October 2015

SANTA ANA CLIMATE ACTION PLAN INITIAL STUDY/NEGATIVE DECLARATION

for the City of Santa Ana

Prepared for: City of Santa Ana Planning Division, M-20 20 Civic Center Plaza Santa Ana, CA 92701

Prepared by: AECOM 401 West A Street #1200 San Diego, CA 92101

Table of Contents

Sec	tion		Page
1.	PRO	JECT DESCRIPTION	1
	1.1	Introduction	
	1.2	Regional Setting	
	1.3	City Characteristics	
	1.4	Project Background	
	1.5	Project Objectives	5
	1.6	Project Description	
		1.6.1 Emissions Inventory, Baseline and Projections	
		1.6.2 GHG Emission Reduction Measures	
		1.6.5 Potential Environmental Impacts	
2.	ENVI	RONMENTAL CHECKLIST	11
	2.1	Background	
	2.2	Environmental Factors Potentially Affected	
	2.3	Determination	
	2.4	Summary of Environmental Impact Analysis	
3.	ENVI	RONMENTAL ANALYSIS	21
	3.1	Aesthetics	
	3.2	Agriculture and Forestry Resources	
	3.3	Air Quality	
	3.4	Biological Resources	
	3.5	Cultural Resources	
	3.6	Geology and Soils	
	3.7	Greenhouse Gas Emissions	
	3.8	Hazards and Hazardous Materials	
	3.9	Hydrology and Water Quality	
	3.10 2.11	Land Use and Planning	
	3.11	Noise	
	3.12	Population and Housing	
	3.14	Public Services	
	3.15	Recreation	
	3.16	Transportation/Traffic	
	3.17	Utilities and Service Systems	
	3.18	Mandatory Findings of Significance	
4.	REFE	ERENCES	51
5.	LIST	OF PREPARERS	54

Table of Contents

Figure	Page

Figure 1	Regional Location Map	2
Figure 2	Project Location Map	3
Figure 3	Community-wide 2008 Baseline GHG Emissions	7

Table	Page

Table 1	GHG Emissions Reduction of Existing Measures	. 8
Table 2	GHG Emissions Reduction of CAP Measures	9
Table 3	GHG Emissions Reduction Totals	10

1. Project Description

1.1 INTRODUCTION

California has adopted a wide variety of regulations aimed at reducing the State's greenhouse gas (GHG) emissions. In addition to the efforts at the State level, local governments have broad influence and, in some cases, exclusive jurisdiction over activities that contribute to significant GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations. As a result, many communities throughout the state are taking responsibility for planning to reduce energy use and emissions. Through proactive measures in land use, transportation, energy efficiency, green building, waste diversion, water conservation and more, local governments help residents and businesses save money while improving quality of life and reducing emissions in their communities.

Over the past three years, the City of Santa Ana (City) has gathered input from residents and businesses and has prepared a Climate Action Plan (CAP) for public review and comment. The CAP represents the City's commitment to improving quality of life by reducing carbon pollution, both from its own operations and from the community as a whole.

1.2 REGIONAL SETTING

The City of Santa Ana covers 27.3 square miles in Orange County between the metropolitan areas of Los Angeles and San Diego, and is approximately 10 miles east of the Pacific Ocean and 7 miles west of the Santa Ana Mountains. Interstate 5 (I-5) intersects the northeast section of the City, connecting Santa Ana to the greater Los Angeles region and southern Orange County. State Route 55 (SR-55) also serves the City along the south and east side and connects to SR-22, which serves the northern portion of Santa Ana. Interstate 405 (I-405) runs north and south and is located just south of the City boundary. The Santa Ana River is a channelized river that collects runoff from Riverside and Orange counties and runs through Santa Ana before continuing on between the cities of Huntington Beach and Costa Mesa and entering the Pacific Ocean. Figures 1 and 2 show the regional location and local project area, respectively.

1.3 CITY CHARACTERISTICS

The project area consists of all land located within the incorporated limits of the City of Santa Ana. Of the total 27.3 square miles identified in the Land Use Element of the City's General Plan, approximately 58% is devoted to residential development, 15% to commercial uses, 14% to industrial uses, 11% to public and





institutional uses, and 2% to public parkland and open space.¹ The City is almost entirely built out, and new development would consist mostly of infill and redevelopment projects.

1.4 PROJECT BACKGROUND

California has adopted a wide variety of regulations aimed at reducing the State's GHG emissions. The Governor is authorized to issue executive orders, or formal written directives, that typically only affect state agencies, departments, boards, and commissions. The executive orders can be used to enforce public policy embodied in the laws and Constitution. However, the Governor is limited in the use of executive orders, as they may not interfere or conflict with existing legislation. Executive Order S-3-05, signed in June 2005, proclaimed that California is vulnerable to the impacts of climate change. To combat those concerns, the Executive Order established total GHG emissions targets. Specifically, emissions are to be reduced to year 2000 level by 2010, the 1990 level by 2020, and to 80% below the 1990 level by 2050.

In 2006, this goal was reinforced with the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act. AB 32 requires California to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 directs the California Air Resources Board (ARB) to develop and implement regulations that reduce statewide GHG emissions.

AB 32 further requires that the California Air Resources Board (ARB) create a plan that includes market mechanisms, and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases." The Climate Change Scoping Plan (Scoping Plan) was approved by ARB in December 2008 and outlines the State's plan to achieve the GHG reductions required in AB 32. In the Scoping Plan, ARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State commitment to reduce GHGs.

ARB is required to update the Scoping Plan at least once every 5 years to evaluate progress and develop future inventories that may guide this process. ARB approved the First Update to the Climate Change Scoping Plan: Building on the Framework in June 2014.² The Scoping Plan update includes a status of the 2008 Scoping Plan measures and other state, federal, and local efforts to reduce GHG emissions in California and potential actions to further reduce GHG emissions by 2020. The Scoping Plan Update confirms that the state is on track to meet the 2020 emissions reduction target.

In April 2015, Governor Edmund Brown issued Executive Order B-30-15 establishing a statewide GHG reduction goal of 40 percent below 1990 levels by 2030. The emission reduction target acts as an interim goal between the AB 32 goal (i.e., achieve 1990 emission levels by 2020) and Governor Brown's Executive Order S-03-05 goal of reducing statewide emissions 80 percent below 1990 levels by 2050.

¹ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. 6. Available online at: <u>http://www.ci.santa-ana.ca.us/generalplan/documents/LandUse.pdf</u>, accessed September 2, 2015.

² California Air Resources Board. First Update to the Climate Change Scoping Plan: Building on the Framework. Adopted May 2014. Available online at: http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf, accessed September 1, 2015.

Senate Bill 375 (SB 375), signed in September 2008, enhances California's ability to reach its AB 32 targets and aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or an Alternative Planning Strategy (APS), which will prescribe land use allocation in that MPO's Regional Transportation Plan (RTP). ARB has established regional targets for 2020 and 2035 for each region covered by one of the state's 18 metropolitan planning organizations.

The targets for the Southern California Association of Governments (SCAG), where Santa Ana is located, are per capita CO_2 emission reductions from passenger vehicles of 8% below 2005 levels by 2020, and 13% below 2005 levels by 2035. Many of the measures in this CAP help to implement strategies from the SCS in the City of Santa Ana.

AB 32 and SB 375 do not place any requirements on local governments and also do not require that individual local governments reduce their community emissions to these levels. However, the AB 32 Scoping Plan prepared by ARB, maps out strategies for reaching the AB 32 targets and identifies an important role for local governments in implementing many of the strategies. Local governments are not currently required to adopt climate action plans, and these plans are just one of several approaches that agencies can use to address GHG emissions.

1.5 PROJECT OBJECTIVES

In 2007, the City of Santa Ana signed the U.S. Mayors' Climate Protection Agreement, committing to reduce GHG emissions. Santa Ana, in addition to more than 1,000 local governments worldwide, joined ICLEI – Local Governments for Sustainability, an association for local governments to share knowledge and successful strategies toward increasing local sustainability. ICLEI provides a CAP framework and methodology for local governments to identify and reduce GHG emissions:

- 1. Conduct an inventory and forecast of local GHG emissions;
- 2. Establish GHG emissions reduction targets;
- 3. Develop a CAP for achieving the emissions reduction targets;
- 4. Implement the CAP; and
- 5. Monitor and report on progress.

As mentioned above, one of the steps in the framework is to develop a CAP to achieve reduction targets. The project objectives, derived from the framework and from the Scoping Plan, are expressed below.

- Adopt a Climate Action Plan that will comply with and implement State law, citywide sustainability, and reflect community values.
- Place the City on a path to reduce annual community-wide GHG emissions by 15% below 2008 baseline emission levels by 2020 and 30% by 2035.
- Provide clear guidance to City staff and decision-makers regarding when and how to implement key actions to reduce GHG emissions.
- Inspire residents and businesses to participate in community efforts to reduce GHG emissions.

1.6 PROJECT DESCRIPTION

The proposed project is adoption of the CAP, a document that provides measures intended to reduce GHG emissions within the City. The CAP describes the 2008 baseline GHG emissions produced in Santa Ana and estimates business-as-usual emissions that could be expected in 2020 and 2035. GHG emissions were estimated for 2008, 2020, and 2035 for both community-wide and municipal operations. The City has indirect ability to influence many sources and activities producing community-wide emissions, while it has more direct control over municipal operations emissions. Municipal operations emissions are a subset of community-wide emissions. Overall, the goal of the CAP is to reduce Santa Ana's community-wide GHG emissions by 15% below 2008 emission levels by the year 2020. In addition, Santa Ana has established a goal to place the City on a path to reduce community-wide emissions by 30% below 2008 emission levels by the year 2035. For municipal operations emissions, the City has established goals of 30% below 2008 emission levels by 2020 and 40% below 2008 emission levels by 2035.

The Draft CAP identifies measures that have a quantifiable emissions reduction and also includes recommended action steps, co-benefits, cost, and funding sources. The Draft CAP is the result of extensive community outreach and public participation. An initial public engagement session was held in March 2012, where participants suggested potential emissions reduction measures to be included in the CAP. The measures gathered were then analyzed for feasibility and assessed by City staff. The working list of measures was presented to key stakeholders and to the public in additional workshops in July 2014. Feedback from these sessions was incorporated, resulting in the measures included in the CAP.

1.6.1 EMISSIONS INVENTORY, BASELINE AND PROJECTIONS

To establish an effective baseline for the CAP, the City used the "Local Government Significant Influence" frame, which includes those emissions sources and activities that the City government has significant ability to influence through regulation, incentives, or other measures. GHG emissions were calculated for both community-wide and municipal operations sources for 2008 based on activity data (i.e., energy consumption, vehicle miles traveled) for each emission sector.

In 2008, emissions from community-wide sources and activities in Santa Ana were approximately 1.96 million metric tons of carbon dioxide equivalents (MMTCO₂e). As shown in Figure 3, transportation and land use activities were the largest emissions sources and contributed approximately 48% of Santa Ana's annual GHG emissions. Energy use within buildings contributed approximately 42% of Santa Ana's community-wide GHG emissions. Solid waste generation contributed approximately 3%, water and wastewater contributed approximately 3%, and the remaining 4% was classified as other.



Figure 3: Community-wide 2008 Baseline GHG Emissions

Santa Ana's GHG emissions levels were also projected for the years 2020 and 2035 to determine the emission reductions needed to achieve the City's goal. Projections were calculated for a trend scenario, also known as a business-as-usual scenario, which assumes that historical emission trends would continue. Under this scenario, Santa Ana's community-wide GHG emissions are expected to increase by 5% to approximately 2.06 MMTCO₂e in 2020 and by 11% to 2.17 MMTCO₂e in 2035. To meet the City's 2020 goal of 15% below 2008 baseline emissions, Santa Ana will need to reduce its GHG emissions from 2.06 to 1.66 MMTCO₂e by 2020. This goal would require a reduction of 400,000 MTCO₂e. To meet the City's 2035 goal of 30% below 2008 baseline emissions, Santa Ana will need to reduce its GHG emissions from 2.17 to 1.37 MMTCO₂e by 2035. This is a reduction of 800,000 MTCO₂e.

Municipal operations emissions were estimated to be 31,413 MTCO₂e, or about 1.6% of the City's total community-wide emissions. The largest source of municipal emissions was energy consumption within the buildings and facilities sector, which accounted for 31% of all municipal emissions. The City municipal staff has decreased significantly in recent years, and may decrease further in coming years. Because of this trend it was assumed that no growth would occur in municipal operations; therefore, business -as-usual municipal operations emissions in 2020 and 2035 are expected to be the same as in 2008.

