to “identify the **highest and best use** of the project under current MEMU zoning and demonstrate **financial viability** of the development.”

Identification of highest and best use typically involves comparison of multiple potential land uses using proforma analysis to estimate potential project returns or residual land value. Determination of financial viability may also rely on proforma analysis to estimate Net Operating Income (NOI) and development costs. While the Report features multiple exhibits that demonstrate key inputs and parameters that could be incorporated into proforma analysis, no such additional analysis is conducted to test for highest best use and financial viability.

Multi-Family Market Analysis

The Multi-Family Residential (MFR) market analysis clearly demonstrates potential achievable rents for the units proposed in the project. The Report’s assumptions and data are consistent with previous analysis conducted by AECOM of the residential market, and the Report’s conclusions are supported by the analysis.

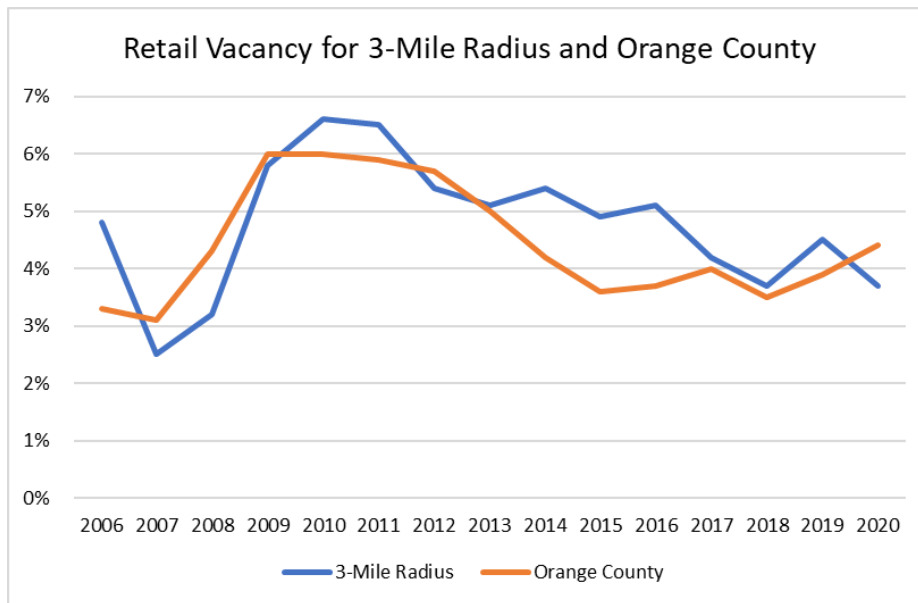
The rents, absorption rates, vacancies, and unit mixes presented in the comparative analysis are broadly representative of the competitive market area. While the proposed rents represent the upper range for the market areas examined, they may be justifiable by the desirable location and the quality of proposed amenities. The Project unit mix, which emphasizes 1-BR units (51 percent) and 2-BR units (39 percent), appears to be optimized to take advantage of market area trends, which indicate that smaller units command higher rents (on a square-foot-basis) and achieve lower vacancy rates than 3-BR units.

Retail Market Analysis

The City is particularly interested in the potential for the Project to include retail space to support the mixed-use nature of the MEMU land use designation. The proposed Project currently contains 15,200 square feet of retail space, and the Report justifies this quantity through arguments regarding Project location, general retail market trends, and comparison with other established mixed-use projects. AECOM has supplemented this analysis with retail leakage/surplus analysis and a retail demand model and concurs that under normal market conditions, 15,200 square feet is supportable. However, as the long-term market impact of COVID-19 on retail performance is not known, caution regarding retail expansion is warranted.

The Report features a comparison with three existing mixed-use projects in Orange County that highlight the potential difficulty the Project may face attracting and retaining retail tenants. Two of these comparison projects, which have a similar walkability score as the Project, show vacancy rates of 70 percent and 56 percent. However, such rates are not typical for retail in Orange County, as indicated by Figure 1, which shows retail vacancies fluctuating between 2.5 percent and 6.5 percent between 2006 and 2020 in Orange County and within the 3-Mile Radius surrounding the Project. While the comparison projects illustrate the potential difficulties of sustaining retail tenants in mixed-use projects, the general retail market in Orange County has remained stable in the recent past.

Figure 1: Retail Vacancy



Source: Costar

There are three other mixed-use residential and retail projects in the development pipeline with program retail ranging from 6,000 to 24,290 square feet contributing 1.4 percent to 3.5 percent of total Gross Building Area (GBA). The Project’s 15,200 square feet of retail space represents approximately 2.6 percent of GBA, which falls within the range of both pipeline projects and similar projects under development within a half mile of the Project’s site, as shown in Table 1.

Table 1: Mixed Use Projects

Comparison of Mixed-Use Projects Under Development within Half-Mile of the Project					
Project Name	Project Address	Dwelling Units	Total GBA (SF)	Retail Space (SF)	% Retail
Madison	200 N Cabrillo Park Dr.	260	186,000	6,500	3.5%
AMG First Point	2112 & 2116 E. First St.	552	700,000	10,000	1.4%
Elan	1600 E. First St.	603	650,000	20,000	3.1%
Project	4th and Cabrillo	644	576,000	15,200	2.6%

Source: Costar, City of Santa Ana, AECOM

Retail leakage/surplus analysis offers another perspective on retail potential. Leakage/surplus analysis compares estimated potential retail spending with estimated actual retail spending to determine whether there is a variance. A surplus variance, where estimated retail spending exceeds estimated demand, indicates the area is drawing retail spending from outside its boundaries, whereas a deficit variance suggests retail “leakage” where residents are leaving the area for retail spending. Leakage can indicate an undersupply of retail space and a potential opportunity for retail development (although not always: if substantial retail supply exists just outside of the boundaries of an area showing leakage, then new supply within the area risks oversupplying the market and diluting sales).

AECOM conducted a retail leakage/surplus analysis for both the City of Santa Ana and the 2-Mile Radius² around the site and found that both geographies capture a significant surplus of retail spending. While the surplus is a net benefit to the City, which benefits from the resulting sales taxes, it also suggests the area is already well supplied and may not have capacity to absorb much more. While the new on-site residential population will help absorb some of this demand, the proposed retail also needs to be unique and differentiated enough to continue to draw shoppers from outside the area to avoid diluting the performance of existing retail supply. Table 2 shows that the 2-Mile Radius has a

² AECOM uses standard geographies for retail demand assessment, typically a half mile and 2-mile radius around the site that represent the immediate opportunities for pedestrian traffic and a short car ride respectively.

retail surplus of over \$640 million in sales, while the City of Santa Ana has a surplus of approximately \$1.2 billion in sales.

Table 2: Retail Leakage/Surplus

2-Mile Radius Retail Leakage/Surplus Analysis					
	Demand	Supply	Retail Gap	Leakage/Surplus	Number of
	(Retail Potential)	(Retail Sales)		Factor	Businesses
Retail Trade	\$1,124,811,711	\$1,655,118,799	-\$530,307,088	-19.1	895
Food & Drink	\$124,997,520	\$235,536,446	-\$110,538,926	-30.7	395
Total	\$1,249,809,231	\$1,890,655,245	-\$640,846,014	-20.4	1,290

City of Santa Ana Retail Leakage/Surplus Analysis					
	Demand	Supply	Retail Gap	Leakage/Surplus	Number of
	(Retail Potential)	(Retail Sales)		Factor	Businesses
Retail Trade	\$2,311,832,197	\$3,452,949,815	-\$1,141,117,618	-19.8	1,606
Food & Drink	\$255,926,740	\$405,314,351	-\$149,387,611	-22.6	646
Total	\$2,567,758,937	\$3,858,264,166	-\$1,290,505,229	-20.1	2,252

Source: ESRI, AECOM

As a final test of supportable retail supply, AECOM prepared a retail demand model that quantifies supportable retail based on a region's demographics, socio-economic trends, and the current development pipeline. The model assumes capture rates for residents and employees based on their proximity to the site and data on retail spending patterns. Based on current demographics and projects in the development pipeline, the model estimates the Project could support between 10,000 and 21,000 square feet of retail space. This indicates that the 15,200 square feet currently proposed falls well within the range of supportable retail at the site. The calculation of net supportable square feet, as shown in Table 3, is based on an estimate of total supportable square feet less the approximately 40,890 square feet of retail space in several mixed-use projects currently proposed or under construction within a half mile of the Project's site. An extended table showing the model's assumptions is found in Appendix A.

Table 3: Net Supportable Retail Demand Model

Retail Demand Model Net Supportable Retail at 4th and Cabrillo			
	Total Supportable	Current Pipeline	Net Supportable
High Scenario (\$350/SF)	61,500	40,890	21,000
Low Scenario (\$425/SF)	50,600	40,890	10,000

Source: ESRI, BLS, LEHD, Costar, California DOF, ICSC, AECOM

These findings support TCG's analysis in the Report and offer validation that the proposed 15,200 square feet of retail could be supported under normal market conditions.

Fiscal and Economic Impact Analysis

The Report estimates fiscal impacts on City's General Fund that may result from the Project. Fiscal impacts are comprised of fiscal revenues and fiscal expenditures. Fiscal revenues considered by the Report include Property Tax, Property Tax in-Lieu of VLF, Sales Tax (Direct and Indirect), Utility User Tax, and Business Tax, while fiscal expenditures include Police, Fire, Parks/Recreation/Community Services, Finance & Management Services, Planning & Building Agency, Personnel Services, and the Clerk of the Council.

Property Tax

Estimated Property Tax revenues are based on an estimate of assessed value of the Development at full buildout. This approach to property valuation is widely accepted and suitable for the Project in its current stage of development. The estimate of Property Tax in-lieu of VLF uses a proportional approach, in which estimated Project assessed value is compared to Citywide assessed value, and the proportional increment of new value is applied to the previous year's Property Tax in-lieu of VLF payment to estimate the new incremental tax revenue. This is a common and generally accepted estimation methodology.

Sales Tax

Estimates for indirect Sales Tax rely on several assumptions regarding household/employee spending habits and the City’s capture of this spending. The Report estimates a City capture rate of 60 percent of taxable spending for new households. Capture rates in comparable studies from AECOM (2018), Economic and Planning Systems (2016) and Keyser Marston Associates (2018) show a range from 25 percent to 50 percent with greater capture rates for developments near the commercial center of larger cities. Precedents from other studies suggest that the 60 percent capture rate for new households may be high considering the Project’s central in Orange County with numerous shopping centers in neighboring jurisdictions. A more conservative and defensible capture rate would be between 30 percent and 40 percent.

The estimate of taxable sales for households is within the range of several data sources. The Bureau of Labor Services Consumption Survey for the Los Angeles Metro Area estimates taxable sales of approximately \$22,000 per household in the region, while ESRI estimates approximately \$18,000 for the City. Because of the small average size of the households projected to occupy the principally 1-BR and 2-BR dwelling units, the Report’s approximate annual household spending of \$17,800 is a reasonable estimate.

For the business-derived sales tax, the Report assumes a rate of \$250 per square foot of retail space to estimate total sales. According to an eMarketer survey of retail locations in Southern California, sales per square foot averaged \$436 in 2018 with a median of \$322. Consequently, assuming a higher sales tax rate may be defensible.

The Report shows inconsistency in the sales tax estimates as indicated in Table 2 and Tables 6 and 7 of the Report. Table 2 in the Report, which shows a cashflow analysis representing the 25-year net new recurring fiscal impact projections of all estimated revenue streams and expenditures, lists the base rate sales tax at buildout at \$90,244 and the Measure X sales tax at \$135,366. These figures are consistent with the concluding text on page 42 of the Report that summarizes the fiscal impacts of sales tax. However, Tables 6 and 7 in the Report and the accompanying text show a combined \$103,700 for base rate sales tax at buildout and \$155,550 for Measure X sales tax at buildout. These measures are approximately 15 percent higher than the measures shown in the cashflow analysis in Table 2 of Report on which the net fiscal revenue calculations are based. In a final version of the Report, TCG should explain this discrepancy if intended or correct it if an error.

In order to test the impacts of observations above about different input assumptions for calculating fiscal revenues and fiscal expenditures, AECOM prepared an alternate estimate that assumes \$350/square foot in retail sales and a capture rate of 40 percent. In addition, to explore whether the data discrepancy discussed above might also have a meaningful impact, AECOM prepared an alternate version of the Report’s estimate: as shown in Table 4 below, “Report” represents TCG’s base estimate, which uses the cashflow shown in the Report’s Table 2. The “Report Alternative” estimate is based on the sales tax measures shown in the Report’s Tables 6 and 7. The results of these alternate calculations show the Report’s original estimate to be the lowest and most conservative, with a net present sales tax value (NPV at 4% discount rate) of approximately \$3.6 million. The AECOM alternative, with a higher sales yield per square foot but lower capture rate, is higher at approximately \$4.1 million. Finally, the Report Alternative is highest at approximately \$4.3 million. From this, it may be concluded that the Report’s original finding is defensible but that higher Project fiscal revenues may be achievable.

Table 4: Adjusted Fiscal Revenue Estimate for Sales Tax

Fiscal Impact of Sales Tax Assumptions				
	Sales Tax Base Rate ¹	Sales Tax Measure X ¹	Total Sales Tax ¹	25-Year Recurring Sales Tax (NPV at 4% Discount)
Report²	\$90,244	\$135,366	\$225,610	\$3,640,360
Report Alternative³	\$103,700	\$155,550	\$259,250	\$4,298,055
AECOM	\$99,584	\$149,376	\$248,960	\$4,127,459

(1) Annual revenues at first year of buildout of the Project
 (2) Cash Flow Analysis from Table 2 in the Report
 (3) Derived from Tables 6 and 7, based on the methodology described in the Report
 (4) Assumes 40% capture rate for Project residents and \$350 per square foot for Project retail space
 Source: TCG, RSG, AECOM

Utility User, Franchise and Business Taxes

The Report estimates Utility Users Taxes based on household data for phone, electricity, gas, and water expenditures for Project residents and Energy Information Association (EIA) estimates of utility expenditures for retail properties for the Project’s retail space.

Business Tax estimates are based on annual sales of the retail future retail tenants and business activities of the property management company. These are acceptable methodologies, and the predictions are in line with assumptions made in comparable studies.

Fiscal Expenditures

The Report applies a standard pro rata fiscal expenditure for the service population of the Project (which is derived from commuting patterns of the City’s residents and workforce. Based on estimated demand for City services from people living and working in Santa Ana (with demand adjusted to reflect time spent in the City as it varies between full-time residents and in-commuters), the Report estimates a service population of 1,399 persons for the Project. This methodology is a standard practice and widely accepted for general planning purposes.

The Report estimates that City expenditures for the service population would result in an increase of approximately \$354,000 for the first full year of buildout, or approximately \$253 per person. This estimate is based on the City budget for Fiscal Year 2019-2020 and considers whether expenditures are variable versus fixed costs. The estimate excludes costs such as the City Manager’s office and City Attorney’s Office but scales up services such as the Police and Fire Departments. AECOM recently conducted a series of fiscal analyses for the City that adopted a similar approach that combined budgetary and demographic analysis with interviews with City staff. The most recent report (March 2020) estimated a pro-rata expenditure of \$487 per member of the service population. The AECOM estimate represents an increase of \$234 over the Report’s estimate, a variance that if applied to the overall estimate has a substantial impact on the Gross Expenditures and Net New Revenues from the Project. Using the same assumptions as the Report in calculating the rolling 25-year impact (Net Present Value at a discount rate of 4 percent), AECOM estimates fiscal expenditures at approximately double of that estimated by the Report. The results of these estimates are shown in Table 5.

Table 5: Adjusted Fiscal Expenditure Estimate

Pro Rata City Expenditure Estimates				
	Service Population	Pro Rata Share	Total Annual Expenditures at Buildout	25 Year Net Recurring (NPV at 4%)
Report	1,399	\$253	\$353,986	\$7,026,724
AECOM (2020)	1,399	\$487	\$681,313	\$14,354,016

Source: US Census LEHD, ESRI, Santa Ana 2019-20 Adopted Budget, AECOM

This adjusted fiscal expenditure estimated carries over to the estimate of Net New Revenue. As shown in Table 6, estimated adjustments to annual fiscal revenues (sales tax) and expenditures result in net new fiscal revenues of approximately \$540,000 compared to \$890,000 for the first year of buildout out. As shown in Table 7, estimated adjustments to fiscal revenues and fiscal expenditures result in a net present value estimate of \$10.3 million, compared with the Report’s estimate of \$16 million.

Table 6: Adjusted Fiscal Revenue and Expenditure Estimates

Adjusted Annual Fiscal Impacts at Project Buildout			
	Sales Tax at First Year Buildout	Fiscal Expenditures at First Year Buildout	Net New Fiscal Revenues at First Year Buildout
Report¹	\$225,610	-\$353,986	\$891,096
AECOM	\$248,960	-\$681,313	\$540,418

(1) Assumes Sales Tax cash flow analysis from Table 2 in the Report

Source: TCG, RSG, AECOM

Table 7: 25-Year Recurring Adjusted Fiscal Impact

25-Year Recurring Net New Fiscal Impacts (NPV at 4% discount rate)			
	25 year Recurring Fiscal Revenues	25 year Recurring Fiscal Expenditures	25 year Recurring Net New Impact
Report¹	\$23,109,060	\$7,026,724	\$16,082,335
AECOM	\$24,679,077	\$14,354,016	\$10,325,061
(1) Assumes Sales Tax cash flow analysis from Table 2 in the Report			
<i>Source: TCG, RSG, AECOM</i>			

Economic Impacts

The Report only considers the impacts on employment for the “Region,” which is not specified (but is likely to be Orange County). The Report derives an estimate of construction phase jobs from construction costs. The estimate of permanent jobs is derived from rate assumptions that associate employment with retail square footage and dwelling units. The analysis uses IMPLAN software that draws on data from several local, state and federal sources, including the Bureau of Economic Analysis (BEA), the Bureau of Labor Statistics (BLS), and the California Department of Finance. This software package is used widely for estimating economic impacts across a wide array of industries and economic settings. To test the estimated economic impacts shown in the Report, AECOM conducted a parallel IMPLAN input/output analysis using the Report’s inputs for Project construction costs and full-time positions. The outputs of AECOM’s model were close to those of the Report and validate the Report’s employment estimates.

3. Appendix

Table 8: Retail Demand Model for the Project Site

Estimated 4th and Cabrillo Capture of Household Retail Expenditures						
	1/2 Mile Radius		2 Mile Radius ¹		Total	
	Current	Buildout ²	Current	Buildout ²	Current	Buildout ²
Households	2,216	4,271	35,204	35,746	37,420	40,017
On-Site ³	0	612	0	0	0	612
Site Capture(%)	7.5%	7.5%	0%	0%	0%	0%
Off-Site	2,216	3,659	35,204	35,746	35,204	39,405
Site-Capture(%)	5.0%	5.0%	2.5%	2.5%	2.5%	2.5%
Median HH Income	\$60,500	\$60,500	\$60,500	\$60,500	\$60,500	\$60,500
HH Retail Expenditures ⁴	\$15,125	\$15,125	\$15,125	\$15,125	\$15,125	\$15,125
<u>Estimated Household Sales Capture</u>	<u>\$1,675,850</u>	<u>\$3,461,281</u>	<u>\$13,045,282</u>	<u>\$13,246,127</u>	<u>\$13,045,282</u>	<u>\$16,707,408</u>
Employees	5,900	5,900	54,700	55,272	60,600	61,172
On-site	48	48	0	0	48	48
Annual Expenditures ⁵	\$4,000	\$4,000	\$4,000	\$4,000	\$4,000	\$4,000
Site Capture (%)	5.0%	5.0%	0%	0%	0%	0%
Off-site	5,852	5,852	54,700	55,272	60,552	61,124
Annual Expenditures ⁵	\$4,000	\$4,000	\$4,000	\$4,000	\$4,000	\$4,000
Site Capture (%)	4%	4%	2%	2%	2%	2%
<u>Estimated Business Sales Capture</u>	<u>\$852,288</u>	<u>\$852,288</u>	<u>\$3,938,400</u>	<u>\$3,979,606</u>	<u>\$4,790,688</u>	<u>\$4,831,894</u>
Total Estimated Retail Capture	\$2,528,138	\$4,313,569	\$16,983,682	\$17,225,733	\$19,511,820	\$21,539,302
Supportable Retail SF (\$350/SF)⁶	7,223	12,324	48,525	49,216	55,748	61,541
Supportable Retail SF (\$425/SF)⁶	5,949	10,150	39,962	40,531	45,910	50,681

(1) 2 Mile Radius is exclusive of 1/2 Mile Radius to avoid double counting
(2) Assumes stable occupancy of all known current development pipeline
(3) Assumes 95% Occupancy of the Project
(4) BLS assumes 20%-30% of median income is spent on all retail categories, site capture adjusted for retail type
(5) Based on ICSC data for average workday spending for office/retail workers, excluding transportation, grocery, and warehouse expenditures
(6) Gross supportable retail before adjustment for retail development in the current pipeline

Source: ESRI, BLS, LEHD, Costar, California DOF, ICSC, AECOM

EXHIBIT 15

1 - 287



MEMORANDUM

To: City of Santa Ana
From: THE CONCORD GROUP
Date: October 22, 2020
Re: **Viability of a Grocery Store and Market Optimal Scale of Retail for the 4th and Cabrillo Project in Santa Ana, CA**

In August 2020, The Concord Group (“TCG”) completed a highest and best use analysis for the 4th and Cabrillo project in Santa Ana. It was TCG’s conclusion that the current plan set forth by the developer, which includes 644 apartments and 15,200 square feet of retail, is the highest and best use for the property.

Per preliminary feedback from the Planning Commission, we understand the City would like further explanation with regards to two key conclusions in the analysis:

1. A grocery store is not supportable on site;
2. The +/- 15,000 square feet of retail planned is the maximum marketable retail square footage that the project can support.

Grocery Store

A grocery store is not viable in the project. Grocery stores require: (1) a high degree of marketing visibility; (2) high density of nearby rooftops with strong incomes; and (3) and convenient accessibility.

1. With regards to point 1, the project possesses attractive visibility along 4th Street, with up to 30,000 cars passing by the site daily. However, with regards to points 2 and 3, the project fails.
2. The density of rooftops and associated incomes is insufficient to attract a grocery tenant. Within a one-mile radius of the project, there are only 9,800 households, with incomes well below the County median.
3. Only in the most urban settings (ie. downtown Los Angeles, Santa Monica), will grocery operators consider structured parking for their shoppers. Grocery shoppers seek “easy in / easy out” accessibility. The large amount of surface parking required for a grocery store would render the mixed-use character of the project financially infeasible.

Scale of Retail

The current scale of retail planned for the project is the maximum that can be supported on the site. There are several marketing concerns limiting the market viability of more retail on site:

1. There is limited demand for new retail in the site’s trade area. Over the last ten years, only 100,000 square feet of retail has been added, with no improvements to retail occupancy during the timeframe.
2. Secondly, successful, large-scale commercial shopping destinations require anchor tenancy – typically a grocery – which is not viable on site. Anchor tenants are the “draw” that attract consumers to the smaller, in-line tenant spaces.
3. Lastly, while mixed-use retail and residential is common in the most densely populated urban settings, a large scale of ground floor retail is not viable in a suburban setting. TCG surveyed three mixed-use projects in Orange County, with ground level retail footprints ranging from 8,500 to 14,000 square feet. Two of the three projects were considered distressed, with elevated rates of retail vacancy (54% and 70%). Like the subject, each mixed-use analog lacks an anchor tenant magnet to attract consumers.

In summary, TCG considers the current land plan to be the highest and best use for the 4th and Cabrillo site.

* * *

The above assignment was completed Michael Reynolds and David Prokopenko. Should you have any questions regarding the data or conclusions generated by the analysis, feel free to contact us at (949) 717-6450.

EXHIBIT 16

1 - 289



WATERFORD
PROPERTY COMPANY

130 Newport Center Drive, Ste. 230
Newport Beach, CA 92660

**CENTRAL POINTE, 4th St. & Cabrillo Park
Sunshine Ordinance Meeting**

Meeting Minutes

Date & Time: Thursday, August 15, 2019, 6:00 PM

Location: Creekside Plaza, 505 N. Tustin Ave., Suite 243, Santa Ana, Ca 92705

Purpose: Community meeting in compliance with the Sunshine Ordinance for Central Pointe at 4th St. & Cabrillo Park in Santa Ana

In Attendance: City Representatives: Vince Fregoso, Selena Kelaher, Scott Kutner, Mark McLoughlin
Applicant: Sean Rawson and Consultant Team (KTYG/Architect, MJS/Landscape Architect and Debra Pember/Asst. Project Manager
Members of the Public: 15 members were in attendance

The meeting began at approximately 6:05 pm. Sean Rawson, the applicant, introduced himself and his team. He provided an overview of the proposed project with a power point slide presentation, illustrating the conceptual elevations, floor plans, finishes, amenities and open space. It was emphasized that this is only a conceptual plan at this time. This is the first opportunity to get public feed-back. The following information was shared, followed by questions and comments.

