RESOLUTION NO. 2015-004

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SANTA ANA CERTIFYING THE REA/FEIR FOR THE SANTA ANA-GARDEN GROVE FIXED GUIDEWAY PROJECT AND APPROVING THE PROJECT

WHEREAS, the City of Santa Ana (the "City"), along with the City of Garden Grove, has proposed that a streetcar line be constructed and operated along a 4.2 mile-long corridor through the City of Santa Ana and into the eastern portion of the City of Garden Grove (the "Santa Ana-Garden Grove Fixed Guideway Project" or "the Project"); and

WHEREAS, under the California Environmental Quality Act (Public Resources Code section 21000 et seq., "CEQA"), and pursuant to Public Resources code section 21067 and State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) section 15367, the City has assumed the role of the lead agency for the Project on behalf of itself and the City of Garden Grove; and

WHEREAS, the City determined that an environmental impact report should be prepared pursuant to CEQA in order to analyze all potential adverse environmental impacts of the Project; and

WHEREAS, pursuant to State CEQA Guidelines sections 15082(a) and 15375, the City circulated a Notice of Preparation ("NOP") to public agencies, special districts, and members of the public for an initial 30-day public comment period commencing May 24, 2010 and ending June 22, 2010. In addition, four scoping meetings were conducted for the general public between June 8 and June 10, 2010; and

WHEREAS, during the NOP comment period, the City solicited comments from potential responsible and trustee agencies and members of the public; and

WHEREAS, the City prepared an Environmental Assessment/Draft Environmental Impact Report ("EA/DEIR") to analyze the potential environmental effects of the Project, and then published the EA/DEIR on May 23, 2014 with a 45-day public review period which expired on July 7, 2014. During the public review period, three public meetings regarding the Project were also held, on June 14, 17, and 19, 2014; and

WHEREAS, pursuant to CEQA Guidelines section 15087, the City circulated a public notice of availability of the EA/DEIR; and

WHEREAS, pursuant to CEQA Guidelines section 15086, the City consulted with and requested comments from all responsible and trustee agencies, other regulatory agencies and other interested parties during the 45-day comment period; and

WHEREAS, the City received 17 written comment letters during the public review period for the EA/DEIR and prepared responses to the same. Responses were also prepared to oral comments made during the aforementioned meetings held during the public review period; and

WHEREAS, pursuant to Public Resources Code section 21092.5, the City provided copies of the written responses to all commenting public agencies; and

WHEREAS, the EA/DEIR assessed the environmental impacts of a number of alternative versions of the Project, without indicating a preference for any particular alternative; and

WHEREAS, after review of the public comments and testimony received during the 45-day public review period, the City Council of the City of Santa selected, via Resolution No. 2001-049 (adopted on August 5, 2014), "Streetcar Alternative 1" (Operations & Maintenance Facility Site B [west of Raitt Street] and Fourth Street Parking Scenario A [parallel parking]) as the "Locally Preferred Alternative" to be implemented. For the purposes of this Resolution, the "Project" shall hereafter refer to Streetcar Alternative 1, as described in Resolution No. 2001-049; and

WHEREAS, the City has prepared a Revised Environmental Assessment/Final Environmental Impact Report ("REA/FEIR"), consisting of comments received during the 45-day public review and comment period on the EA/DEIR, written responses to those comments, and revisions and errata to the EA/DEIR. For the purposes of this Resolution, the "REA/FEIR" shall refer to the EA/DEIR, as revised by the REA/FEIR's errata section, together with the other sections of the REA/FEIR; and

WHEREAS, as contained herein, the City has endeavored in good faith to set forth the basis for its decision on the Project; and

WHEREAS, all requirements of CEQA and the State CEQA Guidelines have been satisfied in the REA/FEIR, which is sufficiently detailed so that all of the potentially significant environmental effects of the Project have been adequately evaluated; and

WHEREAS, the REA/FEIR sufficiently analyzes both the feasible mitigation measures necessary to avoid or substantially lessen the Project's potential environmental impacts and a range of feasible alternatives capable of eliminating or reducing these effects in accordance with CEQA and the State CEQA Guidelines; and

WHEREAS, all of the findings and conclusions made by the City Council pursuant to this Resolution are based upon oral and written evidence presented to it as a whole and the entirety of the record of proceedings on the Project, which is hereby incorporated by this reference, and not based solely on the information provided in this Resolution; and

WHEREAS, the REA/FEIR reflects the independent judgment of the City Council and is deemed adequate for purposes of making decisions on the merits of the Project; and

WHEREAS, the City has not received any comments or additional information that produced substantial new information requiring recirculation under Public Resources Code section 21092.1 and State CEQA Guidelines section 15088.5; and

WHEREAS, on January 20, 2015, the City Council conducted a duly noticed public hearing on this Resolution, at which time all persons wishing to testify were heard, and the Project was fully considered; and

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SANTA ANA AS FOLLOWS:

SECTION 1. The City Council of the City of Santa Ana hereby adopts the Findings and Facts attached as Exhibit A to this Resolution and incorporates them into this Resolution as if fully set forth herein.

SECTION 2. Based on the entire record before the City Council, all written and oral evidence presented, and the Findings and Facts attached as Exhibit A to this Resolution, the City Council of the City of Santa Ana finds that it has reviewed and considered the REA/FEIR in evaluating the Project, that the REA/FEIR is an accurate and objective statement that fully complies with the Public Resources Code and the State CEQA Guidelines, and that the REA/FEIR reflects the independent judgment of the City Council. The City Council consequently hereby certifies the REA/FEIR and adopts the Statement of Overriding Considerations incorporated within the Findings and Facts attached as Exhibit A to this Resolution.

SECTION 3. Pursuant to Public Resources Code section 21081.6, the City Council hereby adopts the Mitigation Monitoring and Reporting Program attached as Attachment A to the Findings and Facts, which are collectively attached to this Resolution as Exhibit A. In the event of any inconsistencies between the mitigation measures as set forth in the Findings and Facts and the Mitigation Monitoring and Reporting Program, the Mitigation Monitoring and Reporting Program shall control.

SECTION 4. The documents and other materials that constitute the record of proceedings for the City's actions related to the Project are available at the City of Santa Ana, Public Works Agency, 20 Civic Center Plaza Ross Annex (M-36), Santa Ana, California 92701. The City of Santa Ana is the custodian of the record of proceedings for the Project.

SECTION 5. Staff is hereby directed to file a Notice of Determination within five (5) days of the approval of this Resolution with the County Clerk of the County of Orange.

SECTION 6. The City Council of the City of Santa Ana hereby approves the Project.

ADOPTED this 20th day of January, 2015.

Miguel A. Pulido

APPROVED AS TO FORM:

By: Sonia R. Carvalho
Sonia R. Carvalho,
City Attorney

AYES: Councilmembers: Amezcua, Martinez, Pulido, Reyna, Tinajero (5)

NOES: Councilmembers: None (0)

ABSTAIN: Councilmembers: Sarmiento (1)

NOT PRESENT: Councilmembers: Benavides (1)

CERTIFICATE OF ATTESTATION AND ORIGINALITY

I, MARIA D. HUIZAR, Clerk of the Council, do hereby attest to and certify the attached Resolution No. 2015-004 to be the original resolution adopted by the City Council of the City of Santa Ana on January 20, 2015.

Date: 1/27/2015

Maria D. Huizar
Clerk of the Council
City of Santa Ana

EXHIBIT "A"

SEE LASERFICHE

RESOLUTION NO. 2015-004 FOR EXHIBIT

EXHIBIT A

FINDINGS AND FACTS IN SUPPORT OF FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE SANTA ANA—GARDEN GROVE FIXED GUIDEWAY PROJECT STATE CLEARINGHOUSE NO. 2010051060

1. INTRODUCTION

The City Council of the City of Santa Ana (City Council) hereby certifies and finds that the Santa Ana-Garden Grove (SA-GG) Fixed Guideway Project (proposed project) Revised Environmental Assessment/Final Environmental Impact Report (REA/FEIR), State Clearinghouse Number 2010051060, has been completed in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21000, *et seq.*) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Sections 15000, *et seq.*, or CEQA Guidelines). The REA/FEIR incorporates the following documents by reference as part of the environmental record for the proposed project: (1) Environmental Assessment/Draft EIR (EA/DEIR); (2) Technical Appendices to the EA/DEIR; (3) Alternative Analysis Report; and (4) REA/FEIR, which includes Responses to Comments, Corrections and Additions, and the Mitigation Monitoring and Reporting Program (MMRP). The aforementioned documents, and the entirety of the Administrative Record for the proposed project, are hereby incorporated by reference into these findings.

The City Council hereby further confirms it received, reviewed, and considered the information contained in the REA/FEIR and all hearings and submissions of testimony from City officials and departments, the public, other public agencies, community groups, and organizations, and finds that the REA/FEIR reflects its independent judgment and analysis. Concurrently with the adoption of these findings, the City Council adopts a Statement of Overriding Considerations (see Section 9, below) and an MMRP, attached hereto as Attachment A.

Having received, reviewed, and considered the foregoing information, as well as any and all information in the Administrative Record, the City Council hereby makes the findings below pursuant to and in accordance with PRC Section 21081 and CEQA Guidelines Sections 15090 and 15091.

The City Council makes the following findings:

a. None of the public comments submitted to the City regarding the EA/DEIR and the REA/FEIR, including the public testimony made at three public hearings or responses to comments, present any significant new information that would require the EA/DEIR to be recirculated for additional public review.

b. No new significant environmental impacts would result from new or modified mitigation measures proposed to be implemented.

c. The EA/DEIR adequately analyzed project alternatives, and there are no feasible project alternatives or mitigation measures considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the project.

d. Any new information in the REA/FEIR has been provided merely to clarify or amplify information in the EA/DEIR. The new information does not reveal that the proposed project would cause significant new impacts not previously identified in the EA/DEIR.

In addition, PRC Section 21081 and CEQA Guidelines Section 15091 require the City Council, prior to approving the SA-GG Fixed Guideway Project, to identify significant impacts of the proposed project and make one or more of three allowable findings for each of the significant impacts:

a. The first allowable finding is that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR" (CEQA Guidelines Section 15091, subd. [a][1]).

b. The second allowable finding is that "such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency" (CEQA Guidelines Section 15091, subd. [a][2]).

c. The third allowable finding is that "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final environmental impact report" (CEQA Guidelines Section 15091, subd. [a][3]).

The findings reported in Sections 4 through 8 are founded on, and hereby explicitly incorporate by reference, the analysis, facts, and discussions contained in the REA/FEIR regarding each particular environmental impact. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts initially identified as "less than significant," these findings will, nevertheless, fully account for all such effects identified in the REA/FEIR.

A. Document Format

These findings have been organized into the following sections:

1. Section 1 provides an introduction to these findings.
2. Section 2 provides a summary of the project, overview of the discretionary actions required for approval of the proposed project, and a statement of the project's objectives.
3. Section 3 provides a summary of public participation in the environmental review for the proposed project.
4. Section 4 sets forth findings regarding the environmental impacts that were determined to be less than significant without mitigation.
5. Section 5 sets forth findings regarding significant or potentially significant environmental impacts. These impacts include those that the City Council has determined can be feasibly

mitigated to a less-than-significant level through the imposition of existing regulations, standard conditions and/or mitigation measures. In order to ensure compliance and implementation, all mitigation measures will be included in the MMRP for the proposed project and adopted as conditions of the proposed project by the City Council.

6. Section 6 sets forth findings regarding those significant or potentially significant environmental impacts that will or may result from the proposed project and which the City has determined cannot feasibly be mitigated to a less-than-significant level.
7. Section 7 sets forth findings regarding the cumulative, growth-inducing, and irreversible effects of the proposed project.
8. Section 8 sets forth findings regarding alternatives to the proposed project.
9. Section 9 sets forth a statement of overriding considerations, which identifies the benefits that would outweigh the significant, unavoidable environmental impacts associated with implementation of the proposed project.