1.6.2 GHG EMISSION REDUCTION MEASURES

Several initiatives are underway that improve quality of life in Santa Ana while reducing carbon pollution. These existing climate action measures were implemented or planned for prior to the development of the Draft CAP. The existing measures include emissions reductions that were achieved between 2008 and 2012, and emissions reductions that are planned for but not yet implemented, such as long range transportation plans. The emissions reductions associated with the existing measures were estimated and subtracted from

the City's business-as-usual scenario to assess the level of reductions achieved without implementation of the Draft CAP. Table 1 shows the existing measures and the emissions reduction quantified for each measure.

Measure	Emission Reduction (MTCO ₂ e/Year)			
	2020	2035		
Southern California Edison (SCE) Programs	7,517	7,517		
Southern California Gas Company (SCG) Programs	8,362	8,362		
Weatherization	1,533	1,533		
Solar	5,751	5,751		
Water conservation	1,853	1,853		
Reclaimed water	142	142		
Increased recycling rate	2,060	2,060		
LED street lighting	365	365		
City facilities ARRA funded efficiency	362	362		
City water wells efficient motors	461	461		
Transportation initiatives ¹	23,492	48,390		
Total	51,898	76,796		

 Table 1. GHG Emissions Reduction of Existing Measures

¹ The emission reductions for transportation initiatives that are planned, but not implemented, were estimated at 23,492 MTCO2e per year in 2020. The estimated benefit of these initiatives would be 48,390 MTCO₂e per year in 2035. Source: ICLEI-USA 2015

The Draft CAP includes measures related to reducing future emissions from transportation and land use, energy, solid waste, water and wastewater. Table 2 identifies the MTCO₂e reductions that would be expected from implementation of each proposed measure. Measures in green are measures that are state mandates or utility programs and measures in yellow are measures that were developed through the CAP process.

Implementation of the Draft CAP and emissions reductions from existing measures would result in annual community-wide GHG emissions reductions of 418,896 MTCO₂e by 2020 and 731,090 MTCO₂e by 2035. Therefore, the City would meet its goal for 2020 by reducing emissions by 16% below 2008 emissions. In 2035, the Draft CAP would result in a reduction of 25% below the 2008 baseline emission levels. Table 3 shows the total emissions reductions of the existing measures and the CAP measures combined in relation to the City's goal.

The City will continue to evaluate and monitor the Draft CAP by (1) tracking the implementation status of individual measures, (2) estimating emissions reductions associated with individual measures, and (3) conducting a periodic re-inventory of community-wide emissions. The City will publish an annual progress report that details the status of each measure in the Draft CAP. Conducting a periodic re-inventory and comparing the results with past inventories will show how Santa Ana community emissions are changing overall, and whether they are on track to meet the adopted goals. A re-inventory will be completed in 2018 and every three to five years after that time.

Measures	Reduction in 2020 (MT CO2e/	Reduction in 2035 (MT CO2e/	
	Year)	Year)	
Transportation and Lan	d Use		
Pavley II	130,308	335,939	
Development of Local Retail Service Nodes	916	14,660	
Local Residential Nodes near Retail and Employment	916	14,660	
Traffic Signal Synchronization Program	2,504	5,864	
Local Employment Nodes near Residential and Retail Areas	366	5,864	
End of Trip Facilities in New Projects	366	5,864	
Safe Routes to School	2,129	4,984	
Design Guidelines for External Bike/Pedestrian/Transit Connectivity	311	4,984	
Design Guidelines for Internal Bike/Pedestrian/Transit Connectivity	311	4,984	
Adjust Parking Ratios	311	4,984	
Community-wide Bike Sharing Stations	311	4,984	
Municipal Operations Measures	709	2,041	
Energy			
CA Renewable Portfolio Standard	182,020	182,762	
Property Assessed Clean Energy (PACE) Financing – Commercial	3,791	8,458	
SCE Small and Medium Business Direct Install	7,793	7,793	
PACE Financing – Residential	1,633	5,833	
Solar Photovoltaic Systems – New Private Install	4,881	4,881	
SCE and SCG Residential Programs	3,965	3,965	
Weatherization	3,720	3,720	
SCG Commercial Programs	3,280	3,280	
Streetlight Purchase and Retrofit	160	2,556	
Benchmarking and Retrocommissioning	1,533	2,147	
Title 24 Energy Efficiency Standards – Commercial	490	1,050	
Title 24 Energy Efficiency Standards – Residential	329	705	
Solar Hot Water Heating Systems for Laundromats	267	267	
Green Business Challenge Program	78	78	
Municipal Operations Measures	4,503	3,176	
Solid Waste, Water, and Wa	astewater		
AB 341 Commercial and Multifamily Recycling	8,460	12,663	
Food Waste Digestion	605	1,109	
Rainwater Harvesting	29	29	
Turf Removal	2.5	10	
Total	366,998	654,294	

Table 2. GHG Emissions Reduction of CAP Measures

Source: ICLEI-USA 2015

Measures	Emission Reduction (MTCO ₂ e/Year)			
	2020	2035		
Existing Measures	51,898	76,796		
CAP Measures	366,998	654,294		
Total of Existing Measures and CAP Measures Combined	418,896	731,090		
Goal	400,000	800,000		

Table 3. GHG Emissions Reduction Totals

1.6.3 POTENTIAL ENVIRONMENTAL IMPACTS

Although the overall purpose of the CAP is to reduce the impact that the community will have on global climate change and GHG emissions, implementation of measures within the CAP could potentially result in adverse impacts on the physical environmental as a result of construction and operational activities.

Construction of solar photovoltaic systems or other energy infrastructure, pedestrian and bicycle paths, and building retrofits could result in increased criteria pollutant and GHG emissions and noise impacts from construction activities. Completing energy efficient retrofits to existing residential, commercial, and municipal buildings could potentially affect culturally-significant historical buildings. Some land use development projects could also result in higher urban runoff and ambient noise levels, increases in population and resulting needs for services, utilities, and infrastructure.

In addition to these potential impacts on the physical environment, implementation of the CAP could also result in the need to amend some City planning documents and regulations, such as the General Plan, the Zoning Ordinance, and Specific Plans.

2. Environmental Checklist

2.1 BACKGROUND

1. Project Title: Santa Ana Climate Action Plan

2. Lead Agency Name and Address:

City of Santa Ana Planning Division, M-20 20 Civic Center Plaza Santa Ana, CA 92701

3. Contact Person and Phone Number:

Melanie McCann, Associate Planner (714) 667-2746

4. **Project Location:** The proposed project consists of all land area located within the incorporated limits of the City of Santa Ana. Santa Ana covers 27.3 square miles in Orange County between the metropolitan areas of Los Angeles and San Diego and is approximately 10 miles east of the Pacific Ocean and 7 miles west of the Santa Ana Mountains.

5. Project Sponsor's Name and Address:

City of Santa Ana Planning Division, M-20 20 Civic Center Plaza Santa Ana, CA 92701

- 6. General Plan Designation: Existing land use designations include Low Density Residential (LR-7), Low-Medium Density Residential (LMR-11), Medium Density Residential (MR-15); Mixed Use District Center (DC) and Urban Neighborhood (UN); Commercial Professional and Administrative Office (PAO), General Commercial (GC), One Broadway Plaza District Center (OBPDC); as well as Industrial (IND); Institutional (INS), and Open Space (OS).
- 7. Zoning: Existing zoning districts includes General Agriculture (A1), Residential Estate (RE), Single-Family Residence (R1), Two Family Residence (R2), Multiple Family Residence (R3), Suburban Apartment (R4), Professional (P), Government Center (GC), Community Commercial (C1), Community Commercial Museum District (C1-MD), General Commercial (C2), Planning Shopping Center (C4), Arterial

Commercial (C5), Commercial Residential (CR), Light Industrial (M1), Heavy Industrial (M2), South Main Street Commercial (C-SM), Open Space (OS), Specific Plan (SP), Specific Development (SD), Military Operations (MO), and Overlay Zone (OZ).

8. Description of Project: The proposed project is the adoption of the CAP, a document that provides measures intended to reduce GHG emissions within the City. The CAP describes the 2008 baseline GHG emissions produced in Santa Ana and estimates business-as-usual emissions that could be expected in 2020 and 2035. GHG emissions were estimated for 2008, 2020, and 2035 for both community-wide and municipal operations. The City has indirect ability to influence many sources and activities producing community-wide emissions, while it has more direct control over municipal operations emissions. Municipal operations emissions are a subset of community-wide emissions. Overall, the goal of the CAP is to reduce Santa Ana's community-wide GHG emissions by 15 percent below 2008 emission levels by the year 2020. In addition, Santa Ana has established a goal to reduce community-wide emissions by 30 percent below 2008 emission levels by the year 2035. For municipal operations emissions, the City has established goals of 30 percent reduction by 2020 and 40 percent reduction by 2035.

The Draft CAP identifies measures that have a quantifiable emissions reduction and also includes recommended action steps, co-benefits, cost, and funding sources. The Draft CAP is the result of extensive community outreach and public participation. An initial public engagement session was held in March 2012, where participants suggested potential emissions reduction measures to be included in the CAP. The measures gathered were then analyzed for feasibility and assessed by City staff. The working list of measures was presented to key stakeholders and to the public in additional workshops in July 2014. Feedback from these sessions was incorporated, resulting in the measures included in the CAP.

9. Surrounding Land Uses and Setting: The City of Santa Ana is built on relatively flat land and is bordered by the cities of Orange to the north; Garden Grove, Westminster, and Fountain Valley to the west; Costa Mesa and Irvine to the south; and Tustin to the east.

The project area consists of all land located within the incorporated limits of the City of Santa Ana. Of the total 27.3 square miles identified in the Land Use Element of the City's General Plan, approximately 58% is devoted to residential development, 15% to commercial uses, 14% to industrial uses, 11% to public and institutional uses, and 2% to public parkland and open space.³ The City is almost entirely built out, and new development would consist mostly of infill and redevelopment projects.

10. Other Public Agencies Whose Approval Is Required: The City of Santa Ana is the lead agency with responsibility for approving the proposed Draft CAP and its measures. No other public agency approvals are needed.

³ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. 6. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUse.pdf, accessed September 2, 2015.

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the Environmental Impacts discussion in Section 3.



2.3 DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
 - I find that the proposed project MAY have a significant effect on the environment, and an environmental impact report is required.
- I find that the proposed project may have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature Melanie McCann, Associate Planner City of Santa Ana

19/15

Date

2.4 SUMMARY OF ENVIRONMENTAL IMPACT ANALYSIS

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incornorated	Less Than Significant Impact	No Impact
I.	AESTHETICS. Would the project:		-		
a.	Have a substantial adverse effect on a scenic vista?			X	
b.	Substantially damage scenic resources, including, but not limited to, trees,			x	
	rock outcroppings, and historic buildings within a state scenic highway?				
c.	Substantially degrade the existing visual character or quality of the site and			x	
	its surroundings?				
d.	Create a new source of substantial light or glare that would adversely affect			x	
	day or nighttime views in the area?				
II.	AGRICULTURE AND FORESTRY RESOURCES. In determining wh resources are significant environmental effects, lead agencies may refer to th Evaluation and Site Assessment Model (1997) prepared by the California De	ether imp e Califori epartmen	pacts to a nia Agricu t of Cons	gricultural Iltural Lan ervation as	d s an
	optional model to use in assessing impacts on agriculture and farmland. In d forest resources, including timberland, are significant environmental effects, information compiled by the California Department of Forestry and Fire Pre- inventory of forest land, including the Forest and Range Assessment Project Assessment project; and forest carbon measurement methodology provided California Air Resources Board. Would the project:	eterminin lead ager otection 1 and the in Forest	ng whethen ncies may regarding Forest Le Protoco	er impacts refer to the state's gacy s adopted	to by the
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				x
b.	Conflict with existing zoning for agricultural use, or a Williamson act contract?			X	
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				x
d.	Result in the loss of forest land or conversion of forest land to non-forest				x
	use?				
e.	Involve other changes in the existing environment that, due to their				
	location or nature, could result in conversion of Farmland, to non-			X	
	agricultural use or conversion of forest land to non-forest use?				
	AIR QUALITY. Where available, the significance criteria established by the or air pollution control district may be relied upon to make the following de	e applicat terminati	ole air qua ons. Wou	lity manag ld the proj	ement ject:
a.	Conflict with or obstruct implementation of the applicable air quality plan?			X	
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	Result in a cumulatively considerable net increase of any criteria pollutant				
	for which the project region is non-attainment under an applicable federal			Х	
	or state ambient air quality standard (including releasing emissions which				
d.	Expose sensitive receptors to substantial pollutant concentrations?			x	
e.	Create objectionable odors affecting a substantial number of people?			X	
IV.	BIOLOGICAL RESOURCES. Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat				
	modifications, on any species identified as a candidate, sensitive, or special				
	status species in local or regional plans, policies, or regulations, or by the			Х	
	California Department of Fish and Game or U.S. Fish and Wildlife				
1.	Service?				
D.	have a substantial adverse effect on any riparian habitat of other sensitive				
	regulations, or by the California Department of Fish and Game or U.S.			Х	
	Fish and Wildlife Service?				
c.	Have a substantial adverse effect on federally protected wetlands as				
	defined by Section 404 of the Clean Water Act (including, but not limited			x	
	to, marsh, vernal pool, coastal, etc.) through direct removal, filling,			A	
	hydrological interruption, or other means?				
d.	Interfere substantially with the movement of any native resident or				
	migratory hish or wildlife species or with established native resident or			Х	
	sites?				
e.	Conflict with any local policies or ordinances protecting biological				
	resources, such as a tree preservation policy or ordinance?			X	
f.	Conflict with the provisions of an adopted Habitat Conservation Plan,				
	Natural Community Conservation Plan, or other approved local, regional,				Х
	or state habitat conservation plan?				
V.	CULTURAL RESOURCES. Would the project:	1			
a.	Cause a substantial adverse change in the significance of a historical			Х	
h	resource as defined in CEQA Guidelines Section 15064.5?				
υ.	resource pursuant to CEOA Guidelines Section 15064.52			Х	
C.	Directly or indirectly destroy a unique paleontological resource or site or				
	unique geologic feature?			Х	
d.	Disturb any human remains, including those interred outside of formal			v	
	cemeteries?			Λ	