- Project Zoning: The intent of the MEMU (Metro East Mixed-Use Overlay District) was explained and how the project complies with the zoning.
- Type of Project: 650 unit mixed-use residential project located in the Active Urban District. The mixed-use will include retail space on the first floors facing 4th Street. The project will create 500 jobs and bring \$36 million to the City in short-term income.
- Project has just recently been submitted to the City and no City feedback has been received since submittal.
- Project Amenities: The Landscape Architect, Matt Jackson, described the green open space open to the public and some of the roof top amenities that will be available to the residents, such as pools, fitness and clubrooms. A dog park is also being planned for the residents.
- Number of Units: Two buildings that total 650 luxury apartment units for rent, made up of studio units, one, two and some three-bedroom units. It was emphasized that this is conceptual as this point in time, until public and City feedback is received.

SPR No. 2020-04 1801 East Fourth Street
Central Pointe Mixed-Use Development
Exhibit 16 – Sunshine Meeting Minutes

Questions, Comments, Answers:

- Q. Target demographics?
A. Millennial renters and empty nesters. Project will also comply with HOO (Housing Opportunity Ordinance).
- Q. Will there be affordable units on site?
A. Reviewed options that support HOO and which option to pursue is being considered and not yet determined.
- Q. What types of businesses will occupy the retail component?
A. Too soon to determine. Generally, the project needs to be built first and marketing for tenants will follow.
- Q. When will the project be started? What is the time frame for completion?
A. We just started the entitlement process, which could take 10 to 12 months. After project is approved, the construction document phase starts, which with plan check, could take 8 to 10 months and then 30 months to build out.
- Q. Concern over dust impacts during construction.
A. The EIR will identify all impacts and have specific requirements for mitigation.
- Q. Parking concerns: 650 units is 1,400 cars; project will have 2-3 residents per unit. What is the parking? Concern over parking spilling over into the neighborhoods (like Mabury cul-de-sacs) where not enough parking currently exists. Need to increase parking ratio. Is there parking onsite? What about visitors parking? What about parking for the retail?
A. Parking is 1.82 spaces per unit and is consistent with the zoning. There is a parking structure for each building; it's considered a wrap design. We're hearing your concerns and the parking will be further studied through the entitlement period.
- Q. Concerns over traffic: Number of cars per unit; 650 units is 1,400 cars. Concerns with traffic using Mabury as a thorough fare to and from 17th St.
A. A traffic study is being done. Everyone's comments and concerns will be considered and addressed.
- Q. Queuing going west on 4th St. is already difficult. How will this affect that?
A. An additional traffic lane is being added.
- Q. Will there be consideration to add a bus route on 4th St.? Is it transit oriented?
A. That's a question more for CalTrans. However, we are considering a shuttle service to/from the train station.
- Q. Will there be a sound wall along the freeway side?
A. We don't know yet. Those are details that still need to be worked out through the process.
- Q. Utility poles, what's the status?
A. They'll be undergrounded.

- Q. What is the roadway to west used for (on site plan)?
A. That's actually a gated access for emergency vehicles only.
- Q. What is the sidewalk width going to be around the project?
A. Not sure exactly, but those details will follow.
- Q. Will there be security on site?
A. Some areas will be gated.
- Q. How far was the outreach? 500' is not enough, doesn't cover everyone. Should consider reaching out to neighboring communities. One couple talked about how they found out about the meeting through "Next Door". When is next meeting? How was it posted?
A. Rules were followed within the City's guidelines for Sunshine Ordinance. It was posted in the paper, meeting notices mailed and posted signs on the property.
- Signs should also be posted at the Mabury curve.
- Q. When is the next meeting?
A. The next meeting with the community will be hosted after the traffic study is complete.
- Q. What kind of landscaping is being proposed? (Desi) I don't like palm trees; they get tall and lose their value. I think you should plant pine trees; also wants boulders and some type of public art.
A. Matt Jackson, project's landscape architect addressed the question. Tall, fuller type trees, vegetation will be placed along the freeway and other areas. However, typically, palm trees work well along storefronts or other commercial buildings, because they don't have a tendency to hide the signage.
- Q. Could you please bring more displays?
A. Yes, definitely.
- Q. Will we be kept informed of all activities?
A. Yes.
- Q. Could we have the next community meeting at the Cabrillo Park, maybe the tennis court area?
A. Yes, we'll work on that.
- Additional comment: Desi stated his concerns, but added that "overall, likes the project".

Meeting adjourned approximately 7:15 PM

8/15/19

CENTRAL POINTE
SIGN IN SHEET

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REQUEST FOR Planning Commission Action



PLANNING COMMISSION MEETING DATE:

NOVEMBER 9, 2020

TITLE:

**PUBLIC HEARING – ENVIRONMENTAL IMPACT
REPORT NO. 2020-03 AND GENERAL PLAN
AMENDMENT NO. 2020-06 FOR THE
COMPREHENSIVE UPDATE TO THE SANTA
ANA GENERAL PLAN**

PLANNING COMMISSION SECRETARY

APPROVED

- As Recommended
- As Amended
- Set Public Hearing For _____

DENIED

- Applicant's Request
- Staff Recommendation

CONTINUED TO _____

Prepared by Vince Fregoso, AICP

Handwritten signature of Vince Fregoso in blue ink.

Executive Director

Handwritten signature of the Planning Manager in blue ink.

Planning Manager

RECOMMENDED ACTION

Recommend that the City Council:

1. Adopt a resolution certifying Final Environmental Impact Report No. 2020-03 (SCH No. 2020029087), including adoption of environmental findings of fact pursuant to the California Environmental Quality Act, adoption of a Statement of Overriding Considerations, and adoption of a Mitigation Monitoring and Reporting Program;
2. Adopt a resolution approving General Plan Amendment No. 2020-06.

DISCUSSION

At the direction of the Mayor and City Council in late 2015, the Planning Division began efforts to complete a comprehensive update to the City's General Plan. The General Plan is a state mandated document that includes goals, policies, implementation measures and maps that will guide Santa Ana's physical growth for the next 25 years. The State of California requires every city to prepare and adopt "a comprehensive, long-term general plan for the physical development of the city, and any land outside its boundaries which is in the planning agency's judgement bears relation to its planning." The role of the General Plan is often referred to as the "Constitution of the City" as it serves as the guiding document by which all land use related decisions must be derived.

The City's current General Plan (with the exception of the Housing Element) was last comprehensively adopted in 1982 and is now 38 years old. The General Plan establishes a community vision and strategies to guide growth, change and community preservation within the City, providing goals and policies to enhance, preserve and protect the unique qualities that the Santa Ana community values. The General Plan is the single-most important tool used to guide communities achieve their vision. As the General Plan is a policy document, it differs from the Zoning Code in that the Zoning Code will identify specific development standards (setbacks, parking, open space etc.) for each parcel in the City. Upon adoption of the General Plan, staff will begin the process to complete a

comprehensive update to the Zoning Code to ensure consistency between the General Plan and Zoning Code.

A General Plan:

- Sets the course for decision making
- Helps balance the interest of residents, business owners and property owners
- Informs and educates the community
- Serves as an effective governance tool for City staff
- Provides guidance for economic decisions
- Ensures the protection of the natural environment
- Identifies implementation actions that should be undertaken to achieve the goals and policies identified in the General Plan

The comprehensive update to the General Plan document, known as “Golden City Beyond – A Shared Vision for Santa Ana,” is comprised of two separate documents:

- The General Plan (comprised of three Sections and 12 Elements)
- Environmental Impact Report

Community Outreach

General Plan Advisory Group

Following direction from the City Council in 2015 to comprehensively update the General Plan, in late 2015, a 17-member General Plan Advisory Group (GPAG) was established to provide guidance to City staff and the consultant team early in the process. The GPAG was critical in developing goals and policies that would serve as the foundation of the General Plan elements. The GPAG was also tasked with functions such as formulating a community vision, identifying area-wide and community-wide land use planning issues, and prioritizing economic development activities. The GPAG was comprised of representatives from various commissions, residents, business owners, interest groups, youth and property owners to represent the community's interests. Over the past few years, the GPAC has held several meetings, providing direction to staff on key matters that are now embodied in the updated General Plan.

Development of Core Values

A variety of community issues and considerations were identified through the different community outreach activities. With this community input, and with the input of the GPAG, a Draft General Plan Policy Framework was created in December 2018. Included within the Framework was a set of Community "Core Values" that were created to reflect the voice of the collective Santa Ana community and to express its environmental justice principals. These Core Values: Health, Equity, Sustainability, Culture and Education, serve as the backbone of the goals, policies and implementation items found throughout the General Plan Elements.

Public Outreach

Since starting the General Plan update process in late 2015, the City has sought to meaningfully engage all residents of the community, looking for best practices and community partnerships to reach all residents, especially those that have not traditionally engaged in the public decision making process. The General Plan Outreach Program included a series of over 60 Community Workshops starting in 2015, informational "pop-ups" at community events, presentations to focus groups, and the convening of a General Plan Advisory Group. Moreover, translation services were offered during the meetings, and videos of workshops were archived and made available for those unable to attend.

The City's General Plan is a community-wide vision document that is intended to address and respond to community needs. As such, the comprehensive update to the General Plan required staff to advertise and educate community members about the process to as wide an audience as possible. Over the past five years starting in December 2015, an extensive public outreach campaign to engage the public was conducted to supplement the feedback, input and direction of the GPAG. Public outreach efforts include:

- Over 60 community meetings and workshops
- Individual community workshops within each of the five Focus Areas with over 300 residents, business leaders, and community stakeholders participating in the workshops.
- Distribution of an online community survey with over 650 respondents to collect input on the content of the General Plan
- Approximately 44,000 direct mailers sent to property owners and tenants
- A dedicated webpage (santa-ana.org/general-plan) with continuous updates on the General Plan update process and related documents as well as information about Environmental Justice. Also includes an online web learning tool with a narrated presentation to help educate and increase awareness on Environmental Justice issues.
- Presentations at neighborhood Communication Linkages (CommLink) meetings
- Meetings with Environmental Justice groups (Madison Park Neighborhood Association, Logan Neighborhood Association, Artesia-Pilar Neighborhood Association) on August 31st, October 14th and October 19th
- Attendance at approximately 100 Cares events (daily neighborhood functions and evening City Park events) from late-August through the end of October within Environmental Justice communities to discuss the General plan update with residents
- Development of a video series on the General Plan update
- Planning Commission study sessions on August 24th and September 14th
- City Council study sessions on July 7th and October 20th
- One-on-one meetings with the Planning Commission and City Council

The City continued to participate in outreach meetings and discussions with the community on key issues such as proposed land use changes, open space, and addressing EJ issues facing the community. Councilmembers, the City Manager, the Executive Director of Planning and Building, and City staff have met and will continue to meet with individual neighborhood leaders of disadvantage communities in the Logan and Madison Park neighborhoods as well as walking through the neighborhoods with residents and neighborhood leaders.

PROPOSED 2020-2045 GENERAL PLAN – SANTA ANA: GOLDEN CITY BEYOND

Community Vision Statement

Through a robust dialogue with the community, including residents, business and property owners, and other interested citizens, the City adopted the first long-term Vision Statement. This Vision Statement is not only the foundation for the updated General Plan, but also for all long-term decision making in the City. The Vision Statement memorializes the community's aspirations and describes the "Santa Ana – Golden City Beyond" as embracing the following principles:

- Protect and enhance our cultural and community assets
- Create a land use pattern that promotes healthy and active lifestyles
- Ensure equitable outcomes and land use distributions
- Create a sustainable and livable city
- Promote lifelong education and prosperity

Format and Content of the General Plan

The proposed General Plan is a comprehensive update and reorganization of the current General Plan Document, with the exception of Housing Element, which is on an eight-year cycle and is scheduled to be updated independently of this effort in 2021 to comply with State law. The State mandated elements (Land Use, Circulation, Open Space, Conservation, Noise, Safety and Housing) are organized into three Sections:

- **Services and Infrastructure (Section I)**
 - Community Element
 - Mobility Element
 - Economic Prosperity Element
 - Public Services Element
- **Natural Environment (Section II)**
 - Conservation Element
 - Open Space Element
 - Noise Element
 - Safety Element
- **Built Environment (Section III)**
 - Land Use Element
 - Historic Preservation Element
 - Housing Element (to be updated in 2021)
 - Urban Design Element

A recent State law, SB1000, requires local jurisdictions with disadvantaged communities within the City that are updating their General Plan to identify objectives and policies to reduce unique health risks in disadvantaged communities. Further, SB1000 requires cities to identify policies to promote civil engagement in the decision making process and prioritize improvements and programs that address the needs of disadvantaged communities. The law provides two options for accomplishing

the goals of SB1000: Adopt a separate Environmental Justice Element, or integrate the objectives of SB1000 into the various elements of the General Plan. Because the environmental justice topic touches all aspects and all elements of the General Plan, it was determined early in the process to incorporate environmental justice components as policies woven into the fabric of the various Elements, elevating their importance and prominence in each Element.

As shown in the list on the previous page, the City also elected to prepare additional optional elements (Community, Economic Prosperity, Public Services, Historic Preservation and Urban Design) to address special and unique community priorities. Outlined below is an overview of the 11 Elements that are being updated:

Community Element

The Community Element is a new element of the Santa Ana General Plan. The element reinforces the city's values of recreation, culture, education, health and wellness, and cultivates opportunities for improved quality of life for all residents. The goals and policies of this element can be realized through partnerships with local agencies and organizations on facilities, activities and events throughout Santa Ana

This Element functions in tandem with other elements of the General Plan, such as Open Space, which contains policies related to parks and recreation facilities. Dozens of plans and programs implemented by the City and other agencies and organizations overlap with the goals and policies of this Element, such as the Community Arts and Culture Master Plan, which establishes goals and strategies on topics such as cultural equity, infrastructure for the arts, communitywide access, youth programming, and place making.

There are 3 goals, 27 policies and 16 implementation items associated with this element. This element is not mandated by State law and is an optional element.

Mobility Element

The Mobility Element, known as the Circulation Element in the current General Plan, is the City's blueprint for moving people, goods, and resources throughout the community. Moving beyond mere functionality, the City seeks to improve the quality of life in Santa Ana by providing more complete streets, offering ways to be more active, and conserving natural resources. In planning the City's transportation system for the 21st Century, the City is also making the community safer, more affordable, and more livable.

Santa Ana envisions a balanced multimodal transportation system that supports community values. These values include a vibrant local economy, healthy neighborhoods, health and wellness, and an attractive environment. Context sensitive design solutions strengthen the livability, vitality and safety of our neighborhoods, districts, and corridors.

There are 5 goals, 46 policies and 45 implementation items associated with this Element. This Element is one of the State mandated elements.

Economic Prosperity Element

The Economic Prosperity Element, identified as the Economic Development in the existing General Plan, will ensure Santa Ana's local economy. The Element defines Santa Ana's role in the broader regional economy, expands, maintains, and enhances job opportunities, attracts and retains a balance of business types, provides sufficient revenue for public services, and contributes to the overall quality of life experienced by the City's residents.

The goals and policies of this Element will inform and guide decisions across local government. The City intends that its allocation of resources, the operation of its agencies, and the application of its regulatory authority will grow and diversify the local economy. The city further intends that local economic growth and diversification will reduce poverty, increase overall prosperity, improve health and wellness outcomes, expand housing opportunities, and increase quality of life choices available to City residents.

There are 4 goals, 39 policies and 31 implementation items associated with this Element. This Element is not a State mandated element.

Public Services Element

The Public Services Element, identified as the Public Facilities Element in the current General Plan, provides Santa Ana's diverse population with quality services and infrastructure, including accessible public facilities and enhanced public safety. Anticipated growth will require the City to fulfill community needs and to ensure proper management of those needs. It is important that public facilities and services are equitably distributed and maintained at sustainable levels throughout the community. A wide range of City entities and external agencies work closely together to provide the full spectrum of services and facilities.

There are 3 goals, 38 policies and 40 implementation items associated with this element. This Element is an optional General Plan Element.

Conservation Element

The protection and management of Santa Ana's air, water, and energy resources are essential for a healthy, sustainable and equitable path forward. Additionally, the preservation of the remaining stretches of undisturbed plant and wildlife environment, such as in Santiago Park, is important to residents.

The Conservation Element identifies the community's natural resources and illustrates the benefits for retention, enhancement, and development of these resources towards improving quality of life and the environment as a whole. This Element will guide the City in its efforts to prioritize sustainability and enhance the environment for current and future generations.

The Core Values reinforce the City's commitment to enable all persons to enjoy equal access to healthy environments, healthy food, parks and recreational facilities, and civic engagement opportunities. However, the City recognizes that throughout Santa Ana's communities, some bear a disproportionate burden of pollution and associated health risks. As a result, this element also embraces the concept of environmental justice, which seeks to correct inequity by reducing

pollution and increasing public investment in the communities most affected, while also ensuring their input is considered in decisions that affect them.

There are 4 goals, 38 policies and 39 implementation items associated with this element. This Element is a State mandated Element

Open Space Element

Open space is a limited and valuable resource, providing multiple benefits to those living and working in Santa Ana. Open space provides a place of relaxation and reprieve from the urban environment. Open space also offers places to gather, celebrate, learn or exercise, whether alone, with friends or family, or with other members of the community. Open space is so important that its presence or absence can profoundly shape physical, social, mental and economic health, and overall well-being of the community.

The purpose of the Open Space Element is to identify and preserve open space areas that provide value to the community and enrich the quality of life. Such lands or waters provide value in the form of recreation, health, biodiversity, wildlife conservation and aesthetics. Additionally, open spaces are used for climate change, mitigation and adaption, flood risk reduction, managed natural resources production, agricultural production, and protection from hazardous conditions. The Open Space Element will guide the City in its efforts to plan for open space lands in what is largely a built-out, urban environment. Through this element, opportunities for capturing additional open space in the City will be discussed.

There are 3 goals, 25 policies and 22 implementation items associated with this Element. This Element is a State mandated element.

Noise Element

The purpose of the Noise Element is to appraise noise levels in the community, prepare noise contours to guide land use decisions, and establish measures that address current and future noise impacts. This Element works to ensure that the City limits the exposure of the community to excessive noise levels in noise-sensitive areas and at noise-sensitive times of day. This Element works in tandem with other Elements of the General Plan, such as the Mobility Element, which contains policies related to the mitigation of transportation related noise.

There are 3 goals, 10 policies and 20 implementation items associated with this Element. This Element is one of the State mandated elements.

Safety Element

The Safety Element combines the Public Safety and Seismic Safety elements of the existing General Plan into one document. Public health and safety and protection from the risks of natural and human-induced disasters, emergencies, and hazards are vital in establishing a safe and healthy environment for Santa Ana's residents, workers, and visitors. The purpose of the Safety Element is to eliminate and minimize risks associated with natural and human-generated hazards such as floods, earthquakes, and hazardous materials. By assessing and preparing for levels of risk, the City can endure the range of safety hazards and adapt to changes over time.

This Element works in tandem with other elements of the General Plan, such as the Public Services Element, which contains goals and policies related to police, fire, and health services, as well as emergency planning and resiliency.

There are 4 goals, 25 policies and 26 implementation items associated with this Element. This is a State mandated element.

Historic Preservation Element

The Historic Preservation Element is a new element of the Santa Ana General Plan. Santa Ana was incorporated as a City in 1886 and designated the County seat in 1889. Historic preservation of the City's cultural and architectural heritage is an essential part of the City's economic vitality and identity. Residents take pride in the architectural heritage of the City, including its historical buildings and unique neighborhood character. Sites such as the Old Orange County Courthouse, Pacific Substation, Yost Theatre, and the Spurgeon Building reflect the City's rich cultural history and architectural diversity.

The purpose of the Historic Preservation Element is to provide guidance in developing and implementing activities that ensure that identification, designation and protection of architectural, historical, cultural and archaeological resources are part of the City's planning, development and permitting processes. Through historic preservation policies and programs, Santa Ana's heritage and diversity will continue to be a source of community pride.

There are 3 goals, 21 policies and 28 implementation items associated with this Element. This is an optional element of a General Plan.

Land Use Element

The Land Use Element provides a long-range guide for the physical development of the City, reflecting the community's vision for a high quality of life. This Element guides the distribution, location, and size of new development, ensuring that residential neighborhoods are protected, and future growth is sustainable and minimizes potential conflicts. Through its focus on the pattern of land use, this element is also a tool to promote public health, reduce infrastructure costs, enhance local economies, and address long-term environmental issues such as air quality, climate change and water resources.

The development, use and distribution of land are critical to achieving the City's vision and adhering to the Core Values. As stewards of the land, the City must plan for uses and development that creates a sustainable, healthy and livable City, ensures equitable outcomes and land use distributions, protects and enhances cultural and community assets, and provides opportunities for growth and prosperity. As in other cities, land is a finite and valuable resource. Its use dictates the City's economic and fiscal future.

The Land Use Element preserves existing neighborhoods by directing new growth to major corridors and avoids land use changes in lower density neighborhoods. The five growth areas are identified as Focus Areas. These include South Main Street, Grand /Seventeenth Street, West Santa Ana Boulevard (adjacent to the OC Streetcar line), 55 Freeway/Dyer Road, and South Bristol Street. The proposed Land Use Element will connect existing planning areas in the City (Transit Zoning Code, Harbor Boulevard Mixed-Use Corridor, Metro East Mixed Use Overlay Zone,

etc.) with the five proposed Focus Areas. Within these Focus Areas, the City anticipates the most potential for development.

There are 4 goals, 42 policies and 41 implementation items associated with this element. This is one of the State mandated elements.

Urban Design Element

Urban design is the process of shaping the physical character and organization of the City and defining the relationship between people and their environment. It respects the history of a place, considers existing organizational patterns and the form and character of existing buildings, supports healthy outdoor spaces, and is mindful of the natural environment. These considerations unite to define a distinct visual quality and sense of place that reflects community values.

The Urban Design Element establishes the long-range vision for the physical development, visual qualities, and sensory experience of the City. This Element, in coordination with other elements of the General Plan, orchestrates a safe, functional and aesthetically pleasing urban environment. Specifically, the Urban Design Element addresses the public realm, building form, and establishes programs and measures to improve the physical setting in which community life takes place while curtailing obsolete, dysfunctional, and chaotic development.

There are 7 goals, 48 policies and 27 implementation items associated with this Element. This is an optional element of the General Plan.

California Environmental Quality Act (CEQA)

The comprehensive update to the General Plan required extensive environmental review. Pursuant to the California Environmental Quality Act (CEQA), and after completion of the Initial Study for the project, it was determined that CEQA required the preparation and certification of a program environmental impact report (PEIR) for this project. The purpose of a PEIR is to identify and disclose the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the way those significant effects can be mitigated or avoided. To determine what potential effects would be caused by the project, the Draft PEIR analyzes issues related to: Aesthetics; Air Quality; Biological Resources; Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazard and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Noise; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; and Utilities and Service Systems. The draft PEIR also studies alternatives to the General Plan update. The draft PEIR analyzes direct and indirect impacts resulting from construction and operation of the proposed project.

On February 26, 2020, a Notice of Preparation was distributed for comment regarding the scope and content of the Draft PEIR. A public scoping meeting was held on March 5, 2020 with 16 persons in attendance and 18 written comment letters received at the conclusion of the 30-day public comment period. The comments were reviewed and addressed as required by CEQA. The comments are included as part of the Final EIR.

Three project alternatives were also analyzed within the document. These included a no project alternative, where the existing General Plan document would remain in effect (Alternative 1); a

reduced intensity alternative with two focus areas (55 Freeway/Dyer Road and South Bristol Street) would be reduced to approximately 50 percent of the maximum densities allowed by their respective land use designation (Alternative 2); and build out of the site to be consistent with the Southern California's Association of Regional Government's (SCAG) RTP/SCS projections, which could result in an approximate 75 percent reduction in both the number of allowable units and commercial/industrial square footage (Alternative 3).