B. Custodian and Location of Records

The documents and other materials that constitute the administrative record for the City's actions related to the proposed project are available at the City of Santa Ana, Planning and Building Agency, 20 Civic Center Plaza Ross Annex (M-20), Santa Ana, California 92701. The City of Santa Ana is the custodian of the Administrative Record for the proposed project.

2. PROJECT SUMMARY

A. Project Location

The SA-GG Fixed Guideway Study Area is located in central Orange County, California and directly accesses both the Los Angeles-San Diego-San Luis Obispo rail corridor and the Pacific Electric right-of-way (PE ROW) rail corridor. Running predominantly in an east-west direction, the corridor extends 4.2 miles through the City of Santa Ana and into the eastern portion of the City of Garden Grove. The Study Area is generally bounded by Harbor Boulevard to the west, 17th Street to the north, Grand Avenue to the east, and 1st Street to the south. The eastern terminus of the alignment is the Santa Ana Regional Transportation Center (SARTC) and the western terminus is the Harbor Boulevard/ Westminster Avenue intersection.

B. Project Description

Following receipt of public comments on the EA/DEIR and after the close of the public comment period, the City Council selected Streetcar Alternative 1 with Operations & Maintenance (O & M) Facility Site B (west of Raitt Street) and 4th Street Parking Scenario A (parallel parking) as the Locally Preferred Alternative for the SA-GG Fixed Guideway Project on August 5, 2014.

Streetcar Alternative 1 (proposed project) would utilize the PE ROW, an abandoned and vacant rail right-of-way owned by the Orange County Transportation Authority (OCTA), through the western half of its alignment and generally operate along Santa Ana Boulevard, and 4th Street on the way to SARTC. The 4.2-mile alignment would include 12 stations and it is anticipated that the streetcar system would operate seven days a week with 10-minute headways during

peak periods and 15-minute headways during off-peak periods. The streetcars would be electrically powered using an overhead contact system and a series of Traction Power Substations (TPSS) located intermittently along the alignment.

The Downtown segment of the alignment would feature couplet operations with the westbound streetcar alignment on Santa Ana Boulevard, and the eastbound streetcar alignment on 4th Street. For the eastbound transition from Santa Ana Boulevard to 4th Street, a direct route would be provided from Santa Ana Boulevard along a public easement on the southern edge of Sasscer Park to 4th Street.

The western terminus is located at the northeast corner of Harbor Boulevard and Westminster Avenue; the transition from the PE ROW to the western terminus site will include an elevated crossing. In addition, the proposed project would utilize the PE ROW and cross over the Santa Ana River. A new single-track bridge for the fixed guideway would be constructed immediately south of the Old Pacific Electric Santa Ana River Bridge, which is designated as a historic bridge and would remain in its current location and condition. Through the use of gates and signaling, the single-track bridge would accommodate bi-directional fixed guideway traffic.

The proposed project would require the construction of an O & M Facility for streetcar operations. An O & M Facility is a stand-alone building which would meet the maintenance, repair, operational and storage needs of the proposed streetcar system. The O & M Facility accommodates daily and routine vehicle inspections, interior/exterior cleaning of the streetcars, preventative (scheduled) maintenance, unscheduled maintenance, and component change-outs. The proposed facility would also provide a venue for parking vehicles that are not in use and for rebuilding components. The O & M Facility is a rectangular site slightly larger than 2.4 acres. It is located west of Raitt Street and is bordered by 5th Street to the north and the PE ROW to the south. Located in an area zoned for industrial and commercial uses, this site is comprised of three parcels, two of which contain existing businesses and a combination of industrial buildings. The third parcel contains several residences.

The proposed project alignment would utilize 4th Street between Ross Street and Mortimer Street in the eastbound direction. From east of Ross Street to French Street, 4th Street has one travel lane in each direction with head-in diagonal parking along each side of the roadway. The diagonal parking, with vehicles exiting parking spaces by backing into the travel lane, is incompatible with streetcar operations and the proposed project would convert the diagonal parking along the south side of 4th Street, between Ross Street and French Street, to parallel parking, widen the sidewalk along the south side from 12 to 20 feet, and replace streetlights and landscaping. A total of 26 on-street parking spaces would be removed.

C. Discretionary Actions

Implementation of the proposed project will require several actions by the City Council, including the following:

- **Certification of the Santa Ana-Garden Grove Fixed Guideway Project REA/FEIR (SCH#2010051060).** The REA/FEIR evaluated the environmental impacts resulting from the proposed project, in accordance with CEQA, as amended (PRC Sections 21000 *et*

seq.), and the State CEQA Guidelines for Implementation of CEQA (CCR, Title 14, Sections 15000 *et seq.*).

- **Approval of the Santa Ana-Garden Grove Fixed Guideway Project**
- **Adoption of the MMRP for the Santa Ana-Garden Grove Fixed Guideway Project**
- **Adoption of the Findings and Statement of Overriding Considerations for the Santa Ana-Garden Grove Fixed Guideway Project**

The REA/FEIR would provide environmental information to responsible agencies, trustee agencies, and other public agencies that may be required to grant approvals and permits or coordinate with the City as a part of project implementation. These agencies include, but are not limited to, the following:

- **California Public Utilities Commission.** Approval of crossings and horn-sounding exemption for the crossings at 5th and Fairview Streets.
- **City of Garden Grove.** Various permits, including construction permits.
- **Southern California Regional Rail Authority.** Issuance of a Right-of-Entry Permit.
- **Santa Ana Regional Water Quality Control Board.** Issuance of a Clean Water Act 401 Water Quality Certification, Stormwater Municipal Separate Storm Sewer System Permit, National Pollutant Discharge Elimination System Statewide Permit.
- **U.S. Army Corps of Engineers.** Issuance of a Clean Water Act Section 404 Permit.

D. Statement of Project Objectives

The purpose of the proposed project is to provide a new east-west transit line in Orange County between the SARTC in the City of Santa Ana and the Harbor Boulevard/Westminster Avenue intersection in the City of Garden Grove. The primary objectives of the proposed project are as follows:

- To improve transit connectivity within the Study Area;
- To relieve congestion by providing alternative mobility options;
- To be sensitive to the character of the community;
- To increase transit options;
- To improve transit accessibility to and within the Study Area; and
- To provide benefits to the environment through improved air quality.

3. ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

Meaningful public engagement was an important component of the SA-GG Fixed Guideway Project from the onset. Beginning in 2008 and continuing throughout project development to March 2014, in preparation for the public review of the EA/DEIR, the City of Santa Ana conducted outreach to the Downtown businesses. The City's multi-lingual outreach team conducted door-to-door visits to approximately 230 businesses in the Downtown area, including approximately 156 businesses along 4th Street. The purpose of the outreach was to share key

information with Downtown business and property owners about the SA-GG Fixed Guideway Project, inform them about the upcoming release of the EA/DEIR, document questions and input, and provide business owners with appropriate contact information for additional follow-up. A "Sorry We Missed You" letter and information packet was also prepared and left behind for business owners who were not available during the initial visit. The letter offered a briefing with the outreach team to review the proposed project information packet.

Extensive efforts were conducted to involve the public and stakeholders in the planning for the implementation of a streetcar along the alignment and through the Downtown area. Prior to the release of the EA/DEIR, numerous meetings were held with stakeholders throughout the Study Area to obtain input and provide updates on the SA-GG Fixed Guideway Project. Community meetings were held with the Lacy Neighborhood, the French Park Neighborhood, the Santiago Lofts Homeowners Association, the Santa Ana Senior Center, and many other stakeholders. Stakeholder comments were collected and recorded at each meeting. In addition, a series of Stakeholder Working Group meetings were held to involve key business people and leaders in the community. Below is a list of organizations which received presentations on the proposed project:

- French Park Association
- Kennedy Commission
- Santa Ana Collaborative for Responsible Development
- Santiago Lofts Homeowners Association
- Artesia Pilar Neighborhood Association
- Labor Union Members
- Federal Courthouse
- Santa Ana Senior Center
- Stakeholders Working Group
- Santa Ana City Council
- Santa Ana Restaurant Association
- Templo Calvario
- State Appellate Court
- Orange County Superior Court
- Rancho Santiago Community College District Board of Trustees
- Lacy Neighborhood
- SARTC Community Meeting to discuss the Santa Ana Train Station
- Board of Directors, Santa Ana Merchants Association
- Downtown Inc
- Santa Ana Merchants Association
- Santa Ana Unified School District
- Stakeholders Working Group Advisory Committee
- One-on-one briefings with 140 Downtown Businesses
- Santa Ana City College
- Railway Association of Southern California
- Santa Ana Unified School District Board

- Orange County Transportation Authority (OCTA)
- Everest College/Corinthian College
- Santa Ana Resource Network
- Orange County Business Council
- Orange County Transportation Authority Transportation 2020 Committee
- Federal Transit Administration
- California Public Utilities Commission staff
- County of Orange Supervisors and staff

In addition, prior to making any key decisions on the proposed project, the City of Santa Ana initiated a public scoping process to define the appropriate range of issues to be addressed in the EA/DEIR. Four scoping meetings were conducted for the general public between June 8 and June 12, 2010. Two of these meetings were scheduled in the evening, one meeting was scheduled in the morning, and one meeting was scheduled on a Saturday afternoon, providing those community members who could not attend any of the weekday evening meetings with an opportunity to participate. Public comment opportunities were made available at each meeting. It should also be noted that articles and advertisements were published in a number of local newspapers, including several non-English publications. All information materials were presented in English, as well as Spanish.

In compliance with PRC Sections 21080.4 and 21092, the Notice of Availability of the EA/DEIR for public review, beginning May 23, 2014, was filed and posted at the Orange County Clerk-Recorder's Office; advertised in the local newspaper; flyers were distributed at every community center in the City of Santa Ana; outreach was also conducted via social media; and a press release was covered by at least three different news organizations. Although not required under CEQA regulations, available data from County Assessor and City property records were used to establish a list of property owners and tenants within 500 feet of the alignment. There were 3,796 postcards delivered to property owners, business owners, tenants, and residents related to EA/DEIR availability for public review. Hard copies of the notifications and document were also made available at different locations (Santa Ana City Hall Public Works Counter, Santa Ana City Hall City Clerk's Office, Santa Ana Public Library, Salgado Center, Rosita Park, Santa Ana Train Station, Garden Grove City Hall, and OCTA), as well as online on the City of Santa Ana website. During the review period, 17 written submissions were received on the EA/DEIR from public agencies, community groups, and individuals. In addition, three public meetings were held on June 14, 17, and 19, 2014. Approximately 150 people attended the public meetings, and roughly 34 attendees gave verbal testimony at the meetings.

The REA/FEIR, which contains written responses to the comment letters received during and after the 45-day comment period and to oral testimonies during the public meetings, was completed and distributed on November 8, 2014. Distribution of the REA/FEIR entailed providing copies of the REA/FEIR to public agencies and organizations that received and/or commented on the EA/DEIR and notifying individuals who commented on the EA/DEIR or the REA/FEIR availability. The REA/FEIR was made available to the public on the City's website at http://santaanatransitvision.com and the locations listed above. The REA/FEIR was prepared

and distributed in accordance with CEQA Guidelines Section 15088(b), which requires that written responses be provided at least 10 days prior to certifying an EIR.

