4th & Mortimer Project

Environmental Impact Report Addendum

SCH#2006071100

prepared by

City of Santa Ana
Planning and Building Agency
20 Civic Center Plaza
Santa Ana, California 92701
Contact: Pedro Gomez, AICP, Associate Planner

prepared with the assistance of

Rincon Consultants, Inc.
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October 2020

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1 Introduction

This document is an Addendum to an Environmental Impact Report (EIR) for changes to the previously approved Transit Zoning Code (hereafter referred to as the "approved project" or "approved TZC"), for which the City of Santa Ana (City) certified in a programmatic Final EIR in 2010 (hereafter referred to as the "2010 FEIR"). This Addendum serves as the California Environmental Quality Act (CEQA) documentation for the proposed project. The proposed project is located within the TZC area, which provided new zoning for over 100 blocks and 450 acres in the central core of the City. Under the proposed project, Northgate Gonzalez and Red Oak Investments (applicant) proposes to develop the 4th and Mortimer Project (hereafter referred to as the "project" or "proposed project"), a residential and commercial development that would consist of 169 residential units and 11,361 square feet of commercial/retail space on two city blocks, 409 East 4th Street (Block A) and 509 East 4th Street (Block B).

An Addendum to a previously certified EIR is prepared when a lead agency is asked to issue a discretionary decision regarding a proposed project, but none of the conditions triggering the need for a Subsequent or Supplemental EIR are present.

Pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162, when an EIR has been certified or a negative declaration adopted for a project, no subsequent or supplemental EIR or negative declaration shall be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2) Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR or negative declaration due to the involvement of new significant environmental effects, or a substantial increase in the severity of previously identified significant effects; or
3) New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    A. The project will have one or more significant effects not disclosed in the previous EIR or negative declaration.
    B. Significant effects previously examined will be substantially more severe than identified in the previous EIR.
    C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If some changes or additions to the previously prepared EIR or negative declaration are necessary, but none of the conditions specified in CEQA Guidelines Section 15162 are present, the lead agency shall prepare an addendum.

In reviewing this Addendum, the question before the City decision makers is not whether the previous EIR complies with CEQA, but only whether one of the events triggering the need for subsequent environmental review has occurred. (*A Local & Regional Monitor v. City of Los Angeles* (1993) 12 Cal.App.4th 1773; *Committee for Green Foothills v. Santa Clara County Board of Supervisors* (2010) 48 Cal.4th 32.)

Pursuant to CEQA Guidelines Section 15164(c), an addendum to a previously certified EIR is not circulated for public review; but is considered by the Lead Agency in making a decision about the project.

This EIR Addendum contains this introduction, a comparison of the approved and proposed projects (Section 2), and an environmental impact analysis that compares the impacts of the proposed project to those of the approved project as identified in the 2010 FEIR (Section 3). As discussed in Section 3, *Environmental Impact Analysis*, the proposed project would not result in any new significant environmental impacts or any substantial increase in the severity of previously identified significant environmental impacts as compared to the approved project. Consequently, this Addendum is the appropriate environmental document for the proposed project under CEQA.

The City of Santa Ana shall consider the Addendum with the 2010 FEIR prior to making a decision on the proposed project. The Final EIR for the approved project is available for review online at https://www.santa-ana.org/transit-zoning-code-environmental-impact-report on the City of Santa Ana's website.

2 Project Description

This section describes the characteristics of the approved Transit Zoning Code ("approved TZC") studied in the 2010 FEIR and the proposed project, including project location, existing conditions, proposed activities, and required approvals.