The Draft PEIR determined that the proposed comprehensive update would require mitigation related to air quality, cultural resources, geology and soils, greenhouse gas emissions, noise, and tribal cultural resources. On August 3, 2020, the Draft EIR was circulated for review and comment to public, City Council, Planning Commission, local, regional and state agencies, and interested parties for a 45-day public comment review period that originally ended on September 16, 2020. However, due to community request for additional time to review the document, the comment period was extended by an additional 20 days to October 6, 2020. During the review and comment period, staff held a public hearing to receive comments on the PEIR and held a work-study session with the Planning Commission on August 24, 2020, with an additional work-study session held on September 10, 2020.

The City has evaluated the comments received from persons and agencies on the Draft PEIR and completed detailed Response to Comments, revisions to the Draft PEIR including clarifications and/or corrections to typographical errors, and a Mitigation Monitoring and Reporting Program (MMRP). The MMRP contains mitigation measures to address impacts to air quality, cultural resources, geology and soils, greenhouse gas emissions, noise, and tribal cultural resources. The response to comments, MMRP and Final EIR were published on October 30, 2020 for public review. The Draft PEIR, responses to comments document, revisions to the Draft PEIR, and the MMRP constitute the Final PEIR for the project.

The PEIR identifies five significant and unavoidable impacts associated with this project, which pertain to Air Quality, Cultural Resources, Greenhouse Gas Emissions, Noise and Population and Housing. Air Quality impacts stem from the General Plan update being inconsistent with the South Coast Air Quality Management Plan (AQMP) as buildout under the plan would exceed the population estimates assumed for the AQMP and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB). Further, construction activities associated with buildout of the General Plan update would generate short-term emissions that exceed the AQMD's significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Buildout would also generate long-term emissions and expose sensitive receptors to substantial concentrations of toxic air contaminants. Finally, construction and operation emissions generated by individual development projects have the potential to exceed the AQMD's local significance thresholds. Cultural Resource impacts result from the proposed General Plan allowing development in areas that have historic resources identified by previous cultural resource surveys, with development in these areas potentially causing the disturbance of historic resources in the plan area. Greenhouse Gas Emissions would result in a decrease in GHG emissions in 2045 but may not meet the long-term GHG reduction goal under Executive Order S-03-05. Due to the potential for proximity of construction activities to sensitive uses, the number of construction projects, and the longevity of the projects, construction noise

could result in a temporary increase in noise levels above ambient conditions. Further, buildout of the General Plan update would expose residents to projects generating traffic noise. Finally, the buildout anticipated by the General Plan update would result in an increase in population and housing units that exceed the Orange County Council of Government projections by up to 38 percent, with no feasible mitigation measure to address the issue.

These impacts cannot be mitigated to a less than significant level, and even with the inclusion of feasible policies and implementation items proposed in the General Plan, adoption of a Statement of Overriding Considerations is required prior to approving the project. A Statement of Overriding Considerations is the process through which decision makers balance the economic, legal, social, and technological or other benefits of the proposed project against its unavoidable environmental impacts.

Airport Land Use Commission Review

The proposed changes to the Land Use Element to adopt the South Bristol and the 55 Freeway/Dyer Road Focus Areas required the General Plan update to be presented to the Airport Land Use Commission (ALUC) for a determination of consistency with their Airport Environs Land Use Plan (AELUP). On October 15th, 2020 the ALUC determined that the General Plan update conflicts with the goals and objectives of the AELUP and voted 5:0 to find the General Plan update inconsistent with their plan. As a result, on October 16th, 2020, at a special City Council meeting, the Council directed staff to file a Notice of Intent to Overrule the ALUC's determination. This action is tentatively scheduled to be heard by the City Council on December 1, 2020.

Conclusion

The proposed comprehensive update to the General Plan will guide development with the City for the next 25 years. The goals, policies and implementation items within the 11 Elements have been developed through extensive input from the community. Further, extensive outreach on the General Plan update has assisted in shaping the final vision expressed within the Elements. Based on the analysis above, it is recommended that the Planning Commission recommend that the City Council adopt a resolution certifying Final Environmental Impact Report No. 2020-03 (SCH No. 2020029087), adopt the environmental findings of fact pursuant to the California Environmental Quality Act, adopt a Statement of Overriding Considerations, and adopt the Mitigation Monitoring and Reporting Program. In addition, staff recommends that the Planning Commission recommend that the City Council adopt a resolution approving General Plan Amendment No. 2020-06.



Vince Fregoso, AICP
Planning Manager

Exhibits:

1. EIR Resolution, including Findings of Fact and Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program (MMRP)
2. General Plan Amendment Resolution & Exhibits
3. Final EIR Link
4. Final General Plan 2045 - Santa Ana Beyond Link

EXHIBIT 1

RESOLUTION NO. 2020-xx

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA ANA (1) CERTIFYING THE FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE GENERAL PLAN UPDATE (STATE CLEARINGHOUSE NO. 2020029087), (2) ADOPTING ENVIRONMENTAL FINDINGS OF FACT AND A STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE GENERAL PLAN UPDATE PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, (3) ADOPTING THE MITIGATION MONITORING AND REPORTING PROGRAM, AND (4) APPROVING THE PROPOSED GENERAL PLAN UPDATE

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SANTA ANA AS FOLLOWS:

Section 1. The City Council of the City of Santa Ana hereby finds, determines and declares as follows:

WHEREAS, the City of Santa Ana seeks to approve the City of Santa Ana General Plan Update (“proposed project”); and

WHEREAS, the project as currently proposed entails, among other things, (1) adoption of the Santa Ana General Plan Update; (2) Certification of a Program Environmental Impact Report (the “PEIR”); (3) Adoption of Finding of Fact and Statement of Overriding Considerations; (4) Adoption of the Mitigation Monitoring and Reporting Program; and (5) Adoption of any ordinances, guidelines, programs, actions, or other mechanisms that implement the Santa Ana General Plan update; and

WHEREAS, the proposed project has been submitted and requires review and certification of the PEIR (State Clearinghouse/SCH No. 2020029087) (Environmental Impact Report No. 2020-03) and the adoption of the Santa Ana General Plan Update; and

WHEREAS, the City of Santa Ana is in the western central portion of Orange County, approximately 30 miles southwest of the city of Los Angeles and 10 miles northeast of the city of Newport Beach. The city is bordered by the city of Orange and unincorporated areas of Orange County to the north, the city of Tustin to the east, the cities of Irvine and Costa Mesa to the south, and the cities of Fountain Valley and Garden Grove to the west. In November 2019, the City annexed the 17th Street Island, a 24.78-acre area in the northeast portion of the city. The 17th Street Island is bounded by State Route 55 to the east, 17th Street to the south, and North Tustin Avenue to the west. The city also includes a portion of the Santa Ana River Drainage Channel within

its sphere of influence (SOI); and

WHEREAS, pursuant to Section 21067 of the Public Resources Code, and Section 15367 of the State CEQA Guidelines (California Code of Regulations, Title 14, § 15000 et seq.), the City of Santa Ana is the lead agency for the proposed project; and

WHEREAS, in accordance with State CEQA Guidelines Section 15063(a), the City as lead agency determined that a program EIR was clearly required for the project, and therefore did not prepare an initial study; and

WHEREAS, the City determined that a program EIR should be prepared to evaluate the proposed project's potential to have a significant effect on the environment in all of the following areas as required by Appendix G of the CEQA Guidelines: Aesthetics; Air Quality; Biological Resources; Cultural Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Population and Housing; Public Services and Recreation; Transportation; Tribal Cultural Resources; Utilities and Service Systems; and Project Alternatives; and

WHEREAS, in accordance with State CEQA Guidelines Section 15082, on February 26, 2020, the City sent to the Office of Planning and Research and each responsible and trustee agency a Notice of Preparation ("NOP")—which was also published in the Orange County Register, a newspaper of general circulation in the City of Santa Ana—stating that an environmental impact report (SCH No. 2020029087) would be prepared; and

WHEREAS, pursuant to Public Resources Code Section 21083.9 and State CEQA Guidelines Sections 15082(c) and 15083, the City held a duly noticed scoping meeting on Thursday, March 5, 2020, to solicit comments on the scope of the environmental review of the proposed project; and

WHEREAS, 18 comment letters were received in response to the NOP; and

WHEREAS, a Draft PEIR was prepared for the proposed project addressing comments received in response to the NOP and evaluating the proposed project's potentially significant environmental impacts; and

WHEREAS, the Draft PEIR identifies five significant and unavoidable impacts associated with the project that pertain to Air Quality, Cultural Resources, Greenhouse Gas Emissions, Noise, and Population and Housing. Air Quality impacts stem from inconsistency with the South Coast Air Quality Management District's (AQMD) air quality management plan (AQMP) and exceedance of the South Coast AQMD's significance thresholds that would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB), and would result in long-term emissions that would exceed South Coast AQMD's significance thresholds and again cumulatively contribute to the nonattainment designations of the SoCAB. Cultural Resources impacts result from significant impacts to historical resources that may be

considered unavoidable and therefore significant. Greenhouse Gas Emissions impacts stem from the inability to meet the year 2050 GHG reduction goal set by California Executive Order S-03-05. Noise impacts result from a substantial increase in noise levels above ambient conditions due to construction noise and project-generated traffic noise for existing residences along affected roadways. Lastly, population impacts stem from population and housing growth at buildout being larger than Orange County Council of Government's 2045 population and housing projections; and

WHEREAS, the Draft PEIR further determines that mitigation measures are required to address impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Noise and Tribal Cultural Resources, and Utilities and Service Systems; and

WHEREAS, in accordance with State CEQA Guidelines Section 15085, a Notice of Completion was prepared and filed with the Office of Planning and Research on February 26, 2020; and

WHEREAS, as required by State CEQA Guidelines Section 15087(a), the City provided a Notice of Availability of the Draft PEIR to the public—and published the Notice of Availability in the Orange County Register—at the same time that the City sent a Notice of Completion to the Office of Planning and Research on August 3, 2020; and

WHEREAS, during the public comment period, copies of the Draft PEIR and technical appendices were available for review and inspection at City Hall (20 Civic Center Plaza), on the City's website, and at the Santa Ana Public Library (26 Civic Center Plaza); and

WHEREAS, during the public comment period, Planning Commission work-study sessions were held on August 24, 2020 and September 14, 2020 where staff presented the proposed project and described the Draft PEIR; and

WHEREAS, consistent with State CEQA Guidelines Section 15087(e), the Draft PEIR was circulated for a 45-day review period, from August 3, 2020, to September 16, 2020; and was extended for review 20 days thereafter to October 6, 2020; and

WHEREAS, during the 45-day public comment period, the City consulted with and requested comments from all responsible and trustee agencies, other regulatory agencies, and others pursuant to State CEQA Guidelines Section 15086; and

WHEREAS, the City has complied with CEQA environmental review requirements; and

WHEREAS, pursuant to Public Resources Code Section 21092.5, on October 30, 2020, the City provided copies of its responses to commenting public agencies and interested organizations and parties more than 10 days prior to the City's consideration of the Final PEIR; and

WHEREAS, on November 3, 2020, the City released the Final PEIR, attached hereto as Exhibit “A”, which consists of the Draft PEIR, all technical appendices prepared in support of the Draft PEIR, all written comment letters received on the Draft PEIR, written responses to all written comment letters received and verbal comments received on the Draft PEIR, revisions to the Draft PEIR and technical appendices, and the Mitigation Monitoring and Reporting Program; and

WHEREAS, on November 9, 2020, the Planning Commission conducted a duly noticed public hearing to consider the PEIR and the General Plan Update, and the associated EIR and GPA applications. After hearing all relevant testimony from staff, the public, and the City’s consultant team, the Planning Commission voted to recommend that the City Council certify the PEIR; adopt the findings of fact, the statement of overriding considerations, and the mitigation monitoring and reporting program; and approve the project; and

WHEREAS, on November 20, 2020, the City gave public notice of a City Council public hearing for consideration of the PEIR No. 2020-03 (State Clearinghouse No. 2020029087) by publishing in the Orange County Register, a newspaper of general circulation in the City of Santa Ana, and by mailing to owners of property and residents within 500 feet of the proposed Focus Areas, those individuals on the project interest list, and those individuals on the PEIR Notice of Availability list; and

WHEREAS, on December 1, 2020, the City Council conducted a duly noticed public hearing to consider the PEIR, at which hearing members of the public were afforded an opportunity to comment upon Environmental Impact Report No. 2020-03. After hearing all relevant testimony from staff, the public, and the City’s consultant team, the City Council voted to certify the PEIR; adopt the findings of fact, the statement of overriding considerations, and the mitigation monitoring and reporting program; and approve the project; and

WHEREAS, the “PEIR” consists of the Final PEIR, and all attachments and appendices to the Final PEIR, as well as the Draft PEIR and its attachments and appendices (as modified by the Final PEIR); and

WHEREAS, all potentially significant adverse environmental impacts were sufficiently analyzed in the PEIR; and

WHEREAS, as contained herein, the City Council has endeavored in good faith to set forth the basis for its decision and recommendations on the project; and

WHEREAS, all of the requirements of the Public Resources Code and the State CEQA Guidelines have been satisfied by the City in connection with the preparation of the PEIR, which is sufficiently detailed so that all of the potentially significant environmental effects of the project have been adequately evaluated; and

WHEREAS, all of the findings and conclusions made by the City Council pursuant to this Resolution are based upon the oral and written evidence presented to it as a whole and the entirety of the administrative record for the PEIR project, which

are incorporated herein by this reference, and not based solely on the information provided in this Resolution; and

WHEREAS, the City Council finds that the project's significant environmental impacts that cannot be mitigated to a less than significant level even with incorporation of all feasible mitigation measures, as identified in the PEIR, are described in Section V of the Findings of Fact, attached hereto as Exhibit "B"; and

WHEREAS, the City Council finds that the PEIR project's environmental impacts that are less than significant with the incorporation of mitigation measures, as identified in the PEIR, are described in Section IV of the Findings of Fact, attached hereto as Exhibit "B"; and

WHEREAS, the City Council finds that environmental impacts that are identified in the PEIR as less than significant and do not require mitigation are described in Section III of the Findings of Fact, attached hereto as Exhibit "B"; and

WHEREAS, the potential significant and irreversible environmental changes that would result from the project identified in the PEIR and set forth herein, are described in Section VI of the Findings of Fact, attached hereto as "Exhibit B"; and

WHEREAS, the existence of any growth-inducing impacts resulting from the PEIR project identified in the PEIR and set forth herein, are described in Section VII of the Findings of Fact, attached hereto as Exhibit "B"; and

WHEREAS, alternatives to the PEIR project that might further reduce the PEIR project's environmental impacts are described in Section VIII of the Findings of Fact, attached hereto as Exhibit "B"; and

WHEREAS, prior to taking action, the City Council has heard, been presented with, reviewed, and considered all of the information and data in the administrative record, including but not limited to the PEIR and all oral and written evidence presented to it during all meetings and hearings; and

WHEREAS, the PEIR reflects the independent judgment of the City Council and is deemed adequate for purposes of making decisions on the merits of the proposed project; and

WHEREAS, no comments made in the public hearing conducted by the City Council and no additional information submitted to the City have produced substantial new information requiring recirculation of the PEIR or additional environmental review of the project under Public Resources Code Section 21092.1 and State CEQA Guidelines Section 15088.5; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred.

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF SANTA ANA DOES RESOLVE, DETERMINE, FIND, AND ORDER AS FOLLOWS:

Section 2. The City Council hereby finds that it has been presented with the PEIR, which it has reviewed and considered, and further finds that the PEIR is an accurate and objective statement that has been completed in full compliance with CEQA and the State CEQA Guidelines, and that the PEIR reflects the independent judgment and analysis of the City, acting as lead agency for the project.

Section 3. The City Council declares that no evidence of new significant impacts or any new information of “substantial importance,” as defined by State CEQA Guidelines Section 15088.5, has been received by the City after circulation of the Draft PEIR that would require recirculation of the PEIR.

Section 4. The City Council hereby:

1. Certifies the PEIR based on the entirety of the record of proceedings.
2. Adopts the Findings of Fact and Statement of Overriding Considerations, attached hereto and incorporated herein as Exhibit “B”, after balancing the significant and unavoidable air quality, cultural resources, greenhouse gas emissions, noise, and population and housing impacts of the proposed project against the benefits of the proposed project.
3. Adopts the Mitigation Monitoring and Reporting Program attached hereto and incorporated herein as Exhibit “C”, consistent with Public Resources Code Section 21081.6; makes implementation of the mitigation measures in the Mitigation Monitoring and Reporting Program a condition of approval of the project; and finds that in the event of any inconsistencies between the mitigation measures set forth herein and the Mitigation Monitoring and Reporting Program, the Mitigation Monitoring and Reporting Program shall control.
4. Directs City staff to cause a Notice of Determination to be filed and posted with the County of Orange Registrar-Recorder/County Clerk and the State Clearinghouse within five working days of the City Council’s final project approval.

Section 5. This Resolution shall take effect immediately upon its adoption by the City Council, and the Clerk of the Council shall attest to and certify the vote adopting this Resolution.

ADOPTED this ____ day of _____, 2020.

Miguel A. Pulido
Mayor

APPROVED AS TO FORM:
Sonia R. Carvalho
City Attorney

By: _____
Lisa Storck
Assistant City Attorney

AYES: Councilmembers _____

NOES: Councilmembers _____

ABSTAIN: Councilmembers _____

NOT PRESENT: Councilmembers _____

CERTIFICATE OF ATTESTATION AND ORIGINALITY

I, Daisy Gomez, Clerk of the Council, do hereby certify the attached Resolution No. 2020-____ to be the original resolution adopted by the City Council of the City of Santa Ana on _____, 2020.

Date: _____

Clerk of the Council
City of Santa Ana

**CEQA FINDINGS OF FACT
FOR THE
SANTA ANA GENERAL PLAN UPDATE
FINAL ENVIRONMENTAL IMPACT REPORT
City of Santa Ana**

STATE CLEARINGHOUSE NO. 2020029087

I. INTRODUCTION

The California Environmental Quality Act (“CEQA”) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (“EIR”) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. The State CEQA Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
 - 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can or should be adopted by such other agency.
 - 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
- (b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

EXHIBIT B

- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

Public Resources Code Section 21061.1 defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” CEQA Guidelines section 15364 adds another factor: “legal” considerations. (See *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565 (*Goleta II*).)

The concept of “feasibility” also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*California Native Plant Soc. v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 [“an alternative ‘may be found infeasible on the ground it is inconsistent with the project objectives as long as the finding is supported by substantial evidence in the record’”].) An alternative may also be rejected because it “would not ‘entirely fulfill’ [a] project objective.” (*Citizens for Open Government v. City of Lodi* (2012) 205 Cal.App.4th 296, 314-315.) “[F]easibility” under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's “benefits” rendered “acceptable” its “unavoidable adverse environmental effects.” (CEQA Guidelines, §§ 15093, 15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).) The California Supreme Court has stated, “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (*Goleta II, supra*, 52 Cal.3d at p. 576.)

When adopting Statements of Overriding Considerations, State CEQA Guidelines Section 15093 further provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- (b) Where the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. This statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, independently reviewed, and considered the Draft Program Environmental Impact Report (“Draft PEIR”) and the Final Program Environmental Impact Report (“Final PEIR”) for the Santa Ana General Plan Update, SCH No. 2020029087 (collectively, the “PEIR”), as well as all other information in the record of proceedings on this matter, the following Findings of Facts (“Findings”) are hereby adopted by the City of Santa Ana (“City”) in its capacity as the CEQA Lead Agency.

These Findings set forth the environmental basis for the discretionary actions to be undertaken by the City for adoption and implementation of the Santa Ana General Plan Update (“Proposed Project”). This action includes the certification of the following:

§ Santa Ana General Plan Update Program Environmental Impact Report, SCH No. 2020029087

A. DOCUMENT FORMAT

These Findings have been organized into the following sections:

- 1) Section I provides an introduction.
- 2) Section II provides a summary of the project, overview of the discretionary actions required for approval of the project, and a statement of the project’s objectives.
- 3) Section III provides a summary of previous environmental reviews related to the project area that took place prior to the environmental review done specifically for the project, and a summary of public participation in the environmental review for the project.

- 4) Section IV sets forth findings regarding the environmental impacts that were determined to be—as a result of the Notice of Preparation (NOP) and consideration of comments received during the NOP comment period—either not relevant to the project or clearly not at levels that were deemed significant for consideration given the nature and location of the proposed project.
- 5) Section V sets forth findings regarding significant or potentially significant environmental impacts identified in the Draft FEIR that the City has determined are either not significant or can feasibly be mitigated to a less than significant level through the imposition of project design features and/or mitigation measures. In order to ensure compliance and implementation, all of these measures are included in the Mitigation Monitoring and Reporting Program (“MMRP”) for the project and adopted as conditions of the project by the Lead Agency. Where potentially significant impacts can be reduced to less than significant levels through adherence to project design features and/or mitigation measures, these findings specify how those impacts were reduced to an acceptable level. Section V also includes findings regarding those significant or potentially significant environmental impacts identified in the Draft PEIR that will or may result from the project and which the City has determined cannot feasibly be mitigated to a less than significant level.
- 6) Section VI sets forth findings regarding alternatives to the proposed project.
- 7) Section VII sets forth the statement of overriding considerations for the proposed project.
- 8) Section VIII sets forth the resolution regarding certification of the PEIR
- 9) Section IX sets for the resolution adopting a mitigation and monitoring plan for the proposed project.
- 10) Section X sets for the resolution regarding custodian of records for the proposed project.

B. RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- § The NOP and all other public notices issued by the City in conjunction with the proposed project
- § The DEIR for the proposed project
- § The FEIR for the proposed project
- § All written comments submitted by agencies or members of the public during the public review comment period on the Draft PEIR

- § All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft PEIR
- § All written and verbal public testimony presented during a noticed public hearing for the proposed project
- § The Mitigation Monitoring and Reporting Program
- § The reports and technical memoranda included or referenced in the Response to Comments
- § All documents, studies, EIRs, or other materials incorporated by reference in the Draft PEIR and Final PEIR
- § The Resolutions adopted by the City of Santa Ana in connection with the proposed project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto
- § Matters of common knowledge to the City of Santa Ana, including but not limited to federal, state, and local laws and regulations
- § Any documents expressly cited in these Findings
- § Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

The documents and other material that constitute the record of proceedings on which these findings are based are located at the City of Santa Ana Planning Division Counter. The custodian for these documents is the City of Santa Ana. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and 14 California Code Regulations Section 15091(e).

C. CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for the City's actions related to the project are at the City of Santa Ana Planning Division, 20 Civic Center Plaza, M-20, Santa Ana, CA 92701. The City's Planning Division is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the Planning Division Counter. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and 14 California Code Regulations Section 15091(e).

II. PROJECT SUMMARY

A. PROJECT LOCATION

Santa Ana is in the western central portion of Orange County, approximately 30 miles southwest of the city of Los Angeles and 10 miles northeast of Newport Beach. Orange County is surrounded by the counties of Los Angeles, San Bernardino, Riverside, and San Diego and is one of six counties comprising the Southern California Region.

Santa Ana is bordered by Orange and unincorporated areas of Orange County to the north, Tustin to the east, Irvine and Costa Mesa to the south, and Fountain Valley and Garden Grove to the west. In November 2019, the City annexed the 17th Street Island, a 24.78-acre area in the northeast portion of the city. The 17th Street Island is bounded by State Route 55 to the east, 17th Street to the south, and North Tustin Avenue to the west. The city also includes a portion of the Santa Ana River Drainage Channel in its sphere of influence (SOI). The city and its SOI are defined and referred to herein as the plan area.

Regional access to the city is provided by the Garden Grove Freeway (SR-22) and the Orange Freeway (SR-57) on the north, the Santa Ana Freeway (1-5) on the northeast, the Costa Mesa Freeway (SR-55) on the east, and the San Diego Freeway (I-405) on the south.

B. PROJECT DESCRIPTION

In March 2014, the City Council adopted the Santa Ana Strategic Plan. The Strategic Plan was the result of an extensive community outreach process and established specific goals, objectives, and strategies to guide the City's major efforts. One of the key strategies identified was to complete a comprehensive update of the existing General Plan. The General Plan Update (GPU) will provide long-term policy direction to guide the physical development, quality of life, economic health, and sustainability of the Santa Ana community through 2045. The General Plan Update will identify areas of opportunity and provide options to enhance development potential in key areas of the city. It will also bring the city into compliance with recent State laws, reflect current conditions, and incorporate input from the general public, City staff, and other stakeholders.