4. ENVIRONMENTAL ISSUES THAT WERE DETERMINED TO BE LESS THAN SIGNIFICANT

The following environmental resource areas would not be significantly impacted by the proposed project:

A. Aesthetics (pages 3-86 and 3-190 of the EA/DEIR)

- The proposed project would result in the installation of overhead contact wire poles with catenary wires, new light poles, and additional traffic signals along the entire length of the proposed project alignment. These project components would introduce new vertical elements to the PE ROW and Santa Ana Boulevard. Workers and patrons of commercial establishments, motorists, and pedestrians would have limited views of the proposed improvements as they move through the area or visit commercial facilities. The visual quality associated with the Old Pacific Electric Santa Ana River Bridge, Santa Ana River Trail, Sasscer Park, the French Park and Downtown Santa Ana Historic Districts, and SARTC would not be substantially affected by the proposed project. Therefore, a less-than-significant impact related to scenic vistas, scenic resources, and visual quality would occur.
- The proposed vertical elements and TPSS would not impact the low to moderate visual quality of the Study Area. Therefore, a less-than-significant impact related to visual character would occur.
- While the lighting design, including intensity and height, has not been determined to date, in general, the lighting will be designed to direct lighting to the immediate area to minimize spillover, and will be consistent with the existing lighting in the area. However, it is possible that lighting associated with the O & M Facility and the stations/platforms located adjacent to residential neighborhoods could create a new source of lighting that might impact nighttime views in those areas. Project design features, including, but not limited to, architectural integration of all lighting fixtures with the character of the surrounding environment, use of shielded or recessed lighting, and use of low-profile walkway lights, would eliminate potential light and glare impacts. Therefore, a less-than-significant impact related to lighting would occur.

B. Agricultural and Forest Resources (page 3-14 of the EA/DEIR)

- There are no agricultural, timberland, or forestry resources within the Study Area. The proposed project would not convert farmland to non-agricultural use; conflict with zoning for agricultural use, forest land, or timberland; conflict with Williamson Act contracts; or result in the loss or conversion of forest land to non-forest use. Therefore, no impacts related to agricultural resources, farmland, and forestry resources would occur.

C. Air Quality (page 3-156 of the EA/DEIR)

- The proposed project is consistent with the City of Santa Ana long-term vision for transportation development and traffic congestion alleviation. Regionally, the proposed

project would develop a mass transit infrastructure, which is a Transportation Control Measure in the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan that seeks to reduce air pollutant emissions via a reduction in vehicle trips and congestion. In addition, the proposed project is included in Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted on April 4, 2012. Therefore, a less-than-significant impact related to conflicting or obstructing the air quality management plan would occur.

- Operational activity would increase regional emissions by less than one pound per day when compared with the emissions under the No Build Alternative. The net increase in emissions would not exceed the SCAQMD significance thresholds. Therefore, a less-than-significant impact related to violation of an air quality standard or contribution to an existing or projected air quality violation would occur.
- The proposed electrically-powered streetcars would not generate localized exhaust emissions. However, changes to intersection operations as a result of project implementation could potentially increase vehicle idling and result in carbon monoxide (CO) hotspots. In addition, the proposed park-and-ride facility located on the northeast corner of the Harbor Boulevard/Westminster Avenue intersection would potentially increase localized pollutant concentrations. The CO hotspot analysis conducted for the project indicated that the proposed project would contribute less than 0.1 part per million (ppm) to the one- and eight-hour CO concentrations and would be less than the State one- and eight-hour CO standards of 20 and 9 ppm. The proposed electrically-powered streetcars would not generate diesel particulate matter. The O & M Facility would service streetcar vehicles and would require the use of solvents and related chemicals for cleaning and repair activities. However, the O & M Facility would not generate diesel emissions or be a substantial source of chemicals identified in the California Air Resources Board guidance for locating pollutant generators near sensitive populations. Therefore, a less-than-significant impact related to exposing sensitive receptors to substantial pollutant concentrations would occur.
- The O & M Facility would require the use of solvents and related chemicals for cleaning and repair activities. However, these sources would not be used in sufficient quantities that would emit substantial odors for public complaints. Therefore, a less-than-significant impact related to odors would occur.

D. Biological Resources (page 3-217 of the EA/DEIR)

- The Study Area is heavily developed and contains no natural biological communities. The ground disturbance footprint consists entirely of disturbed or developed land, which includes roadways, developed and undeveloped lots, parking areas, and residential and commercial developments. Literature review and field survey data determined that no special status plant or wildlife species have the potential to occur within the project's footprint and that the Study Area lacks suitable habitat that would typically support special status species or receive State or federal Endangered Species Act protections. Therefore, a less-than-significant impact related to candidate, sensitive, or special species would occur.

- The Santa Ana River is the only potential special aquatic feature within the Study Area. It is concrete lined and contains no wetlands or hydrophytic vegetation. Therefore, no impact related to wetlands and riparian habitat would occur.
- The Study Area is already heavily developed and additional development would not interfere with wildlife movement. The Study Area does not provide a major or local wildlife corridor or travel route because it does not connect two significant habitats for either fish or wildlife species. Operational activity within the ROW may frighten urban wildlife, such as raccoons and opossums. However, operational noise would cause most animals to avoid streetcar activity. Therefore, a less-than-significant impact related to wildlife movement would occur.
- The proposed alignment would be located within existing surface streets or within the PE ROW. Operational activities would not result in the removal of special species trees listed in the City's Tree Preservation Policy. Therefore, the proposed project would not conflict with local policies or ordinances protecting biological resources, such as the tree preservation policy, and a less-than-significant impact related to biological resources would occur.
- The Study Area is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local (including the City of Garden Grove), regional, or State habitat conservation plan. Therefore, no impact related to conservation plans would occur.

E. Architectural Resources (pages 3-96 and 3-191 of the EA/DEIR)

- Construction and operation of the proposed project would not result in significant impacts to any architecturally significant (historic) properties, including the Old Pacific Electric Santa Ana River Bridge. Although the proposed project would require an alteration to the west abutment of the Old Pacific Electric Santa Ana River Bridge to allow the Santa Ana River Trail on both the east and west sides of the river to be separated, the abutment of the bridge is not an original component of the bridge and is not an element or feature that contributes to the historic quality of the bridge. Therefore, a less-than-significant impact related to architectural resources would occur.

F. Geology and Soils (pages 3-97 and 3-192 of the EA/DEIR)

- The Study Area is not within an earthquake fault zone as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. There is no known evidence of a fault surface rupture expressed in the regional geomorphology and available historic aerial photographs. Given that there is no mapped earthquake fault zone within seven miles of the Study Area, the potential for fault rupture is low. Therefore, a less-than-significant impact related to fault rupture would occur.
- The subsurface condition of the Study Area is composed mostly of alluvium that could potentially be exposed to strong seismic ground shaking. This ground shaking could damage streetcar tracks, the Santa Ana River Bridge, the Westminster Avenue Bridge, or the O & M Facility. In addition, the segment of the alignment between Harbor Boulevard and Raitt Street may be impacted by liquefaction due to the potential shallow depth to groundwater of less than 20 feet. The impacts of liquefaction could include potential

collapse or misalignment of at-grade rails, which may cause streetcar derailment. However, City Staff and regulatory agencies are required to review the design plans and approve the appropriate foundation treatment prior to the issuance of building permits to ensure the structure integrity of project facilities. Therefore, a less-than-significant impact related to seismic ground shaking and liquefaction would occur.

- The topography of the Study Area is relatively flat with no significant slopes and is not mapped as being in an Earthquake-Induced Landslide Zone. There is no potential for landslides or seismically-induced landslides. Therefore, no impact related to landslides would occur.
- The entire length of the alignment and the O & M Facility would be completely paved. The Study Area is in a flat, highly urbanized area, and there is little potential for soil erosion. Therefore, no impact related to soil erosion would occur.
- Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. It is not anticipated that expansive soils are located near the surface in the Study Area. Therefore, no impact related to expansive soil would occur.
- The Study Area is in a flat, highly urbanized area without a unique geologic feature. Therefore, no impact related to unique geologic features would occur.
- The Study Area is located in an urbanized area extensively served by existing sewer infrastructure. Implementation of the proposed project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact related to septic tanks would occur.

G. Greenhouse Gas Emissions (page 3-148 of the EA/DEIR)

- Greenhouse gas (GHG) emissions associated with the proposed project would be approximately 1,224 metric tons per year and would not exceed the significance threshold of 10,000 metric tons per year. Therefore, a less-than-significant impact related to GHG emissions would occur.
- The proposed project would be designed to reduce vehicle miles traveled-related emissions by encouraging the use of public transit by providing accessibility to activity centers that provide employment and educational opportunities, goods and services. Therefore, a less-than-significant impact related to GHG plans, policies, and regulations would occur.

H. Hazards and Hazardous Materials (pages 3-103 and 3-193 of the EA/DEIR)

- There is a potential for hazardous materials/waste spills to occur at the O & M Facility, which is of importance as this site is located 0.20 mile from John C. Fremont Elementary School at 1930 10th Street and Romero-Cruz Elementary School at 1512 Santa Ana Boulevard. The O & M Facility would store hazardous materials/waste primarily for cleaning and routine maintenance of the streetcars and tracks and would likely house cleaning chemicals, lubrication oils, and hydraulic oils. However, the storage and disposal of hazardous materials/waste would be conducted in accordance with all federal and State regulatory

requirements that are intended to prevent or manage hazards and/or remediate spills, including periodic site inspections for compliance with these required practices. Therefore, a less-than-significant impact related to hazardous materials would occur.

- The proposed alignment is approximately 4.3 miles from the nearest airport (John Wayne Airport). The proposed alignment is not within an airport land use plan or near a private airstrip. Therefore, no impact related to airport hazards would occur.
- The proposed project would operate both in an exclusive ROW and within mixed-flow traffic. The exclusive PE ROW portion of the proposed alignment would not block or interrupt emergency access or evacuation routes. The on-street portion of the alignment would add streetcars to mixed-flow traffic, which would also have no substantial impact on emergency access or evacuation routes. However, should a major accident or emergency occur, emergency vehicles could, with permission from OCTA, use the PE ROW as an emergency access or evacuation route. Therefore, a less-than-significant impact related to emergency response and evacuation plans would occur.
- The proposed alignment is located in a fully urbanized area and is not located adjacent to or intermixed with wildlands. The proposed project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Therefore, no impact related to wildland fires would occur.

I. Hydrology and Water Quality (pages 3-186 and 3-214 of the EA/DEIR)

- The proposed project would likely generate pollutants that could travel in stormwater runoff along the track alignment in daily maintenance activities. Best management practices (BMPs) designed to reduce potential stormwater pollution would reduce, if not eliminate, potential impacts to water quality. Therefore, less-than-significant impacts related to water quality, water discharge, and stormwater runoff would occur.
- The proposed project is a transportation facility and would not deplete groundwater supplies. The O & M Facility would use water for maintenance activities (e.g., vehicle washing and landscaping and screening) and worker hygiene. Implementation of BMPs would ensure that water use would be minimal. Therefore, a less-than-significant impact related to groundwater would occur.
- The existing drainage pattern of the project alignment would not be substantially altered or impacted by the proposed project. The streetcar tracks do not have gutters like a traditional road, but water that falls onto impervious surfaces associated with the track system would be collected and conveyed into the storm drain system by inlets similar to roadway inlets. Therefore, a less-than-significant impact related to the drainage pattern would occur.
- A small portion of the Study Area is within an area of low to moderate hazard but is not expected to be inundated during the 100-year flood. However, there are locations that would be inundated during a 100-year flood at channel crossings and within the western portion of the proposed project alignment. In addition, the Study Area crosses the Santa Ana River. Development in these areas is required to follow applicable federal and State regulations guiding flood management. The greatest potential for flooding would be by dam

inundation of the Prado Dam or a 500-year flood. These events are unlikely with a 0.2 percent chance of occurring annually. Therefore, a less-than-significant impact related to flooding would occur.

- There are no bodies of water in the vicinity of the Study Area that are large enough to produce a seiche. Therefore, no impact related to seiches would occur.
- The Study Area is located approximately nine miles inland of the Pacific Ocean and would not be subject to tsunami inundation. Therefore, no impact related to tsunamis would occur.
- The closest hillsides up-gradient from the project alignment are more than ten miles to the north and are separated from the project alignment by urban development, including residential uses, streets, and storm drain systems, which makes it unlikely that the project alignment would experience effects caused by mudslides. Therefore, no impact related to mudslides would occur.