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
VI.	GEOLOGY AND SOILS. Would the project:			•	
a.	Expose people or structures to potential substantial adverse effects,			v	
	including the risk of loss, injury, or death involving:			Λ	
i)	Rupture of a known earthquake fault, as delineated on the most recent				
	Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist			x	
	for the area or based on other substantial evidence of a known fault? Refer				
	to Division of Mines and Geology Special Publication 42.				
ii)	Strong seismic ground shaking?			X	
iii)	Seismic-related ground failure, including liquefaction?			X	
iv)	Landslides?				X
b.	Result in substantial soil erosion, loss of topsoil, or changes in topography			x	
	or unstable soil conditions from excavation, grading, or fill?				
c.	Be located on a geologic unit or soil that is unstable, or that would become				
	unstable as a result of the project, and potentially result in on-or off-site			X	
	landslide, lateral spreading, subsidence, liquefaction or collapse?				
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform			X	
	Building Code (1994), creating substantial risks to life or property?				
e.	Have soils incapable of adequately supporting the use of septic tanks or				
	alternative wastewater disposal systems where sewers are not available for				X
	the disposal of wastewater?				
VII	.GREENHOUSE GAS EMISSIONS: Would the project:			1	
a.	Generate greenhouse gas emissions, either directly or indirectly, that may			X	
	have a significant impacts on the environment?				
b.	Conflict with an applicable plan, policy or regulation adopted for the			Х	
	purpose of reducing the emissions of greenhouse gases?				
VII	1. HAZARDS AND HAZARDOUS MATERIALS: Would the project	:	Т	r	1
a.	Create a significant hazard to the public or the environment through the			Х	
	routine transport, use, or disposal of hazardous materials?				
b.	Create a significant hazard to the public or the environment through			37	
	reasonably foreseeable upset and accident conditions involving the release			X	
	of hazardous materials into the environment?				
c.	Emit nazardous emissions or handle hazardous or acutely hazardous			v	
	materials, substances, or waste within one-quarter mile of an existing or			Х	
1	proposed school?				
d.	Be located on a site that is included on a list of hazardous materials sites			v	
	complied pursuant to Government Code Section 65962.5 and, as a result,			A	
1	would it create a significant nazard to the public or the environment?			1	

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	For a project located within an airport land use plan or, where such a plan				
	has not been adopted, within two miles of a public airport or public use			х	
	airport, would the project result in a safety hazard for people residing or				
	working in the project area?				
f.	For a project within the vicinity of a private airstrip, would the project			X	
	result in a safety hazard for people residing or working in the project area?				
g.	Impair implementation of or physically interfere with an adopted			Х	
	emergency response plan or emergency evacuation plan?				
h.	Expose people or structures to a significant risk of loss, injury or death				37
	involving wildland fires, including where wildlands are adjacent to				X
137	urbanized areas or where residences are intermixed with wildlands?				
IX.	HYDROLOGY AND WATER QUALITY. Would the project:			V	
a.	Violate any water quality standards or waste discharge requirements?			Χ	
D.	Substantially deplete groundwater supplies or interfere substantially with				
	groundwater recharge such that there would be a net denot in aquiter				
	volume of a lowering of the local groundwater table level (e.g., the				Х
	would not support existing lead uses or planned uses for which permits				
	have been granted)?				
C	Substantially alter the existing drainage pattern of the site or area including				
с.	through the alteration of the course of stream or river, in a manner that			x	
	would result in substantial erosion or siltation on- or off-site?			28	
d	Substantially alter the existing drainage pattern of the site or area including				
c	through the alteration of the course of a stream or river or substantially				
	increase the rate or amount of surface runoff in a manner that would result			Х	
	in flooding on- or off-site?				
e.	Create or contribute runoff water which would exceed the capacity of				
	existing or planned stormwater drainage systems or provide substantial			X	
	additional sources of polluted runoff?				
f.	Otherwise substantially degrade water quality?			X	
g.	Place housing within a 100-year flood hazard area as mapped on a federal				
	Flood Hazard Boundary or Flood Insurance Rate Map or other flood			Х	
	hazard delineation map?				
h.	Place within a 100-year flood hazard area structures that would impede or			v	
	redirect flood flows?			Λ	
i.	Expose people or structures to a significant risk of loss, injury or death				
	involving flooding, including flooding as a result of the failure of a levee or			X	
	dam?				
j.	Inundation by seiche, tsunami, or mudflow?				Х

		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	LAND USE AND PLANNING. Would the project:			\$7	
a.	Physically divide an established community?			X	
b.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	
c.	Conflict with any applicable habitat conservation plan or natural				v
	community conservation plan?				л
XI.	MINERAL RESOURCES. Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				x
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				x
XII	.NOISE. Would the project result in:				
a.	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?			X	
XII	I. POPULATION AND HOUSING. Would the project:	Γ	1		
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			Х	
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?			X	
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?			X	

		Potentially Significant Impact		Less I han Significant	Incorporated	Less Than Significant Impact	No Impact	
XIV	XIV. PUBLIC SERVICES.							
a.	would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					X		
i)	Fire protection?					X		
ii)	Police protection?					X		
iii)	Schools?					X		
iv)	Parks?					X		
v)	Other public facilities?					X		
XV	RECREATION.							
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?					X		
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?					X		
XV	I. TRANSPORTATION/TRAFFIC. Would the project:							
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non- motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?					x		
b.	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?					x		
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?						X	
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?					X		
e.	Result in inadequate emergency access?					X		
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?					X		

			-		
		Potentially Significant Impact	Less Than Significant Impact After Mitigation Incorporated	Less Than Significant Impact	No Impact
XV	II. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional			v	
	Water Quality Control Board?			л	
b.	Require or result in the construction of new water or wastewater treatment				
	facilities or expansion of existing facilities, the construction of which could			X	
	cause significant environmental effects?				
с.	Require or result in the construction of new stormwater drainage facilities				
	or expansion of existing facilities, the construction of which could cause			X	
	significant environmental effects?				
d.	Have sufficient water supplies available to serve the project from existing			v	
	entitlements and resources, or are new or expanded entitlements needed?			Λ	
e.	Result in a determination by the wastewater treatment provider that serves				
	or may serve the project that it has adequate capacity to serve the project's			Х	
	projected demand in addition to the provider's existing commitments?				
f.	Be served by a landfill with sufficient permitted capacity to accommodate			x	
	the project's solid waste disposal needs?			28	
g.	Comply with federal, state, and local statutes and regulations related to				v
	solid waste?				Δ
XV	III. MANDATORY FINDINGS OF SIGNIFICANCE.				
a.	Does the project have the potential to degrade the quality of the				
	environment, substantially reduce the habitat of a fish or wildlife species,				
	cause a fish or wildlife population to drop below self-sustaining levels,				
	threaten to eliminate a plant or animal community, reduce the number or			Х	
	restrict the range of a rare or endangered plant or animal or eliminate				
	important examples of the major periods of California history or				
	prehistory?				
b.	Does the project have impacts that are individually limited, but				
	cumulatively considerable? "Cumulatively considerable" means that the				
	incremental effects of a project are considerable when viewed in			Х	
	connection with the effects of past projects, the effects of other current				
	projects, and the effects of probable future projects.				
c.	Does the project have environmental effects that will cause substantial				x
1	adverse effects on human beings, either directly or indirectly?				

3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions in the checklist.

3.1 **AESTHETICS**

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The Draft CAP proposes measures that would aid in reducing the City's GHG emissions, and, thus, would not directly lead to development that would affect scenic vistas. However, the proposed measures encourage the installation of solar photovoltaic (PV) systems both through new private installs on residences and businesses, or on municipal facilities, to provide alternative sources of energy. The municipal solar PV system measure assumes the installation of a 160 kW system, which could be installed on one City facility or could represent the total capacity of several systems on multiple City facilities. However, for purposes of environmental analysis, if installed as one system on one structure, the system would cover an area of approximately 100 feet by 200 feet.

Both private and municipal PV systems would most likely be placed on rooftops, which could alter scenic views. However, the City is built out, relatively flat, and does not have significant hills or viewpoints that may provide scenic vistas. Nearby hills, including the Santa Ana Mountains to the east and the Puente Hills and the San Bernardino Mountains to the north, are visible from some areas within the City. However, PV systems on commercial or civic structures would likely not be significant enough to block or greatly alter the viewshed and would be subject to Planning and Building Agency review and approval. In addition, AB 2188, which took effect on January 1, 2015, required local governments to adopt a streamlined and expedited permit approval process for small residential rooftop solar energy panels.⁴ The City of Santa Ana adopted an ordinance to comply with AB 2188 regulations. The ordinance stipulates that once the application process is complete, a permit shall be issued.⁵ Therefore, small residential rooftop systems, consistent with the size and placement requirements set forth in the ordinance, are not subject to design review or other approval, such as local aesthetic policies. Therefore, impacts to scenic vistas would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less than Significant Impact. There are no state-designated scenic highways within the City of Santa Ana or within view of the City. A segment of State Route 91 (SR-91), from SR-55 to the City of Anaheim east

⁴ California Legislative Information. Bill Information, AB-2188 Solar energy: permits. Available online at: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB2188, accessed October 13, 2015.

⁵ City of Santa Ana Building Safety Division. Streamlined Residential Solar Plan Check and Permitting. Available online at: <u>http://www.ci.santa-ana.ca.us/pba/buildingsafety/ResidentialSolar.asp</u>, accessed October 13, 2015.

boundary, is a state designated highway and is located approximately five miles north of the City boundary.⁶ However, implementation of the Draft CAP measures would occur entirely within City limits. Additionally, the City of Santa Ana identifies several scenic corridors within the City that form a specific image of the City. The Scenic Corridors Element of the City's General Plan identifies Main Street, 1st Street, and MacArthur Boulevard as primary street corridors and contains policies and programs to enhance the image of the City as viewed from these corridors.⁷ However, as discussed above, solar PV systems on commercial or civic structures would likely not be significant enough to block or greatly alter the viewshed and would require Planning and Building Agency review and approval. Additionally, as discussed above, the City of Santa Ana has adopted an ordinance for a streamlined and expedited permit approval process for small residential rooftop solar energy systems per AB 2188. Therefore, the installation of any small residential solar energy system that meet the size and placement requirements set forth in the ordinance would be exempt from local aesthetic policies. Impacts to scenic resources would be less than significant.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact. The Draft CAP proposes a variety energy efficiency retrofit programs for existing private and municipal buildings. The Draft CAP also includes incentive-based measures to encourage more local retail service node development, new residential development near retail and employment corridors, and additional employment within or adjacent to residential and retail areas. Encouraging this type of development would result in a mix of land uses and live/work units aimed at reducing automobile use and encouraging bike and pedestrian travel. However, these developments are anticipated to be consistent with Citywide Design Guidelines and Zoning to transition with the existing urban environment. Additionally, as discussed above, the installation of commercial or civic solar PV systems could result in slight changes to existing visual character, but would be subject to Planning and Building Agency approval to determine appropriate sizing and placement prior to installation. However, as discussed above, small residential solar energy systems would not be subject to Planning and Building Agency review and approval, as well as applicable General Plan policies, to ensure that they would not result in substantial changes to the visual character of the City. Therefore, the impacts to the existing visual character within the City would be less than significant.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less than Significant Impact. The Draft CAP includes measures related to the installation of solar PV systems on homes, businesses, and municipal facilities. However, solar PV systems are specifically designed to absorb sunlight, not reflect it. Thus, their placement and orientation on private or municipal structures would not adversely affect day or nighttime views in the area. In addition, the Draft CAP proposes measures to convert existing high pressure sodium lamp streetlights to more energy efficient LED streetlights. LED streetlights reduce direct and reflected uplight, which are the primary causes of urban sky glow. No new

⁶ California Department of Transportation. Officially Designated Scenic Highways. Website: <u>http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm</u>, accessed August 31, 2015.