The proposed GPU is organized into three sections: I, Services and Infrastructure; II, Natural Environment; and III, Built Environment. The proposed GPU addresses the seven topics required by state law as well as five optional topics. State law gives jurisdictions the discretion to incorporate optional topics and to address any of these topics in a single element or across multiple elements of the general plan. The 12 proposed elements of the GPU will replace the 16 elements of the current General Plan. The GPU will incorporate the current 2014–2021 housing element, and no substantive changes are anticipated. The topic of housing will be addressed as a separate effort in late 2021 in accordance with State law. The topic of environmental justice will be incorporated throughout the GPU, with goals and policies incorporated into multiple elements. The 12 elements of the proposed General Plan update are:

Mandatory Topics

- § Land Use Element
- § Circulation Element
- § Housing Element
- § Open Space Element
- § Conservation Element
- § Safety Element
- § Noise Element

Optional Topics

- § Public Services Element
- § Urban Design Element
- § Community Element
- § Economic Prosperity Element
- § Historic Preservation Element

The proposed GPU is comprehensive both in its geography and subject matter. It addresses the entire territory within the plan area's boundary and the full spectrum of issues associated with management of the plan area. The GPU also includes forecasts of long-term conditions and outlines development goals and policies; exhibits and diagrams; and the objectives, principles, standards, and plan proposals throughout its various elements. The GPU can be found online at <https://www.santa-ana.org/general-plan>. The General Plan Policy Framework can be accessed at

<https://www.santa-ana.org/sites/default/files/pb/general-plan/documents/GeneralPlanPolicyFrameworkMaster.DRAFT.cmo2.pdf>

Coordination and consistency are essential between the elements of the GPU, but in particular with the land use element. The circulation element, which identifies proposed improvements to the transportation system, may impact surrounding land uses and future development. The urban design element sets forth policies and programs to improve the city's design and urban form. The conservation element protects and maintains the city's natural, cultural, and other resources, with a focus on preserving aesthetics and the environmental quality of the city.

Both the land use element and the circulation element are described in more depth below. Focus areas and specific plan/special zoning areas are also described.

Updated Land Use Element

The updated land use element will guide growth and development (e.g., infill development, redevelopment, use, and revitalization/restoration) within the plan area by designating land uses as shown in the proposed land use map. Figure 3-7 of the Draft PEIR shows the 13 proposed land use designations of the General Plan update, and Table 3-4 of the Draft PEIR gives a general description of the land use designations that are added to the GPU and were not in the current General Plan. Land use designations define the type and nature of development that would be allowed in a given location of the plan area. The land use designations and patterns are intended to provide the basis for more detailed zoning designations and development intensities, requirements, and standards established in the City's development code.

It is important to note that the updated land use element is a regulatory document that defines the framework for future growth and development in the plan area but does not directly result in development in and of itself. Before any project can be developed in the plan area, it must be

analyzed for conformance with the General Plan Update, zoning requirements, and other applicable local and state requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

Updated Mobility (Circulation) Element

The Mobility Element update is integrally related to federal, state, and regional transportation programs as well as local plans and regulations. The City's role in transportation planning has become increasingly important because recent legislation in the areas of growth management, congestion management, and air quality require more active local coordination to meet regional objectives. Furthermore, the Mobility Element update is intended to guide future development of the city's transportation system in a manner consistent with the updated land use element.

The Master Plan of Streets and Highways (MPSH) details proposed street classifications to reflect buildout of the city's roadway system. The street classifications include Freeway, Major Arterial, Primary Arterial, Secondary Arterial, Divided Collector Arterial, and Collector Arterial. As part of the implementation of complete streets principles,¹ a series of modifications to the city's roadway network has been identified and includes both the reclassification of roadways and assignment of new MPSH roadway classifications to selected existing streets.

A number of proposed roadway reclassifications, adoptions, and removals from the MPSH are as follows:

§ Reclassified as Divided Collector Arterial:

- | Santa Clara Avenue between Grand Avenue and SR-55 freeway (currently Secondary Arterial)
- | Flower Street between Warner Avenue and 1st Street (currently Secondary Arterial)
- | Chestnut Avenue between Standard Avenue and eastern city limit (currently Secondary/Primary Arterial)
- | Raitt Street between Segerstrom Avenue and Santa Ana Boulevard (currently Secondary Arterial)
- | Civic Center Drive between Fairview Street and Bristol Street (currently Secondary Arterial)
- | Penn Way between I-5 on/off ramps and Washington Avenue (currently Secondary Arterial)
- | Santiago Street between Washington Avenue and 6th Street (currently Secondary Arterial)
- | Standard Avenue between 6th Street and Warner Avenue (currently Secondary Arterial)

¹ Complete streets are transportation facilities that are planned, designed, operated, and maintained to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, truckers, and motorists, appropriate to the function and context of the facility.

- | Santa Ana Boulevard between French Street and Santiago Street (currently Primary Arterial)
- | Santa Ana Boulevard between Raitt Street and Flower Street (currently Major Arterial)
- | Cambridge Street between Fairhaven Avenue and SR-22 freeway (currently Secondary Arterial)
- | Hazard Avenue between Euclid Street and Harbor Boulevard (currently Secondary Arterial)
- | Halladay Avenue between Warner Avenue and Dyer Road (currently Secondary Arterial)
- | McFadden Avenue between Harbor Boulevard and Grand Avenue (currently Secondary Arterial)
- | Broadway between 1st Street and 17th Street (currently Secondary Arterial)
- | 4th Street between French Street and Grand Avenue (currently Primary/Secondary Arterial)
- | Fairhaven Avenue from Grand Avenue to Tustin Avenue (currently Secondary Arterial)

§ Reclassified as Primary Arterial:

- | Santa Ana Boulevard between Flower Street and Ross Street (currently a Major Arterial)
- | 1st Street between Bristol Street and Tustin Avenue (currently Major Arterial)

§ Reclassify as Collector Arterial:

- | Civic Center Drive between French Street and Santiago Street (currently a Secondary Arterial)

§ Add the following to the MPSH as Divided Collector Arterial:

- | Greenville Street between Segerstrom Avenue and Warner Avenue

§ Add the following to the MPSH as Collector Streets:

- | Greenville Street between Edinger Avenue and Warner Avenue

§ Remove the following from the MPSH

- | Flower Street between 17th Street and its northern terminus
- | Logan Street between Civic Center Drive and Santa Ana Boulevard

The majority of the proposed reclassifications aim to reduce existing rights-of-way for vehicular traffic lanes to make room for bicycle and pedestrian improvements. Landmark streets are also identified within or adjacent to the Santa Ana Downtown Historic District, which is listed on the National Register of Historic Places.

The Mobility Element update incorporates the proposed Santa Ana-Garden Grove Fixed Guideway project, which will introduce new transit service to the city. Santa Ana is working with Garden Grove and Orange County Transit Authority to build a fixed guideway system called the

OC Streetcar. Expected to begin operations in 2022, the OC Streetcar will link the Santa Ana Regional Transportation Center to a new multimodal hub at Harbor Boulevard/Westminster Avenue in Garden Grove. OC Streetcar will serve historic downtown Santa Ana and Civic Center. Along its four-mile route, OC Streetcar will connect with 18 Orange County Transit Authority bus routes and increase transportation options along Santa Ana Boulevard, 4th Street, the Pacific Electric right-of-way, and Harbor Boulevard.

Focus Areas

1. South Main Street Focus Area

The South Main Street focus area introduces the opportunity for greater flexibility and a more dynamic mix of land uses and urban design along the properties fronting Main Street. The intent is to transition an auto-dominated corridor into a transit- and pedestrian-friendly corridor through infill development without disrupting the surrounding lower-density neighborhoods. The objectives of this focus area are:

- § Facilitate redevelopment and property improvements along Main Street.
- § Create a more active and dynamic streetscape.
- § Protect established residential neighborhoods.
- § Support transit, pedestrian, and nonmotorized travel.

The majority of properties fronting Main Street will be designated Urban Neighborhood, allowing for future development to include commercial uses, low- and medium-density housing, or a combination of both in a vertically mixed-use format. South of Warner Avenue, the Industrial/Flex designation will offer new options for small-scale manufacturing, live-work, and retail opportunities.

The balance of the focus area will remain designated for Low Density Residential or Institutional to reflect the existing development patterns and land uses. New buildings and spaces will be sensitive to the surrounding low-density neighborhoods while still emphasizing the creation of active and attractive urban spaces.

2. Grand Avenue / 17th Street Focus Area

The Grand Avenue / 17th Street focus area will foster the development of an urban mixed-use corridor connecting into the city's downtown and transit core. The intent is to create opportunities for a new mix of land uses and design to transition Grand Avenue from a series of auto-oriented shopping plazas to a series of dynamic urban spaces. The objectives of this focus area are:

- § Create mixed-use corridors and urban villages.
- § Promote infill development while respecting established neighborhoods.
- § Foster community spaces and neighborhood-serving amenities.
- § Develop opportunities for live-work, artist spaces, and small-scale manufacturing.
- § Maintain compatible nodes of commercial activity.

The majority of land in this focus area is planned for Urban Neighborhood or District Center land use designations, which will allow a blend of residential and commercial uses to develop simultaneously, as market conditions allow. An intense mixed-use area is envisioned adjacent to the Santa Ana Regional Transportation Center, along the east side of Grand Avenue south of I-5. This part of the focus area will support larger, more visually dynamic buildings and urban spaces that complement and benefit from the adjacent regional transit center.

North of I-5, the buildings and spaces will be sensitive to the surrounding low-density neighborhoods but will still emphasize the creation of active and attractive urban spaces. A mix of residential, retail, and office will be interspersed along the frontage of Grand Avenue, with a concentrated node of commercial and mixed-use residential uses at Grand Avenue and 17th Street. A small portion of the focus area is designated for Industrial/Flex and General Commercial to support small-scale manufacturing, live-work, and retail opportunities will be located along 17th Street near the Regional Transportation Center.

3. West Santa Ana Boulevard Focus Area

The West Santa Ana Boulevard focus area connects the Harbor Mixed Use Transit Corridor Specific Plan area and Downtown Santa Ana, and the OC Streetcar Project improvements will create the physical transit link in 2022. The intent is to transition a group of auto-oriented neighborhoods, businesses, and institutions into a series of transit-oriented neighborhoods that support and benefit from future streetcar stops. The objectives of this focus area are:

- § Develop housing and mixed-use opportunities near streetcar stations.
- § Promote infill development while respecting established neighborhoods.
- § Buffer industrial land uses and residential neighborhoods.
- § Create opportunities for clean industrial/maker-type spaces.

4. 55 Freeway / Dyer Road Focus Area

The 55 Freeway / Dyer Road focus area will transition from almost exclusively professional office to a range of commercial, industrial/flex, and mixed-use development. The intent is to create opportunities for a truly urban lifestyle with easy access to Downtown Santa Ana, multiple transit options, and the new investments and amenities in adjacent communities. The objectives of this focus area are:

- § Provide housing opportunities at an urban level of intensity at the city's edge.
- § Enhance opportunities for corporate offices.
- § Attract economic activity into the city from surrounding communities.
- § Protect industrial and office employment base.
- § Maintain hotel and commercial uses.

The overall scale and experience of the focus area along the freeway and city boundary will reflect an urban intensity and design, with inspiring building forms and public spaces. At the southeastern edge, the District Center land use designation will facilitate large residential mixed-use

developments in structures that incorporate high-density housing, hotels, and complementary expansions of commercial uses. Adjacent to the 55 freeway, the Industrial/Flex land use designation will promote large-scale office-industrial flex spaces, multilevel corporate offices, and research and development uses.

The node surrounding the freeway interchange will remain as currently planned for General Commercial uses, with new improvements introducing development and spaces that complement the existing examples and elements.

South Bristol Street Focus Area

The South Bristol Street focus area represents Santa Ana's southern gateway and is a part of the South Coast Metro area. Between Sunflower and Alton Avenues, the District Center land use designation will create opportunities to transform auto-oriented shopping plazas to walkable, bike-friendly, and transit-friendly urban villages that incorporate a mix of high intensity office and residential living with experiential commercial uses. The objectives of this focus area are:

- § Capitalize on the success of the South Coast Metro area.
- § Introduce mixed-use urban villages and encourage experiential commercial uses that are more walkable, bike friendly, and transit oriented.
- § Provide for mixed-use opportunities while protecting adjacent, established, low-density neighborhoods.

Between MacArthur Boulevard and Alton Avenue, the form and intensity will scale down but remain distinctly urban in nature. The redevelopment of the auto-oriented commercial plazas will result in the construction of landmark buildings and structures set in and around spaces accessible to future occupants and the general public. The corridor north of Alton Avenue is planned with the Urban Neighborhood land use designation, allowing for commercial and residential projects, frequently in a mixed-use format, to develop in accordance with market fluctuations. The buildings and spaces in this part of the focus area will be sensitive to the surrounding low-density neighborhoods but will still emphasize the creation of active and attractive urban spaces.

Specific Plan/Special Zoning

There are seven planning areas that represent specific plans and other special zoning areas that were previously adopted: Adaptive Reuse Project Incentive Area (2014), Bristol Street Corridor Specific Plan (1991/2018), Harbor Mixed Use Transit Corridor Specific Plan (2014), MainPlace Specific Plan (2019), Metro East Mixed-Use Overlay Zone (2007/2018), Midtown Specific Plan (1996), and Transit Zoning Code Specific Development (2010). The most recent adoption/amendment date for each document is noted in parentheses.

Adaptive Reuse Project Incentive Area

The Adaptive Reuse Ordinance, Section 41-1651 of the Santa Ana Municipal Code, provides alternative building and fire standards for the conversion of eligible buildings, or portions thereof, from nonresidential uses to dwelling units, guest rooms or joint living, and work quarters. Eligible structures are buildings within the Adaptive Reuse project incentive area that were constructed in accordance with building and zoning codes in effect prior to July 1, 1974, or which have been determined to be a Historically Significant. The Project Incentive Area includes properties in the Midtown Specific Plan area; the Transit Zoning Code area; the Metro East Mixed-Use Overlay Zone; the North Main Street Corridor on both sides of Main Street, from 17th Street to the northernmost MainPlace Drive; and the East 1st Street Corridor on both sides of 1st Street from Grand Avenue to Elk Lane. Residential uses are allowed in the Project Incentive Area irrespective of the underlying zoning as part of an approved Adaptive Reuse Project.

Harbor Mixed Use Transit Corridor Specific Plan

The Harbor Mixed Use Transit Corridor Specific Plan covers the 2.5-mile segment of Harbor Boulevard on the west side of Santa Ana. The approximately 305-acre planning area includes parcels adjacent to Harbor Boulevard between Westminster Avenue and Lilac Avenue as well as parcels along Westminster Avenue, 1st Street, and 5th Street. The Harbor Mixed Use Transit Corridor Specific Plan creates the zoning necessary to take advantage of the regional and local transit investments made along and around Harbor Boulevard. The plan expands development options to include residential alongside or integrated into a mix of nonresidential uses.

MainPlace Specific Plan

The purpose of the MainPlace Specific Plan is to transform MainPlace Mall into a family oriented retail, entertainment, and dining destination. The plan creates a mixed-use urban village with a revitalized mall at its central core. The Specific Plan area is on the north edge of Santa Ana, between Main Street on the east and SR-22 and I-5 to the north and west. The property is identified in the current General Plan land use element as District Center. The District Center designation includes the major activity areas of the city, designed to serve as anchors to the city's commercial corridors and to accommodate major development activity. No General Plan amendment is required for the specific plan, and the MainPlace Specific Plan is the zoning for the property and defines the allowable uses within its boundaries.

Metro East Mixed-Use Overlay Zone

The Metro East Mixed Use (MEMU) Overlay Zone consists of an original MEMU Overlay Zone and an expansion component. The original MEMU Overlay Zone is largely developed with commercial and office uses and comprises approximately 200 acres immediately east of the I-5 and immediately west of SR-55. It is bounded by I-5 on the west and south, Tustin Avenue on the east, and East Sixth Street on the north. The MEMU expansion area added 33.52 acres or approximately 48 parcels to the original MEMU Overlay Zone area. The additional project area

extends west primarily along First Street and is generally bounded by the I-5 to the east, Grand Avenue to the west, East Chestnut Avenue to the south, and Fourth Street to the north.

The overall objectives of the MEMU Overlay Zone are to encourage a more active commercial and residential community, provide an expanded economic base, maximize property sales tax revenues, improve the jobs/housing balance within the city, and provide for a range of housing options identified in the 2014 housing element.

Midtown Specific Plan

The Midtown Specific Plan area is generally bounded by 17th Street to the north, Civic Center Drive to the south, North Ross Street to the west, and North Spurgeon Street to the east. The Midtown area is readily accessible from the Santa Ana Freeway (I-5). Midtown is envisioned as an integrated district of civic, business, cultural, and retail activity with a small residential component.

Transit Zoning Code Specific Development

The City adopted a Transit Zoning Code to provide zoning for the integration of new infill development into existing neighborhoods; to allow for the reuse of existing structures; to provide for a range of housing options, including affordable housing; and to provide a transit-supportive, pedestrian-oriented development framework to support the addition of new transit infrastructure. The code encompasses an area in the central urban core of Santa Ana that comprises over 100 blocks and 450 acres. The area is west of I-5 and bounded by First Street on the south, Flower Street on the west, Grand Avenue on the east, and Civic Center Drive on the north.

General Plan Buildout Scenario

In general, many areas currently designated for General Commercial and Professional Office will expand opportunities for residential development by a proposed change in General Plan land use designation to Urban Neighborhood or District Center. Industrial Flex will be introduced in each of the five focus areas and replace Industrial land use designations that currently exist to allow for cleaner industrial and commercial uses with live-work opportunities.

Furthermore, state law allows a graduated density bonus for the inclusion of affordable housing units. For an increasing amount of affordable units (by percentage), a project is allowed an increasing ability to exceed the permitted density (up to a cap of 35 percent). Recent updates to state housing law (Assembly Bill 1763, effective January 1, 2020), enables projects that are 100 percent affordable (either 100 percent lower income or 80 percent lower and 20 percent limited moderate), to obtain a density bonus of 80 percent, or no limit if within one-half mile of a major transit stop. However, not every proposed project pursuant to the GPU would include affordable units, and not every project that includes affordable units would need a density bonus. Proposed projects pursuant to the GPU are not required to build at densities that exceed maximum limits; the law only requires that jurisdictions grant the density bonus if requested. The buildout methodology for the GPU was based on past development trends, current development trends,

and a forecast market analysis. These trends accounted for any units approved (density bonus or otherwise), to determine the appropriate density and amount of development to assume.

Additionally, the optimal density of affordable units is at or below the density levels assumed for forecasting buildout. Generally, projects beyond 50 to 70 units per acre require Type 1 construction (steel and concrete structure), which is much more expensive than Type V construction (wood structure). Accordingly, affordable projects are rarely greater than 70 units per acre except for very small parcels. The average densities used to calculate projected buildout at 2045 are 50 to 90 units per acre in the three most intense focus areas; 55 Freeway/Dyer Road, Grand Avenue/17th Street, and South Bristol Street focus areas. For the remaining two focus areas, a residential assumption at 30 units per acre was used over a broad area to account for development at or above the maximum density of 30 units per acre. The maximum is 20 units per acre for projects proposed exclusively residential in the South Main Focus Area. The maximum is 30 units per acre for a relatively small part of the West Santa Ana Boulevard Focus Area. The City's buildout projections are therefore considered to include and account for the application of density bonus provisions of state law to future projects.

Furthermore, the potential for development in specific plan and special zoning areas is based on the forecast buildout at the time of the respective zoning document's adoption, minus the amount of new development built between the adoption date and 2019.

Growth outside of the focus areas and special planning areas is expected to be incremental and limited. Some growth was projected for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan. Some growth was also projected for the commercial and retail area south of the West Santa Ana Boulevard focus area. Finally, some additional residential development is expected on a small portion (5 percent) of single-family and multifamily lots through the construction of second units.

For the focus areas, the forecast buildout is based on development at approximately 80 percent of the maximum allowed development for each respective land use designation.

C. DISCRETIONARY ACTIONS AND APPROVALS

Project development requires the following discretionary actions and approvals from the City:

- § Adoption of the Santa Ana General Plan update
- § Certification of PEIR
- § Adoption of Findings of Fact and Statement of Overriding Considerations
- § Adoption of the Mitigation Monitoring Program
- § Adoption of any ordinances, guidelines, programs, actions, or other mechanisms that implement the Santa Ana General Plan update

D. STATEMENT OF PROJECT OBJECTIVES

The updated General Plan is based on a vision statement and core values established as part of an extensive, multiyear community outreach effort. The City has identified the following core values to guide the General Plan Update (GPU):

- § **Health.** The people of Santa Ana value a physical environment that encourages healthy lifestyles, a planning process that ensures that health impacts are considered, and a community that actively pursues policies and practices that improve the health of our residents.
- § **Equity.** Residents value taking all necessary steps to ensure equitable outcomes, expanding access to the tools and resources that residents need, and balancing competing interests in an open and democratic manner.
- § **Sustainability.** Santa Ana values land use decisions that benefit future generations, plans for the impacts of climate change, and incorporates sustainable design practices at all levels of the planning process.
- § **Culture.** The Santa Ana's community values efforts that celebrate our differences as a source of strength, preserve and build upon existing cultural resources, and nurture a citywide culture of empowered residents.
- § **Education.** Santa Ana values the creation of lifelong learners, the importance of opening up educational opportunities to all residents, and investing in educational programs that advance residents' economic well-being.

These core values were used as the basis to define more specific project objectives to aid decision makers in their review of the GPU and associated environmental impacts. The objectives include:

1. Promote infill development while respecting and protecting established neighborhoods.
2. Optimize high density residential and mixed-use development that maximizes potential use of mass transit.
3. Provide locations for new housing development that maximizes affordable housing opportunities to achieve both City and regional housing goals.
4. Facilitate new development at intensities sufficient to generate community benefits and attract economic activity.
5. Provide housing and employment opportunities at an urban level of intensity at the City's edge.
6. Introduce mixed-use urban villages and encourage experiential commercial uses that are more walkable, bike-friendly, and transit-oriented.
7. Develop opportunities for live/work, artist spaces, and small-scale manufacturing.

III. ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION PROCESS

In conformance with CEQA, the State CEQA Guidelines, and the City of Santa Ana CEQA Guidelines, the City conducted an extensive environmental review of the proposed project.

- § The City of Santa Ana concluded that a PEIR should be prepared, and the Notice of Preparation (NOP) was released for a 30-day public review period from February 26, 2020, through March 27, 2020. The NOP was posted at the Orange County Clerk's Office on February 26, 2020. The notice was published in the *Orange County Register*, a newspaper of general circulation. Under CEQA, a lead agency may proceed directly with preparation of a PEIR without preparation of an Initial Study if it is clear that a PEIR will be required (State CEQA Guidelines § 15060[d]). The City of Santa Ana made such a determination for this project and did not prepare an Initial Study.
- § Completion of a scoping process, in which the public was invited by the City of Santa Ana to participate. The scoping meeting for the PEIR was held on March 5, 2020, at 6:00 p.m. at the Santa Ana Police Community Room at 60 Civic Center Plaza in Santa Ana. The notice of a public scoping meeting was included in the NOP distributed on February 26, 2020.
- § Preparation of a Draft PEIR by the City of Santa Ana, which was made available for a 45- day public review period (August 3, 2020, through September 16, 2020) and extended to October 6, 2020. The Notice of Availability (NOA) for the Draft PEIR was sent to all persons, agencies, and organizations on the list interested persons, sent to the State Clearinghouse in Sacramento for distribution to public agencies, and published in the August 3, 2020, *Orange County Register*. The NOA was posted at the Orange County Clerk's Office on August 3, 2020. Copies of the Draft PEIR were made available for public review at the City of Santa Ana, Planning Division Counter at 20 Civic Center Plaza, M-20, Santa Ana, CA 92701, and the City of Santa Ana Public Library at 26 Civic Center Plaza, Santa Ana, CA 92701. The Draft EIR was also available for review and download on City website: <https://www.santa-ana.org/general-plan>.
- § The Final PEIR contains comments on the Draft PEIR, responses to those comments, revisions to the Draft PEIR, if any, and appended documents. The Final PEIR was released for a 10-day agency review period prior to certification of the Final PEIR.
- § After considering the PEIR and in conjunction with making these findings, the City of Santa Ana hereby finds that, pursuant to Section 15092 of the CEQA Guidelines, approval of the project will result in significant effects on the environment; however, the significant effects will be eliminated or substantially lessened where feasible, and the City has determined that remaining significant effects are acceptable under Section 15093.
- § The Mitigation Monitoring and Reporting Program is hereby adopted to ensure implementation of feasible mitigation measures identified in the PEIR. The City of Santa Ana finds that these mitigation measures are fully enforceable conditions on the project and shall be binding upon the City and affected parties.