J. Land Use and Zoning (pages 3-28 and 3-201 of the EA/DEIR)

- The proposed project would operate in-street within the eastern portion of the proposed alignment and in the existing PE ROW between Harbor Boulevard and Raitt Street. These transportation corridors within the Cities of Santa Ana and Garden Grove act as boundaries between neighborhoods. The in-street alignment would not create a new physical barrier that would divide any portion of the Cities of Santa Ana or Garden Grove. Similarly, the PE ROW was constructed in 1905. The operation of a streetcar along this segment would not create a new physical barrier that divides either city. Therefore, no impacts related to dividing an established community would occur.
- On a regional scale, the proposed project would be consistent with the growth management policies of the SCAG Regional Comprehensive Plan and Guide to improve the standard of living, improve the regional quality of life, and maintain social, political, and cultural equity. They would also be consistent with the air quality and open space policies of the SCAG 2012-2035 RTP/SCS. On the local level, the proposed SA-GG Fixed Guideway Project would be consistent with the North Harbor Boulevard Specific Plan, Bristol Street Corridor Specific Plan, Midtown Specific Plan, and City of Santa Ana Transit Zoning Code. Therefore, a less-than-significant impact related to land use would occur.

K. Mineral Resources (page 3-108 of the EA/DEIR)

- The Study Area does not lie within a known mineral resource or mineral hazard area (i.e., radon) that would pose a risk to the human population. The Study Area does not include mineral activity areas regulated by the Surface Mining and Reclamation Act and, according to the State of California Department of Conservation Division of Oil, Gas and Geothermal Resources on-line mapping system, there are no geothermal resources, including oil and gas, located in the Study Area. Therefore, no impact related to mineral resources would occur.

L. Noise (pages 3-152 and 3-207 of the EA/DEIR)

- Regarding operational vibration, the maximum vibration level generated by the proposed project would be 70 VdB at a streetcar speed of 40 miles per hour and would not exceed Federal Transit Administration (FTA) vibration impact criteria of 72 VdB for residential land uses. For institutional land uses, the maximum vibration level would be 74 VdB at a streetcar speed of 35 miles per hour and would not exceed FTA vibration impact criteria of 75 VdB. Operational activity would not expose people to excessive vibration levels. Therefore, a less-than-significant impact related to vibration would occur.

- The proposed project would generate construction-related noise and vibration. Alignment and bridge construction activities would employ pieces of equipment (i.e., mounted impact hammer, foundation driller, pneumatic tools, concrete pump truck, and pavement miller or scarifier) that would exhibit high noise and vibration levels. A Noise and Vibration Control Plan will be developed and implemented prior to construction that will include BMPs to minimize exposure to high levels of noise and vibration and ensure compliance with City and FTA standards. With implementation of the Noise and Vibration Control Plan described in Section 3.16.2.3 of the EA/DEIR, the proposed project would not conflict with applicable noise standards and would not generate excessive vibration. Therefore, a less-than-significant impact related to construction noise and vibration would occur.

- The closest public airport within the Study Area is John Wayne Airport, located approximately four miles to the southeast, and is not within the impacted airport noise level contours. Therefore, no impact related to airport noise would occur.

M. Population and Housing (page 3-28 of the EA/DEIR)

- The proposed project would require housing acquisition resulting in displacement of approximately 28 persons. In addition, acquisition would affect fewer than a dozen businesses, which would displace no more than 50 jobs. Due to the small amount of housing and business displacement (less than one percent of the Study Area population), the number of persons displaced would be minimal compared to the existing population. Therefore, a less-than-significant impact related to population would occur.

- Given the length of the four-mile alignment and the City of Santa Ana's population of over 58,000 within the Study Area, the displacement of 28 people (less than 0.05 percent) would not be considered substantial. Acquisitions requiring the displacement of existing residential uses would comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act). The proposed project would provide relocation assistance and compensation to displaced residences per the Uniform Act. Compensation would not be less than the approved appraisal of the property. Therefore, the proposed project would not result in the displacement of substantial housing, and a less-than-significant impact related to housing would occur.

N. Public Services (page 3-62 of the EA/DEIR)

- The proposed project would not introduce a new population to create additional demand for police and fire services. The proposed project is not anticipated to create additional demand

for police and fire services although an increased demand for security personnel may occur. However, it is expected that the existing police and fire facilities would be adequate, and no new facilities would be required. Therefore, a less-than-significant impact related to police and fire services would occur.

- The proposed project would include security-oriented design features, such as perimeter fencing around the O & M Facility. A Crime Prevention through Environment Design program would be implemented during final design that includes natural access control, natural surveillance, territoriality, and maintenance to create a safe environment. In addition, all streetcar operators would participate in a safety/security training program and surveillance cameras may be installed inside streetcar vehicles. These design features, along with police security patrols, will substantially reduce the risk for criminal activities on streetcars, at transit stations, and at the O & M Facility. Therefore, a less-than-significant impact related to streetcar security would occur.
- The proposed project would not alter emergency response times given the wide distribution of emergency facilities throughout the Study Area. Crossing gates for the streetcar would generally not be down for a period of more than 30 seconds. It is likely that emergency vehicles would switch to the other side of the street particularly when there are median extensions. Should the at-grade crossing be inaccessible for a substantial duration, emergency vehicles could access multiple alternative routes within the Study Area based on the well-defined street grid. Therefore, a less-than-significant impact related to emergency response times would occur.
- Although the proposed project would provide improved mobility and access to the Study Area in accordance with adopted transportation and land use plans, these improvements would not result in substantial growth of the local student population and, as such, would not necessitate the need for new schools. Therefore, no impact related to schools would occur.
- Although the proposed project would improve mobility and access to communities in accordance with adopted transportation and land use plans, it would not introduce new population to the Study Area that could increase demand for parks or require the provision of new parkland. In addition, the project alignment would not disrupt or impair access to parks. Portions of the project alignment located outside of the existing transportation ROW would require some land acquisitions and easements; however, new land and easements acquisition would not displace parkland. Therefore, no impact related to parks would occur.
- There are two federal buildings located near the proposed alignment. The streetcar system will be designed so as not to inhibit the function or access to the Ronald Reagan Federal Building and United States Courthouse or the Santa Ana Federal Building. The station near Santa Ana Boulevard and Ross Street will be at an adequate distance from the federal buildings so that a safety buffer is provided. Access to federal buildings would be maintained during construction and operation, and emergency access would be prioritized. Additional safety measures would also be incorporated to ensure the safe operation of the federal buildings. Therefore, a less-than-significant impact to the federal buildings would occur.

- The proposed project would improve regional transit access to public service facilities in the Study Area, including schools, parks and recreation areas, hospitals and community health facilities. The Willowick Public Golf Course, Spurgeon Intermediate School, George Washington Carver Elementary School, Santa Ana Civic Center, Santa Ana Public Library, OCTA Park and Ride Parking Structure, and SARTC are all within walking distance of proposed stations. These public service facilities would benefit directly from the improved transit services and access to the populated areas, specifically in the Downtown Santa Ana area near the Civic Center, where a number of public governmental agencies are located. Therefore, a less-than-significant impact related to public facilities would occur.

O. Recreation (page 3-231 of the EA/DEIR)

- The proposed project would improve transit access to recreational facilities within the Study Area, several of which are located within walking distance of stations, and would promote inter-city travel and increase access to the Study Area. This would potentially increase the use of existing parks and recreational facilities. However, based on ridership projections, the increased use is not expected to be significant enough to result in substantial physical deterioration of existing recreation facilities, including the Santa Ana River Trail and bikeways. Therefore, a less-than-significant impact related to recreational facilities would occur.
- The Santa Ana River Trail (bicycle and equestrian paths) currently crosses underneath the Santa Ana River Bridge. The proposed project would be designed to provide sufficient clearance for users of these paths on both sides of the Santa Ana River. Therefore, a less-than-significant impact to the Santa Ana River Trail would occur.

P. Transportation and Traffic (pages 3-131 and 3-206 of the EA/DEIR)

- All intersections assessed for proposed project would operate at similar or improved levels of service (LOS) as the No Build Alternative. Therefore, a less-than-significant impact related to intersection LOS would occur.
- A roadway segment capacity analysis was completed because the proposed project would operate in mixed traffic in the central and eastern portion of the Study Area. The proposed project would not cause additional roadway segments to experience capacity deficiencies beyond those identified under the No Build Alternative. Therefore, a less-than-significant impact related to roadway segments capacities would occur.
- Grade crossing vehicle activity would not cause excessive vehicle queuing or significantly impact the transportation system given the relatively small number of passenger vehicle and pedestrian activity around stations at the termini or intersection movements at the Harbor Boulevard/Westminster Avenue Station and SARTC. In addition, it is not expected that the proposed project would attract a significant volume of commuters using SARTC as a park-and-ride to access the streetcar system. It is anticipated that streetcar patrons would come primarily from Metrolink and Amtrak, and secondarily from other local and intercity bus services that also utilize SARTC. Therefore, a less-than-significant impact related to grade crossings and station circulation would occur.

- The proposed project would affect access to driveways of four businesses, which would not interfere with driveway capacity or impact business operations. Therefore, a less-than-significant impact related to driveway access would occur.
- The Harbor Boulevard/1st Street intersection, which operates at LOS C in the AM and PM peak hour, is the one Congestion Management Program (CMP) intersection within the Study Area. The proposed project would not change the LOS at this intersection. Therefore, a less-than-significant impact related to the CMP would occur.
- The proposed project would involve improvements to the surface transportation network. The proposed alignment would not connect to an airport or cause an increase in air traffic. Therefore, no impact related to air traffic patterns would occur.
- The proposed project would maintain existing or equivalent emergency access routes and response times throughout the Study Area by retaining the existing street network and connections. The proposed alignment does not pass in front of a fire station, and station locations would not prohibit access to structures. Therefore, a less-than-significant impact related to emergency access would occur.
- As a fixed guideway system, the proposed project would facilitate and encourage alternative forms of transportation, including increased use of the local bus system and other transit lines (e.g., Metrolink and Greyhound). Accordingly, the proposed project would promote rather than conflict with adopted policies, plans, or programs supporting alternative transportation and would have no impact on alternative transportation modes.

Q. Utilities and Service Systems (page 3-229 of the EA/DEIR)

- The proposed project would not generate wastewater from activity along the alignment or at stations. Wastewater would be generated by the O & M Facility but would not put added strain on existing wastewater treatment capacity. Therefore, a less-than-significant impact related to wastewater treatment and facilities would occur.
- The existing drainage pattern of the proposed alignment would not be substantially altered or impacted by the proposed project. Streetcar tracks would be constructed mostly at-grade with the existing street ROW and the PE ROW. The streetcar tracks do not have gutters like a traditional road, but water that falls onto impervious surfaces associated with the track system would be collected and conveyed into the storm drain system by inlets similar to roadway inlets. Stormwater from non-street portions of the alignment may be directed to vegetated swales for treatment before conveyance to the City storm drain. Therefore, a less-than-significant impact related to stormwater drainage facilities would occur.
- The proposed project is a transportation facility and would not deplete water supplies. The O & M Facility would use water for maintenance activities (e.g., vehicle washing) and worker hygiene. Implementation of BMPs would ensure that water use would be minimal. Therefore, a less-than-significant impact to water supply would occur.
- The proposed project would not generate solid waste from activity along the alignment although standard waste receptacles would be placed at stations. It is not anticipated that streetcar riders would generate new solid waste that would exceed existing planning

assumptions and landfill capacity. Therefore, a less-than-significant impact related to solid waste disposal and regulations.