⁷ City of Santa Ana Planning Division. *City of Santa Ana General Plan Scenic Corridors Element*. Adopted September 20, 1982. Available online at: <u>http://www.ci.santa-ana.ca.us/generalplan/documents/ScenicCorridors.pdf</u>, accessed August 31, 2015.

lighting is anticipated to be installed as the measure proposes replacement of existing fixtures. Therefore, the number of street lights would be the same as existing conditions. Therefore, impacts from light or glare would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The City of Santa Ana does not have any prime farmland, unique farmland, or farmland of statewide importance and is largely built out.⁸ No impact to designated farmland would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Less than Significant Impact. As stated above in Section 3.2(a), there is no farmland in the City of Santa Ana. Additionally, there is no City land under a Williamson Act contract.⁹ However, several parcels within the City are zoned for agricultural use (A1; General Agriculture). The General Agriculture zone permits a variety of uses such as farming, including all types of crop agriculture and horticulture, grazing, and small animal farms, parks and recreation uses, temporary farm stands, and low density residential uses.¹⁰ The Draft CAP encourages local retail development and residential units near existing retail and employment corridors. Therefore, the Draft CAP would not encourage development of or conflict with existing agricultural uses. This impact would be less than significant.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. According to the City's zoning map, there is no land zoned for forest land, timberland, or timberland production in the City of Santa Ana.¹¹ No impact related to forest land or timberland would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

⁸ California Department of Conservation, Division of Land Resource Protection. Orange County Important Farmland 2012. Available online at: <u>ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/ora12.pdf</u>, accessed September 1, 2015.

⁹ California Department of Conservation. Division of Land Resource Protection. Agricultural Preserves 2004 – Williamson Act Parcels Orange County, California. Available online at: <u>ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Orange WA 03 04.pdf</u>, accessed September 1, 2015.

 ¹⁰ City of Santa Ana Planning Division. A1(General Agriculture) Zoning Document. Available online at: http://www.ci.santa-ana.ca.us/pba/planning/documents/A1.pdf, accessed September 1, 2015.

¹¹ City of Santa Ana Planning Division. City of Santa Ana Zoning Map. Available online at: <u>http://www.ci.santa-ana.ca.us/pba/planning/documents/Zoning2014FullCity.pdf</u>, accessed September 1, 2015.

No Impact. As mentioned above, the City does not have any land that is designated or zoned for forest use. No impact related to forest land conversion would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Less than Significant Impact. As discussed above, the City does not have any land that is designated or zoned for forest land. However, several parcels within the City are zoned for agricultural use (A1; General Agriculture). The General Agriculture zone permits a variety of uses such as farming, including all types of crop agriculture and horticulture, grazing, and small animal farms, parks and recreation uses, temporary farm stands, and low density residential uses. The Draft CAP does not encourage conversion of Farmland or forest land to non-agricultural or non-forest use. However, should any new mixed use type development result in changes to the existing environment or land zoned for agricultural use, a zone change would be reviewed and approved by the City. Therefore, this impact would be less than significant.

3.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. Air quality plans describe air pollution control strategies and measures to be implemented by a city, county, region, and/or air district. The most recent Air Quality Management Plan (AQMP) was adopted by the South Coast Air Quality Management District (SCAQMD) in December 2012.12 Consistency with the SCAQMD AQMP is based on whether the project would exceed the estimated air basin emissions used as the basis of the plan. The purpose of the Draft CAP is to reduce GHG emissions within the City to help contribute to global efforts to reduce the effects of climate change. Recommendations within the Draft CAP include implementing energy efficient retrofits, developing design guidelines to improve pedestrian, bicycle, and transit connectivity, implementing the Safe Routes to School Program, and encouraging the development of residential nodes near employment and retail corridors. In addition to reducing GHG emissions, each of these elements would help to reduce criteria air pollutants. Short-term criteria pollutant emissions would be generated during construction activities with the use of construction equipment and vehicle trips. Assumptions for off-road equipment emissions in air quality plan were developed based on annual hours of activity and equipment population for the region. The Draft CAP would not increase the assumptions for off-road equipment use in the AQMP. The estimated emissions used as the basis of the air quality plan are also based in part on projections of population and vehicle miles traveled (VMT). The Draft CAP would not increase population or VMT beyond that considered in the General Plan.

¹² South Coast Air Quality Management District. 2012 Air Quality Management Plan. Available at <u>http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan.</u> Accessed October 19, 2015.

Therefore, the Draft CAP would not conflict with the implementation of the applicable air quality management plan. The impact would be less than significant.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than Significant Impact. Short-term air quality emissions would be generated during construction activities associated with implementation of the proposed project. Estimating the construction-related emissions of the Draft CAP is not possible due to the variability and uncertainties related to future individual projects. The measures in the Draft CAP are not are not anticipated to generate significant impacts, because those measures would result in only minor upgrades to existing uses. Examples of these types of these measures include installation of solar PV systems, energy efficiency retrofits, and solar water heating systems for laundromats. All construction activities would be subject to the South Coast AQMD rules related to fugitive dust control (Rule 403) and nuisance (Rule 402). While the Draft CAP encourages land use patterns that would result in emission benefits, the Draft CAP does not encourage or require development of individual land use projects that would not otherwise occur. In addition, any development projects constructed in the City would undergo project-level CEQA review. In addition to reducing GHG emissions, the Draft CAP would help to reduce long-term operational criteria air pollutants. Therefore, the impact would be less than significant.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less than Significant Impact. As discussed in Section 3.3(b) above, construction and operational activities associated with the implementation of the Draft CAP measures would not violate any air quality standard or contribute to an existing or projected air quality violation. Therefore, the impact would be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. These people include children, older adults, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Sensitive receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The greatest potential for toxic air contaminant (TAC) emissions would originate from diesel PM emissions associated with off-road equipment operations. However, heath risk assessments should be limited to the period/duration of activities associated with the emissions activity. Because the Draft CAP does not require substantial development activity, implementation of the measures would not be anticipated to expose sensitive receptors to substantial TAC concentrations. Therefore, the impact would be less than significant.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment, which could be considered offensive to some individuals. Odors from these sources would be localized and generally confined to the immediate area surrounding the construction site. The Project would use typical construction techniques, and the odors from off-road equipment and on-road vehicles would be typical of most construction sites and temporary in nature. Therefore, the odor impact during construction would be less than significant.

The proposed project would not be expected to generate increased odors. The Draft CAP includes a food waste digestion measure that would arrange for the dedicated treatment of food waste. Processing of food waste could result in objectionable odors. However, food waste would go either to dedicated facilities for food waste, or be added to existing anaerobic digesters at wastewater treatment plants that use digester gas for energy. Project operations for those facilities would comply with applicable SCAQMD regulations. Therefore, the odor impact during operation would be less than significant.

3.4 BIOLOGICAL RESOURCES

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Less than Significant Impact. The Draft CAP is a policy document that would not directly lead to development that would conflict with local policies protecting listed species. The CAP would not modify, either directly or indirectly, habitats of any species identified as a candidate, sensitive, or special status species. Furthermore, the City is largely built out and any existing applicable federal, state, and local policies would constrain development in areas that support sensitive or special status species. In addition, most of the City's open space has undergone significant modification and no longer reflects native habitats.

Sensitive species within the City are limited to the possible occurrence of the San Diego Horned Lizard, an endangered species candidate. The species was last seen in 1922 in the northern section of the City and is still presumed to be in existence today.¹³ In addition, Santiago Creek is the main tributary of the Santa Ana River and is located in the northern portion of the City. According to the City's General Plan Land Use Element, some non-riparian habitats are located along this channel.¹⁴ Additionally, the City's official flower is the hibiscus and the official tree is the Jacaranda, which are designated as locally significant species within the General Plan. These species can be found along the City's roadway medians and parkways.¹⁵

¹³ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. A-50. Adopted February 2, 1998. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUseElement.pdf, accessed August 31, 2015.

¹⁴ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. A-50. Adopted February 2, 1998. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUseElement.pdf, accessed August 31, 2015.

¹⁵ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. A-50. Adopted February 2, 1998. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUseElement.pdf, accessed August 31, 2015.

New mixed use development, as encouraged by the Draft CAP, could be located in areas where sensitive species are known to exist. Additionally, the Draft CAP measures include the replacement of existing streetlights with LED streetlights, which would occur within roadway medians and parkways. However, if new development or streetlight replacement were to involve listed species, project specific biological studies and mitigation would be required as part of specific project approvals in compliance with applicable federal, state and local requirements. Therefore, impacts to species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations would be less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Less than Significant Impact. As stated above, the City of Santa Ana is largely built out and contains small amounts of open space that supports very limited habitat. Within the City, the Santa Ana River extends from SR-22 to MacArthur Boulevard and is channelized entirely throughout this segment. Santiago Creek is one area of open space that is not channelized and contains some non-riparian habitat. Plant life in the City of Santa Ana is limited to non-native, introduced, exotic, and ornamental species which are used for landscaping. ¹⁶ The Draft CAP is a policy document that would not directly lead to development that would affect riparian habitat or other sensitive natural community. The impact would be less than significant.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant Impact. There are no wetlands within the City of Santa Ana jurisdiction.¹⁷ The Draft CAP is a policy document that would not directly lead to development that would affect federally protected wetlands. The impact would be less than significant.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. The Draft CAP is a policy document that would not directly lead to development that would interfere with movement of resident or migratory fish or wildlife species. The City of Santa Ana contains parks, bridges, mature trees, other vegetation, and structures that are suitable for use by migratory birds. However, due to the urban nature of the City, the majority of birds likely to nest within vegetation or on structures adjacent to the developed alignment would already be tolerant of frequent vehicular and pedestrian presence; indirect impacts to nesting birds are therefore not anticipated. Therefore, the impact would be less than significant.

¹⁶ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. A-50. Adopted February 2, 1998. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUseElement.pdf, accessed August 31, 2015.

¹⁷ U.S. Fish and Wildlife Service. National Wetlands Inventory. Available online at: <u>http://www.fws.gov/wetlands/data/mapper.HTML</u>, accessed October 13, 2015.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. The Draft CAP is a policy document that would not directly lead to development that would conflict with local policies protecting biological resources, such as a tree preservation policy. However, the Draft CAP recommends measures to improve pedestrian, bicycle, and transit connectivity and implement the Safe Routes to School Program, which could result in the development of expanded alternative transportation facilities. Should sidewalks and bike paths be expanded as part of the proposed project, any removal of trees and vegetation along City streets would comply with the City's tree planting, maintenance, and removal ordinance within the City of Santa Ana Municipal Code.¹⁸ The ordinance requires approval related to street tree planting requirements, public tree care and maintenance, and planting of certain street tree species. Thus, impacts related to local policies or ordinance, such as a tree preservation policy, would be less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. No Habitat Conservation Plan or Natural Communities Conservation Plan applies to the City of Santa Ana. The County of Orange Natural Communities Conservation Plan and Habitat Conservation Plan includes central and coastal areas within the County, but does not include any areas of the City of Santa Ana.¹⁹ No impact would occur.

3.5 CULTURAL RESOURCES

a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Less than Significant Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered to be "historically significant" if it meets one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history.

¹⁸ City of Santa Ana. Municipal Code. Chapter 33 Article VII.

¹⁹ California Department of Fish and Wildlife. NCCP Plan Summary – County of Orange (Central/Coastal) NCCP/HCP. Website: <u>https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Orange-Coastal</u>, accessed August 31, 2015.

According to the City of Santa Ana General Plan, there are a number of sites in the City that are considered National and State historic resources. In addition, as of 2014, the City has locally designated over 560 structures to the Santa Ana Register of Historic Properties.²⁰ The Draft CAP proposes to retrofit older buildings to be more energy efficient and install solar PV systems on structures within the City. As discussed above, the City of Santa Ana has adopted an ordinance for a streamlined and expedited permit approval process for small residential rooftop solar energy systems per AB 2188. Therefore, the installation of any small residential solar energy system that meet the size and placement requirements set forth in the ordinance would be permitted so long as the application is complete. Therefore, solar PV systems that would be installed on small residential historic structures would not be subject to local historic resource preservation policies. Should any historic structures be proposed for other energy efficient retrofits, compliance with federal, state, and local policies related to historical resources would ensure a less than significant impact.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impact. The Draft CAP does not propose any measure that would directly result in an adverse change in the significance of an archaeological resource. According to the City of Santa Ana General Plan, there is one prehistoric site located near Santiago Creek.²¹ The site originally contained grinding stones and was disturbed in 1965 during the development of a residential subdivision. Additionally, there are 18 post contact (following European contact) archaeological sites that have been identified. However, construction associated with CAP measures, such as expanding pedestrian, bicycle, and transit facilities or implementing the Safe Routes to School Program, would most likely take place within existing rights-of-way. Should construction associated with implementation of the proposed measures take place outside the existing rights-of-way, new ground disturbance has the potential to uncover unknown resources. In addition, should any construction take place in close proximity to or within the identified prehistoric site near Santiago Creek, compliance with applicable regulations would be necessary and an onsite monitor during construction activity may be required. In the event that this occurs, compliance with State regulations pertaining to discovery of archaeological resources would ensure a less than significant impact.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. The Draft CAP does not propose any measure that would directly result in an adverse change in the significance of a paleontological resource. Construction associated with the proposed measures would most likely take place within existing rights-of-way. However, should construction associated with implementation of the proposed measures occur, new ground disturbance has the potential to uncover unknown resources. In the event that this occurs, compliance with State regulations pertaining to discovery of paleontological resources would ensure a less than significant impact.

d) Disturb any human remains, including those interred outside of formal cemeteries?