- § The City of Santa Ana finds that the project is in the public interest and is necessary for the public health, safety, and welfare.
- § The City of Santa Ana hereby certifies the Final PEIR in accordance with the requirements of CEQA.
- § Pursuant to CEQA Guidelines Section 15095, staff is directed as follows: a) copy of the Final PEIR and CEQA Findings of Fact shall be retained in the project files; b) copy of the Final PEIR and CEQA Findings of Fact shall be provided to the project applicant who is responsible for providing copy of same to all CEQA "responsible" agencies.

IV. ENVIRONMENTAL ISSUES THAT WERE DETERMINED NOT TO BE POTENTIALLY AFFECTED BY THE PROPOSED PROJECT

A. IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT DURING THE SCOPING PROCESS

Based on the public scoping process (including review of NOP responses and input at the public scoping meeting), in addition to analysis prepared for the Draft PEIR, the City determined, based upon the threshold criteria for significance, that the project would have no impact or a less than significant impact on the following potential environmental issues (see Draft PEIR, Chapter 8, Impacts Found Not to Be Significant). It was determined, therefore, that these potential environmental issues would be precluded from detailed discussion in the Draft PEIR. Based upon the environmental analysis presented in the Draft PEIR, and the comments received by the public on the Draft PEIR, no substantial evidence was submitted to or identified by the City which indicated that the project would have an impact on the following environmental areas:

- (a) **Agriculture and Forestry Resources:** The City does not have any significant agricultural resources. Additionally, Santa Ana has no land designated or zoned for agricultural use and does not have any land subject to a Williamson Act contract. Santa Ana does not have any land designated or zoned for forestland, timberland, or zoned Timberland Production.
- (b) **Wildfire:** According to CAL FIRE, the nearest fire hazard severity zone (FHSZ) in an SRA to the City of Santa Ana is a high FHSZ about 4.0 miles east along the western edge of Loma Ridge. The nearest FHSZ in an LRA is about 3.8 miles away at the southern tip of the Peters Canyon Regional Park. The city is not in or near SRAs or lands classified as very high FHSZs. Additionally, no area in the city is on the wildland-urban interface.

All other topical areas of evaluation included in the Environmental Checklist were determined to require further assessment in the Draft PEIR.

B. IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT IN THE DRAFT PEIR

This section identifies impacts of the proposed project determined to be less than significant without implementation of project-specific mitigation measures. This determination, however, does assume compliance with existing regulations, as detailed in each respective topical section of Chapter 5 in the Draft PEIR.

- (a) **Aesthetics:** Buildout under the GPU will be at a greater intensity/density in all five focus areas compared to existing conditions. While maximum height would generally be similar to existing buildings, the overall increase in allowed intensity and height across the focus areas would lead to a visually denser urban setting and alter Santa Ana's existing skyline. Buildout under the GPU would not have a substantial adverse effect on scenic vistas (such as the Santa Ana River and Santiago Creek) since these existing open space parcels would remain unchanged. Additionally, no state scenic highways, eligible or officially designated, traverse the city nor are located near the city. Therefore, the GPU would not damage scenic resources, including rock outcroppings, trees, and historic buildings within state scenic

highways. The GPU would also create new sources of light or glare in the project area, but adverse impacts would be minimized with compliance to building codes.

- (b) **Biological Resources:** Development pursuant to the GPU would not impact riparian habitat or other sensitive natural communities. Additionally, the GPU would not impact wetlands and jurisdictional waterways. The GPU would not conflict with an adopted NCCP/HCP as the City is not within a NCCP/HCP area and would not conflict with local policies or ordinances protecting biological resources.
- (c) **Cultural Resources:** The likelihood that human remains may be discovered during clearing and grading activities is considered extremely low. In the unlikely event human remains are uncovered, impacts would be less than significant upon compliance with California and Safety Code Section 7050.5.
- (d) **Energy:** Implementation of proposed policies under the GPU, in conjunction with and complementary to regulatory requirements, will ensure that energy demand associated with growth under the GPU would not be inefficient, wasteful, or unnecessary. Additionally, the GPU would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
- (e) **Geology and Soils:** The plan area's location and underlying geology make it likely to experience seismic hazards, including strong seismic ground shaking, and secondary hazards, like liquefaction. No active surface faults are mapped and zoned under the AP Zoning Act in the plan area. Additionally, all structures that would be constructed in accordance with the GPU would be designed to meet or exceed current design standards as found in the latest CBC. Most of the plan area is within an area susceptible to liquefaction; however, all structures constructed under the GPU would be designed in accordance with current seismic design standards as found in the CBC. There are no substantial hazards with respect to slope stability, as the plan area is mostly flat. Unstable geologic unit or soils conditions, including soil erosion, could result from development of the GPU. Mandatory compliance with existing regulations, including the preparation and submittal of a SWPPP and a soil engineering evaluation, would reduce soil erosion impacts to a less than significant level. Implementation of the CBC design code, which has been adopted by the City and requires that structures be designed to mitigate expansive and compressible soils, would reduce impacts to a less than significant level. The probability of subsidence impacts is generally low in the majority of Santa Ana; however, the statutorily required sustainable groundwater management practices of the Orange County Water District would ensure that impacts would be less than significant. Future development in the plan area would require connection to the City's sewer system as the City of Santa Ana does not allow for the installation of septic tanks.
- (f) **Greenhouse Gas Emissions:** The GPU would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

- (g) **Hazards and Hazardous Materials:** Construction and operations under the GPU would involve the transport, use, and/or disposal of hazardous materials; however, compliance with existing regulations would ensure that construction workers and the general public are not exposed to any risks related to hazardous materials during demolition and construction. Furthermore, strict adherence to all emergency response plan requirements set by the Orange County Fire Authority would be required throughout the duration of project construction. GPU buildout is expected to result in some increase in the number of hazardous waste generators; however, hazardous wastes would be stored, transported, and disposed of in conformance with existing regulations of the EPA, US Department of Transportation, CalRecycle, and other agencies. Use, storage, transport, and disposal of hazardous materials in conformance with regulations would reduce both the likelihood of an accidental release and the potential consequences in the event of an accidental release.

The plan area includes 555 sites on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 that could create a significant hazard to the public or the environment. Any development, redevelopment, or reuse on or next to any of these sites would require environmental site assessment by a qualified environmental professional to ensure that the project would not disturb hazardous materials on any of the hazardous materials sites or plumes of hazardous materials diffusing from one of the hazardous materials sites, and that any proposed development, redevelopment, or reuse would not create a substantial hazard to the public or the environment.

Santa Ana is in the vicinity of an airport or within the jurisdiction of an airport land use plan. Projects approved under the proposed GPU would be required to comply with FAA airspace protection regulations using the AELUP consistency determination process.

The buildout of the GPU would not result in substantial changes to the circulation patterns or emergency access routes, and would not block or otherwise interfere with use of evacuation routes. Buildout would not interfere with operation of the City's Emergency Operations Center and would not interfere with operations of emergency response agencies or with coordination and cooperation between such agencies.

Santa Ana is not in a designated fire hazard zone, and implementation of the GPU will not expose structures and/or residences to wildland fire danger.

- (h) **Hydrology and Water Quality:** Projects pursuant to the GPU would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Development pursuant to the GPU would increase the demand on groundwater use but would not impede sustainable groundwater management of the basin. Development pursuant to the GPU would increase the amount of pervious surfaces in the plan area, but could substantially increase the rate or amount of surface runoff in some focus areas in a manner which would result in flooding off-site or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. In flood hazard, tsunami, or seiche zones, development pursuant to the GPU would not risk release of pollutants due to project inundation or impede or redirect flood flows. Development

pursuant to the GPU would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

- (i) **Land Use Planning:** Implementation of the GPU would not divide an established community. Additionally, the GPU would be consistent with the Airport Environs Land Use Plan for the John Wayne Airport. Implementation of the GPU would be consistent with the goals of the Southern California Association of Governments' RTP/SCS. Implementation of the GPU would also be consistent with the OCTA Congestion Management Plan.
- (j) **Mineral Resources:** Project implementation would not result in the loss of availability of a known mineral resource.
- (k) **Noise:** The proximity of the plan area to an airport or airstrip would not result in exposure of future residents and/or workers to excessive airport-related noise.
- (l) **Population and Housing:** The proposed GPU would provide more housing opportunities than currently exist. Therefore, implementation of the GPU would not displace people and/or housing.
- (m) **Public Services:** The GPU would introduce new structures and allow for up to 22,361 new residents and workers in the OCFA and Santa Ana Police Department service boundaries, thereby increasing the requirement for fire protection facilities and personnel, as well as increasing the service needs for the Main Library and the Newhope Library Learning Center. The GPU would also generate additional students who would impact the school enrollment capacities of the Santa Ana Unified School District, Garden Grove Unified School District, and Orange Unified School District. However, upon implementation of regulatory requirements and standard conditions of approval the project would not create significant impacts related to fire protection services, police protection, library services, or school services.
- (n) **Recreation:** The GPU would generate additional residents that would increase the use of existing park and recreational facilities. However, upon implementation of regulatory requirements and standard conditions of approval, impacts would not be significant. Project implementation would result in environmental impacts to provide new and/or expanded recreational facilities, but potentially adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and multiuse trails pursuant to buildout of the proposed land use plan would be less than significant upon the implementation of the GPU's goals, policies, and actions and existing federal, state, and local regulations. Subsequent environmental review for future individual park developments would also be required.
- (o) **Transportation and Traffic:** The GPU is consistent with adopted programs, plans, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Additionally, GPU implementation would result in a reduction of vehicle miles traveled per service population (VMT/SP) in comparison to existing City conditions, and would achieve a VMT/SP at least 15 percent lower than the countywide VMT/SP. Finally,

circulation improvements associated with future development that would be accommodated by the GPU would be designed to adequately address potentially hazardous conditions (sharp curves, etc.), potential conflicting uses, and emergency access.

- (p) **Utilities and Service Systems:** Development pursuant to the GPU would require or result in the relocation or construction of new or expanded wastewater facilities. However, Orange County Sanitation District (OCSD) has a functioning and effective process in place to ensure the regional sewer infrastructure will support future developments under the Santa Ana GPU. Additionally, OCSD and OC Water District have adequate capacity to serve development pursuant to the GPU in addition to the providers existing commitments. Development pursuant to the GPU would require or result in the relocation or construction of new or expanded water facilities. However, the City would have adequate capacity for the proposed increases in water flows across the city under implementation of the GPU and would be able to serve the additional dwelling units and commercial square footage proposed. Furthermore, GPU policies encourage the maintenance and upgrade of water infrastructure through impact fees from new development, and the exploration of other funding sources. Water supply would be adequate to meet development pursuant to the GPU. Existing and/or proposed stormwater drainage facilities would be able to accommodate proposed development pursuant to the GPU. Existing and/or proposed solid waste facilities would be able to accommodate development pursuant to the GPU and comply with related solid waste regulations. Development pursuant to the GPU would require or result in the relocation or construction of new or expanded electric power and natural gas. However, the net increases in natural gas demands due to the GPU buildout are within the amounts that SoCalGas forecasts that it will supply to its customers, and buildout would not require SoCalGas to obtain increased natural gas supplies over its currently forecast supplies.

V. FINDINGS REGARDING POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS

The following potentially significant environmental impacts were analyzed in the Draft PEIR, and the effects of the project were considered. Because of environmental analysis of the project and the identification of relevant General Plan policies; compliance with existing laws, codes, and statutes; and the identification of feasible mitigation measures, some potentially significant impacts have been determined by the City to be reduced to a level of less than significant, and the City has found—in accordance with CEQA Section 21081(a)(1) and State CEQA Guidelines Section 15091(a) (1)—that “Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.” This is referred to herein as “**Finding 1.**”

Where the City has determined—pursuant to CEQA Section 21081(a)(2) and State CEQA Guidelines Section 15091(a)(2)—that “Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency,” the City’s finding is referred to herein as “**Finding 2.**”

Where, as a result of the environmental analysis of the project, the City has determined that either (1) even with the identification of project design features, compliance with existing laws, codes and statutes, and/or the identification of feasible mitigation measures, potentially significant impacts cannot be reduced to a level of less than significant, or (2) no feasible mitigation measures or alternatives are available to mitigate the potentially significant impact, the City has found in accordance with CEQA Section 21081(a)(3) and State CEQA Guidelines Section 15091(a)(3) that “Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.” This is referred to herein as “**Finding 3.**”

A. IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The following summary describes impacts of the proposed project that, without mitigation, would result in significant adverse impacts. Upon implementation of the mitigation measures provided in the Draft PEIR, the impacts would be considered less than significant.

1. Air Quality

Impact 5.2-6: Industrial land uses accommodated under the General Plan update could create other emissions, such as those leading to objectionable odors, that would adversely affect a substantial number of people.

Industrial land uses associated with the GPU may generate potentially significant odor impacts for a substantial number of people. Impacts from potential odors generated from residential and other nonresidential land uses associated with the GPU are considered less than significant. Impacts associated with construction-generated odors are considered less than significant.

The Industrial and Industrial Flex land uses are not anticipated to produce odors, and Mitigation Measure AQ-4 would ensure that odor impacts are minimized and facilities would comply with South Coast AQMD Rule 402. Therefore, Impact 5.2-6 would be less than significant.

Mitigation Measures

AQ-4 Prior to discretionary approval by the City of Santa Ana, if it is determined that a development project has the potential to emit nuisance odors beyond the property line, an odor management plan shall be prepared by the project applicant and submitted to the City of Santa Ana for review and approval. Facilities that have the potential to generate nuisance odors include, but are not limited to:

- Wastewater treatment plants
- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Food-processing facilities

The odor management plan shall demonstrate compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors. The Odor Management Plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document prepared for the development project and/or incorporated into the project's site plan.

Finding

Finding 1. The City hereby makes Finding 1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

2. Biological Resources

Impact 5.3-1: Implementation of the General Plan Update could result in adverse impacts to candidate, sensitive, or special-status species.

The inventory of existing conditions determined that no parcels with a proposed land use designation that allows for development (i.e., not an open space designation) currently has

sensitive vegetation. All parcels currently have ruderal vegetation and little to no biological value. Therefore, there is no current indication that future development in accordance with the GPU would have significant unavoidable biological impacts. However, the programmatic analysis prepared for this GPU was not at the detailed, site-specific analysis required for a specific development project. Site-specific analyses could reveal biological resources not identified in the Biological and Natural Resources Report. Therefore, there is a potential for biological impacts associated with implementation of the GPU. Therefore, implementation of the GPU could result in a potentially significant impact.

The letter received from CDFW states that the Santa Ana River and its tributaries historically supported federally endangered southern California steelhead. CDFW's letter requests that the Draft Program EIR include an analysis of any proposed major stream crossings in the context of fish passage, and states that the analysis should include, but not be limited to, steelhead presence or historic presence, existing conditions including habitat and barrier assessments, any known projects to remove barriers or restore habitat that would affect or be affected by this project, and cumulative impacts to steelhead populations and/or habitat resulting from this project. The GPU does not propose any major stream crossings. If any future development project entails improvements for stream crossings (e.g. Santa Ana River and Santiago Creek), project-level CEQA compliance would require a biological resources report that would address potential impacts to endangered species, including the California steelhead.

Impact 5.3-1 would be less than significant with compliance with all applicable federal, state, and local regulations and incorporation of mitigation measure BIO-1.

Mitigation Measures

BIO-1 For development or redevelopment projects that would disturb vegetated land or major stream and are subject to CEQA, a qualified biologist shall conduct an initial screening to determine whether a site-specific biological resource report is warranted. If needed, a qualified biologist shall conduct a field survey for the site and prepare a biological resource assessment for the project, including an assessment of potential impacts to sensitive species, habitats, and jurisdictional waters. The report shall recommend mitigation measures, as appropriate, to avoid or limit potential biological resource impacts to less than significant.

Finding

Finding 1. The City hereby makes Finding 1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Impact 5.3-4: Implementation of the General Plan Update could result in adverse impacts to candidate, sensitive, or special-status species.

The City of Santa Ana is largely urbanized, and migration corridors are generally limited to the Santa Ana River and the Santiago Creek. Development under the GPU would result in the further infill of the city and removal of vacant sites. The GPU would not change land use designations of parcels that encompass the Santa Ana River or the Santiago Creek. However, development under the GPU could further result in vegetation removal, intrusion by humans and pets, and increased noise and air pollutants, which could impact wildlife movement and nesting sites. Therefore, the buildout of the GPU could affect wildlife movement, nesting sites, and migratory birds protected under the Migratory Bird Treaty Act as well as state law.

Impact 5.3-4 would be less than significant with compliance with all applicable federal, state, and local regulations and incorporation of mitigation measure BIO-1.

Mitigation Measures

Refer to BIO-1 above.

Finding

Finding 1. The City hereby makes Finding 1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

3. Cultural Resources

Impact 5.4-2: Development in accordance with the General Plan Update could impact archaeological resources.

Development involving ground disturbance within the plan area has the potential to impact known and unknown archaeological resources. Typically, surface-level and subsurface archaeological sites and deposits can be affected by ground-disturbing activities associated with most types of construction. Based on literature review and records searches, eight archaeological resources have been recorded within the plan area, including four prehistoric sites, one multicomponent site, and three historic isolates. The plan area includes many locations that would have been favorable for prehistoric Native American occupation. While most of the plan area has been developed over the course of the twentieth century, buried resources may remain in areas where developments such as parking lots, parks, or structures with shallow foundations have required only minimal ground disturbance. A review of historical and ethnographic maps indicates a moderate likelihood that intact subsurface archaeological resources would be encountered during redevelopment.

Archaeological resources impacts are site specific, but more intensive development can result in cumulative impacts on a regional level and should be considered in addition to individual project

impacts on individual sites. As determined by the respective lead agency on a project by project basis, Phase I Cultural Resources studies would be required before ground disturbances and demolition activities are permitted to occur. The study would identify resources on the affected project sites that are, or appear to be, eligible for listing on the National or California Register. Such studies would also recommend mitigation measures to protect and preserve archaeological and tribal cultural resources.

Mitigation Measures CUL-4 through CUL-7 were developed to reduce potential individual and cumulative impacts associated with future development and redevelopment. Mitigation Measure CUL-4 requires an archaeological resources assessment be conducted for future development projects to identify any known archaeological resources and sensitivity of the site. Mitigation Measures CUL-5 through CUL-7 detail the next steps required should the archaeological resources assessment identify known resources or determine the site to have high or moderate resource sensitivity. Upon compliance with Mitigation Measures CUL-4 through CUL-7, individual and cumulative impacts to archaeological resources would be reduced to less than significant levels.

Mitigation Measures

CUL-4 For projects with ground disturbance—e.g., grading, excavation, trenching, boring, or demolition that extend below the current grade—prior to issuance of any permits required to conduct ground-disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior’s Professionally Qualified Standards in either prehistoric or historic archaeology.

Assessments shall include a California Historical Resources Information System records search at the South Central Coastal Information Center and of the Sacred Land Files maintained by the Native American Heritage Commission. The records searches will determine if the proposed project area has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within the past 10 years, a Phase I pedestrian survey shall be undertaken in proposed project areas to locate any surface cultural materials that may be present.

CUL-5 If potentially significant archaeological resources are identified, and impacts cannot be avoided, a Phase II Testing and Evaluation investigation shall be performed by an archaeologist who meets the Secretary of the Interior’s Standards to determine significance prior to any ground-disturbing activities. If resources are determined significant or unique through Phase II testing, and site avoidance is not possible, appropriate site-specific mitigation measures shall be undertaken. These might include a Phase III data recovery program implemented by a qualified archaeologist

and performed in accordance with the Office of Historical Preservation's "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (OHP 1990) and "Guidelines for Archaeological Research Designs" (OHP 1991).

- CUL-6 If the archaeological assessment did not identify archaeological resources but found the area to be highly sensitive for archaeological resources, a qualified archaeologist shall monitor all ground-disturbing construction and pre-construction activities in areas with previously undisturbed soil. The archaeologist shall inform all construction personnel prior to construction activities of the proper procedures in the event of an archaeological discovery. The training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance by an archaeologist who meets the Secretary's Standards, and tribal consultation shall be conducted in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.
- CUL-7 If an Archaeological Resources Assessment does not identify potentially significant archaeological resources but the site has moderate sensitivity for archaeological resources (Mitigation Measure CUL-4), an archaeologist who meets the Secretary's Standards shall be retained on call. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The pre-construction training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the on-call archaeologist is contacted. The resource shall be evaluated for significance and tribal consultation shall be conducted, in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant.

Finding

Finding 1. The City hereby makes Finding 1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation

measures above. The City of Santa Ana hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

4. Geology and Soils

Impact 5.6-4: Future development that would be accommodated by the General Plan Update could impact known and unknown paleontological resources.

Paleontological resources are recognized as nonrenewable and therefore receive protection under the California Public Resources Code and CEQA. Adoption of the GPU in itself will not directly affect paleontological resources. Long-term implementation of the GPU land use plan could allow development (e.g., infill development, redevelopment, and revitalization/restoration), including grading, of known and unknown sensitive areas. Grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than in the past could potentially disturb paleontological resources. Therefore, future development that would be accommodated by the GPU could potentially unearth previously unrecorded resources. Review and protection of paleontological resources are also afforded by CEQA for individual development projects that would be accommodated by the GPU, subject to discretionary actions that are implemented in accordance with the land use plan of the GPU. Fossil localities have been found in the vicinity of the plan area, although not in the plan area itself.

Mitigation Measures GEO-1 through GEO-3 prescribe requirements for monitoring based on the sensitivity of sites for paleontological resources. Under GEO-1, areas that range from high to low sensitivity are required to prepare a Paleontological Resources Monitoring and Mitigation Plan. With adherence to mitigation measures GEO-1 through GEO-3, Impact 5.6-4 would be less than significant.

Mitigation Measures

GEO-1 **High Sensitivity.** Projects involving ground disturbances in previously undisturbed areas mapped as having “high” paleontological sensitivity shall be monitored by a qualified paleontological monitor on a full-time basis. Monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, if the fossils are determined to be significant, professionally and efficiently recover the fossil specimens and collect associated data. The paleontological monitor shall use field data forms to record pertinent location and geologic data, measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities.

GEO-2 **Low-to-High Sensitivity.** Prior to issuance of a grading permit for projects involving ground disturbance in previously undisturbed areas mapped with “low-to-high” paleontological sensitivity, the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that

underlying sediments may have high sensitivity, construction activity shall be monitored by a qualified paleontologist. The paleontologist shall have the authority to halt construction during construction activity as outlined in Mitigation Measure GEO-3.

GEO-3 All Projects. In the event of any fossil discovery, regardless of depth or geologic formation, construction work shall halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology (2010). The most likely repository is the Natural History Museum of Los Angeles County. The repository shall be identified and a curatorial arrangement shall be signed prior to collection of the fossils.

Finding

Finding 1. The City hereby makes Finding 1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Santa Ana hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

5. Noise

Impact 5.12-3: Buildout of the individual land uses and projects for implementation of the GPU may expose sensitive uses to excessive levels of groundborne vibration.

Construction Vibration Impacts. Construction activity at projects within the plan area would generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures but can achieve the audible and perceptible ranges in buildings close to the construction site.

Vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the FTA criteria for architectural damage (e.g., 0.12 inches per second [in/sec] PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). Construction details and equipment for future project-level developments under the GPU are not known at this time but may cause vibration impacts.

With implementation of Mitigation Measures N-2, N-3, and N-4, coupled with adherence to associated performance standards, Impact 5.12-3 would be reduced to less-than-significant levels. Specifically, Mitigation Measure N-2 would reduce potential vibration impacts during construction below the pertinent thresholds, and Mitigation Measures N-3 and N-4 (operations-related vibration) would reduce potential vibration impacts from commercial/industrial uses and proposed uses near existing railroads and facilities to less-than-significant levels. No significant and unavoidable vibration impacts would remain.