5. ENVIRONMENTAL ISSUES THAT WERE DETERMINED TO BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

The following environmental resource areas would not be significantly impacted by the proposed project with implementation of mitigation measures:

A. Archaeological and Paleontological Resources (page 3-203 of the EA/DEIR)

Potential Impact: The discovery of archaeological or paleontological resources is possible during excavation activities. Therefore, without mitigation, significant impacts related to archaeological and paleontological resources would occur.

Finding: Changes or alterations have been required in, or incorporated into, the proposed project which would mitigate or avoid the significant effects on the environment as identified in the REA/FEIR.

Facts in Support of Finding: The Study Area does not include archeological or paleontological resources eligible for listing in the National Register of Historic Places. Ground disturbance would not be more than five feet beneath the existing surface in most areas although ground disturbance may exceed five feet to accommodate drainage improvements near Raitt Street and for foundations for elevated structures across Westminster Avenue and the Santa Ana River. These areas are all located in previously disturbed areas with underground infrastructure that are along the street ROW or across a concrete channel, and the potential for the accidental discovery of archeological resources is remote. However, discovery of archaeological or paleontological resources is possible during excavation activities. Implementation of Mitigation Measure **CR1** would provide the appropriate process in the event of an accidental discovery and impacts related to archaeological and paleontological resources would be less than significant.

Mitigation Measure

CR1 Treatment of Undiscovered Resources – The contractor shall notify construction personnel of the potential for encountering significant archaeological and paleontological resources along the alignment, and instructed in the identification of fossils and other potential resources. All construction personnel shall be informed of the need to stop work on the project site until a qualified archaeologist or paleontologist has been provided the opportunity to assess the significance of the find and implement appropriate measures to protect or scientifically remove the find. If human remains are encountered during construction, all work shall cease in the area of potential affect and the Orange County Coroner's Office shall be contacted pursuant to procedures set forth in Public Resources Code Section 5097 et seq. and Health and Safety Code in Sections 7050.5, 7051, and 7054 with respect to treatment and removal, Native American involvement, burial treatment, and re-burial, if necessary. A fifty-foot buffer, or more if deemed appropriate by the principal investigator, shall be established and work outside the buffer may resume.

B. Hazards and Hazardous Materials (Hazardous Sites) (page 3-114 of the EA/DEIR)

Potential Impact: Three properties identified as potentially hazardous sites would be acquired as part of O & M Facility. The acquisition of these properties would require Phase I Environmental Site Assessments to ascertain if employees working at the O & M Facility would be exposed to toxic levels of hazardous materials. Therefore, without mitigation, significant impacts related to hazardous sites would occur.

Finding: Changes or alterations have been required in, or incorporated into, the proposed project which would mitigate or avoid the significant effects on the environment as identified in the REA/FEIR.

Facts in Support of Finding: The proposed project would require limited acquisition of property, which could have the potential to contain hazardous materials. The majority of potentially hazardous properties identified within a 0.25-mile radius of the project alignment would not be acquired or disturbed and do not require further investigation. However, three properties identified as potentially hazardous sites would be acquired as part of the O & M Facility, including All Car Auto Parts located at 2002 West 5th Street, SA Recycling located at 2006 West 5th Street, and American Auto Wrecking located at 1908 West 5th Street. Implementation of Mitigation Measure **HAZ1** would reduce impacts related to hazardous sites to less than significant.

Mitigation Measure

HAZ1 A Phase I Environmental Site Assessment shall be prepared for the following sites:

- All Car Auto Parts located at 2002 West 5th Street
- SA Recycling located at 2006 West 5th Street
- American Auto Wrecking located at 1908 West 5th Street

The assessment shall be prepared by a Registered Environmental Assessor. The assessment shall be prepared in accordance with State standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. If hazardous materials are identified in the Phase I Environmental Site Assessment, a Phase II Environmental Site Assessment would be completed to identify the extent of contamination and the procedures for remediation. The Phase II Environmental Site Assessment shall be approved by the California Department of Toxic Substances Control.

C. Noise (Project Operation) (page 3-152 of the EA/DEIR)

Potential Impact: Project-related noise levels would exceed the significance thresholds at five Noise Sensitive Areas (NSA). Therefore, without mitigation, a significant impact related to operational noise levels would occur.

Finding: Changes or alterations have been required in, or incorporated into, the proposed project which would mitigate or avoid the significant effects on the environment as identified in the REA/FEIR.

Facts in Support of Finding: Significant noise impacts at sensitive receptors NSA-4 (Spurgeon Intermediate School), NSA-6 (seven housing units), NSA-7 (five housing units), and NSA-8 (two housing units) would result from sounding of a warning horn and audible warning devices at gate crossings. Significant noise impact at NSA-9 (five housing units) would result from operation of the O & M Facility. Mitigation Measure **N1** would reduce noise impacts associated with warning horns, Mitigation Measure **N2** would reduce noise impacts associated with streetcar pass-by noise, and Mitigation Measure **N3** would reduce noise impacts at NSA-9 by 5 dBA and NSA-10 by 4 dBA. Implementation of Mitigation Measures **N1** through **N3** would reduce impacts related to operational noise to less than significant.

Mitigation Measure

N1 The City of Santa Ana shall request a horn-sounding exemption from the California Public Utilities Commission for the crossing at 5th and Fairview Streets. The exemption shall provide justification and demonstrate that safety would not be compromised. In lieu of the warning horn, supplemental safety measures (e.g., four-quad gates, roadway median barriers on grade crossing approaches, and pedestrian gates) would be implemented. If a horn sounding exemption is approved and established, warning horns would not be sounded except under an emergency situation.

N2 When practical, the contractor shall design special trackwork elements, such as turn-outs, switches, and cross-over to be located at least 600 feet away from sensitive receptors. If this cannot be achieved, then special switch devices, such as spring frogs or movable point frogs shall be utilized. A frog device is used where two rails cross. The frog is designed to ensure the wheel crosses the gap in the rail without "dropping" into the gap.

N3 The contractor shall construct a noise barrier at the land uses identified as Noise Sensitive Areas 9 and 10. For receptors in Noise Sensitive Area 9, the noise barrier shall be at least 10 feet high and extend for 400 feet along the northern property edge of the proposed operations and maintenance facility. For receptors in Noise Sensitive Area 10, the noise barrier shall be at least 8 feet high and extend for 225 feet along the southern boundary of the PE ROW adjacent to 4th Street. The design of the noise barriers shall be identified on project plans prior to issuance of building permits.

D. Safety and Security (Traffic Hazards) (page 3-191 of the EA/DEIR)

Potential Impact: The proposed project would result in significant safety hazards related to streetcar and passenger vehicle collisions and pedestrian safety. Therefore, without mitigation, a significant impact related to safety hazards would occur.

Finding: Changes or alterations have been required in, or incorporated into, the proposed project which would mitigate or avoid the significant effects on the environment as identified in the REA/FEIR.

Facts in Support of Finding: The proposed project could potentially result in streetcar-to-streetcar collisions; collision with vehicles, pedestrians, and bicyclists; and streetcar derailment. The proposed project would be required to comply with all federal and State mandates that affect rail safety, including regulations that require fixed guideway systems to establish system safety and security programs. Following construction, the proposed project would be operated in accordance with OCTA standard operating procedures, operator rules, and the emergency plan. A safety program would be developed for and administered to all streetcar operators. Despite safety features incorporated into the project design, streetcar and passenger vehicle conflicts have been identified at schools located adjacent to the tracks. These locations include Spurgeon Intermediate School, Romero Cruz Elementary School, George Washington Carver Elementary School, and James Garfield Elementary School. Each of these locations represents an area where streetcars could collide with a passenger vehicle.

The proposed project could potentially result in significant impacts related to pedestrian safety. The proposed project would include construction of the Willowick Station, located between Westminster Avenue and the Santa Ana River, to allow future access when the Willowick golf course site is redeveloped. Without the development of the Willowick Station, there are no public roadways that cross the proposed alignment within this segment. As an interim solution, a ten-foot walking path would be constructed on both sides of the fenced OCTA ROW to allow access from adjacent residential neighborhoods, located north and south of the ROW. The proposed walking path would be accessed from the two gates near Green Drive and the end of

Clinton Street. The walking path would not be visible from public streets and from the rear yards of adjacent homes due to the height of a proposed masonry ROW wall. The walking path is proposed to be lighted. It is also proposed that there would be pedestrian crossings of the tracks immediately south of the station platform and approximately 350 feet north of the station platform. However, the proposed project design creates several safety concerns, including the following:

- Transit patrons would have to walk a long distance along a walking path that is not visible to the general public;
- The proposed lighting level along the walking path may create shadowed or dimly lit areas;
- Gates would be accessed by a pass key, which may trap transit patrons without a pass key or without immediate access to a pass key within the ROW;
- If no pass keys are needed at access gates, then it may be possible for non-residents to access the neighborhoods adjacent to the rear of the homes on isolated streets and walkways;
- Pedestrian crossings of the tracks, located north of the station platforms, may raise safety consideration for train operations; and
- Allowing pedestrian access into the OCTA ROW without fencing of the area directly to the tracks would potentially result in pedestrians crossing the tracks within the ROW.

Mitigation Measure **SAF1** would eliminate adverse effects related to safety for pedestrian during pick-up/drop-off times at schools within along the alignment. Mitigation Measures **SAF2** through **SAF6** would eliminate adverse effects related safety for pedestrian accessing the walking path. Implementation of Mitigation Measures **SAF1** through **SAF6** would reduce impacts related to traffic hazards and safety to less than significant.

Mitigation Measure

SAF1 The City of Santa Ana shall coordinate with the Santa Ana Unified School District and Santa Ana Police Department regarding safety at schools adjacent to the alignment. The collaborative effort between the City and interested parties shall develop and teach rail safety measures to students and parents. Other precautionary safety features shall include signs, gated crossing, and crossing and traffic signals to create a safe environment for parents and students during pick-up/drop-off times.

SAF2 The contractor shall install surveillance cameras along the pedestrian walking paths within the PE ROW and at pedestrian gates to adjacent neighborhoods. Police security personnel shall be responsible for surveillance camera monitoring.

SAF3 The contractor shall install emergency call boxes along the pedestrian walking paths within the PE ROW.

SAF4 The contractor shall design the lighting plan for the pedestrian walking paths within the PE ROW to eliminate shadows or dimly lit areas to the greatest extent feasible.

SAF5 Within the PE ROW, the contractor shall fence the track area, and appropriate signage and audible and visual warning devices shall be installed at gate openings.

SAF6 If Mitigation Measures **SAF2** through **SAF4** are considered infeasible, then the Willowick Station shall not be made operational by the contractor until an appropriate public access point from the PE ROW is created as part of the Willowick Public Golf Course redevelopment.

6. ENVIRONMENTAL ISSUES THAT WERE DETERMINED TO BE SIGNIFICANT AND UNAVOIDABLE AFTER MITIGATION

The following environmental resource area would be significantly impacted by the proposed project even with implementation of mitigation measures (i.e., significant and unavoidable):

A. Air Quality (Construction Emissions) (page 3-221 of the EA/DEIR)

Potential Impact: Significant and unavoidable air quality impacts, after incorporation of mitigation measures, would occur as a result of the violation of an air quality standard during project construction.

Finding: Changes or alterations have been required in, or incorporated into, the proposed project which would partially mitigate the significant effects on the environment as identified in the REA/FEIR, but would not reduce the impact below a level of significance.

Facts in Support of Finding: Construction emissions would temporarily impact air quality with the amount and type of construction activities that would occur for the proposed project. The proposed project would be segmented for construction purposes, and construction activities would be completed in phases to minimize the disruption to local residents and businesses in the Study Area. The SCAQMD has established daily significance thresholds for assessing regional construction emissions. Nitrogen oxide (NO_X) emissions associated with the proposed project would exceed the regional NO_X threshold at times during the construction process. NO_X emissions would continue to exceed the SCAQMD significance threshold after implementation of Mitigation Measure **AQ1**. Therefore, significant and unavoidable impacts related to regional NO_X emissions would occur.