2.1 Approved Transit Zoning Code

Transit Zoning Code (SD 84A and SD 84B) Area

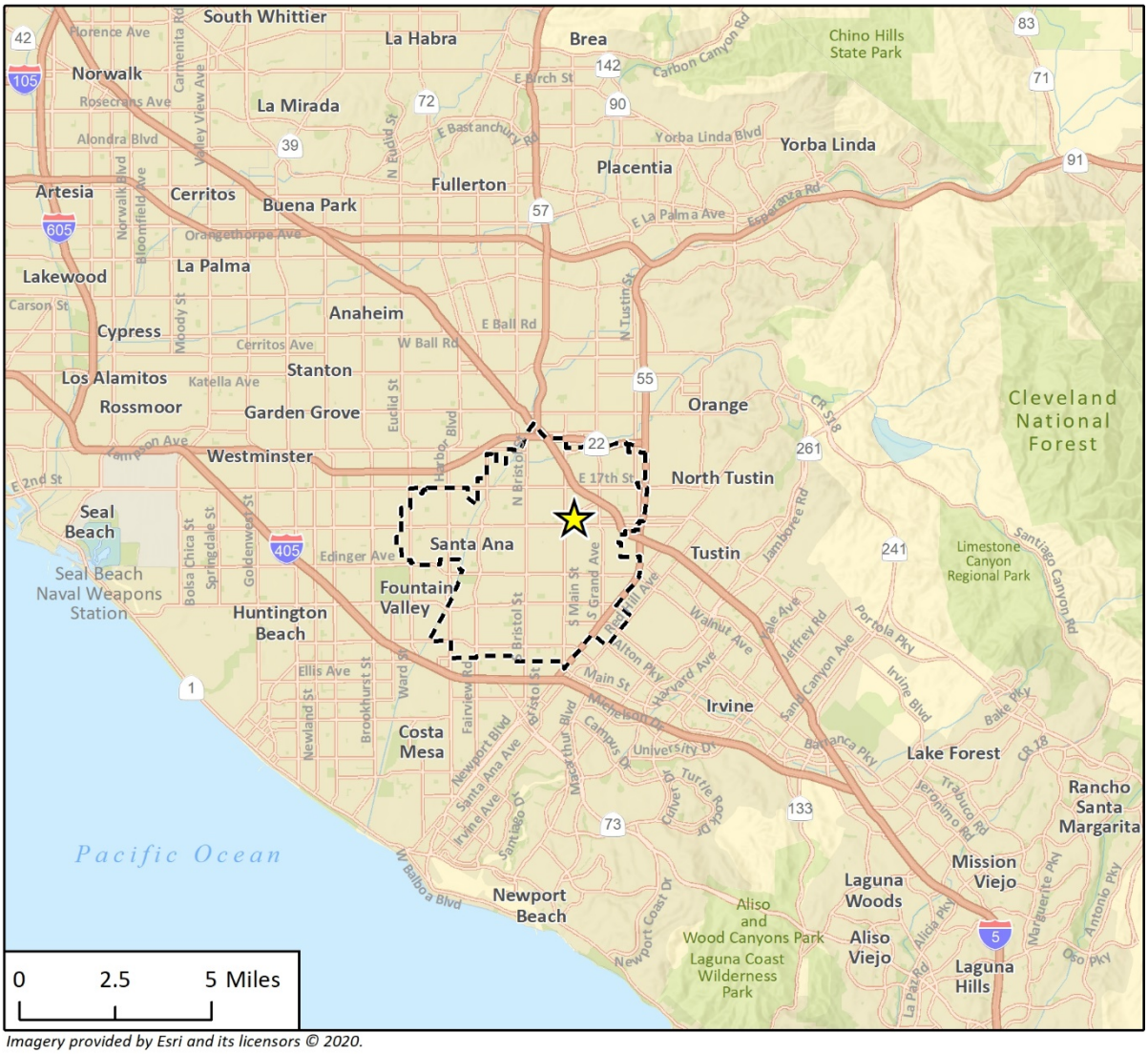
The approved TZC area is located in the central urban core of the City of Santa Ana in Orange County, California, and comprises over 100 blocks and 450 acres, including the project site. The TZC area is generally bounded by 1st Street, Flower Street, Civic Center Drive, Grand Avenue, and Interstate 5 (I-5); and is generally located in the area west of I-5, north of First Street, and between Grand Avenue and Flower Street and south of Civic Center Drive. Figure 2-1 shows the regional location of the project site and TZC area.