Operational Vibration Impacts. Commercial and industrial operations within the plan area would generate varying degrees of ground vibration, depending on the operational procedures and equipment. Such equipment-generated vibrations would spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the vibration source varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. In addition, future sensitive receptors could be placed within close proximity to existing railroad lines through buildout in the plan area.

Because specific project-level information is not available at this time, it is not possible to quantify future vibration levels at vibration-sensitive receptors that may be near existing and future vibration sources.

With implementation of Mitigation Measures N-2, N-3, and N-4, coupled with adherence to associated performance standards, Impact 5.12-3 would be reduced to less-than-significant levels. Specifically, Mitigation Measure N-2 would reduce potential vibration impacts during construction below the pertinent thresholds, and Mitigation Measures N-3 and N-4 (operations-related vibration) would reduce potential vibration impacts from commercial/industrial uses and proposed uses near existing railroads and facilities to less-than-significant levels. No significant and unavoidable vibration impacts would remain.

Mitigation Measures

N-2 Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed

this threshold, alternative uses such as drilling piles as opposed to pile driving and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.

- N-3 New residential projects (or other noise-sensitive uses) located within 200 feet of existing railroad lines shall be required to conduct a groundborne vibration and noise evaluation consistent with Federal Transit Administration (FTA)-approved methodologies.
- N-4 During the project-level California Environmental Quality Act (CEQA) process for industrial developments under the General Plan Update or other projects that could generate substantial vibration levels near sensitive uses, a noise and vibration analysis shall be conducted to assess and mitigate potential noise and vibration impacts related to the operations of that individual development. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents.

Finding

Finding 1. The City hereby makes Finding 1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Santa Ana hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

6. Tribal Cultural Resources

Impact 5.17-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

The Sacred Land File search yielded positive results, indicating that known tribal resources exist within the plan area. Further, a CHRIS records search at SCCIC indicates that 23 archaeological resources were previously recorded within 0.5 mile of the plan area. Of these resources, eight archaeological resources were located within the plan area; these include four prehistoric sites with habitation debris and lithic scatters, one multicomponent site, and three historic isolates. The plan area includes many locations that would have been favorable for prehistoric Native American occupation. While the city is urbanized and most of the plan area has been developed, buried resources may remain in areas of minimal ground disturbance, such as parks, parking lots, and structures with shallow foundations. Tribal cultural resources are site specific in nature.

Implementation of Mitigation Measures CUL-4 through CUL-7 would reduce impacts relating to tribal cultural resources to less than significant.

Mitigation Measures

Refer to Mitigation Measures CUL-4 through CUL-7 in section A.3, above.

Finding

Finding 1. The City hereby makes Finding 1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Santa Ana hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

Impact 5.17-2: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code Section 5024.1(c).

Future development as a result of the implementation of the GPU could include grading in portions of the City with sensitivity to tribal cultural resources. Grading and construction activities that require more intensive soil excavation than in the past could potentially cause disturbance to tribal cultural resources. Future development could potentially unearth previously unknown or unrecorded tribal cultural resources.

Because the NAHC SLF search yielded positive results and the Gabrieleño Band of Mission Indians – Kizh Nation identified sensitive areas within the city, the buildout of the GPU may cause a substantial adverse change in the significance of tribal cultural resources. Earthwork activities may occur with buildout under the GPU that could impact previously undisturbed tribal cultural resources.

Implementation of Mitigation Measures CUL-4 through CUL-7 would reduce impacts relating to tribal cultural resources to less than significant.

Mitigation Measures

Refer to Mitigation Measures CUL-4 through CUL-7 in section A.3, above.

Finding

Finding 1. The City hereby makes Finding 1. Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Santa Ana hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

B. SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The following summary describes the unavoidable adverse impact of the GPU where mitigation measures were found to be either infeasible or would not lessen impacts to less than significant. The following impacts would remain significant and unavoidable.

1. Air Quality

Impact 5.2-1: The additional population growth forecast for the General Plan Update and the associated emissions would not be consistent with the assumptions of the air quality management plan.

Support for this environmental impact conclusion is fully discussed in Section 5.2, Air Quality, starting on page 5.2-28 of the Draft PEIR.

The GPU would be inconsistent with the South Coast Air Quality Management Plan (AQMP) because buildout under the GPU would exceed the population estimates assumed for the AQMP and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB). Buildout of the GPU would exceed current population estimates for the city, and therefore the emissions associated with the additional population are not included in the current regional emissions inventory for the SoCAB. Additionally, air pollutant emissions associated with buildout of the GPU would cumulatively contribute to the nonattainment designations in the SoCAB. Therefore, overall, the GPU would be inconsistent with the AQMP.

Incorporation of Mitigation Measure AQ-2 into future development projects for the operation phase would contribute to reduced criteria air pollutant emissions associated with buildout of the GPU. Additionally, goals and policies in the GPU would promote increased capacity for alternative transportation modes and implementation of transportation demand management strategies. However, due to the magnitude and scale of the land uses that would be developed, no mitigation measures are available that would reduce operation and construction impacts below South Coast AQMD thresholds. In addition, the population and employment assumptions of the AQMP would continue to be exceeded until the AQMP is revised and incorporates the projections of the GPU. Therefore, Impact 5.2-1 would remain significant and unavoidable.

Mitigation Measure

AQ-2 Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation phase-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development

projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- For site-specific development that require refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in for the anticipated number of refrigerated trailers to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485).
- Provide changing/shower facilities as specified in Section A5.106.4.3 of the CALGreen Code (Nonresidential Voluntary Measures).
- Provide bicycle parking facilities per Section A4.106.9 (Residential Voluntary Measures) of the CALGreen Code and Sec. 41-1307.1 of the Santa Ana Municipal Code.
- Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CALGreen Code (Nonresidential Voluntary Measures).
- Provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CALGreen Code.
- Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star–certified or equivalent appliances shall be verified by Building & Safety during plan check.
- Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Santa Ana and Orange County Transit Authority to ensure that bus pad and shelter improvements are incorporated, as appropriate.

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These

changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

However, the City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

Impact 5.2-2: Construction activities associated with future development that would be accommodated under the General Plan Update could generate short-term emissions in exceedance of the South Coast Air Quality Management District's threshold criteria.

Support for this environmental impact conclusion is fully discussed in Section 5.2, Air Quality, starting on page 5.2-30 of the Draft PEIR.

Buildout of the GPU would occur over a period of approximately 25 years or longer. Construction activities associated with buildout of the GPU could generate short-term emissions that exceed the South Coast AQMD'S significance thresholds during this time and cumulatively contribute to the nonattainment designations of the SoCAB. Implementation of Mitigation Measure AQ-1 would reduce criteria air pollutant emissions from construction-related activities to the extent feasible. However, construction time frames and equipment for site-specific development projects are not available at this time, and there is a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. Therefore, despite adherence to Mitigation Measure AQ-1, Impact 5.2-2 would remain significant and unavoidable.

Mitigation Measures

AQ-1 Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant

emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:

- Require fugitive-dust control measures that exceed South Coast AQMD's Rule 403, such as:
 - § Use of nontoxic soil stabilizers to reduce wind erosion.
 - § Apply water every four hours to active soil-disturbing activities.
- Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower
- Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour.
- Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.
- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast AQMD's website.

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social,

technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

Impact 5.2-3: Implementation of the General Plan Update would generate long-term emissions in exceedance of South Coast AQMD's threshold criteria.

Support for this environmental impact conclusion is fully discussed in Section 5.2, Air Quality, starting on page 5.2-31 of the Draft PEIR.

Buildout in accordance with the GPU would generate long-term emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Mitigation Measure AQ-2, in addition to the goals and policies of the GPU, would reduce air pollutant emissions to the extent feasible. The measures and policies covering topics such as expansion of the pedestrian and bicycle networks, promotion of public and active transit, and support to increase building energy efficiency and energy conservation would also reduce criteria air pollutants in the city. Further, compared to existing baseline year conditions, emissions of NO_x, CO, and SO_x are projected to decrease from current levels despite growth associated with the GPU.

However, Impact 5.2-3 would remain significant and unavoidable due to the magnitude of the overall land use development associated with the GPU. Contributing to the nonattainment status would also contribute to elevating health effects associated with these criteria air pollutants. Reducing emissions would further contribute to reducing possible health effects related to criteria air pollutants.

It is speculative for this broad-based GPU to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment, since mass emissions are not correlated with concentrations of emissions, or how many additional individuals in the air basin would suffer health effects. South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in the SoCAB, and at the present time it has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health in order to address the issue raised in the Friant Ranch case.

Ozone concentrations are dependent upon a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California Ambient Air Quality Standards, it is not possible to link health risks to the magnitude of emissions exceeding the significance thresholds. To achieve the health-based standards established by the EPA, the air districts prepare air quality management plans that detail regional programs to attain the ambient air quality standards. However, because cumulative development within the city would exceed the regional significance thresholds, the proposed project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

Mitigation Measures

Refer to Mitigation Measure AQ-2, above.

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

Impact 5.2-4: Operation of industrial and warehousing land uses accommodated under the General Plan Update could expose sensitive receptors to substantial toxic air contaminant concentrations.

Support for this environmental impact conclusion is fully discussed in Section 5.2, Air Quality, starting on page 5.2-34 of the Draft PEIR.

Buildout of the GPU could expose sensitive receptors to substantial concentrations of toxic air contaminants (TAC). Buildout could result in new sources of criteria air pollutant emissions and/or TACs near existing or planned sensitive receptors. Review of development projects by South Coast AQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) would ensure that health risks are minimized. Additionally, Mitigation Measure AQ-3 would ensure mobile sources of TACs not covered under South Coast AQMD permits are considered during subsequent, project-level environmental review by the City of Santa Ana. Individual development projects would be required to achieve the incremental risk thresholds established by South Coast AQMD, and TACs would be less than significant.

However, implementation of the GPU would generate TACs that could contribute to elevated levels in the air basin. Though individual projects would achieve the project-level risk threshold of 10 per million, they would nonetheless contribute to the higher levels of risk in the SoCAB. Therefore, the GPU's cumulative contribution to health risk is significant and unavoidable.

Mitigation Measures

AQ-3 Prior to discretionary approval by the City of Santa Ana, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Santa Ana for review and approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the South Coast Air Quality Management District. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceed the respective thresholds, as established by the South Coast AQMD at the time a project is considered, the project applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs), including appropriate enforcement mechanisms, are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include, but are not limited to, restricting idling on-site, electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

Impact 5.2-5: Development and operation of land uses accommodated by the General Plan Update could generate emissions that exceed the localized significance thresholds and expose sensitive receptors to substantial concentrations of criteria air pollutants.

Support for this environmental impact conclusion is fully discussed in Section 5.2, Air Quality, starting on page 5.2-35 of the Draft PEIR.

Because existing sensitive receptors may be close to project-related construction activities and large emitters of on-site operation-related criteria air pollutant emissions, construction and operation emissions generated by individual development projects have the potential to exceed South Coast AQMD's Local Significance Thresholds (LSTs). Mitigation Measures AQ-1 and AQ-2 would reduce the regional construction and operation emissions associated with buildout of the GPU and therefore also result in a reduction of localized construction- and operation-related criteria air pollutant emissions, to the extent feasible. However, even with the implementation of these mitigation measures, Impact 5.2-5 would remain significant and unavoidable.

Mitigation Measures

Mitigation Measures AQ-1 and AQ-2 would also be applicable in reducing construction- and operation-related LST impacts.

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measures above. The City of Santa Ana hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

2. Cultural Resources

Impact 5.4-1: Buildout consistent with the General Plan Update could impact an identified historic resource.

Support for this environmental impact conclusion is fully discussed in Section 5.4, Cultural Resources, starting on page 5.4-26 of the Draft PEIR.

Generally, potential impacts to historical resources resulting from future projects developed pursuant to the GPU would be mitigated by the City's fulfillment of its statutory responsibilities under CEQA. However, for certain development pursuant to the GPU, the City may determine that significant impacts to historical resources cannot be avoided. The City shall require, at a minimum, that the affected historical resources be thoroughly documented before issuance of any permits. Though the possible demolition or alteration of a historical resource cannot be mitigated to a less than significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible.

With fulfillment of the CUL-1 and CUL-2, future development consistent with the GPU would result in a less than significant impact to cultural resources. However, if significant impacts cannot be avoided, the City shall require, at a minimum, that the affected historical resources are documented consistent with Mitigation Measure CUL-3. The Historical Resources Technical Report determined that unavoidable impacts to historical resources resulting from future development under the GPU will be reduced to the maximum extent feasible, but will still be significant with implementation of Mitigation Measure CUL-3. Therefore, the development under the GPU would result in significant and unavoidable impacts.

Mitigation Measures

CUL-1 Identification of Historical Resources and Potential Project Impacts. For structures 45 years or older, a Historical Resources Assessment (HRA) shall be prepared by an architectural historian or historian meeting the Secretary of the Interior's Professional Qualification Standards. The HRA shall include: definition of a study area or area of potential effect, which will encompass the affected property and may include surrounding properties or historic district(s); an intensive level survey of the study area to identify and evaluate under federal, State, and local criteria significance historical resources that might be directly or indirectly affected by the proposed project; and an assessment of project impacts. The HRA shall satisfy federal and State guidelines for the identification, evaluation, and recordation of historical resources. An HRA is not required if an existing historic resources survey and evaluation of the property is available; however, if the existing survey and evaluation is more than five years old, it shall be updated.

CUL-2 Use of the Secretary of the Interior's Standards. The Secretary of the Interior's Standards for the Treatment of Historic Properties shall be used to the maximum extent practicable to ensure that projects involving the relocation, conversion,

rehabilitation, or alteration of a historical resource and its setting or related new construction will not impair the significance of the historical resource. Use of the Standards shall be overseen by an architectural historian or historic architect meeting the Secretary of the Interior's Professional Qualification Standards. Evidence of compliance with the Standards shall be provided to the City in the form of a report identifying and photographing character-defining features and spaces and specifying how the proposed treatment of character-defining features and spaces and related construction activities will conform to the Standards. The Qualified Professional shall monitor the construction and provide a report to the City at the conclusion of the project. Use of the Secretary's Standards shall reduce the project impacts on historical resources to less than significant.

- CUL-3 **Documentation, Education, and Memorialization.** If the City determines that significant impacts to historical resources cannot be avoided, the City shall require, at a minimum, that the affected historical resources be thoroughly documented before issuance of any permits and may also require additional public education efforts and/or memorialization of the historical resource. Though demolition or alteration of a historical resource such that its significance is materially impaired cannot be mitigated to a less than significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian, historian, or historic architect meeting the Secretary of the Interior's Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; archival photographic documentation; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as the Santa Ana Library History Room, the South Central Coastal Information Center at California State University, Fullerton, and/or the HABS collection housed in the Library of Congress. Depending on the significance of the adversely affected historical resource, the City, at its discretion, may also require public education about the historical resource in the form of an exhibit, web page, brochure, or other format and/or memorialization of the historical resource on or near the proposed project site. If memorialized, such memorialization shall be a permanent installation, such as a mural, display, or other vehicle that recalls the location, appearance, and historical significance of the affected historical resource, and shall be designed in conjunction with a qualified architectural historian, historian, or historic architect.

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These

changes are identified in the form of the mitigation measures above. The City of Santa Ana hereby finds that implementation of the mitigation measures is feasible, and the measures are therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

3. Greenhouse Gas Emissions

Impact 5.7-1: Implementation of the proposed General Plan Update would result in a decrease in GHG emissions in horizon year 2045 from existing baseline but may not meet the long-term GHG reduction goal under Executive Order S-03-05.

Support for this environmental impact conclusion is fully discussed in Section 5.7, Greenhouse Gas Emissions, starting on page 5.7-31 of the Draft PEIR.

Implementation of Mitigation Measure GHG-1 would ensure that the City is tracking and monitoring the City's GHG emissions in order to chart a trajectory to achieve the long-term, year 2050, GHG reduction goal set by Executive Order S-03-05. However, at this time, there is no plan past 2030 that achieves the long-term GHG reduction goal established under Executive Order S-03-05. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advancements in technology. Advancements in technology in the future could provide additional reductions and allow the state and City to meet the 2050 goal, but in the meantime, Impact 5.7-1 would be significant and unavoidable.

Mitigation Measures

GHG-1 The City of Santa Ana shall update the Climate Action Plan (CAP) every five years to ensure the City is monitoring the plan's progress toward achieving the City's greenhouse gas (GHG) reduction target and to require amendment if the plan is not achieving the specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under Executive Order S-03-05 for year 2050 and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP update (e.g., Senate Bill 32 for year 2030). The CAP update shall include the following:

- GHG inventories of existing and forecast year GHG levels.
- Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal of Executive Order S-03-05.
- Plan implementation guidance that includes, at minimum, the following components consistent with the proposed CAP:
 - § Administration and Staffing
 - § Finance and Budgeting
 - § Timelines for Measure Implementation
 - § Community Outreach and Education
 - § Monitoring, Reporting, and Adaptive Management
 - § Tracking Tools

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

4. Noise

Impact 5.12-1: Construction activities associated with buildout of the plan area would result in temporary noise increases at sensitive receptors.

Support for this environmental impact conclusion is fully discussed in Section 5.12, Noise, starting on page 5.12-29 of the Draft PEIR.

Implementation of Mitigation Measure N-1 would reduce potential noise impacts during construction to the extent feasible. However, due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential duration of construction activities, construction noise could result in a temporary

substantial increase in noise levels above ambient conditions. Therefore, impacts would remain significant and unavoidable. It should be noted that the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level.

Mitigation Measures

N-1 Construction contractors shall implement the following measures for construction activities conducted in the City of Santa Ana. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans submitted to the City: The City of Santa Ana Planning and Building Agency shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading, and/or building permits.

- Construction activity is limited to the hours: Between 7 AM to 8 PM Monday through Saturday, as prescribed in Municipal Code Section 18-314(e). Construction is prohibited on Sundays.
- During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.
- Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- Stationary equipment, such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses.
- Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.
- Construction traffic shall be limited, to the extent feasible, to approved haul routes established by the City Planning and Building Agency.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City.
- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of

unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.

- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.
- Erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier.

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

The City finds that there are no other mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

Impact 5.12-2: Buildout of the plan area would cause a substantial traffic noise increase on local roadways and could locate sensitive receptors in areas that exceed established noise standards.

Support for this environmental impact conclusion is fully discussed in Section 5.12, Noise, starting on page 5.12-30 of the Draft PEIR.

Mitigation Measure N-2 would reduce potential interior noise impacts to future noise-sensitive receptors below the thresholds. However, there are no feasible or practical mitigation measures available to reduce project-generated traffic noise to less than significant levels for existing

residences along affected roadways. No individual measures and no set of feasible or practical mitigation measures are available to reduce project-generated traffic noise to less than significant levels in all cases. Thus, traffic noise would remain a significant and unavoidable impact. It should be noted that the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level.

Mitigation Measures

Refer to Mitigation Measure N-2, above.

Finding

Finding 3. Changes or alterations have been required in, or incorporated into, the GPU that avoid or substantially lessen the significant environmental effect as identified in the Draft PEIR. These changes are identified in the form of the mitigation measure above. The City of Santa Ana hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.”

The City finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

5. Population and Housing

Impact 5.13-1: The GPU would directly induce substantial unplanned population growth.

Support for this environmental impact conclusion is fully discussed in Section 5.13, Population and Housing, starting on page 5.13-12 of the Draft PEIR.

Full buildout of the GPU would result in a population of 431,629, and the city’s 2045 population growth would be approximately 20 percent greater than the Orange County Council of Governments’ 2045 projections. Furthermore, the city’s housing units at buildout would be 115,053, which exceeds the Orange County Council of Governments’ projection by 38 percent. There are no feasible mitigation measures to mitigate the population and housing growth at buildout, and impacts would be significant and unavoidable.

Mitigation Measures

There are no feasible mitigation measures to mitigate the population and housing growth at buildout.

Finding

Finding 3. The City finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the PEIR, as discussed in Section G of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the City has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the GPU outweigh its significant effects on the environment.

VI. FINDINGS REGARDING ALTERNATIVES

CEQA requires that an EIR include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]).

As discussed above, the Draft PEIR identified significant impacts in a number of categories. The following impacts could be mitigated below a level of significance: air quality, biological resources, cultural resources, geology and soils, noise, tribal cultural resources impacts. The following impacts cannot be mitigated below a level of significance: certain air quality, cultural resources, greenhouse gas (GHG) emissions, noise, and population and housing impacts.

The Draft PEIR analyzed four alternatives to the proposed project that could reduce some, if not all, of the impacts.

A. ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING

“Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines § 15126.6[c]).

Alternative Circulation Element – Roadway Classifications. The proposed circulation element in the GPU evolved over a long process and coordination with the Orange County Transportation Authority (OCTA). During this process, alternative packages of arterial roadway classifications were considered that involved roadways in OCTA’s Master Plan of Arterial Highways (MPAH). The majority of reclassifications proposed were identified for bicycle facility safety improvements in the City’s Safe Mobility Santa Ana (SMSA) Plan, prepared in 2016. Most of the reclassifications identified were for roadways where bicycle and pedestrian safety improvements would require roadway reconfiguration and a reduction in the number of existing or planned travel lanes. Many of the SMSA recommendations across the city have already been, or are in the process of being, implemented along arterial roadways without reducing the number of lanes.

A cursory review of two optional roadway reclassification packages was conducted to determine whether these optional plans would have the potential to eliminate significant impacts of the proposed GPU and meet most the project objectives. It was determined that a detailed evaluation of this alternative was not needed to provide a reasonable range of EIR project alternatives. Transportation/traffic impacts of the proposed project were determined to be less than significant (VMT/SP falls below the significance threshold for the GPU without mitigation). Although these alternatives may have some potential to reduce VMT (by reducing the number of travel lanes for some roadways) and thereby also potentially reduce air quality, greenhouse gas, and traffic noise impacts, these alternatives would also result in more inconsistencies with the MPAH and result in more traffic congestion. Although traffic congestion is no longer a CEQA consideration, the GPU sets forth standards for level of service that will be considered by decision-makers. Moreover, the

Reduced Density and RTP/SCS Consistency alternatives were determined to be meaningful alternatives to consider for the potential of reducing air quality, GHG, and traffic noise impacts.

Reduced Traffic Noise Alternative. Since traffic noise was determined to be a significant, unavoidable impact of the proposed GPU, a project alternative designed to eliminate this significant impact was considered. The required reductions in traffic volumes (ADT) were determined along roadways where buildout of the GPU would result in significant noise increases. These estimates were compared to the surrounding land uses that would generate ADTs for those roadway segments. Traffic noise along these roadways would both exceed the noise standard and abut sensitive land uses (e.g., residences, schools, hospitals). Several segments would experience significant, unavoidable traffic noise impacts without the land use changes proposed under the GPU. Since significant traffic noise could not be avoided, further evaluation of this alternative was not deemed to be meaningful.

B. ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Given the significant, unavoidable impacts identified for the proposed GPU, project alternatives with the potential to substantially reduce development were identified for further review. Significant GPU impacts to long-term air quality, GHG emissions, and population and housing all directly relate to the level of development that would occur within the city. At the programmatic level of this GPU PEIR, site-specific information regarding potential significant historical impacts is not available, and therefore, an alternative could not be customized to reduce that impact. A reduced intensity alternative would also be expected to reduce the significant traffic noise impact (as discussed above). The following development alternatives to the proposed GPU were chosen for further analysis.

No Project / Current General Plan Alternative

The evaluation of the No Project alternative is required by CEQA. The No Project alternative is typically defined as the development scenario that would occur if the project as proposed is not adopted. For a General Plan, the No Project alternative is typically represented by the jurisdiction's existing General Plan, including land use plan, circulation master plan, and policies in each General Plan element. Therefore, this alternative assumes that the existing General Plan—with various adoption dates for different elements between 1982 and 2014—would remain in effect. This existing General Plan also reflects amendments, including new Specific Plans and special zoning areas that have been adopted through the Notice of Preparation for this GPU.

Finding. The City Council rejects the No Project/Current General Plan Alternative on the basis of policy and economic factors as explained herein. (See Pub. Resources Code, § 21061.1; CEQA Guidelines, § 15364; see also *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; *California Native Plant Soc. v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001; *Sequoiah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative identified in the Final PEIR.