²⁰ City of Santa Ana Planning Division. Santa Ana Register of Historical Properties. Website: <u>http://www.ci.santa-ana.ca.us/pba/planning/documents/Historic_Register.pdf</u>, accessed October 13, 2015.

²¹ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. A-57. Adopted February 2, 1998. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUseElement.pdf, accessed August 31, 2015.

Less than Significant Impact. There is a remote possibility that ground-disturbing activities that would occur as a result of implementing transportation and land use measures as set forth in the Draft CAP could uncover previously unknown human remains. In the unlikely event that this occurs, compliance with State regulations pertaining to discovery of human remains would ensure a less than significant impact.

3.6 GEOLOGY AND SOILS

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. The City of Santa Ana is not located within an Alquist-Priolo Earthquake Fault Zone as illustrated on the maps issued by the State Geologist for the area.²² The City of Santa Ana is located in a seismically active area, as is most of southern California. The Newport-Inglewood-Rose Canyon fault is located approximately eight miles southwest of the City.²³ However, no active faults are located within City boundaries. Impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. The City of Santa Ana is located in a seismically active area, as is most of southern California. As stated above, the Newport-Inglewood-Rose Canyon fault is located approximately eight miles southwest of the City. Any development that occurs as a result of the Draft CAP measures would adhere to seismic standards in the latest version of the California Building Code (CBC). The City has adopted the 2013 CBC under the City's Municipal Code. Therefore, impacts to seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction occurs when water saturated sediments are subjected to extended periods of shaking. Pressure increases in the soil pores temporarily alter the soil state from solid to liquid. Liquefied sediments lose strength, in turn causing the failure of adjacent infrastructure, including bridges and buildings. Whether a soil would resist liquefaction depends on a number of factors, including grain size, compaction and cementation, saturation and drainage, characteristics of the vibration, and the occurrence of past liquefaction. Granular, unconsolidated, saturated sediments are the most likely to liquefy, while dry, dense or cohesive soils tend to resist liquefaction. Liquefaction is

²² California Department of Conservation. Search for Regulatory Maps by County. Website: <u>http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm</u>, accessed September 3, 2015.

²³ City of Santa Ana Planning Division. *City of Santa Ana General Plan Seismic Safety Element* p. 9. Adopted September 20, 1982. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/SeismicSafety.pdf, accessed August 31, 2015.

generally considered to be a hazard where the groundwater is less than 20 feet in depth. Where soil drainage is good, the pore pressure, which builds up when ground motion shakes unconsolidated soil, would be more easily dissipated; thus, soils with good drainage are less likely to liquefy.

The City of Santa Ana contains areas located within a State-designated liquefiable area.^{24,25,26,27} Additionally, according to Exhibit 5 of the City of Santa Ana General Plan Seismic Safety Element, the potential for liquefaction hazards ranges from very low in the northeastern portion of the City to very high in the southwestern portion. The Draft CAP does not require development of individual land use projects that would not otherwise occur. However, any developments that would occur within the City consistent with the goals of the Draft CAP would be designed and constructed in compliance with the latest version of the CBC and other applicable federal, state, and local codes relative to liquefaction criteria. Compliance with existing regulations would ensure a less than significant impact to seismic-related ground failure, including liquefaction.

iv) Landslides?

No impact. Landslides occur when sloped ground becomes unstable and falls downward. The City is relatively flat; therefore, the potential for landslides to occur within the City is low. Future development as a result of implementation of the Draft CAP would comply with applicable CBC standards. No impacts involving exposure of people or structures to adverse effect related to landslides would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. No future project resulting from implementation of the Draft CAP would directly involve substantial loss of topsoil or directly result in substantial soil erosion. In the event that new development or construction of expanded bike paths and pedestrian amenities would require construction activity that may result in substantial soil erosion or loss of topsoil, such activities would be subject to the latest version of the CBC and the National Pollutant Discharge Elimination System (NPDES) to reduce erosion impacts. In addition, while the Santa Ana River is completely channelized within the City, Santiago Creek is not and therefore erosions hazards can be found near Santiago Creek.²⁸ However, any development near the creek would comply with the CBC and NPDES. The impact would be less than significant.

http://gmw.consrv.ca.gov/shmp/download/quad/TUSTIN/maps/ozn_tus.pdf, accessed August 28, 2015.

²⁴ California Department of Conservation Division of Mines and Geology. Seismic Hazard Zones Map – Newport Beach Quadrangle. April 17, 1997. Available online at: <u>http://gmw.consrv.ca.gov/shmp/download/quad/NEWPORT_BEACH/maps/ozn_newb.pdf</u>, accessed August 28, 2015.

²⁵ California Department of Conservation Division of Mines and Geology. Seismic Hazard Zones Map – Anaheim Quadrangle. April 15, 1998. Available online at:

http://gmw.consrv.ca.gov/shmp/download/quad/ANAHEIM/maps/ozn_anah.pdf, accessed August 28, 2015.
 ²⁶ California Department of Conservation Division of Mines and Geology. Seismic Hazard Zones Map – Orange Quadrangle. April 15, 1998. Available online at:

http://gmw.consrv.ca.gov/shmp/download/quad/ORANGE/maps/ozn_ora.pdf, accessed August 28, 2015.
 ²⁷ California Department of Conservation Division of Mines and Geology. Seismic Hazard Zones Map – Tustin Quadrangle. January 17, 2001. Available online at:

²⁸ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. A-40. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUseElement.pdf, accessed September 1, 2015.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact. Seismic hazard zone maps from the California Geological Survey indicate that areas of the City contain unstable soil and are susceptible to liquefaction. Additionally, Exhibit 4 of the City of Santa Ana General Plan Seismic Safety Element includes several areas susceptible to subsidence.²⁹ Future development as a result of implementation of the Draft CAP has the potential to occur within these areas of the City. However, development would be subject to the latest version of the CBC. Compliance with the CBC would ensure impacts to unstable soils would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant. According to the City of Santa Ana General Plan, expansive soils are found within the south central section of the City.³⁰ However, any development associated with the Draft CAP that would take place in this area would be subject to the latest version of the CBC. Compliance with the CBC would ensure impacts associated with expansive soils would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. With the exception of a few geographic areas, the City of Santa Ana uses a sewer system and does not require the use of alternative wastewater disposal systems or septic tanks. Additionally, the recommended measures in the Draft CAP would not require the use of septic tanks or alternative waste water disposal systems. No impact would occur.

3.7 GREENHOUSE GAS EMISSIONS

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. The measures in the Draft CAP are not anticipated to generate substantial construction emissions, because those measures would result in only minor upgrades to existing uses. In addition, any construction-related GHG emissions would be anticipated to be more than offset by the operational benefits of the measures in the CAP. Implementation of the strategies and measures proposed within the Draft CAP would result in annual community-wide GHG emission reductions. As shown in Table 2, the future Draft CAP measures would result in total MTCO2e reductions of approximately 366,998 MTCO2e by 2020 and 654,294 MTCO2e by 2035. This does not include the emission benefits of existing

²⁹ City of Santa Ana Planning Division. *City of Santa Ana General Plan Seismic Safety Element* p. 13. Adopted September 20, 1982. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/SeismicSafety.pdf, accessed August 31, 2015.

³⁰ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. A-40. Adopted February 2, 1998. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUseElement.pdf, accessed August 31, 2015.

measures shown in Table 1. Implementation of the Draft CAP and emissions reductions from existing measures would result in annual community-wide GHG emissions reductions of 418,896 MTCO₂e by 2020 and 731,090 MTCO₂e by 2035. The impact would be less than significant.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. As discussed in Section 1.4, California has adopted executive orders and legislation aimed at reducing the State's GHG emissions, including Executive Order S-3-05, AB 32, SB 375, and Executive Order B-30-15.

In the Scoping Plan, ARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State commitment to reduce GHGs.

The Scoping Plan recommends that local governments consider adopting a goal of 15% below current emissions levels to assist the State in implementing AB 32. The Scoping Plan did not directly create any regulatory requirements related to implementation of the Draft CAP. The Draft CAP measures and any associated construction or development would be required to comply with applicable regulations, including those developed as measures in the ARB Scoping Plan.

Although not mandated by AB 32 and the Scoping Plan, the Draft CAP articulates the City's intentions with respect to reducing community-wide GHG emissions in a manner consistent with AB 32. Implementation of the Draft CAP would exceed the 15% community-wide GHG reduction target by 2020, which would be consistent with AB 32 Scoping Plan recommendations.

The Scoping Plan Update approved in 2014 confirms that the state is on track to meet the 2020 emissions reduction target, but will need to maintain and build upon its existing programs, scale up deployment of clean technologies, and provide more low-carbon options to accelerate GHG emission reductions, especially after 2020, in order to meet the 2050 target. However, the Scoping Plan does not recommend additional measures for meeting specific GHG emissions limits beyond 2020.

The measures and projected reductions in the Draft CAP include emission reduction benefits associated with state programs. While the measures described in the Scoping Plan Update are designed to meet statewide emissions goals in 2020, those measures have not yet been adjusted to meet emission reduction targets after 2020. As a result, the Draft CAP would also have to be adjusted to account for statewide emission reductions after 2020 in order to meet goals beyond 2020. Therefore, the existing measures and Draft CAP are projected to result in a reduction of 25% below the 2008 baseline emission levels in 2035, which would not meet the City's goal to reducing GHG emissions to 30% below 2008 baseline levels by 2035; however, it would place the City on a path to do so. While the measures in the Draft CAP do not currently meet the 2035 goal of reducing annual community-wide GHG emissions by 30% below 2008 baseline emission levels, the Draft CAP has a process for evaluation and monitoring progress and identifying additional local and state emission reduction measures in future years to meet these reduction goals.

As mentioned above, the Draft CAP would meet the emission reduction goals of AB 32. In addition, as discussed in the project description, the City will continue to evaluate and monitor the Draft CAP by (1) tracking the implementation status of individual measures, (2) estimating emissions reductions associated with individual measures, and (3) conducting a periodic re-inventory of community-wide emissions. The City will publish an annual progress report that details the status of each measure in the Draft CAP. Conducting a periodic re-inventories will show how Santa Ana community emissions are changing overall, and whether they are on track to meet the adopted goals. A re-inventory will be completed in 2018 and every three to five years after that time. Therefore, this impact would be less than significant.

3.8 HAZARDS AND HAZARDOUS MATERIALS

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. Implementation of the Draft CAP and its measures would not result in the routine transport, use, or disposal of hazardous materials. It is possible that construction activities would require use of materials that include on-site fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control (DTSC), United States Environmental Protection Agency, the Occupational Safety & Health Administration, the Orange County Fire Authority, and the Orange County Health Care Agency, Environmental Health Division. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with applicable federal, state, and local regulations governing such activities. Therefore, the impact would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. Implementation of the Draft CAP could result in the rehabilitation and renovation of older residential, commercial, and municipal structures to support energy retrofits and the installation of private and municipal solar PV systems. Structures built prior to 1978 may contain asbestos-containing building materials and lead paint. If not properly handled and released into the environment in large enough quantities, these materials could pose a threat to construction workers and residents. However, these retrofits would primarily be small-scale and would no single renovation would likely result in releases large enough to pose a health hazard to the general public. In addition, demolition and construction activities involving hazardous materials removal are heavily regulated, and construction workers must comply with applicable federal and state safety regulations. Compliance with such regulations would ensure a less than significant impact.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. The Draft CAP does not directly recommend projects that would involve the handling of hazardous or acutely hazardous materials. Compliance with regulatory requirements, such as environmental site assessments and health risk assessments, would ensure construction and operation impacts within one-quarter mile of an existing or proposed school are less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact. According to the DTSC and the State Water Resources Control Board (SWRCB), hazard materials sites are located throughout the City, some of which could be encountered during implementation of measures in the Draft CAP.^{31,32} In addition, the Draft CAP is a policy document that in itself would not create a significant hazard. Implementation of the Draft CAP, such as implementation of design guidelines related to pedestrian, bike, and transit connectivity could result in construction of bicycle paths or expanded pedestrian and transit amenities, which could require disturbance of a site. However, demolition and construction activities involving hazardous materials sites are heavily regulated, and construction workers would be required comply with applicable federal and state safety regulations. Compliance with such regulations would ensure a less than significant impact.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Less than Significant Impact. Southern portions of the City are within the John Wayne Airport Land Use Plan.³³ These portions are included within a designated impact zone and a Federal Aviation Administration (FAA) notification zone. The FAA notification zone encompasses City land south of McFadden Avenue and requires notification to the FAA for buildings proposed to be more than 200 feet in height. Although the Draft CAP proposes encouraging development of residential, retail, and employment nodes near one another, proposed development is not likely to exceed 200 feet in height. Therefore, implementation of the Draft CAP would not directly increase exposure of people to airport safety hazards. Impacts related to public use airports would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Less than Significant Impact. Four private heliports exist within the City of Santa Ana: Orange County Sheriffs Forensics Laboratory Heliport; Honda of Santa Ana Heliport; Southern California Edison Southeastern Division Heliport; and Orange County Global Medical Center Heliport.³⁴ The Draft CAP is a policy document and implementation of Draft CAP measures would not result in a safety hazard for people

³¹ DTSC. EnviroStor. Website: <u>http://www.envirostor.dtsc.ca.gov/public/</u>, accessed August 31, 2015.