Approved Transit Zoning Code Characteristics

The approved TZC provides zoning for the integration of new infill development into existing neighborhoods, allows for the reuse of existing structures, provides for a range of housing options, including affordable housing, and provides a transit-supportive, pedestrian-oriented development framework to support the addition of new transit infrastructure. The approved TZC rezoned central Santa Ana (including the project site), to support the long-term development of a successful transit project and provide the development framework for the Santa Ana Redevelopment properties; and new zoning for all properties contained within its boundary (see Figure 2-2), with the exception of properties zoned for Light and Heavy Industrial. The approved TZC allows for the integration of new infill development into existing neighborhoods, reuse of existing buildings, and creation of new mixed use and transit-oriented development. The potential net development of the approved TZC was estimated at 4,075 residential units, 387,000 square feet of retail, and 680,000 square feet of open space. In addition, the TZC includes the following nine distinct designations:

- Transit Village (TV) Zone
- Urban (UC) Zone
- Urban Neighborhood 1 (UN-1 Zone)
- Downtown (DT) Zone
- Open Space (OS)
- Government Center (GCD) District
- Corridor (CDR) Zone
- Industrial Overlay (IO) Zone
- Urban Neighborhood 2 (UN-2) Zone

Figure 2-1 Regional Location of Project Site and TZC Area



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Project Location