This alternative would result in similar impacts to 11 impact categories, reduced impacts to 5 environmental impacts, and increase impacts to 4 categories. Impacts would be similar for agricultural resources, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, tribal cultural resources, and wildfire. This alternative would reduce impacts for aesthetics, population and housing, public services, recreation, and utilities and service systems. Impacts to air quality, greenhouse gas emissions, land use and planning, and transportation would increase. This alternative does not mitigate any of the significant and unavoidable impacts associated with the GPU to a less than significant impact. It would also exceed the City's VMT threshold. Overall, impacts under this alternative would decrease in comparison to the proposed project.

The No Project/Current General Plan alternative would not achieve many of the proposed project objectives. The existing land use plan does not provide the opportunities to provide housing and employment at the levels required to meet local and regional goals. Moreover, the No Project alternative would not provide numerous general policies as included in the GPU to achieve these goals and invigorate communities. The current General Plan, however, protects established neighborhoods and several Specific Plans and Special Zoning areas would provide for infill opportunities, protect established neighborhoods, and result in mixed-use villages and bike- and pedestrian-friendly communities.

Reduced Intensity Alternative

(Reduced capacity for the 55 Freeway/Dyer and South Bristol focus areas) Under the GPU, the only areas that include revisions to land use designations to accommodate new growth are within the five focus areas. The majority of remaining growth would occur within previously approved Specific Plans and Special Zoning areas. A nominal amount of growth is assumed to occur in other areas of the city and would not require land use amendments. The Reduced Intensity Alternative would substantially reduce development capacity within two focus areas, 55 Freeway/Dyer and South Bristol Street, which accommodate approximately 65 percent of the housing unit growth and 72 percent of the nonresidential use (by building square footage) of the growth projected for the combined focus areas under the GPU. For the focus areas, the forecast buildout is based on development at approximately 80 percent of the maximum allowed development for each respective land use designation. For this alternative, development of the 55 Freeway/Dyer and South Bristol focus areas would be reduced to approximately 50 percent of the maximum allowed per the land use designations. This alternative would reduce housing units by a total of 5,383 and would reduce total building square footage by approximately 4.2 million square feet distributed between these two focus areas. This alternative would also reduce population by 19,825 and jobs by 9,184. Overall, this alternative would reduce the housing growth accommodated by the GPU land use changes by approximately 18 percent and reduce nonresidential building square footage by approximately 27 percent.

Finding. The City Council rejects the Reduced Intensity Alternative on the basis of policy and economic factors as explained herein. (See Pub. Resources Code, § 21061.1; CEQA Guidelines, § 15364; see also *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; *California*

Native Plant Soc. v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 1001; *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative identified in the Final PEIR.

This alternative would result in similar impacts to 7 impact categories, reduce impacts to 12 categories, and increase impacts to 1 category. Impacts would be similar for aesthetics, agricultural resources, biological resources, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire. This alternative would decrease impacts to air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, noise, population and housing, public services, recreation, tribal cultural resources, transportation, and utilities and services. It would be expected to increase land use and planning impacts relative to the GPU. As with the GPU, impacts to air quality, cultural resources, greenhouse gas emissions, noise, and population and housing would remain significant and unavoidable. Overall, impacts under this alternative would be decreased in comparison to the proposed project.

The Reduced Density Alternative reduces the level of development for two of the five focus areas (55 Freeway/Dyer Road and South Bristol Street) relative to the GPU. No other changes to the GPU are made for this alternative. It is assumed to include the same General Plan policies and would not modify the circulation element or related improvements. Therefore, this alternative would attain many of the project's objectives. It would not "optimize" high density housing and mass transit opportunities, and so was found not to attain objective No. 2. It would, however, achieve objectives Nos. 3 through 5, but to a lesser extent than the proposed GPU. With the reduced opportunities in the 55 Freeway/Dyer Road and South Bristol focus areas, it would not be as effective in providing affordable housing opportunities, and may not be as economically feasible in terms of funding community benefits. It would provide mixed-use opportunities that are bike and pedestrian friendly and provide opportunities for live-work, artist spaces, and small-scale manufacturing.

2020 RTP/SCS Consistency Alternative

(Reduced development for RTP/SCS population/housing consistency) This alternative was developed to evaluate an update to the General Plan that would be consistent with the population and housing projections used to develop the Southern California Association of Governments' (SCAG) most recent Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)—Connect SoCal (adopted May 7, 2020). Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The plan embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The proposed GPU would result in a significant population and housing impact because development under the GPU would substantially exceed the projections used in Connect SoCal. SCAG uses locally prepared population and housing projections to develop the regional plan. For the City of Santa Ana, those projections were

provided by the Orange County Council of Governments, as prepared by the Center for Demographic Research. The population/housing figures reflected for Santa Ana in the regional plan for 2045 are: population, 360,100; total housing units, 80,100; and total jobs, 176,400. Projections for the RTP/SCS (Connect SoCal) use land use designations as approved in adopted general plans. The employment projections are similar for the GPU and RTP/SCS scenarios, but the RTP/SCS projections for population and housing units are substantially lower than GPU projections (18 percent and 27 percent lower, respectively). The RTP/SCS alternative, therefore, represents the least-development-intensive project alternative evaluated for the Draft PEIR.

§ This alternative would substantially reduce the growth that would be accommodated within the focus areas under the GPU. New growth within the focus areas would total 6,380 housing units and approximately 3.7 million square feet of nonresidential uses, instead of a total additional 23,955 housing units and approximately 15.7 million square feet within the focus areas. This alternative distributes anticipated development through the focus areas and the approved Specific Plans/Special Zoning areas. For purposes of this alternative, it is assumed that a development cap would be used to limit total growth to the projections shown.

§ Subsequent updates of the regional plan would incorporate updated land use from the GPU and resolve the substantial discrepancy between the population and housing projections. Note also that the Draft PEIR concludes that the GPU is consistent with the goals of the RTP/SCS. This alternative has been defined to eliminate the significant impact associated with substantial population growth that is inconsistent with the regional plan, as well as reduce other significant growth-related (AQ/GHG, traffic noise) impacts associated with the GPU as proposed.

Finding. The City Council rejects the 2020 RTP/SCS Consistency Alternative on the basis of policy and economic factors as explained herein. (See Pub. Resources Code, § 21061.1; CEQA Guidelines, § 15364; see also *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; *California Native Plant Soc. v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001; *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative identified in the Final PEIR.

This alternative would reduce impacts to 12 environmental impacts, result in similar impacts to 6 categories, and increase impacts to 1 category. It would reduce impacts to air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, noise, population and housing, public services, recreation, tribal cultural resources, and utilities and service systems. Impacts would be very similar for aesthetics, agricultural resources, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire. It would increase impacts to land use and planning. It would also increase impacts to transportation and potentially introduce a new significant impact. It is anticipated, however, that under this alternative, transportation could be mitigated to less than significant. Under the GPU, transportation impacts are less than significant without mitigation. As with the GPU, impacts to air quality, cultural

resources, greenhouse gas emissions, and noise would remain significant and unavoidable. The impact to population and housing would be reduced to less than significant. Overall, impacts under this alternative would be reduced in comparison to the proposed project.

Due to the substantial reduction in housing opportunities citywide, this alternative is the least effective in achieving the project objectives of the GPU. By setting a development cap to limit housing and nonresidential development to the projections for the city in the 2020 RTP/SCS, this alternative reduces housing units by 31,515 compared to the GPU. It reduces housing development potential within the focus areas by 73 percent in comparison to the GPU, and reduces overall city future development by 27 percent. To achieve this reduction, the development cap would not only limit focus area development but would restrict the entitled housing in Specific Plans/Special Zoning areas (reducing total housing within these areas by almost 14,000 units). This alternative clearly would not optimize high density housing that maximizes mass transit use (objective No. 2) or provide urban-level intensities at the urban edges (objective No. 3). Moreover, it would not facilitate intensities that attract economic activities, particularly since it would not allow the maximum entitlement of approved Specific Plans and Special Zoning areas. It would achieve the remainder of the objectives, but to a lesser extent than the GPU. It would protect established neighborhoods, but not promote infill development as much as the GPU or other alternatives (objective No. 1). It would provide only limited opportunities for live-work and artist spaces and small-scale manufacturing (objective No. 7).

C. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the GPU, the environmentally superior development alternative must be identified. One alternative has been identified as “environmentally superior” to the GPU:

§ The RTP/SCS Consistency Alternative is concluded to be the environmentally superior alternative. The No Project alternative is not environmentally superior to the proposed GPU. Both the Reduced Density and RTP/SCS alternatives reduce environmental impacts in comparison to the GPU, but the RTP/SCS reduces more impacts and eliminates a significant, unavoidable impact of the GPU. This alternative was designed to eliminate the significant population impact of the GPU, but it also reduces potential future development more than any of the other alternatives.

VII. STATEMENT OF OVERRIDING CONSIDERATIONS

A. INTRODUCTION

The City of Santa Ana is the Lead Agency under CEQA for preparation, review and certification of the PEIR for General Plan Update PEIR (project). As the Lead Agency, the City is also responsible for determining the potential environmental impacts of the proposed action and which of those impacts are significant, and which can be mitigated through imposition of mitigation measures to avoid or minimize those impacts to a level of less than significant. CEQA then requires the Lead Agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether or not to approve the proposed project. In making this determination the City is guided by CEQA Guidelines Section 15093, Statement of Overriding Considerations, which states:

- a. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- b. When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- c. If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In addition, Public Resources Code Section 21081(b) requires that where a public agency finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in an EIR and thereby leave significant unavoidable effects, the public agency must also find that overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects of the project.

Pursuant to Public Resources Code Section 21081(b) and the State CEQA Guidelines Section 15093, the City has balanced the benefits of the proposed project against the unavoidable adverse impacts associated with the project and has adopted all feasible mitigation measures

with respect to these impacts. The City also has examined alternatives to the proposed project, none of which both meets the project objectives and is environmentally preferable to the proposed project, for the reasons discussed in the Findings and Facts in Support of Findings.

The City of Santa Ana, as the Lead Agency for this project, and having reviewed the PEIR for the GPU, and reviewed all written materials within the City's public record and heard all oral testimony presented at public hearings, adopts this Statement of Overriding Considerations, which has balanced the benefits of the project against its significant unavoidable adverse environmental impacts in reaching its decision to approve the project.

B. OVERRIDING CONSIDERATIONS

The City, after balancing the specific economic, legal, social, technological, and other benefits of the project, has determined that the unavoidable adverse environmental impacts identified above may be considered acceptable due to the following specific considerations, which outweigh the unavoidable, adverse environmental impacts of the project, and each of which, standing alone, is sufficient to support approval of the project, in accordance with CEQA Section 21081(b) and CEQA Guidelines Section 15093. The specific economic, legal, social, technological, or other benefits of the project are as follows:

1. The community, land use, and public services elements of the project encourage healthy lifestyles, a planning process that ensures that health impacts are considered, and policies and practices that improve the health of residents. The policies also affirm and support a socially and economically diverse community with equitable distribution of resources.
2. Implementation of the GPU fulfills one of the key strategies identified in the Santa Ana Strategic Plan in the completion of a comprehensive update of the existing General Plan.
3. The project improves the jobs-housing balance; the ratio of 1.5 would give the city a more equal distribution of employment and housing. The population growth resulting directly from the proposed GPU would be offset by the level of employment opportunity provided to the city's residents and workers commuting into Santa Ana.
4. The project results in a reduction of vehicle miles traveled per service population (VMT/SP) and a reduction in related traffic congestion, air quality, and greenhouse gas emissions compared with existing conditions because the GPU includes policies that promote the reduction of VMT. Policy 2.5 of the land use element encourages infill mixed-use development at all ranges of affordability to reduce VMT, and policy 4.5 aims to concentrate development along high-quality transit corridors. Policy 4.6 of the circulation element promotes reductions in automobile trips and VMT by encouraging transit use and nonmotorized transportation as alternatives to augmenting roadway capacity.
5. The project provides additional housing to support the regionally forecasted increase in economic activities and employment increases.

6. Implementation of the project would introduce policies and actions that address the importance of protecting the health of residents and the environment by improving air quality, reducing greenhouse gas emissions, and encouraging active transportation.
7. The project implements the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) land use policies related to population and housing by providing additional housing near employment centers.
8. The project facilitates the economic development of the city by promoting development that is mixed use, pedestrian friendly, transit oriented, and clustered around activity centers through new and infill residential development. Additionally, the proposed project would improve the city's jobs/housing balance by supporting development that provides housing and employment opportunities to enable people to live and work in Santa Ana.
9. Implementation of the project would coordinate air quality planning efforts to meet state and federal ambient air quality standards by considering the goals of the Climate Action Plan in all major decision on land use and public infrastructure investment and investing in low- to zero-emission vehicles. These policies also promote development that meets or exceeds standards for energy-efficient building design, and the consideration of sensitive of potential emission sources on sensitive uses.
10. The project promotes economic growth and diversity within the city. The economic prosperity element of the GPU includes policies related to improving Santa Ana's economy and its role within the region.

VIII. RESOLUTION REGARDING CERTIFICATION OF THE PEIR

The City of Santa Ana finds that it has reviewed and considered the Final PEIR in evaluating the proposed project, that the Final PEIR is an accurate and objective statement that fully complies with CEQA and the State CEQA Guidelines, and that the Final PEIR reflects the independent judgment of the City.

The City of Santa Ana declares that no new significant information, as defined by State CEQA Guidelines, section 15088.5, has been received by the City after circulation of the Draft PEIR that would require recirculation.

The City of Santa Ana certifies the PEIR based on the entirety of the record of proceedings, including but not limited to the following findings and conclusions:

Findings: The following significant environmental impacts have been identified in the PEIR and will require mitigation as set forth in Section V of this Resolution but cannot be mitigated to a level of insignificance: air quality (project-related and cumulative), cultural resources (project-related), greenhouse gas emissions (project-related), noise (project-related), and population and housing (project-related).

Conclusions

1. Except the impacts (stated above) relating to air quality, cultural resources, greenhouse gas, noise, and population and housing, all significant environmental impacts from the implementation of the proposed project have been identified in the PEIR and, with implementation of the mitigation measures identified, will be mitigated to a level of insignificance.
2. Other alternatives to the proposed project, which could potentially achieve the basic objectives of the proposed project, have been considered and rejected in favor of the proposed project.
3. Environmental, economic, social, and other considerations and benefits derived from the development of the proposed project override and make infeasible any alternatives to the proposed project or further mitigation measures beyond those incorporated into the proposed project.

IX. RESOLUTION ADOPTING A MITIGATION MONITORING AND REPORTING PLAN

Pursuant to Public Resources Code section 21081.6, the City of Santa Ana hereby adopts the Mitigation Monitoring and Reporting Plan attached to this Resolution as Exhibit A. In the event of any inconsistencies between the mitigation measures as set forth herein and the Mitigation Monitoring and Reporting Plan, the Mitigation Monitoring and Reporting Plan shall control.

X. RESOLUTION REGARDING CONTENTS AND CUSTODIAN OF RECORDS

The documents and materials that constitute the record of proceedings on which these findings have been based are located at the City of Santa Ana Planning Division Counter. The custodian for these records is the City of Santa Ana. This information is provided in compliance with Public Resources Code section 21081.6.

The record of proceedings for the City's decision on the project consists of the following documents, at a minimum:

1. The NOP and all other public notices issued by the City in conjunction with the project.
2. All comments submitted by agencies or members of the public during the 45-day comment periods on the Draft PEIR and the 20-day extension to the comment period.
3. The Final PEIR for the Santa Ana General Plan Update, including comments received on the Draft PEIR, responses to those comments, and technical appendices.
4. The Mitigation Monitoring and Reporting Plan for the project.
5. All findings, resolutions, and ordinances adopted by the City in connection with the General Plan Update, and all documents cited or referred to therein.
6. All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the Santa Ana General Plan Update.
7. All documents submitted to the City by other public agencies or members of the public in connection with the General Plan Update PEIR up through project approval. Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations.
8. Any documents expressly cited or referenced in these findings, in addition to those cited above.
9. Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

The following location is where the record may be reviewed:

City of Santa Ana, Planning Division Counter
20 Civic Center Plaza, M-20
Santa Ana, CA 92701

October 2020 | Mitigation Monitoring and Reporting Program

Santa Ana General Plan Update

City of Santa Ana

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EXHIBIT C

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Mitigation Monitoring and Reporting Program

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Mitigation Monitoring and Reporting Program

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1. Introduction

1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle to monitor mitigation measures and conditions of approval outlined in the Final Program Environmental Impact Report. The MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code and City of Santa Ana monitoring requirements. Section 21081.6 states:

(a) When making the findings required by paragraph (1) of subdivision subsection (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:

(1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.

(2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

(b) A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents which address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other public project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.

(c) Prior to the close of the public review period for a draft environmental impact report or mitigated negative declaration, a responsible agency, or a public agency having jurisdiction over natural resources affected by the project, shall either submit to the lead agency complete and detailed performance objectives for mitigation measures which would address the significant effects on the environment identified by the responsible agency or agency having jurisdiction over natural resources affected by the project, or refer the lead agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a lead

Mitigation Monitoring and Reporting Program

agency by a responsible agency or an agency having jurisdiction over natural resources affected by the project shall be limited to measures which mitigate impacts to resources which are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance by a responsible agency or agency having jurisdiction over natural resources affected by a project with that requirement shall not limit the authority of the responsible agency or agency having jurisdiction over natural resources affected by a project, or the authority of the lead agency, to approve, condition, or deny projects as provided by this division or any other provision of law.

The MMRP will serve to document compliance with adopted/certified mitigation measures that are formulated to minimize impacts associated with future development that would be accommodated by the Santa Ana General Plan.

1.2 PROJECT SUMMARY

The GPU is the comprehensive update of the Santa Ana General Plan. The purpose of the General Plan Update is to comprehensively update the 1982 plan to reflect current conditions, establish a shared vision of the community's aspirations, and create the policy direction to guide Santa Ana's long-term planning and growth over the next two decades. The General Plan Update will include the City's future development goals and will provide policy statements to achieve those goals. Implementation actions related to each goal or policy will be included as a separate Implementation Plan to ensure successful monitoring of progress as a community.

Furthermore, the GPU will focus on five areas in Santa Ana that are better suited for future development or overall improvement. These focus areas are:

- § South Main Street
- § Grand Avenue/17th Street
- § West Santa Ana Boulevard
- § 55 Freeway/Dyer Road
- § South Bristol Street

General Plan Update

The updated General Plan is organized into three sections: Services and Infrastructure (I), Natural Environment (II), and Built Environment (III). The proposed GPU addresses the seven topics required by state law as well as five optional topics. State law gives jurisdictions the discretion to incorporate optional topics and to address any of these topics in a single element or across multiple elements. The 12 proposed elements of the GPU will replace 16 existing elements. The GPU will incorporate the current 2014–2021 Housing Element, and no substantive changes are anticipated. The topic of housing will be addressed as a separate effort in late 2021 in accordance with State law. The topic of environmental justice will be incorporated throughout the GPU, with goals and policies incorporated into multiple elements. The 12 elements of the proposed GPU are:

Mitigation Monitoring and Reporting Program

Mandatory Topics

- § Land Use Element
- § Circulation Element
- § Housing Element
- § Open Space Element
- § Conservation Element
- § Safety Element
- § Noise Element

Optional Topics

- § Public Services Element
- § Urban Design Element
- § Community Element
- § Economic Prosperity Element
- § Historic Preservation Element

The GPU will guide growth and development (e.g., infill development, redevelopment, and revitalization/restoration) in the plan area by designating land uses in the proposed land use map and through implementation of updated goals and policies of the GPU. Table 1-1 outlines the proposed land use designations under the GPU.

Table 1-1 Proposed Land Use Designations and Statistics

Land Use Designation	Acres	% of Total
Grand Avenue/17th Street	171.5	—
District Center	23.7	13.8
General Commercial	19.9	11.6
Industrial/Flex	7.1	4.1
Open Space	1.1	0.6
Urban Neighborhood	119.7	69.8
55 Freeway/Dyer Road	354.5	—
District Center	158.0	44.6
General Commercial	68.0	19.2
Industrial/Flex	127.4	35.9
Open Space	1.1	0.3
South Bristol Street	199.9	—
District Center	108.3	54.2
Open Space	6.0	3.0
Urban Neighborhood	85.7	42.9
South Main Street	312.2	—
Industrial/Flex	29.0	9.3
Institutional	19.2	66.1
Low Density Residential	162.3	845.8

Mitigation Monitoring and Reporting Program

Table 1-1 Proposed Land Use Designations and Statistics

Land Use Designation	Acres	% of Total
Urban Neighborhood	101.7	62.7
West Santa Ana Boulevard	481.6	—
Corridor Residential	10.0	2.1
General Commercial	21.5	4.5
Industrial/Flex	87.9	18.3
Institutional	45.5	9.4
Low Density Residential	108.1	22.4
Low-Medium Density Residential	6.8	1.4
Medium Density Residential	27.0	5.6
Open Space	133.6	27.7
Professional and Administrative Office	6.2	1.3
Urban Neighborhood	35.0	7.3
Balance of City	11,598.8	—
District Center	124.2	1.1
General Commercial	424.2	3.7
Industrial	2,159.6	18.6
Institutional	886.7	7.6
Low Density Residential	6,173.3	53.2
Low-Medium Density Residential	429.0	3.7
Medium Density Residential	335.3	2.9
One Broadway Plaza District Center	4.1	0.0
Open Space	793.8	6.8
Professional and Administrative Office	260.4	2.2
Urban Neighborhood	4.1	0.0
Not Specified	4.1	0.0
Total	13,118.5	100%

Source: Figures aggregated and projected by PlaceWorks, 2020.

The full buildout scenario is analyzed in comparison to existing conditions. Table 1-2 details buildout statistics. Similarly, the PEIR provides conclusions regarding impact significance for this scenario for both the proposed GPU and project alternatives.

Mitigation Monitoring and Reporting Program

Table 1-2 Buildout Statistical Summary

PLANNING AREA	BUILDOUT		
	Housing Units	Bldg. Sq. Ft. ¹	Jobs
FOCUS AREAS	23,955	15,684,285	35,044
55 Freeway/Dyer Road	9,952	6,142,283	13,302
Grand Avenue/17 th Street	2,283	703,894	1,622
South Bristol Street	5,492	5,082,641	11,192
South Main Street	2,308	946,662	2,151
West Santa Ana Boulevard	3,920	2,808,805	6,777
SPECIFIC PLAN / SPECIAL ZONING	20,524	16,958,445	39,702
Adaptive Reuse Overlay Zone ²	1,260	976,935	2,567
Bristol Street Corridor Specific Plan	135	143,139	282
Harbor Mixed Use Transit Corridor Specific Plan	4,622	1,967,982	1,578
MainPlace Specific Plan	1,900	2,426,923	5,380
Metro East Mixed-Use Overlay Zone	5,551	4,685,947	12,258
Midtown Specific Plan	607	1,818,253	4,615
Transit Zoning Code	6,449	4,939,266	13,022
ALL OTHER AREAS OF THE CITY³	70,574	40,325,086	95,670
CITYWIDE TOTAL	115,053	72,967,816	170,416

Source: City of Santa Ana 2020.

¹ Only includes nonresidential building square footage.

² The figures shown on the row for the Adaptive Reuse Overlay represents parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.

³ The City has included an assumption for growth on a small portion (5 percent) of residential parcels through the construction of second units, which is distributed throughout the city and is not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline and an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan.

1.3 PROJECT LOCATION

The City of Santa Ana is in the western central portion of Orange County, approximately 30 miles southwest of the city of Los Angeles and 10 miles northeast of the city of Newport Beach. The city is bordered by the city of Orange and unincorporated areas of Orange County to the north, the city of Tustin to the east, the cities of Irvine and Costa Mesa to the south, and the cities of Fountain Valley and Garden Grove to the west. In November 2019, the City annexed the 17th Street Island, a 24.78-acre area in the northeast portion of the city. The 17th Street Island is bounded by State Route 55 to the east, 17th Street to the south, and North Tustin Avenue to the west. The city also includes a portion of the Santa Ana River Drainage Channel within its sphere of influence (SOI). The city and its SOI are defined and referred to herein as the plan area.

Mitigation Monitoring and Reporting Program

1.4 MITIGATION MONITORING PROGRAM ORGANIZATION

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). The mitigation monitoring and reporting program is designed to ensure compliance with adopted mitigation measures during project implementation. For each mitigation measure recommended in the Draft PEIR, specifications are made herein that identify the action required and the monitoring and reporting that must occur. In addition, a responsible agency is identified for verifying compliance with individual conditions of approval contained in the MMRP. To effectively track and document the status of mitigation measures, a mitigation matrix has been prepared (see Table 1-3).