Construction emissions of PM_{10} were found to exceed the SCAQMD's Localized Significance Thresholds and would, therefore, result in a local air quality impact to sensitive receptors in the vicinity of the O & M Facility. The proposed project is subject to SCAQMD Rule 403 (Fugitive Dust), which requires that dust control measures (i.e., watering, offsite dirt trackout, and haul truck freeboard clearance) be applied to minimize the generation of fugitive dust during construction activities. Despite the application of these dust control measures, PM_{10} emissions are still anticipated to exceed the SCAQMD's localized significance thresholds. No other feasible mitigation measures, standard conditions, or BMPs exist that would reduce this impact. Therefore, significant and unavoidable impacts related to localized PM_{10} emissions would occur.

<u>Mitigation Measure</u>

AQ1 During the construction phase, the contractor shall use Tier 4 or higher off-road construction equipment with higher air pollutant emissions standards.

7. CUMULATIVE, GROWTH INDUCING, AND IRREVERSIBLE EFFECTS

Cumulative Impacts

Cumulative impacts were described on page 3-237 of the EA/DEIR. Table 3.18-1 (page 3-238) lists the current, planned and pending projects in the City of Santa Ana and surrounding communities that are reasonably foreseeable. The related projects are considered as part of the baseline for the No Build Alternative in the cumulative analysis.

A. Aesthetics

The related projects are not anticipated to result in cumulative changes to the visual character and quality of the Study Area. The various local approvals for those projects would ensure visual compatibility with the existing environment. The proposed project would not degrade the existing visual character and quality of the Study Area, including light and glare. The combined effect of the proposed project with the No Build Alternative would not result in a cumulative impact. Therefore, light and glare impacts would not be cumulatively considerable.

B. Agriculture and Forestry

There are no agricultural, timberland, or forestry resources within the Study Area. The combined effects of the proposed project with the No Build Alternative would not result in a loss of lands related to agriculture and forestry. Therefore, agriculture and forestry impacts would not be cumulatively considerable.

C. Air Quality

In accordance with SCAQMD methodology, projects that would result in a significant impact for either regional or localized air pollutant emissions would contribute toward a cumulative impact. Cumulative projects within the Study Area and the surrounding area would include redevelopment of existing uses, as well as development of new commercial and residential uses. As the proposed project would result in a regionally and localized significant impact during construction, it is anticipated that continued development (and associated construction activities) located predominately within the City of Santa Ana would also result in regional and localized air quality impacts. Therefore, construction-related air quality impacts would be cumulatively considerable.

For operational air quality emissions, projects that would not exceed the SCAQMD daily operational emissions significant thresholds would not contribute toward a cumulative impact. The proposed project would not exceed the SCAQMD daily operational emissions significant thresholds. Therefore, operational-related air quality impacts would not be cumulatively considerable.

D. Biological Resources

Due to the site-specific nature of biological impacts (i.e., tree removal), biological impacts are typically assessed on a site-specific basis, rather than a cumulative basis. The Study Area does not include threatened or endangered species or sensitive habitats. In addition, brush clearing and tree removal would be on a small scale as the Study Area is entirely urban. Nonetheless, cumulative growth could result in impacts to biological resources including locally protected trees or violation of the Migratory Bird Treaty Act. Related projects and other future development projects would be subject to the local, regional, State and federal regulations pertaining to biological resources, including the migratory bird act. With adherence to these regulations, the combined effect of the proposed project with the No Build Alternative would not result in a cumulative impact. Therefore, biological resources impacts would not be cumulatively considerable.

E. Cultural Resources

Cultural resources include significant paleontological, archaeological and built environment resources. Cumulative impacts to these cultural resources are directly related to the presence and significance of these resources within the area of direct effect. No significant previously- or newly-recorded paleontological and prehistoric or historic archaeological sites have been identified within the Study Area. Given the lack of direct impacts to significant paleontological or archaeological resources associated with the proposed project, no significant cumulative impacts are anticipated as a result of concurrent construction activities in the area.

The cultural resources assessment prepared for the proposed project has determined that the proposed project would not result in an adverse effect to cultural resources. Based on record searches and historic research, there are a number of significant or potentially significant cultural resources located within the proposed project vicinity. These cultural resources could be impacted on the regional level by the development of all cumulative projects, in addition to the proposed project. Therefore, the proposed project could incrementally contribute to a cumulative effect. However, the above-mentioned projects are subject to CEQA-level environmental review and include provisions to preserve historic structures and districts. Consequently, impacts to significant or potentially significant cultural resources can typically be mitigated through the avoidance of important cultural resources, the development and implementation of a data recovery plan, and/or following the Secretary of the Interior's Standards for the Treatment of Historic Properties. With adherence to these regulations, cultural resource impacts would not be cumulatively considerable.

F. Geology and Soils

Geotechnical hazards are site-specific, and there is little, if any, cumulative geological relationship between the proposed project and the related projects. Nevertheless, cumulative development in the area would increase the overall population and number of structures, thus, increasing the risk of exposure to seismically-induced hazards. Related projects and other future development projects would be subject to the same local, regional, State, and federal regulations pertaining to geology and soils. With adherence to these regulations, the combined

effect of the proposed project with the No Build Alternative would not result in a cumulative impact. Therefore, geology and soil impacts would not be cumulatively considerable.

G. Greenhouse Gas Emissions

California is the 15th largest emitter of GHG on the planet, representing about two percent of the worldwide emissions. An individual project may contribute an incremental amount of GHG emissions that could combine with other emission sources to create concentrations of GHG that could influence climate change. The transportation sector, largely the cars and trucks that move people and goods, is the largest contributor with approximately 37 percent of the State's total GHG emissions. Because of the high percentage of transportation-related GHG emissions, many GHG reduction plans (e.g., Orange County SCS) focus on reducing regional dependence on single-passenger vehicles. The proposed project is designed to reduce vehicle miles traveled-related emissions by encouraging the use of public transit by providing accessibility to activity centers that provide employment and educational opportunities, goods, and services. The proposed project would encourage a shift in mode of transportation travel from private passenger vehicle to commuter use of the mass transit system. As a result, the contribution of the proposed project to the combined GHG impact would not be considerable. Therefore, GHG emission impacts would not be cumulatively considerable.

H. Hazards and Hazardous Materials

Potentially significant impacts of the related projects associated with hazards and hazardous materials, or the release, transport, and disposal of hazardous materials, would be assessed on a case-by-case basis. While impacts associated with hazards and hazardous materials are typically site-specific and do not cumulatively affect off-site areas, conditions, such as contaminated groundwater, can affect down-gradient properties. In addition, operation of the related projects can reasonably be expected to involve the limited use of potentially hazardous materials typical of those used in residential and commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. Related projects would be subject to local, State, and federal regulations pertaining to hazards and hazardous materials. It is expected that all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. With adherence to these regulations, hazards and hazardous materials impacts would not be cumulatively considerable.

I. Hydrology and Water Quality

The geographic context for the cumulative impact analysis on water quality is the Santa Ana River watershed. Like the proposed project, growth in the Santa Ana River watershed would be subject to National Pollutant Discharge Elimination System requirements regarding water quality. The Study Area is already densely developed and future land use changes or development are not likely to cause substantial changes in regional surface water quality. It is also anticipated that these related projects would also be subject to Standard Urban Stormwater Mitigation Plan requirements and implementation of measures to comply with total maximum daily loads. In addition, it is not anticipated that related projects would significantly impact flood

control in the concrete-lined Santa Ana River. With adherence to these regulations, hydrology and water quality impacts would not be cumulatively considerable.

J. Land Use and Planning

Each of the related projects have been reviewed or are under review for consistency with applicable plans, policies and regulations of the City of Santa Ana's General Plan and Zoning Code. The proposed project would be consistent with adopted land use plans and zoning codes. Selection of the proposed project would encourage new development around the stations, and allow access to Downtown and other high-intensity areas of employment, commercial development, and recreational opportunities. New transit-oriented development would be facilitated near station areas with underutilized or vacant land uses. This would further encourage compatibility with surrounding land uses and zoning. Therefore, land use and planning impacts would not be cumulatively considerable.

K. Mineral Resources

Mineral Resource Zones or Oil Drilling/Surface Mining Areas have not been identified within the Study Area or in the vicinity of the proposed project. Therefore, mineral resource impacts would not be cumulatively considerable.

L. Noise

The noise and vibration analysis is based on the forecast of the future growth within the region and the Study Area. The environmental document for SCAG's 2012-2035 RTP/SCS concluded that cumulative noise impacts, including the proposed project, would be significant and unavoidable. However, with implementation and enforcement of mitigation measures, the proposed project would result in less-than-significant project-related noise impacts to sensitive locations along the alignment. As a result, the contribution of the proposed project to the combined noise impact with other development and transportation projects would not be considerable. Therefore, noise impacts would not be cumulatively considerable.

While impacts associated with vibration are typically site-specific and do not cumulatively affect off-site areas, transportation projects could generate new sources of vibration. According to the FTA Transit Noise and Vibration Impact Assessment (2006) guidance document, vibration levels generated by rubber-tired vehicles are rarely perceptible. There are no related projects that would generate transportation-related vibration other than that related to rubber-tired vehicles. The proposed project would not combine with the No Build Alternative to result in a cumulative impact. Therefore, vibration impacts would not be cumulatively considerable.

M. Population and Housing

The Study Area experienced a population decline between 2000 and 2010, while vacancy rates increased. The proposed project would provide construction jobs in the Study Area, which could result in a population increase in Santa Ana, Garden Grove, or Orange County. However, population growth would be minor and, when combined with the growth projections assumed under the No Build Alternative, would not overburden the available housing supply in the Study Area. Therefore, population and housing impacts would not be cumulatively considerable.

N. Public Services

Potentially significant impacts of the related projects associated with increased demand for public services would be assessed on a case-by-case basis. Potential impacts to public services from the related projects would be mitigated to a level of less than significant through the local land use approval process. The proposed project would not create new trips but could change mode of access, which could redistribute existing travel and change routes related to public services. The City of Sana Ana is within an urban environment with an expansive street network and varied inventory of public services. The redistribution in travel would not burden public services or result in substantial decreases in emergency response times. The police and fire stations are widely distributed throughout the Study Area and a comprehensive street network provides numerous alternate routes in the event of a crossing delay. Therefore, emergency response times would not be impacted. The combined effect of the proposed project with the No Build Alternative would not result in a cumulative impact. Therefore, public services impacts would not be cumulatively considerable.

O. Transportation and Traffic

The related projects are mainly land use development projects or are future funded and committed transportation projects that are encompassed in the 2035 traffic analysis that was performed for the proposed project. The results of the analysis captures the known cumulative impacts associated with the proposed project. The proposed project would not result in significant traffic effects and the combined effect of the proposed project with the No Build Alternative would not result in a cumulative impacts. Therefore, transportation and traffic impacts would not be cumulatively considerable.

P. Utilities and Service Systems

Potentially significant impacts of the related projects associated with utilities and service systems would be assessed on a case-by-case basis through permitting and will-serve letters, particularly for development projects. Operation of the proposed project would require the use of various utilities, including electricity, natural gas, and communication systems. Electricity would be used to run the streetcar system. New TPSSs would distribute power along the alignment. The proposed project is included in regional and local land use and transportation planning documents, and utility companies have the capacity to meet the future demand for utility services. The quantities required would not be substantial and major modifications or new utility facilities would not need to be constructed to serve increased demand. Therefore, utilities and service systems impacts would not be cumulatively considerable.

Growth-Inducing Effects

While the proposed project would provide improved mobility and access to the Study Area in accordance with adopted transportation and land use plans, these improvements would not result in substantial population growth. The Study Area experienced a population decline between 2000 and 2010, while vacancy rates increased. The proposed project would provide construction jobs in the Study Area, which could result in a population increase in Santa Ana, Garden Grove, or Orange County. However, population growth would be minor and would not

exceed the growth projections or available housing supply in the Study Area. Therefore, the proposed project would result in less-than-significant impacts related to population growth.