³² SWRCB. GeoTracker. Website: <u>http://geotracker.waterboards.ca.gov/</u>, accessed August 31, 2015.

³³ Airport Land Use Commission for Orange County. Land Use Plan for John Wayne Airport. Adopted April 17, 2008. Available online at: <u>http://www.ocair.com/commissions/aluc/docs/JWA_AELUP-April-17-2008.pdf</u>, accessed September 1, 2015.

³⁴ Airnav. 2014. Website: <u>https://www.airnav.com/airports/get</u>, accessed September 1, 2015.

residing or working in the project area. Discretionary development projects associated with the Draft CAP would undergo project-level CEQA review. Therefore, impacts related to private airstrips would be less than significant.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City of Santa Ana adopted a Natural Hazard Mitigation Plan that provides City officials and residents with information regarding emergency situations.³⁵ In situations where an emergency evacuation is necessary, the use of roads and freeways within the City would be necessary. The Draft CAP is a policy-based document, and the recommendations and measures in the Draft CAP would not interfere with an adopted emergency response plan or emergency evacuation plan Therefore, this impact would be less than significant.

h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. There are no wildland fire areas within the City of Santa Ana.³⁶ Implementation of the proposed Draft CAP measures would not expose people or structures to any wildland fire hazards and no impact would occur.

3.9 HYDROLOGY AND WATER QUALITY

a) Violate any water quality standards or waste discharge requirements?

Less than Significant Impact. The Draft CAP proposes measures that would not directly violate water quality standards or waste discharge requirements. However, implementation of the Draft CAP could result in construction-related wastewater discharge into the local sewer system. Although increases in wastewater are not expected to be large enough to substantially increase the amount of runoff or amount of pollutants in the runoff, if necessary, implementation of the Draft CAP would be required to comply with NPDES to control stormwater discharges. The Draft CAP includes measures to sell and distribute rainwater harvesting barrels to residents, which would minimize the amount of water flowing into storm drains, sewer systems, and local waterways. Nonetheless, when appropriate, any project associated with the Draft CAP would be subject to a Stormwater Pollution Prevention Plan and/or be required to incorporate Best Management Practices during construction to reduce potential impacts. Therefore, impacts to water quality would be less than significant.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater

³⁵ City of Santa Ana. Natural Hazards Mitigation Plan – Executive Summary. Available online at: <u>http://hazardmitigation.calema.ca.gov/docs/lhmp/Santa_Ana_City_of_LHMP.pdf</u>, accessed August 31, 2015.

³⁶ California Department of Forestry and Fire Protection.. Fire Hazard Severity Zones in SRA. Adopted November 7, 2007. Available online at: <u>http://frap.fire.ca.gov/webdata/maps/orange/fhszs_map.30.pdf</u>, accessed September 1, 2015.

table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact. The Draft CAP proposes measures that would not deplete groundwater or interfere with groundwater recharge. The proposed Draft CAP intends to promote water conservation through incentivizing the use of rain harvesting barrels, California friendly landscape (i.e. drought tolerant), and turf removal. Improvements to pedestrian, bicycle, and transit connectivity could increase the amount of landscaping which could increase the need for water for irrigation purposes. However, any landscaping would not be substantially deplete groundwater supplies or interfere substantially with groundwater recharge and would comply with applicable water-efficient landscape standards within the City of Santa Ana Municipal Code.³⁷ No impacts to groundwater supply would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in a substantial erosion or siltation on- or off-site.

Less than Significant Impact. The Draft CAP proposes measures, such as improving the bike and pedestrian network, that could alter existing drainage patterns. However, these projects would largely occur within existing rights-of-way where drainage patterns already exist and would also not result in substantial erosion or siltation on- or off-site. In addition, a majority of the proposed measures involve replacing and retrofitting existing structures and streetlights, which would not alter existing drainage patterns. Therefore, improvements and development consistent with the Draft CAP would not substantially alter existing drainage patterns. The impact would be less than significant.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less than Significant Impact. The Draft CAP proposes measures that would not directly alter existing drainage patterns. However, some measures, such as improving the bike and pedestrian network and implementing the Safe Routes to School Program, could slightly increase the amount of surface runoff due to new pedestrian and bicycle paths. However, the addition of new pedestrian and bicycle paths would not result in substantial surface runoff increases and any changes would be subject to existing federal and state regulations. The impact would be less than significant.

e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. As stated above, the City of Santa Ana is largely built out and contains areas where stormwater drainage systems already exist. Implementation of the Draft CAP would enhance pedestrian, bicycle, and transit connectivity, implement the Safe Routes to School Program, and encourage the development residential nodes near retail and employment nodes. However, both construction and operation of future development would be subject to CEQA review and would be required to comply with applicable regulations from the City and NPDES in relation to stormwater pollution prevention. In addition,

³⁷ City of Santa Ana. Municipal Code Chapter 41 Article XVI.

the Draft CAP proposes water conservation measures, such as rainwater harvesting, which would minimize the amount of water flowing into storm drains, sewer systems, and local waterways. This impact would be less than significant.

f) Otherwise substantially degrade water quality?

Less than Significant Impact. The Draft CAP is a policy document and does not directly involve any activity that would degrade water quality. Implementation of the Draft CAP measures would enhance pedestrian, bicycle, and transit connectivity, implement the Safe Routes to School Program, and encourage the development of residential nodes near retail and employment nodes, which could increase surface runoff. However, both construction and operation of future development would be subject to CEQA review and would be required to comply with applicable regulations from the City and NPDES in relation to stormwater pollution prevention. This impact would be less than significant.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Less than Significant Impact. The Draft CAP does not directly involve the construction of housing. However, the Draft CAP includes measures to encourage residential nodes near retail and employment nodes to reduce vehicle miles traveled. Discretionary residential development associated with the Draft CAP would be subject to project-level CEQA review, which would analyze impacts relating to flood hazards. Additionally, the east portion of the City and the Santa Ana River and Santiago Creek channels are designated as areas within a 100-year flood zone.³⁸ However, future development would be subject to project-level CEQA review to analyze impacts involving flood hazards on a project specific basis. Therefore, impacts to housing within a flood hazard area would be less than significant.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less than Significant Impact. The Draft CAP is a policy document that does not directly involve the placement of structures within flood hazard areas. Implementation of the Draft CAP and its measures would enhance pedestrian, bike, and transit connectivity and encourage residential nodes near retail and employment nodes, which could result in the development of structures that impede or redirect flood flows. As mentioned above in Section 3.9(g), the east portion of the City and the Santa Ana River and Santiago Creek channels are designated as areas within a 100-year flood zone. However, future development would be subject to project-level CEQA review to analyze impacts involving flood hazards on a project specific basis. Therefore, impacts would be less than significant.

i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

³⁸ Federal Emergency Management Agency. Flood Map Service Center. Website: <u>https://msc.fema.gov/portal</u>, accessed October 13, 2015.

Less than Significant Impact. According to the of City's General Plan Public Safety Element, throughout the Santa Ana River Basin, the potential exists for flooding resulting from the failure of Prado Dam.³⁹ However, the General Plan states that the Santa Ana River itself does not present a significant flood hazard. Additionally, as a part of the Santa Ana River Project, the Prado Dam is currently being expanded to increase reservoir storage capacity from 217,000 acre-feet to 362,000 acre-feet.⁴⁰ Improvements began in 2003 and are estimated to be completed in 2020.⁴¹ In order to ensure development is not subject to flood hazards, the City established regulations in areas prone to flooding. The regulations require that construction of new development or improvements in these areas must be elevated above the base flood. Therefore, compliance with existing regulations would ensure impacts that would expose people or structures to flooding would be less than significant.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. The Draft CAP does not recommend any measure that would result in inundation by seiche, tsunami, or mudflow. Seiches are large waves generated in enclosed bodies of water in response to ground shaking; however, there are no large artificial bodies of water within the City. Tsunamis are tidal waves generated in large bodies of water caused by fault displacement or major ground movement; however, the City of Santa Ana is located approximately five miles from the coast and is not within a tsunami inundation zone.⁴² Mudflows occur on hillsides where unvegetated and undeveloped surfaces are exposed to rainfall; however, the City of Santa Ana is built out with limited amounts of vacant land and is relatively flat. Therefore, no impacts associated with inundation from seiche, tsunami, or mudflow would occur.

3.10 LAND USE AND PLANNING

a) Physically divide an established community?

Less than Significant Impact. The Draft CAP is a policy-based document that does not directly involve the construction of a specific project. Implementation of the Draft CAP and its measures would enhance pedestrian, bicycle, and transit connectivity and encourage the development of residential nodes near retail and employment nodes, which could result in the development of structures or improvements that could divide an established community. However, implementation of the Draft CAP intends to increase connectivity throughout the City by implementing both external and internal design guidelines for bike, pedestrian, and transit connectivity, which would connect existing residential development to nearby sidewalks and bus stops. Therefore, impacts to established communities would be less than significant.

³⁹ City of Santa Ana Planning Division. *City of Santa Ana General Plan Public Safety Element* p. 11. Adopted September 20, 1982. Available online at: <u>http://www.ci.santa-ana.ca.us/generalplan/documents/PublicSafety.pdf</u>, accessed August 31, 2015.

⁴⁰ Orange County Public Works Flood Division. Santa Ana River Project, Project Description. Website: <u>http://ocflood.com/sarp/project</u>, accessed October 13, 2015.

⁴¹ Orange County Public Works Flood Division. Santa Ana River Project, Project Cost and Schedule. Website: http://ocflood.com/sarp/cost, accessed October 13, 2015.

⁴² California Department of Conservation. California Geological Survey Tsunami Inundation Map for Emergency Planning Newport Beach Quadrangle. March 15, 2009. Available online at: http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/Orange/Documents/Tsunam i_Inundation_NewportBeach_Quad_Orange.pdf, accessed August 31, 2015.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. Implementing the Draft CAP would require some modification of existing City policies, including changes to the Municipal Code, Zoning Code, General Plan, Specific Plans, and Design Guidelines. The Draft CAP includes an energy measure that would require that all non-residential buildings larger than 10,000 square feet to submit their buildings' energy usage to an Energy Star Portfolio Manager every seven years as part of business license renewal (Benchmarking and Retrocommissioning measure). In addition, the Draft CAP includes implementation of a transportation and land use measure related to requiring end of trip facilities, such as bike lockers, showers, and changing rooms, in new office and larger retail buildings, which would require the City to amend its Municipal Code. In order to implement these measures and the remaining transportation and land use measures (e.g., adjusting parking ratios, residential node development near retail and employment nodes, and implementing bike, pedestrian, and transit connectivity design guidelines), the Municipal Code, Zoning Code and other applicable documents would need to amended to reflect new requirements. While the proposed measures could conflict with some existing policies, the Draft CAP is designed to mitigate adverse environmental impacts associated with global climate change. Where conflicts do occur, the proposed Draft CAP measures would generally result in greater avoidance or mitigation of environmental effects. The impact would be less than significant.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As stated in Section 3.4(f), no Habitat Conservation Plan or Natural Communities Conservation Plan applies to the City of Santa Ana. No impact would occur.

3.11 MINERAL RESOURCES

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. There are no known mineral resources within the City of Santa Ana.^{43,44} Regionally significant resources are found north of the City within the cities of Orange and Anaheim. No impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

⁴³ City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element* p. A-51. Adopted February 2, 1998. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/LandUseElement.pdf, accessed August 31, 2015.

⁴⁴ California Department of Conservation. California Geological Survey. Aggregate Sustainability in California Map. Available online at: <u>http://www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS_52_2012.pdf</u>, accessed August 31, 2015.