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
5.2 AIR QUALITY						
<p>AQ-1 Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:</p> <ul style="list-style-type: none"> • Require fugitive-dust control measures that exceed South Coast AQMD's Rule 403, such as: <ul style="list-style-type: none"> § Use of nontoxic soil stabilizers to reduce wind erosion. § Apply water every four hours to active soil-disturbing activities. § Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. • Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards. • Limit nonessential idling of construction equipment to no more than five consecutive minutes. 	Prior to discretionary approval	Project Applicant and Construction Contractor	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<ul style="list-style-type: none"> Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour. Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area. Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast AQMD's website. 						
<p>AQ-2 Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation phase-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions. Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use. 	Prior to the discretionary approval	Property Owner/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<ul style="list-style-type: none"> Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485). Provide changing/shower facilities as specified in Section A5.106.4.3 of the CALGreen Code (Nonresidential Voluntary Measures). Provide bicycle parking facilities per Section A4.106.9 (Residential Voluntary Measures) of the CALGreen Code and Sec. 41-1307.1 of the Santa Ana Municipal Code. Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CALGreen Code (Nonresidential Voluntary Measures). Provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CALGreen Code. Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star-certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star-certified or equivalent appliances shall be verified by Building & Safety during plan check. Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Santa Ana and Orange County Transit Authority to ensure that bus pad and shelter improvements are incorporated, as appropriate. 						

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
AQ-3 Prior to discretionary approval by the City of Santa Ana, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Santa Ana for review and approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the South Coast Air Quality Management District. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceed the respective thresholds, as established by the South Coast AQMD at the time a project is considered, the project applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs), including appropriate enforcement mechanisms, are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include, but are not limited to, restricting idling on-site, electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan..	Prior to future discretionary project approval	Property Owner/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		
AQ-4 Prior to discretionary approval by the City of Santa Ana, if it is determined that a development project has the potential to emit nuisance odors beyond the property line, an odor management plan shall be prepared by the project applicant and submitted to the City of Santa Ana for review and approval. Facilities that have the potential to generate nuisance odors include, but are not limited to: <ul style="list-style-type: none"> • Wastewater treatment plants • Composting, green waste, or recycling facilities • Fiberglass manufacturing facilities 	Prior to future discretionary project approval	Property Owner/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<ul style="list-style-type: none"> Painting/coating operations Large-capacity coffee roasters Food-processing facilities <p>The odor management plan shall demonstrate compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors. The Odor Management Plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document prepared for the development project and/or incorporated into the project's site plan.</p>						
5.3 BIOLOGICAL RESOURCES						
BIO-1	For development or redevelopment projects that would disturb vegetated land or major stream and are subject to CEQA, a qualified biologist shall conduct an initial screening to determine whether a site-specific biological resource report is warranted. If needed, a qualified biologist shall conduct a field survey for the site and prepare a biological resource assessment for the project, including an assessment of potential impacts to sensitive species, habitats, and jurisdictional waters. The report shall recommend mitigation measures, as appropriate, to avoid or limit potential biological resource impacts to less than significant.	Concurrent with submittal of site development plans and prior to the issuance of grading permits	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division	
5.4 CULTURAL RESOURCES						
CUL-1	Identification of Historical Resources and Potential Project Impacts. For structures 45 years or older, a Historical Resources Assessment (HRA) shall be prepared by an architectural historian or historian meeting the Secretary of the Interior's Professional Qualification Standards. The HRA shall include: definition of a study area or area of potential effect, which will encompass the affected property and may include surrounding properties or historic district(s);	Prior to issuance of grading permits	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division	

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
an intensive level survey of the study area to identify and evaluate under federal, State, and local criteria significance historical resources that might be directly or indirectly affected by the proposed project; and an assessment of project impacts. The HRA shall satisfy federal and State guidelines for the identification, evaluation, and recordation of historical resources. An HRA is not required if an existing historic resources survey and evaluation of the property is available; however, if the existing survey and evaluation is more than five years old, it shall be updated.						
CUL-2 Use of the Secretary of the Interior’s Standards. The Secretary of the Interior’s Standards for the Treatment of Historic Properties shall be used to the maximum extent practicable to ensure that projects involving the relocation, conversion, rehabilitation, or alteration of a historical resource and its setting or related new construction will not impair the significance of the historical resource. Use of the Standards shall be overseen by an architectural historian or historic architect meeting the Secretary of the Interior’s Professional Qualification Standards. Evidence of compliance with the Standards shall be provided to the City in the form of a report identifying and photographing character-defining features and spaces and specifying how the proposed treatment of character-defining features and spaces and related construction activities will conform to the Standards. The Qualified Professional shall monitor the construction and provide a report to the City at the conclusion of the project. Use of the Secretary’s Standards shall reduce the project impacts on historical resources to less than significant.	Prior to any disturbance of a historical resource, as determined by the intensive-level historical evaluation of a property	Property Owner or Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<p>CUL-3 Documentation, Education, and Memorialization. If the City determines that significant impacts to historical resources cannot be avoided, the City shall require, at a minimum, that the affected historical resources be thoroughly documented before issuance of any permits and may also require additional public education efforts and/or memorialization of the historical resource. Though demolition or alteration of a historical resource such that its significance is materially impaired cannot be mitigated to a less than significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian, historian, or historic architect meeting the Secretary of the Interior's Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; archival photographic documentation; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as the Santa Ana Library History Room, the South Central Coastal Information Center at California State University, Fullerton, and/or the HABS collection housed in the Library of Congress. Depending on the significance of the adversely affected historical resource, the City, at its discretion, may also require public education about the historical resource in the form of an exhibit, web page, brochure, or other format and/or memorialization of the historical resource on or near the proposed project site. If memorialized, such memorialization shall be a permanent installation, such as a mural, display, or other vehicle that recalls the location, appearance, and historical significance of the affected historical resource, and shall be designed in conjunction with a qualified architectural historian, historian, or historic architect.</p>	<p>Prior to the issuance of grading permits, and for any subsequent permit involving excavation to increased depth</p>	<p>Project Applicant/ Developer</p>	<p>City of Santa Ana Building Safety Division</p>	<p>City of Santa Ana Building Safety Division</p>		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<p>CUL-4 For projects with ground disturbance—e.g., grading, excavation, trenching, boring, or demolition that extend below the current grade—prior to issuance of any permits required to conduct ground-disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior’s Professionally Qualified Standards in either prehistoric or historic archaeology. Assessments shall include a California Historical Resources Information System records search at the South Central Coastal Information Center and of the Sacred Land Files maintained by the Native American Heritage Commission. The records searches will determine if the proposed project area has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within the past 10 years, a Phase I pedestrian survey shall be undertaken in proposed project areas to locate any surface cultural materials that may be present.</p>	Prior to the issuance of grading permits	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		
<p>CUL-5 If potentially significant archaeological resources are identified, and impacts cannot be avoided, a Phase II Testing and Evaluation investigation shall be performed by an archaeologist who meets the Secretary of the Interior’s Standards to determine significance prior to any ground-disturbing activities. If resources are determined significant or unique through Phase II testing, and site avoidance is not possible, appropriate site-specific mitigation measures shall be undertaken. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the Office of Historical Preservation’s “Archaeological Resource Management Reports (ARMR): Recommended Contents and Format” (OHP 1990) and “Guidelines for Archaeological Research Designs” (OHP 1991).</p>	Prior to any ground disturbing activities	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<p>CUL-6 If the archaeological assessment did not identify archaeological resources but found the area to be highly sensitive for archaeological resources, a qualified archaeologist and a Native American monitor approved by a California Native American Tribe identified by the Native American Heritage Commission as culturally affiliated with the project area shall monitor all ground-disturbing construction and pre-construction activities in areas with previously undisturbed soil of high sensitivity. The archaeologist shall inform all construction personnel prior to construction activities of the proper procedures in the event of an archaeological discovery. The training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. The Native American monitor shall be invited to participate in this training. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance by an archaeologist who meets the Secretary's Standards. and This will include tribal consultation and coordination with the Native American monitor shall be conducted in the case of a prehistoric archaeological resource or tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinterment in an area designated by the tribe.</p>	Prior to construction activities	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
CUL-7 If an Archaeological Resources Assessment does not identify potentially significant archaeological resources but the site has moderate sensitivity for archaeological resources (Mitigation Measure CUL-4), an archaeologist who meets the Secretary's Standards shall be retained on call. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The pre-construction training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the on-call archaeologist is contacted. The resource shall be evaluated for significance and tribal consultation shall be conducted, in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant.	Prior to construction activities	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		
5.6 GEOLOGY AND SOILS						
GEO-1 High Sensitivity. Projects involving ground disturbances in previously undisturbed areas mapped as having "high" paleontological sensitivity shall be monitored by a qualified paleontological monitor on a full-time basis. Monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, if the fossils are determined to be significant, professionally and efficiently recover the fossil specimens and collect associated data. The paleontological monitor shall use field data forms to record pertinent location and geologic data, measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities..	During ground disturbing activities	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
GEO-2 Low-to-High Sensitivity. Prior to issuance of a grading permit for projects involving ground disturbance in previously undisturbed areas mapped with "low-to-high" paleontological sensitivity (see Figure 5.6-3), the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have high sensitivity, construction activity shall be monitored by a qualified paleontologist. The paleontologist shall have the authority to halt construction during construction activity as outlined in Mitigation Measure GEO-3.	Prior to the issuance of grading permits	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		
GEO-3 All Projects. In the event of any fossil discovery, regardless of depth or geologic formation, construction work shall halt within a 50-foot radius of the find until its significance can be determined by a qualified paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology (2010). The most likely repository is the Natural History Museum of Los Angeles County. The repository shall be identified and a curatorial arrangement shall be signed prior to collection of the fossils.	During ground disturbing activities	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		
5.7 GREENHOUSE GAS EMISSIONS						
GHG-1 The City of Santa Ana shall update the Climate Action Plan (CAP) every five years to ensure the City is monitoring the plan's progress toward achieving the City's greenhouse gas (GHG) reduction target and to require amendment if the plan is not achieving the specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under Executive Order S-03-05 for year 2050 and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP update (e.g., Senate Bill 32 for year 2030). The CAP update shall include the following:	Every five years	City of Santa Ana Building Safety Division in coordination with Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<ul style="list-style-type: none"> • GHG inventories of existing and forecast year GHG levels. • Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal of Executive Order S-03-05. • Plan implementation guidance that includes, at minimum, the following components consistent with the proposed CAP: <ul style="list-style-type: none"> § Administration and Staffing § Finance and Budgeting § Timelines for Measure Implementation § Community Outreach and Education § Monitoring, Reporting, and Adaptive Management § Tracking Tools <p>Furthermore, the following measures will be considered when the City updates the Climate Action Plan:</p> <ul style="list-style-type: none"> • Measures to protect the most vulnerable populations • Measure to increase carbon sinks • Standards for electric vehicle parking • Standards for construction projects 						
5.12 NOISE						
<p>N-1 Construction contractors shall implement the following measures for construction activities conducted in the City of Santa Ana. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans submitted to the City: The City of Santa Ana Planning and Building Agency shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading, and/or building permits.</p> <ul style="list-style-type: none"> • Construction activity is limited to the hours: Between 7 AM to 8 PM Monday through Saturday, as prescribed in Municipal Code Section 18-314(e). Construction is prohibited on Sundays. • During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment re-design, 	Prior to issuance of demolition, grading, and/or building permits	Project Applicant/ Developer and Architect	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

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Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<p>use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.</p> <ul style="list-style-type: none"> Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. Stationary equipment, such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses. Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors. Construction traffic shall be limited, to the extent feasible, to approved haul routes established by the City Planning and Building Agency. At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City. Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes. During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the 						

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
<p>background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.</p> <ul style="list-style-type: none"> Erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier. 						
<p>N-2 Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.</p>	<p>Prior to the issuance of building permits</p>	<p>Project Applicant/ Developer</p>	<p>City of Santa Ana Building Safety Division</p>	<p>City of Santa Ana Building Safety Division</p>		
<p>N-3 New residential projects (or other noise-sensitive uses) located within 200 feet of existing railroad lines shall be required to conduct a groundborne vibration and noise evaluation consistent with Federal Transit Administration (FTA)-approved methodologies.</p>	<p>Prior to the issuance of building permits</p>	<p>Project Applicant/ Developer</p>	<p>City of Santa Ana Building Safety Division</p>	<p>City of Santa Ana Building Safety Division</p>		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
N-4 During the project-level California Environmental Quality Act (CEQA) process for industrial developments under the General Plan Update or other projects that could generate substantial vibration levels near sensitive uses, a noise and vibration analysis shall be conducted to assess and mitigate potential noise and vibration impacts related to the operations of that individual development. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents.	Prior to the issuance of building permits	Project Applicant/ Developer and Acoustical Engineer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		
5.16 TRIBAL CULTURAL RESOURCES						
CUL-4 For projects with ground disturbance—e.g., grading, excavation, trenching, boring, or demolition that extend below the current grade—prior to issuance of any permits required to conduct ground-disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior’s Professionally Qualified Standards in either prehistoric or historic archaeology. Assessments shall include a California Historical Resources Information System records search at the South Central Coastal Information Center and of the Sacred Land Files maintained by the Native American Heritage Commission. The records searches will determine if the proposed project area has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within the past 10 years, a Phase I pedestrian survey shall be undertaken in proposed project areas to locate any surface cultural materials that may be present.	Prior to the issuance of grading permits	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
CUL-5 If potentially significant archaeological resources are identified, and impacts cannot be avoided, a Phase II Testing and Evaluation investigation shall be performed by an archaeologist who meets the Secretary of the Interior's Standards to determine significance prior to any ground-disturbing activities. If resources are determined significant or unique through Phase II testing, and site avoidance is not possible, appropriate site-specific mitigation measures shall be undertaken. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the Office of Historical Preservation's "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (OHP 1990) and "Guidelines for Archaeological Research Designs" (OHP 1991).	Prior to any ground disturbing activities	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		
CUL-6 If the archaeological assessment did not identify archaeological resources but found the area to be highly sensitive for archaeological resources, a qualified archaeologist shall monitor all ground-disturbing construction and pre-construction activities in areas with previously undisturbed soil. The archaeologist shall inform all construction personnel prior to construction activities of the proper procedures in the event of an archaeological discovery. The training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance by an archaeologist who meets the Secretary's Standards, and tribal consultation shall be conducted in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinterment in an area designated by the tribe.	Prior to construction activities	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

Table 1-3 Mitigation Monitoring and Reporting Requirements

Mitigation Measure	Timing	Responsible Implementing Party	Responsible Monitoring Party	Document Location (Monitoring Record)	Completion Date	
					Responsible Monitoring Party	Project Mitigation Monitor
CUL-7 If an Archaeological Resources Assessment does not identify potentially significant archaeological resources but the site has moderate sensitivity for archaeological resources (Mitigation Measure CUL-4), an archaeologist who meets the Secretary's Standards shall be retained on call. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The pre-construction training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the on-call archaeologist is contacted. The resource shall be evaluated for significance and tribal consultation shall be conducted, in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant.	Prior to construction activities	Project Applicant/ Developer	City of Santa Ana Building Safety Division	City of Santa Ana Building Safety Division		

Mitigation Monitoring and Reporting Program

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EXHIBIT 2

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RESOLUTION NO. 2020-xx

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA ANA APPROVING GENERAL PLAN AMENDMENT NO. 2020-06 FOR THE COMPREHENSIVE UPDATE TO THE SANTA ANA GENERAL PLAN

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SANTA ANA AS FOLLOWS:

Section 1. The City Council of the City of Santa Ana hereby finds, determines and declares as follows:

WHEREAS, Article 5 of Chapter 3 of Division 1 of Title 7 (commencing with Section 65300) of the Government Code requires the City to prepare and adopt a comprehensive, long-term general plan for the physical development of the City; and

WHEREAS, in 1982, the City of Santa Ana last completed a comprehensive update to the General Plan; and

WHEREAS, various elements of the General Plan have been amended and adopted from time to time; and

WHEREAS, the City of Santa Ana seeks to adopt a comprehensive update to the Santa Ana General Plan; and

WHEREAS, the City created a General Plan Advisory Group (GPAG) to formulate the five Core Values of Culture, Sustainability, Health, Education and Equity that were developed to be interwoven throughout the document; and,

WHEREAS, per SB 1000, the City is required to address Environmental Justice in the General Plan update due to a number of disadvantaged communities located within the City; and,

WHEREAS, the goals, policies, and implementation items associated with environmental justice have been selectively placed within the majority of the updated Elements due to their importance; and,

WHEREAS, the Project as currently proposed entails, among other things, (1) the revision to the State mandated Elements of the General Plan; (2) the inclusion of optional Elements to the General Plan; (3) approval of General Plan Amendment (GPA) No. 2020-06, which would result in a comprehensive update to the existing General Plan; and

WHEREAS, the General Plan is a community-wide vision document that is intended to address and respond to community needs, with staff conducting outreach with community members about the process to as wide an audience as possible; and,

WHEREAS, over the past five years, an extensive public outreach campaign to engage the public was conducted to supplement the feedback, input and direction for the comprehensive update to the General Plan. Public outreach efforts included hosting over 60 community meetings and workshops; hosting individual community workshops within each of the five Focus Areas with over 300 residents, business leaders, and community stakeholders participating in the workshops; distributing an online community survey with over 650 respondents to collect input on the content of the General Plan; the mailing of approximately 44,000 informational flyers to property owners and tenants; presentations at neighborhood Communication Linkages (CommLink) meetings; outreach meetings with Environmental Justice groups (Madison Park Neighborhood Association, Logan Neighborhood Association, Artesia-Pilar Neighborhood Association); and, attendance at approximately 100 Cares events (daily neighborhood functions and evening City Park events) from late-August through the end of October within Environmental Justice communities to discuss the General plan update with residents; and,

WHEREAS, Environmental Impact Report No. 2020-03 (State Clearinghouse/SCH No. 2020029087) (“EIR”) for the proposed General Plan update was circulated between August 3, 2020 and September 16, 2020; and

WHEREAS, due to feedback from the community, the comment period was extended another 20-days and closed on October 6, 2020; and

WHEREAS, on August 3, 2020, the City invited recognized Native American tribes to engage in consultation regarding the proposed General Plan Amendment pursuant to Government Code Section 65352.3; and

WHEREAS, on August 4, 2020, the City received a comment letter from the Juanero Band of Mission Indians, with the group providing comments but not requesting to consult with the City, with comments responded to in the Final EIR; and

WHEREAS, during the public comment period, Planning Commission work-study sessions were held on August 24, 2020 and September 14, 2020 where staff presented the proposed General Plan update and the Draft EIR for review and comment; and

WHEREAS, on November 9, 2020, the Planning Commission conducted a duly noticed public hearing to consider the EIR and General Plan Amendment No. 2020-06. After hearing all relevant testimony from staff, the public and the City’s consultant team, the Planning Commission voted to recommend that the City Council certify the EIR and adopt the findings of fact, the statement of overriding considerations and the mitigation monitoring and reporting program and approve the Project; and

WHEREAS, the “EIR” consists of the Final EIR and its attachments and appendices, as well as the Draft EIR and its attachments and appendices (as modified by the Final EIR); and

WHEREAS, on November 20, 2020, the City gave public notice of a City Council public hearing for consideration of Environmental Impact Report No. 2020-03 (State Clearinghouse No. 2020029087) by noticing in the Orange County Register, a newspaper of general circulation within the City of Santa Ana, and by mailing to owners of property and residents within 500 feet of the five Focus Areas, those listed in the Permanent Notification Binder, those listed on the Notice of Availability distribution list, and those listed on the General Plan interest list; and

WHEREAS, on December 1, 2020, the City Council conducted a duly noticed public hearing to consider the EIR and General Plan Amendment No. 2020-06, at which hearing members of the public were afforded an opportunity to comment upon Environmental Impact Report No. 2020-03. After hearing all relevant testimony from staff, the public and the City’s consultant team, the City Council voted to certify the EIR, adopt the findings of fact, the statement of overriding considerations and the mitigation monitoring and reporting program and approve the Project.

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF SANTA ANA DOES RESOLVE, DETERMINE, FIND, AND ORDER AS FOLLOWS:

Section 2. CALIFORNIA ENVIRONMENTAL QUALITY ACT: The City Council has reviewed, certified and adopted Environmental Impact Report No. 2020-03, adopted the Findings of Fact, the Mitigation Monitoring and Reporting Program (MMRP), and Statement of Overriding Consideration for the proposed Project, including General Plan Amendment No. 2020-06.

Section 3. GENERAL PLAN AMENDMENT: The General Plan Amendment consists of amendments to 11 Elements of the General Plan and text updates, as shown in Exhibit A, attached hereto and incorporated herein by reference.

Section 4. LOCATION OF DOCUMENTS: The General Plan Amendment, Environmental Impact Report and all supporting documents are online, and on file and available for public review at Santa Ana City Hall, 20 Civic Center Plaza, Santa Ana, California 92702.

Section 5. GENERAL PLAN CONSISTENCY: The City Council hereby finds that the proposed General Plan Amendment is compatible with the objectives, policies, and general plan land use programs specified in the General Plan for the City of Santa Ana in that:

- A. The City of Santa Ana has officially adopted a General Plan.

- B. The proposed Project is a comprehensive update to the current General Plan. The current General Plan will be consolidated into 12 elements, with 11 Elements being comprehensively updated including the Community Element, the Mobility Element, the Economic Prosperity Element, the Public Services Element, the Conservation Element, the Open Space Element, the Noise Element, the Safety Element, the Land Use Element, the Historic Preservation Element, and the Urban Design Element.
- C. The Housing Element is on a separate update schedule and will be updated in 2021 in compliance with State law.
- D. The new and updated goals/objectives and policies of the General Plan will be coordinated and consistent throughout the General Plan document.
- E. The proposed General Plan Amendment will not adversely affect the public health, safety, and welfare in that the General Plan Amendment is a comprehensive update to the existing General Plan that is intended to address issues such as incompatible land uses on adjacent properties, inconsistencies between General Plan goals or policies, and will mitigate adverse impacts to the environment.

Section 6. CITY COUNCIL ACTION: The City Council hereby takes the following action:

- 1. The City Council approves General Plan Amendment No. 2020-06 as set forth in Exhibit A, attached hereto and incorporated herein by reference, subject to compliance with the Mitigation Monitoring and Reporting Program, and upon satisfaction of the conditions set forth below:
 - A. The General Plan Amendment shall not take effect unless and until Environmental Impact Report No. 2020-03 is certified by the City Council.
 - B. General Plan Amendment No. 2020-06 shall not take effect unless and until the City Council overrules the Determination of Inconsistency by the Airport Land Use Commission.

Section 7. EXECUTION OF RESOLUTION. The Mayor shall sign this Resolution and the Clerk of the Council shall attest and certify to the adoption thereof.

ADOPTED this ____ day of _____, 2020.

Miguel A. Pulido
Mayor

APPROVED AS TO FORM:
Sonia R. Carvalho
City Attorney

By: _____
Lisa Storck
Assistant City Attorney

AYES: Councilmembers _____

NOES: Councilmembers _____

ABSTAIN: Councilmembers _____

NOT PRESENT: Councilmembers _____

CERTIFICATE OF ATTESTATION AND ORIGINALITY

I, DAISY GOMEZ, Clerk of the Council, do hereby attest to and certify the attached Resolution No. 2020-xx to be the original resolution adopted by the City Council of the City of Santa Ana on _____, 2020.

Date: _____

Daisy Gomez, Clerk of the Council
City of Santa Ana

EXHIBIT 3

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EIR No. 2020-03 and GPA No. 2020-06

Comprehensive Update to the General Plan

The Final EIR and Technical Appendices are available online at:

<https://www.santa-ana.org/general-plan/general-plan-environmental-documents>

Physical copies are also available for viewing by appointment only. Please contact PlanningDepartment@santa-ana.org before visiting the Planning Division public counter located at:

20 Civic Center Plaza, Santa Ana, CA 92701

EXHIBIT 3 – Link to EIR

EXHIBIT 4

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EIR No. 2020-03 and GPA No. 2020-06

Comprehensive Update to the General Plan

The Updated General Plan Elements are available online at:

<https://www.santa-ana.org/general-plan/draft-documents>

Physical copies are also available for viewing by appointment only. Please contact PlanningDepartment@santa-ana.org before visiting the Planning Division public counter located at:

20 Civic Center Plaza, Santa Ana, CA 92701

EXHIBIT 4 – Link to General Plan Elements