Growth-inducing projects are generally located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure (e.g., sewer and water facilities, roadways, etc.) or are those that could encourage "premature" or unplanned growth (i.e., "leapfrog" development, or urban sprawl). Although development of the proposed project supports urban growth, it would not remove an obstacle to population growth since the Study Area is heavily urbanized. The proposed project would not spur new direct or indirect regional growth in terms of population or employment and, therefore, would not result in significant growth-inducing impacts.

Irreversible Effects

The construction and implementation of the proposed project would entail the irreversible and irretrievable commitment of energy and human resources; however, this commitment of energy, personnel, and building materials would be commensurate with that of other projects of similar magnitude. Labor would also be committed for the planning, design, construction, and operation phases of the proposed project.

Construction would require the commitment of a variety of nonrenewable or slowly renewable natural resources. Energy (in the form of fossil fuels) and construction materials (such as lumber, sand and gravel, metals, and water) would be irretrievably committed for construction of the proposed project. However, there would be some offset of the loss of energy resources. Demolition debris would be recycled for other uses. For example, inert construction debris (e.g., concrete and asphalt) would potentially be crushed and used for road base or other uses requiring aggregate as reinforcement material.

Ongoing operation and maintenance of the proposed project would entail a further commitment of energy resources in the form of petroleum products (diesel fuel and gasoline), natural gas, and electricity. This commitment of energy resources would be a long-term obligation because it is not possible to return the land to its original condition once it has been developed. However, the impacts of increased energy usage are not considered significant impacts. Therefore, the implementation of the proposed project would involve irreversible environmental changes to existing natural resources, but the impact would be less than significant.

8. FINDINGS REGARDING ALTERNATIVES

The alternatives identified for evaluation in the EA/DEIR were based on public comments, as well as technical analyses, as detailed in the Alternative Analysis Report (under separate cover and available by request or on the City's website at http://santaanatransitvision.com). The alternatives analysis process included a comprehensive review of potential technology and alignment options.

Prior Analysis of Alternatives

A wide range of public transit options were defined and investigated as candidate technologies. The initial alignment options were based on the need to establish an east-west transit corridor in

the Study Area, and to improve the Study Area's regional transit connectivity by providing direct connections to existing and planned transit services (Metrolink and OCTA fixed route and Bus Rapid Transit [BRT] services) at SARTC and at the northeast corner of Harbor Boulevard and Westminster Avenue in the City of Garden Grove.

A reasonable range of alternatives has been evaluated as part of the environmental process, beginning with a robust alternatives analysis and using a screening process to provide a limited range of alternatives in the EA/DEIR. Several other alternatives, including BRT routes along Santa Ana Boulevard and Civic Center Drive, were considered in the initial alternatives analysis but were ultimately screened out because they did not fully satisfy the purpose and need or project goals and objectives and were less cost effective in terms of both capital and operations and maintenance costs per rider. These other alternatives are described in the Santa Ana and Garden Grove Fixed Guideway Corridor Alternative Analysis Report. The alternatives addressed in the EA/DEIR consisted of a No Build Alternative, Transportation System Management (TSM) Alternative, Streetcar Alternatives 1 and 2, and Initial Operating Segment (IOS)-1 and IOS-2. Streetcar Alternative 1 included the PE ROW through the western half of its alignment and Santa Ana Boulevard and 4th Street on the way to SARTC. Streetcar Alternative 2 also included the PE ROW through the western half of its alignment and generally Santa Ana Boulevard, Civic Center Drive, and 5th Street along the eastern half of the alignment to SARTC. The No Build Alternative was provided as a basis for comparing the build alternatives, each of which was specifically designed to respond to the purpose and need for the project, study goals, and community input.

No Build Alternative

This No Build alternative is required by Section 15126.6 of the CEQA Guidelines and provides the basis for comparing future conditions resulting from other alternatives. Conditions in the foreseeable future (through planning horizon year 2035) include projects that (1) have environmental analysis approved by an implementing agency and (2) have a funding source identified for implementation.

Other projects in the foreseeable future include:

- Implementation of the Transit Zoning Code (SD 84A and SD 84B), both project-level and program-level components, that are anticipated for build-out by 2028;
- Implementation of the Station District Development Projects, which consist of a variety of residential development projects, community open space and some limited neighborhood-serving commercial development'
- Transit improvements including modest adjustments to existing local bus routes; and expanded Metrolink service'
- Three, new bus rapid transit routes: (1) Harbor Boulevard Bus Rapid Transit Corridor [Costa Mesa to Fullerton, 10-minute headways, peak period]; (2) Westminster/17th Street Bus Rapid Transit Corridor [Santa Ana to Long Beach, 10-minute headways, peak period]; and (3) Bristol Street Bus Rapid Transit Corridor [Irvine Transportation Center to Brea Mall, 10-minute headways, peak period]; and

- Roadway improvements including the Bristol Street Widening project, which will widen Bristol Street from four to six lanes between Warner Avenue and Memory Lane, and the Grand Avenue Widening project, which will widen Grand Avenue from four to six lanes between 1st Street and 17th Street.

Findings for No Build Alternative

The City of Santa Ana finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the No Build Alternative identified in the EA/DEIR and REA/FEIR (CEQA Guidelines 15091(a)(3)). Although the No Build Alternative would not result in environmental impacts, it would not provide the desired levels of mobility and accessibility within the City of Santa Ana. In addition, the No Build Alternative would not foster economic development opportunities, promote sustainable transportation investments to respond to the needs of the community, or deliver travel, benefits, reliability, and choice to the public transportation system. Therefore, the No Build Alternative would not be consistent with the goals and objectives of the proposed project.

TSM Alternative

The TSM Alternative enhances the mobility of existing transportation facilities and transit network without construction of major new transportation facilities or significant, costly physical capacity improvements. The TSM Alternative emphasizes low cost (i.e., small physical) improvements and operational efficiencies, such as focused traffic engineering actions, expanded bus service, and improved access to transit services. Included within the TSM Alternative are modifications and enhancements to selected bus routes in the Study Area including:

- Skip-stop overlay service on 1st Street (Route 64) which includes access to SARTC;
- A new route between SARTC and Harbor Boulevard/Westminster Avenue via Civic Center Drive, Bristol Street and 17th Street/Westminster Avenue, providing 10-minute peak and 20-minute off-peak service;
- Expanded service span for StationLink service (Route 462) between SARTC and the Civic Center, providing 15-minute service during both peak and off-peak hours;
- In addition, the following system operational improvements are included in the TSM Alternative:
- Traffic signal timing improvements at select congested locations along Santa Ana Boulevard and Civic Center Drive to provide for enhanced east-west bus flow, potential including but not limited to:
    - Main Street at Civic Center Drive
    - Broadway at Civic Center Drive
    - Flower Street at Civic Center Drive
    - Fairview Street at Civic Center Drive
    - Santa Ana Boulevard at Santiago Street

- Santa Ana Boulevard at Lacy Street (install traffic signal)

- Real-time bus schedule information at high-volume transit stops (e.g., Flower Street and 6th Street, Santa Ana Boulevard and Main Street)
- Improvements to transit stop amenities (benches, shelters, kiosks, sidewalk connections, etc.) along the Santa Ana Boulevard and Main Street corridors
- Improvements to bicycle and pedestrian circulation to promote safe, convenient and attractive connectivity between the transit system and surrounding neighborhoods and activity centers , including accommodating bicycles on all buses, providing real time bus arrival information via internet and mobile devices, installing bicycle storage facilities at SARTC and the Harbor/Westminster stop, and providing study area maps/walking guides on all buses.

Findings for TSM Alternative

The City of Santa Ana finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the TSM Alternative identified in the EA/DEIR (CEQA Guidelines 15091(a)(3)). Although the TSM Alternative would result in less-than-significant environmental impacts, it would not provide the desired levels of mobility and accessibility for the community. The daily ridership for the TSM Alternative was projected to be 3,100 in 2035, as opposed to 6,100 under the proposed project. In addition, the TSM Alternative would not foster economic development opportunities, promote sustainable transportation investments to respond to the needs of the community, or deliver travel, benefits, reliability, and choice to the public transportation system. Therefore, the TSM Alternative would not be consistent with the goals and objectives for the proposed project. For these reasons, the City of Santa Ana rejects this alternative.

Streetcar Alternative 1

Streetcar Alternative 1 (proposed project) would utilize the PE ROW, an abandoned and vacant rail right-of-way owned by the OCTA, through the western half of its alignment and generally operate along Santa Ana Boulevard, and 4th Street on the way to SARTC. The 4.2-mile alignment would include 12 stations and it is anticipated that the streetcar system would operate seven days a week with 10-minute headways during peak periods and 15-minute headways during off-peak periods. The streetcars would be electrically powered using an overhead contact system and a series of TPSS located intermittently along the alignment.

Findings for Streetcar Alternative 1

Streetcar Alternative 1 has no substantial differences in the severity of environmental impacts when compared to the other alternatives. The purpose of the proposed project is to provide a new east-west transit line in Orange County between the SARTC in the City of Santa Ana and the Harbor Boulevard/Westminster Avenue intersection in the City of Garden Grove. The primary objectives of the proposed project are as follows:

- To improve transit connectivity within the Study Area;
- To relieve congestion by providing alternative mobility options;

- To be sensitive to the character of the community;
- To increase transit options;
- To improve transit accessibility to and within the Study Area; and
- To provide benefits to the environment through improved air quality.

Streetcar Alternative 1 would satisfy each of the project objectives and goals with similar environmental effects as the other build alternatives. Therefore, Streetcar Alternative 1 is the environmentally superior alternative.

Streetcar Alternative 2

Streetcar Alternative 2 would utilize the PE ROW through the western half of its alignment and substantially operate along Santa Ana Boulevard, Civic Center Drive, and 5th Street along the eastern half of the alignment to SARTC. The operational characteristics of this alternative are identical to Streetcar Alternative 1. The differences between the two streetcar alternatives are the alignment and the fact that Streetcar Alternative 2 would have one additional station for a total of 13.

Findings for Streetcar Alternative 2

Similar to Streetcar Alternative 1 (the locally preferred alternative), construction-related air quality emissions associated with Streetcar Alternative 2 would result in a regional NO_X impact, a localized PM_{10} impact, and a cumulative impact. The City of Santa Ana finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible Streetcar Alternative 2 identified in the EA/DEIR (CEQA Guidelines 15091(a)(3)). The daily ridership for Streetcar Alternative 2 was projected to be 4,700 in 2035, as opposed to 6,100 for the proposed project. Streetcar Alternative 2 would generate less ridership than the proposed project. It would not provide adequate access to transit within the City of Santa Ana and, therefore, would not be consistent with the goals and objectives of the proposed project. For these reasons, the City of Santa Ana rejects this alternative.

IOS-1 and IOS-2

In response to funding and phasing issues raised by fiscal constraints identified during OCTA's long-range transportation planning process, IOSs, which are shorter segments of the Streetcar Alternatives, were analyzed. Similar to the proposed project, construction-related air quality emissions associated with IOS-1 and IOS-2 would result in a regional NO_X impact, a localized PM_{10} impact, and a cumulative impact. The intent of the IOS alternatives was to identify starter segments that could be constructed and operated until funding is assembled to complete the remaining portion of the project. Both IOS-1 and IOS-2 would terminate at Raitt Station (Raitt Street and Santa Ana Boulevard) rather than Harbor Station (Harbor Boulevard and Westminster Avenue). Both would include the same project features and design options as their respective full alignment build alternatives between Raitt Street and SARTC. The configuration of Raitt as an interim terminus station is the same for IOS-1 and IOS-2. Just over 50 spaces would be provided for station parking at Raitt within the PE ROW on an interim basis

to be replaced by parking at Harbor Station upon completion of the full Project. Vehicular access to Raitt Station parking would be via Daisy Avenue.