No Impact. As discussed above in Section 3.11(a), there are no known mineral resources within the City. No impact would occur.

3.12 NOISE

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact. While the Draft CAP is a policy-based document and does not directly recommend any measures that would generate excessive amounts of construction noise, construction activity associated with implementation of the Draft CAP measures could possibly result in temporary increases in noise levels. The City's noise ordinance designates the entire City of Santa Ana as "Noise Zone 1" which sets forth an exterior noise standard of 55 dBA from 7:00 a.m. to 10:00 p.m. and 50 dBA from 10:00 p.m. to 7:00 a.m.⁴⁵ A special provision exempts construction activities from the provisions of the ordinance so long as construction does not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or any time on Sunday or a federal holiday. A majority of the proposed measures would involve small scale construction projects, such as energy efficient retrofits and streetlight replacement; however, the CAP does include some transportation and land use measures that could lead to the development of larger scale residential, retail, and employment buildings and expanded bike and pedestrian paths. Therefore, the exact nature of future construction that could occur is not known at this time, thus construction noise levels cannot be estimated. However, the Draft CAP does not encourage or require development of land use projects that would result in substantial amounts of construction noise that would not otherwise occur. All construction activities would be required to comply with the City's noise ordinance and undergo project-level CEQA review to analyze impacts related to noise when more specific project details are known. Such compliance would reduce noise levels associated with construction activities. This impact would be less than significant.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. Similar to Section 3.12(a), temporary construction activities as a result of implementation of the Draft CAP could result in excessive groundborne vibration or groundborne noise. In addition, the Draft CAP is a policy-based document and does not directly recommend any measures or land use development that would generate excessive amounts of construction noise. A majority of the measures would involve small scale construction projects, such as energy efficient retrofits and streetlight replacement. The exact nature of future construction that could occur is not known at this time, thus construction noise levels cannot be estimated. However, all construction activities would be required to comply with the City's noise ordinance and undergo project-level CEQA review to analyze impacts related to noise when more specific project details are known. Such compliance would reduce noise groundborne vibration and noise levels associated with construction activities. This impact would be less than significant.

⁴⁵ City of Santa Ana Municipal Code. Chapter 18 Article VI – Noise Control. Section 18-312 – Exterior noise standards.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact. The majority of the measures within the CAP focus on reducing the amount of vehicle miles traveled by providing enhanced access to alternative modes of transportation and encouraging the development of residential nodes near retail and employment nodes. As a result, no permanent increase in local traffic volumes is anticipated. The impact would be less than significant.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact. Although no permanent increases in ambient noise levels will occur, temporary or periodic increases could occur as a result of construction activity. However, the Draft CAP does not encourage or require development of land use projects that would result in substantial amounts of construction noise that would not otherwise occur. However, the exact nature of future construction that could occur is not known at this time, thus construction noise levels cannot be estimated. Further, all construction activities would be required to comply with the City's noise ordinance and undergo project-level CEQA review to analyze impacts related to noise when more specific project details are known. Such compliance would reduce temporary or periodic increases in ambient noise levels. This impact would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less than Significant Impact. Southern portions of the City are within the John Wayne Airport Land Use Plan.⁴⁶ These portions are included within a designated impact zone. The impact zone encompasses a small portion of the City that borders the SR-55 near Dyer Road, which is within the 60 dBA noise level.⁴⁷ The City of Santa Ana General Plan Airport Environs Element states that residential uses within the 60 dBA contour should be mitigated to address present and project noise exposure and that residential interior noise levels should not exceed 45 dBA. However, the land within the 60 dBA contour is designated as commercial, industrial, and office land uses within the General Plan.⁴⁸ In regards to people working in the area and their exposure to excessive noise levels, the Draft CAP proposes measures to encourage residential nodes near retail and employment nodes. Therefore, these land uses could be located near one another and within the noise contours. However, any new residential uses would require noise mitigation consistent with the General Plan element, and no noise incompatibilities would occur. As a result, implementation of the Draft CAP

⁴⁶ Airport Land Use Commission for Orange County. Land Use Plan for John Wayne Airport. Adopted April 17, 2008. Available online at: <u>http://www.ocair.com/commissions/aluc/docs/JWA_AELUP-April-17-2008.pdf</u>, accessed September 1, 2015.

⁴⁷ City of Santa Ana Planning Division. *City of Santa Ana General Plan Airport Environs Element Exhibit 2*. Adopted February 11, 2009. Available online at: <u>http://www.ci.santa-ana.ca.us/generalplan/documents/AirportEnvirons.pdf</u>, accessed September 3, 2015.

 ⁴⁸ City of Santa Ana Planning Division. *City of Santa Ana General Plan Airport Environs Element* p. 4. Adopted February 11, 2009. Available online at: <u>http://www.ci.santa-ana.ca.us/generalplan/documents/AirportEnvirons.pdf</u>, accessed September 3, 2015.

would not expose people residing or working in the project area to excessive noise levels. Impacts related to public use airports would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Less than Significant Impact. Four private heliports exist within the City of Santa Ana: Orange County Sheriffs Forensics Laboratory Heliport; Honda of Santa Ana Heliport; Southern California Edison Southeastern Division Heliport; and Orange County Global Medical Center Heliport.⁴⁹ The Draft CAP is a policy document, and any new discretionary development would undergo project-level CEQA review to ensure potential placement of development would not expose individuals to excessive noise levels. The impact would be less than significant.

3.13 POPULATION AND HOUSING

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact. The City of Santa Ana is largely built out and urbanized. The Draft CAP proposes measures that seek to reduce GHG emissions by encouraging development of residential nodes near employment and retail nodes and enhancing pedestrian, bicycle, and transit connectivity through the adoption of zoning ordinances and design guidelines. However, the Draft CAP does not require development of land use projects that would not otherwise occur. While the City of Santa Ana is largely built out and there are not large amounts of vacant land, mixed use infill development and new housing is anticipated via existing zoning that will increase population growth consistent with anticipated projections. This impact would be less than significant.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Less than Significant Impact. Retrofitting residential buildings to be more energy efficient would involve small construction work and replacement housing would not be necessary. The development of residential nodes near retail and employment nodes would involve new development, but would not displace existing housing. The impact would be less than significant.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Less than Significant Impact. As discussed in Section 3.13(b), implementation of measures as prescribed in the Draft CAP would not result in the displacement of people. The impact would be less than significant.

⁴⁹ Airnav. Website: <u>https://www.airnav.com/airports/get</u>, accessed September 2, 2015.

3.14 PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Less than Significant Impact. While the Draft CAP would not directly introduce new structures, future infill development and redevelopment could occur near retail and employment corridors. New development could increase fire protection service needs in the City. However, the City estimates fire protection needs based on growth as project in the City's General Plan, and new development anticipated via existing zoning would be consistent with anticipated projections The impact would be less than significant.

b) Police protection?

Less than Significant Impact. Similar to the evaluation under Section 3.14(a), the possible increase in population that may occur as a result of implementation of the Draft CAP would not increase the demand for police protection service to the extent that new police protection facilities would be required. Implementation of the Draft CAP measure related to the Safe Routes to School Program would involve physical infrastructure improvements such as expanded sidewalks and bike paths. New pedestrian and bike amenities could slightly increase the amount of police personnel needed within the route areas, but would not result in the need for new police facilities or additional personnel. The impact would be less than significant.

c) Schools?

Less than Significant Impact. Similar to the evaluation under Section 3.14(a) and (b), the possible increase in population that may occur as a result of implementation of the Draft CAP would be small and would not increase the demand for new schools over current levels or anticipated projections. The impact would be less than significant.

d) Parks?

Less than Significant Impact. Similar to the evaluations above, the possible increase in population that may occur as a result of implementation of the Draft CAP would be small and would not increase the demand for new park facilities over current levels or anticipated projections. Additionally, the proposed measures involve the implementation of the Safe Routes to School Program, design guidelines to enhance bike, pedestrian, and transit connectivity, and community-wide bike sharing stations, which would provide additional passive recreation areas and opportunities within the City. The impact would be less than significant.

e) Other public facilities?

Less than Significant Impact. Similar to the evaluations above, the possible increase in population that may occur as a result of implementation of the Draft CAP would be small and would not increase the demand for new public facilities over current levels or anticipated projections. The impact would be less than significant.

3.15 RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. Implementation of the Draft CAP is not expected to result in substantial population growth, and thus would not result in increased physical deterioration of parks and recreational facilities. The Draft CAP measures promote the expansion of the current network of bicycle and pedestrian paths, which would provide additional passive recreational facilities within the City and could potentially lessen wear on existing facilities. The impact would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less than Significant Impact. Implementation of the Draft CAP is not expected to result in substantial population growth, and thus would not result in increased physical deterioration of parks and recreational facilities. Implementation of the Draft CAP includes implementing the Safe Routes to School Program and design guidelines to enhance bike, pedestrian, and transit connectivity, which would provide additional passive recreational facilities within the City. Therefore, implementation of the CAP would not require the expansion of recreational facilities, but rather encourage it to promote alternative modes of transportation. Therefore, the impact would be less than significant.

3.16 TRANSPORTATION/TRAFFIC

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less than Significant Impact. Implementation of the Draft CAP would result in the development of bike, pedestrian, and transit connectivity design guidelines and encourage residential, employment, and retail land uses near one another to would reduce vehicle miles traveled. The City updated its Zoning Code in 2010 to provide new zoning for over 400 acres in downtown Santa Ana. The new zoning supports compact development that is accessible to transit and allows for a mix of uses to place residential units closer to transit and jobs. Therefore, the Zoning Code would only need to be amended to contain incentives to further encourage residential near retail and employment corridors. Potential incentives include density bonuses, reductions in parking requirements, and other similar efforts. The Harbor Mixed Use Transit Corridor Specific Plan and Metro East Overlay Zone also allow for residential and mixed use development

opportunities near transit. Therefore, it is anticipated the measure already aligns with strategies set forth in applicable circulation plans.

The CAP measures also involve traffic signal improvements. Congestion and idling contribute to the GHG emissions. Signal coordination and synchronization would reduce congestion and the amount of time vehicles spend idling while on City streets. All synchronization modifications would be in compliance with applicable Orange County Transportation Authority plans and policies related to the performance of the circulation system. Impacts would be less than significant.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less than Significant Impact. The intent of the CAP measures is to promote alternative modes of transportation, which would reduce vehicular travel and GHG emissions. However, the Draft CAP proposes to adjust parking ratios to reduce vehicular travel and emissions associated with the number of cars being driven on City streets. This would be done by reducing the amount of parking required in new developments to encourage other forms of transportation. The Orange County Transportation Authority (OCTA) Congestion Management Program (CMP) requires a traffic impact analysis when a proposed development would generate 2,400 or more daily trips or 1,600 or more daily trips for developments which would directly access a CMP Highway System link.⁵⁰ Implementation of the Draft CAP measures (e.g., changes in parking ratios) could indirectly increase the potential for vehicles circulating looking for parking in and around residential, employment, and retail areas. However, the Draft CAP would not generate substantial vehicle trips or change level of service on roadways that would conflict with the OCTA CMP. Therefore, the impact would be less than significant.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. JWA is located just south of the City. However, the Draft CAP does not include any measure that would directly or indirectly affect air traffic patterns. No impact would occur.

d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

Less than Significant Impact. The proposed measures are aimed at providing alternative modes of transportation and reducing the amount of vehicle miles traveled throughout the City. In fact, the Draft CAP promotes implementation of the Safe Routes to School Program and design guidelines to enhance bike, pedestrian, and transit connectivity, which would provide greater safety. The Draft CAP does not include measures that would substantially increase hazards due to a design feature or incompatible uses. The impact would be less than significant.

⁵⁰ Orange County Transportation Authority. 2013 Congestion Management Program. Adopted November 2013. Available online at: <u>http://www.octa.net/pdf/Final%202013%20CMP.pdf</u>, accessed September 9, 2015.

e) Result in inadequate emergency access?

Less than Significant Impact. The Draft CAP recommends measures that would increase safety for drivers, pedestrians, and bicyclists and seeks to reduce the number of automobiles on Santa Ana streets, both of which may make access for emergency vehicles easier and more efficient. The impact would be less than significant.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less than Significant Impact. Implementation of the Draft CAP would improve pedestrian, bicycle, and transit connectivity through the development of design guidelines and implementation of the Safe Routes to School Program. The implementation of new design guidelines would need to be included within the Zoning Code. However, it is not anticipated that any new guidelines would not conflict with any adopted plans or policies as the CAP measures align with the goals, policies, and programs within the City's General Plan Circulation Element. Additionally, new design guidelines and enhanced bike and pedestrian routes would be built to current standards and provide greater safety for individuals that use alternatives modes of transportation. The impact would be less than significant.