Findings for IOS-1 and IOS-2

The City of Santa Ana finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible IOS-1 and IOS-2 identified in the EA/DEIR and (CEQA Guidelines 15091(a)(3)). The IOS alternatives would not be environmentally superior to the proposed project with the exception that these shorter route options would result in less excavation and subsequent acquisition and construction-related impacts. The impacts of the IOS alternatives would be essentially the same as the proposed project with traffic, parking and circulation impacts being redistributed to the new terminal station location at Raitt Station. Each IOS alternative would generate approximately 47 percent of the ridership associated with the full alignment. The other key distinction of these shorter alignment options is that they reduce the beneficial effects from the full route, particularly in the area of regional connectivity. Therefore, IOS-1 and IOS-2 would not be consistent with project goals and objectives compared to the proposed project. For these reasons, the City of Santa Ana rejects these alternatives.

O & M Facility Site Options

Both Streetcar Alternatives 1 and 2 would require the construction of an O & M Facility for streetcar operations. An O & M Facility is a stand-alone building which would meet the maintenance, repair, operational and storage needs of the proposed streetcar system. The O & M Facility accommodates daily and routine vehicle inspections, interior/exterior cleaning of the streetcars, preventative (scheduled) maintenance, unscheduled maintenance, and component change-outs. The proposed facility would also provide a venue for parking vehicles that are not in use and for rebuilding components. Two O & M facilities were analyzed in the EA/DEIR. O & M Facility Site A is an irregularly shaped parcel slightly larger than 2.2 acres, and bordered by 6th Street to the north, 4th Street to the south, the Metrolink tracks to the east, and various industrial and commercial businesses to the west. Currently used as a waste transfer and recycling center, this site contains one primary structure with the remainder of the site used for receiving and sorting recycling materials, and parking. O & M Facility Site B is a rectangular site slightly larger than 2.4 acres. It is located west of Raitt Street and is bordered by 5th Street to the north and the PE ROW to the south. Located in an area zoned for industrial and commercial uses, this site is comprised of three parcels, two of which contain existing businesses and a combination of industrial buildings. The third parcel contains a multi-family structure with six residences.

Findings for O & M Facility Site Options

The City of Santa Ana finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible O & M Facility Site A identified in the EA/DEIR and (CEQA Guidelines 15091(a)(3)). The smaller size, irregular shape, and distance from the PE ROW make O & M Facility Site A less efficient to develop and operate, and provides less opportunity to accommodate a greater range of O & M functions on the site. In conjunction with its location

eastern end of the corridor, O & M Facility Site A provides less flexibility to serve future system expansion, or extensions or connections through Garden Grove to Anaheim. For these reasons, the City of Santa Ana rejects O & M Facility Site A.

The size, rectangular shape and proximity to the PE ROW make O & M Facility Site B more efficient to develop and operate, and provides opportunity to accommodate a greater range of O & M functions on the site. In conjunction with its location in the western half of the corridor, O & M Facility Site B provides greater flexibility to serve future system expansion, or extensions or connections through Garden Grove to Anaheim. For these reasons, the City of Santa Ana adopts O & M Facility Site B.

Fourth Street Parking Scenarios

The proposed project would utilize 4th Street between Ross Street and Mortimer Street in the westbound direction. From east of Ross Street to French Street, 4th Street has one travel lane in each direction with head-in diagonal parking along each side of the roadway. The diagonal parking, with vehicles exiting parking spaces by backing into the travel lane, is incompatible with reliable streetcar operations. Three design scenarios were identified in the EA/DEIR to address the diagonal parking on 4th Street.

Scenario A: Convert the diagonal parking along the south side of 4th Street, between Ross Street and French Street, to parallel parking and widen the sidewalk along the south side from 12 feet to 20 feet, and replace streetlights and landscaping. A total of 26 on-street parking spaces would be removed under this scenario.

Scenario B: Remove the diagonal parking along the south side of 4th Street, between Ross Street and French Street, and widen the sidewalk along the south side from 12 feet to 28 feet, and replace streetlights and landscaping. A total of 77 on-street parking spaces would be removed under this scenario.

Scenario C: Remove the diagonal parking along both sides of 4th Street, between Ross Street and French Street, widen the sidewalks along both sides from 12 feet to 28 feet, and replace streetlights and landscaping on both sides of the street. A total of 132 on-street parking spaces would be removed under this scenario.

Findings for Fourth Street Parking Scenarios

The City of Santa Ana finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible Fourth Street Parking Scenarios B and C identified in the EA/DEIR (CEQA Guidelines 15091(a)(3)). Although significant impacts were not identified for any of the parking alternatives, Fourth Street Parking Scenario A would remove the least amount of parking. For this reason, the City of Santa Ana rejects Fourth Street Parking Scenarios B and C in favor of Fourth Street Parking Scenario A.

Findings for Mitigation Measures

Mitigation Measures for the proposed project have been identified in the Mitigation Monitoring and Reporting Program. None of the recommended measures that are within the City of Santa Ana jurisdiction have been rejected. To the extent that these findings conclude that various proposed Mitigation Measures outlined in the Mitigation Monitoring and Reporting Program are feasible and have not been modified, superseded or withdrawn, the City of Santa Ana hereby binds itself to implement or, as appropriate, require implementation of these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the City of Santa Ana adopts a resolution approving the proposed project.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be identified among the selected alternatives. If the No Build Alternative is identified as the environmentally superior alternative, the identification of the next best environmentally superior alternative must be identified. As described in the EA/DEIR and the REA/FEIR, the No Build Alternative has been found to have the least amount of environmental impacts and is the environmentally superior alternative. Of the remaining alternatives, the TSM Alternative is the CEQA environmentally superior alternative because no impacts were identified in the EA/DEIR. However, the City hereby finds that the TSM alternative would not achieve the project's basic objectives and thereby rejects this alternative.

9. STATEMENT OF OVERRIDING CONSIDERATIONS

The REA/FEIR has identified and discussed significant environmental effects that will occur as a result of implementation of the proposed project. With implementation of feasible mitigation measures, standard conditions, and/or BMPs, as discussed in the REA/FEIR, these effects can be mitigated to levels considered less than significant except for the significant impacts related to regional construction emissions and localized construction emissions, as described above in Section 6 of this document. Specifically, implementation of the proposed project would result in the following significant impacts even after imposition of all feasible mitigation measures, standard conditions, and/or BMPs and would require adoption of a Statement of Overriding Considerations:

- Construction emissions associated with the proposed project would result in exceedance of the SCAQMD's NO_X threshold for construction activities for the years 2012 and 2013 and, as such, would result in a significant regional air quality impact. Implementation of Mitigation Measure **AQ1** would reduce NO_X emissions, although emissions would still exceed the SCAQMD significance threshold.
- Construction emissions of PM_{10} were found to exceed the SCAQMD's Localized Significance Thresholds and would, therefore, result in a local air quality impact to sensitive receptors in the vicinity of the O & M Facility. The proposed project is subjected to SCAQMD Rule 403 (Fugitive Dust), which requires that dust control measures (i.e., watering, offsite dirt trackout, and haul truck freeboard clearance) be applied to minimize the generation of fugitive dust during construction activities. Despite the application of these

dust control measures, PM_{10} emissions are still anticipated to exceed the SCAQMD's localized significance thresholds. No other feasible mitigation measures, standard conditions, or BMPs exist that would reduce this impact.

- In accordance with SCAQMD methodology, projects that would result in a significant impact for either regional or localized air pollutant emissions would contribute toward a cumulative impact. Cumulative projects within the Study Area and the surrounding area would include redevelopment of existing uses, as well as development of new commercial and residential uses. As the proposed project would result in a regionally and localized significant impact during construction for both NO_x and PM_{10} emissions, it is anticipated that continued development (and associated construction activities) located predominately within the City of Santa Ana would also result in regional and localized air quality impacts. Therefore, the contribution of the proposed project to this air quality construction impact would be cumulatively considerable. No other feasible mitigation measures, standard conditions, or BMPs exist that would reduce this cumulatively considerable impact.

In making this determination, the Lead Agency is guided by CEQA Guidelines Section 15093, which provides as follows:

a. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

b. When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

c. If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to CEQA Section 15091.

Having considered the unavoidable adverse significant impacts of the proposed project, the City Council hereby determines that all feasible mitigation measures have been adopted to minimize, substantially reduce, or avoid the significant impacts identified in the REA/FEIR, and that no additional feasible mitigation is available to further reduce significant impacts. Further, the City Council finds that economic, social, and other considerations of the proposed project outweigh the significant and unavoidable impacts described above, and adopts the following Statement of Overriding Considerations. In making this Finding, the City Council has balanced the benefits of the proposed project against its significant and unavoidable environmental impacts and has indicated its willingness to accept those impacts.

The following statements are in support of the City Council's action based on the REA/FEIR and/or other information in the record. The following project objectives identify the benefits of project implementation:

- To improve transit connectivity within the Study Area;
- To relieve congestion by providing alternative mobility options;
- To be sensitive to the character of the community;
- To increase transit options;
- To improve transit accessibility to and within the Study Area; and
- To provide benefits to the environment through improved air quality.

The City Council finds the project objectives would include benefits to the City of Santa Ana. In addition to these project objectives, the following benefits constitute an overriding consideration warranting approval of the proposed project despite the significant and unavoidable environmental effects. The City Council finds that the project benefits derived from the project objectives identified above, as well as those listed below, are each individually and separately sufficient to outweigh all of the proposed project's significant and unavoidable impacts.

- The proposed project would support local plans for transit-oriented development (TOD). The City of Santa Ana recognizes that land use, economic opportunity, and transportation planning go hand in hand. Over the last several years, the City of Santa Ana has implemented TOD in the area adjacent to SARTC. Santa Ana's Transit Zoning Code, which encompasses 450 acres within the Study Area, supports mixed-use development and provides a transit-supportive, pedestrian–oriented development framework to reduce vehicle trips and greenhouse gas emissions.

- The proposed project would support economic vitality and foster redevelopment opportunities. The City of Santa Ana recognizes the importance of public investment in infrastructure as a catalyst for economic development. In the competitive Orange County marketplace, transportation infrastructure projects that improve access and mobility enhance the attractiveness of neighborhoods and provide a competitive edge for nearby businesses. Therefore, an important element of the City's integrated transportation-land use vision is the provision of transit service that is continuous and reliable, as well as a permanent and visible fixture for transit users and the community. Such service would improve visibility and access to existing economic activity centers and areas targeted for redevelopment. Connectivity to these key existing and future development areas is one of the most critical aspects of the SA-GG Fixed Guideway Project. In recent years, the City of Santa Ana has taken active steps to revitalize its downtown area to attract new businesses, customers, and visitors, utilizing a design scheme that fosters walkability and transit use. The Artist's Village and the East End Promenade in Downtown Santa Ana are prime examples of this effort. Moreover, the recent adoption of the Transit Zoning Code by the City of Santa Ana provides the policy foundation for redevelopment activities specifically targeted to the SA-GG Fixed Guideway Project. However, constrained access continues to be a challenge for the area. To the west, the City of Garden Grove continues to promote economic development along the Harbor Boulevard Corridor (International West). The proposed transportation investment is intended to support economic vitality and foster redevelopment opportunities within the

Study Area by improving access and connectivity within the Study Area, and between the Study Area and the surrounding region. This, in turn, will improve visibility and enhance access to Study Area land uses, and promote business activity. It will strengthen existing development and foster new opportunities for mixed-use development and transit-supportive residential products, and regionally significant resort and entertainment venues in areas such as the Willowick Public Golf Course and the southern end of the Harbor Boulevard Corridor.

- The proposed project would fulfill Santa Ana's overall vision for the Study Area, including a transit system that integrates seamlessly with the community and that is compatible with the established urban character.