3.17 UTILITIES AND SERVICE SYSTEMS

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact. While the Draft CAP would not directly introduce new structures, future development could occur as a result of encouraging the development of residential nodes near retail and employment corridors. The City of Santa Ana requires National Pollution Discharge Elimination System (NPDES) permits, according to federal regulations for discharges to surface waters of the United States. For point sources such as sewer pipes, the NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Any new development in the City would continue to comply with all provisions of the NPDES program. Therefore, implementation of the Draft CAP would not exceed wastewater treatment requirements. The impact would be less than significant.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. While the Draft CAP would not directly introduce new structures, future development could occur as a result of encouraging the development of residential nodes near retail and employment corridors. However, the population increase would not be substantial enough to create large enough increases in demand for wastewater treatment that would require or result in the construction of new water or wastewater treatment facilities exceed treatment requirements. The Draft CAP proposes energy efficiency retrofits at City water wells to convert all remaining pump stations to variable frequency drives to reduce energy consumption. However, the measure would involve retrofits to existing water pumps and would not create new facilities. The impact would be less than significant.

c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. While the Draft CAP would not directly introduce new structures, future development could occur as a result of encouraging the development of residential nodes near retail and employment corridors. However, the City is largely built out and urbanized, and implementation of the Draft CAP would not result in a significant increase in either population or new surfaces. Thus, it is not likely that stormwater runoff would increase to the extent that new or expanded facilities would be necessary. The impact would be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact. As stated within the City of Santa Ana General Plan Housing Element, the 2010 Urban Water Management Plan indicates that existing water supplies and planned capacity improvements are sufficient to meet anticipated water demands.⁵¹ The California Water Code requires cities to prepare Water Supply Assessments (WSAs) when considering approval of certain discretionary development projects (e.g., residential development of more than 500 dwelling units). The WSA determines whether projected water supplies can meet the project's anticipated water demand and would be included in the CEQA review of discretionary projects. In addition, the Draft CAP recommends turf removal and rainwater harvesting measures, which would reduce the City's water demand. Therefore, the impact is less than significant.

e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. As stated within the City of Santa Ana General Plan Housing Element, the City's sewage is diverted to Reclamation Plant 1 which has a capacity of 60 million gallons per day (gpd) and is planned to provide capacity of up to 120 million gpd.⁵² Additionally, Orange County Sanitation District requires all developers of residential projects within their service area to pay capital facility charges that are designed to fund the construction, maintenance, and improvement of facilities. Therefore, the impact would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. The Draft CAP intends to reduce solid waste generation as a whole through implementation of a commercial and multi-family recycling measure, which would result in an increased diversion of waste from landfills and reduce landfill methane emissions. In addition, the Draft CAP includes

⁵¹ City of Santa Ana Planning Division. *City of Santa Ana General Plan Housing Element* p. B-34. Adopted February 4, 2014. Available online at: <u>http://www.ci.santa-ana.ca.us/housingelement/default.asp</u>, accessed September 3, 2015.

⁵² City of Santa Ana Planning Division. *City of Santa Ana General Plan Housing Element* p. B-34. Adopted February 4, 2014. Available online at: <u>http://www.ci.santa-ana.ca.us/housingelement/default.asp</u>, accessed September 3, 2015.

food waste diversion measure, which may be composted then sent to a digestion facility to allow for energy recovery. Therefore, the impact would be less than significant.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. The Draft CAP does not recommend any measure that does not comply with applicable solid waste regulations. Conversely, the Draft CAP proposes a measure that would reduce the amount of waste sent to landfills and would comply with AB 341, which requires recycling by businesses that generate four cubic yards or more of commercial solid waste per week and multi-family residential dwellings of five units or more. Therefore, no impact would occur.

3.18 MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact. The purpose of the Draft CAP is to reduce community-wide GHG emissions in the City of Santa Ana to reduce environmental impacts associated with global climate change. The Draft CAP proposes measures to lessen numerous environmental impacts and does not contain any strategy or measure that would either directly substantially reduce habitat, reduce wildlife populations, threaten animal or plant communities, restrict the range of species, or eliminate examples of history or prehistory. The impact would be less than significant.

There is one prehistoric site and 18 post contact sites in the City of Santa Ana. However, construction associated with Draft CAP measures, such as expanding pedestrian, bicycle, and transit facilities or implementing the Safe Routes to School Program, would most likely take place within existing rights-of-way. Should construction associated with implementation of the proposed measures take place outside the existing rights-of-way, new ground disturbance has the potential to uncover unknown resources. In addition, should any construction take place in close proximity to or within the identified prehistoric site near Santiago Creek, compliance with applicable regulations would be necessary and an onsite monitor during construction activity may be required. In the event that this occurs, compliance with State regulations pertaining to discovery of archaeological resources would ensure a less than significant impact.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact. The Draft CAP would not result in any adverse environmental impacts that are cumulatively considerable. The project is intended to contribute to a cumulative reduction in GHG emissions and to reduce adaptation impacts associated with global climate change, both of which would have beneficial cumulative environmental effects. Measures within the Draft CAP that may result in indirect

adverse environmental impacts are evaluated throughout this initial study. However, as all impacts are considered to be less than significant or less than significant with mitigation incorporated, it is unlikely that any impact would contribute to a significant cumulative impact. The impact would be less than significant.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

No Impact. The Draft CAP is a policy document intended to reduce the City's community-wide GHG emissions to help cumulatively address the adverse environmental impacts associated with global climate change, while also protecting and enhancing the quality of life within the City. The Draft CAP measures strive to protect the environment, enhance human health and safety, and conserve natural resources, both within and beyond Santa Ana. Adoption and implementation of the Draft CAP would result in beneficial environmental effects, and would not cause substantial adverse direct or indirect effects on human beings resulting from a change in the physical environment. There would be no impact.

4. References

Airnav. 2014. Website: https://www.airnav.com/airports/get, accessed September 1, 2015.

Airport Land Use Commission for Orange County. Land Use Plan for John Wayne Airport. Adopted April 17, 2008. Available online at: <u>http://www.ocair.com/commissions/aluc/docs/JWA_AELUP-April-17-2008.pdf</u>, accessed September 1, 2015.

California Air Resources Board. First Update to the Climate Change Scoping Plan: Building on the Framework. Adopted May 2014. Available online at:

http://www.arb.ca.gov/cc/scopingplan/2013 update/first update climate change scoping plan.pdf, accessed September 1, 2015.

California Department of Conservation. California Geological Survey. Aggregate Sustainability in California Map. Available online at:

http://www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS 52 2012.pdf, accessed August 31, 2015.

California Department of Conservation, Division of Land Resource Protection. Agricultural Preserves 2004 – Williamson Act Parcels Orange County, California. Available online at: <u>ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Orange_WA_03_04.pdf</u>, accessed September 1, 2015.

California Department of Conservation, Division of Land Resource Protection. Orange County Important Farmland 2012. Available online at: <u>ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/ora12.pdf</u>, accessed September 1, 2015.

California Department of Conservation, Division of Mines and Geology. Seismic Hazard Zones Map – Anaheim Quadrangle. April 15, 1998. Available online at: http://gmw.consrv.ca.gov/shmp/download/quad/ANAHEIM/maps/ozn_anah.pdf, accessed August 28, 2015.

California Department of Conservation, Division of Mines and Geology. Seismic Hazard Zones Map – Newport Beach Quadrangle. April 17, 1997. Available online at: <u>http://gmw.consrv.ca.gov/shmp/download/quad/NEWPORT_BEACH/maps/ozn_newb.pdf</u>, accessed August 28, 2015.

California Department of Conservation, Division of Mines and Geology. Seismic Hazard Zones Map – Orange Quadrangle. April 15, 1998. Available online at: http://gmw.consrv.ca.gov/shmp/download/guad/ORANGE/maps/ozn_ora.pdf, accessed August 28,

2015.

California Department of Conservation, Division of Mines and Geology. Seismic Hazard Zones Map – Tustin Quadrangle. January 17, 2001. Available online at: http://gmw.consrv.ca.gov/shmp/download/quad/TUSTIN/maps/ozn_tus.pdf, accessed August 28, 2015.

California Department of Conservation. Search for Regulatory Maps by County. Website: <u>http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm</u>, accessed September 3, 2015.

California Department of Fish and Wildlife. NCCP Plan Summary – County of Orange (Central/Coastal) NCCP/HCP. Website: <u>https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Orange-Coastal</u>, accessed August 31, 2015.

California Department of Forestry and Fire Protection. Fire Hazard Severity Zones in SRA. Adopted November 7, 2007. Available online at: <u>http://frap.fire.ca.gov/webdata/maps/orange/fhszs_map.30.pdf</u>, accessed September 1, 2015.

California Department of Transportation. Officially Designated Scenic Highways. Website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed August 31, 2015.

California Legislative Information. Bill Information, AB-2188 Solar energy: permits. Available online at: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB2188, accessed October 13, 2015.

City of Santa Ana Building Safety Division. Streamlined Residential Solar Plan Check and Permitting. Available online at: http://www.ci.santa-ana.ca.us/pba/buildingsafety/ResidentialSolar.asp, accessed October 13, 2015.

City of Santa Ana Municipal Code. Chapter 18 Article VI – Noise Control. Section 18-312 – Exterior noise standards.

City of Santa Ana Municipal Code. Chapter 33 Article VII.

City of Santa Ana Municipal Code. Chapter 41 Article XVI.

City of Santa Ana. *Natural Hazards Mitigation Plan – Executive Summary*. Available online at: http://hazardmitigation.calema.ca.gov/docs/lhmp/Santa_Ana_City_of_LHMP.pdf, accessed August 31, 2015.

City of Santa Ana Planning Division. A1(General Agriculture) Zoning Document. Available online at: <u>http://www.ci.santa-ana.ca.us/pba/planning/documents/A1.pdf</u>, accessed September 1, 2015.

City of Santa Ana Planning Division. *City of Santa Ana General Plan Airport Environs Element*. Adopted February 11, 2009. Available online at: <u>http://www.ci.santa-ana.ca.us/generalplan/documents/AirportEnvirons.pdf</u>, accessed September 3, 2015.

City of Santa Ana Planning Division. *City of Santa Ana General Plan Housing Element*. Adopted February 4, 2014. Available online at: http://www.ci.santa-ana.ca.us/housingelement/default.asp, accessed September 3, 2015.

City of Santa Ana Planning Division. *City of Santa Ana General Plan Land Use Element*. Available online at: <u>http://www.ci.santa-ana.ca.us/generalplan/documents/LandUse.pdf</u>, accessed September 2, 2015.

City of Santa Ana Planning Division. *City of Santa Ana General Plan Scenic Corridors Element*. Adopted September 20, 1982. Available online at: <u>http://www.ci.santa-ana.ca.us/generalplan/documents/ScenicCorridors.pdf</u>, accessed August 31, 2015.

City of Santa Ana Planning Division. *City of Santa Ana General Plan Seismic Safety Element*. Adopted September 20, 1982. Available online at: http://www.ci.santa-ana.ca.us/generalplan/documents/SeismicSafety.pdf, accessed August 31, 2015.

City of Santa Ana Planning Division. *City of Santa Ana Zoning Map.* Available online at: <u>http://www.ci.santa-ana.ca.us/pba/planning/documents/Zoning2014FullCity.pdf</u>, accessed September 1, 2015.

City of Santa Ana Planning Division. Santa Ana Register of Historical Properties. Website: http://www.ci.santa-ana.ca.us/pba/planning/documents/Historic_Register.pdf, accessed October 13, 2015.

DTSC. EnviroStor. Website: http://www.envirostor.dtsc.ca.gov/public/, accessed August 31, 2015.

Federal Emergency Management Agency. Flood Map Service Center. Website: https://msc.fema.gov/portal, accessed October 13, 2015.

ICLEI-USA. City of Santa Ana Climate Action Plan. October 2015.

Orange County Public Works Flood Division. Santa Ana River Project, Project Cost and Schedule. Website: http://ocflood.com/sarp/cost, accessed October 13, 2015.

Orange County Public Works Flood Division. Santa Ana River Project, Project Description. Website: http://ocflood.com/sarp/project, accessed October 13, 2015.

Orange County Transportation Authority. 2013 Congestion Management Program. Adopted November 2013. Available online at: http://www.octa.net/pdf/Final%202013%20CMP.pdf, accessed September 9, 2015.

South Coast Air Quality Management District. 2012 Air Quality Management Plan. Available online at http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan, accessed October 19, 2015.

SWRCB. GeoTracker. Website: http://geotracker.waterboards.ca.gov/, accessed August 31, 2015.

U.S. Fish and Wildlife Service. National Wetlands Inventory. Available online at: http://www.fws.gov/wetlands/data/mapper.HTML, accessed October 13, 2015.

5. List of Preparers

Lead Agency

City of Santa Ana Melanie McCann, Associate Planner

AECOM

Yara Fisher, Principal Planner Jason Paukovits, Project Manager Erin Murphey, Environmental Analyst