City of Santa Ana

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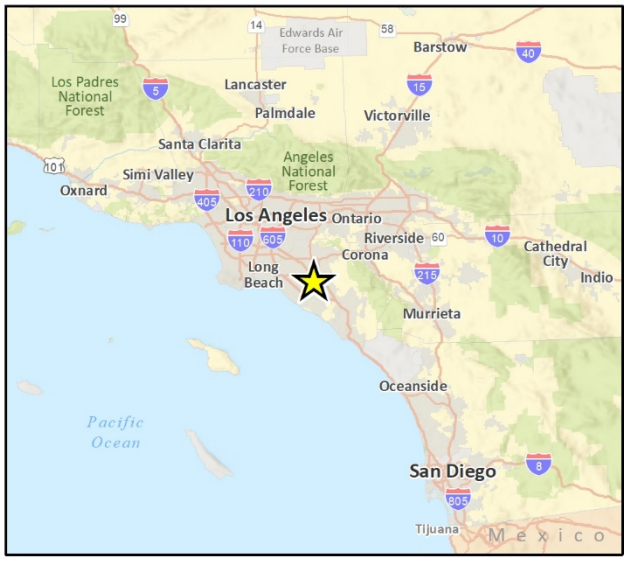
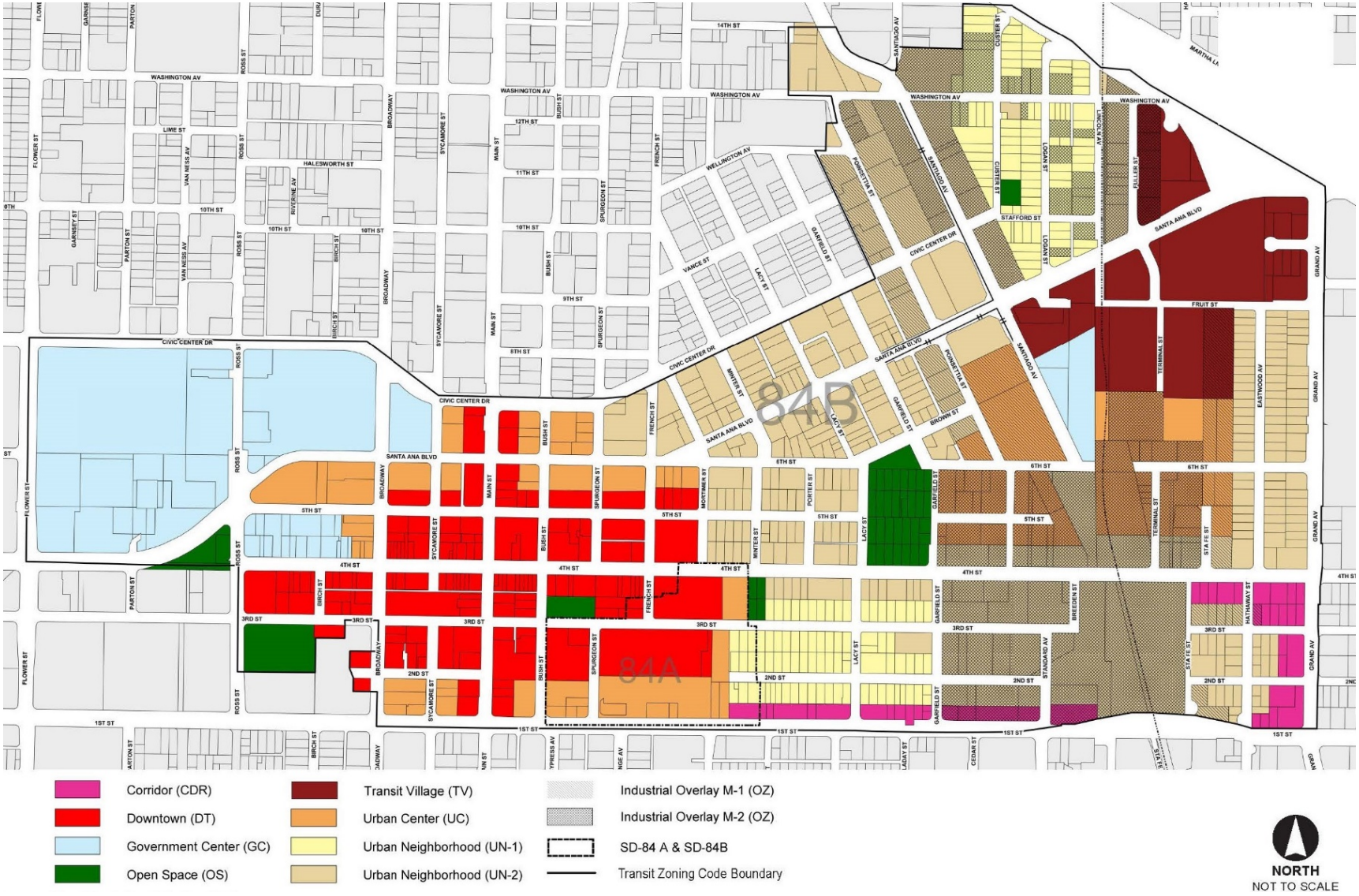


Figure 2-2 Transit Zoning Code Boundary, Zoning Designations, and Project Site



Source: PBS& J 2010

Within the boundary of the TZC area the City of Santa Ana and the Santa Ana Redevelopment Successor Agency (City/Agency) owned 49 parcels comprising approximately seven non-contiguous acres. The City/Agency may be considering the potential acquisition of 20 additional properties within the immediate vicinity of the 49 parcels mentioned above for the purposes of completing the assemblage of properties on those blocks in which the City/Agency already has majority ownership, as well as to secure property to provide for additional open space. The acquisition of these additional properties may lead to demolition and/or relocation of existing structures, as well as the potential relocation of any existing residents.

The City/Agency and the Developer (The Related Companies of California, LLC and Griffin Realty Corporation, a California Corporation [jointly, the Developer]) proposed to redevelop these properties. The Developer concept for these properties included the development of a maximum of 155 rental units and a maximum of 65 for-sale units for a total of 220 new residential units. A component of this residential development was affordable pursuant to the County of Orange's criteria for low-to-moderate income housing. The City/Agency is also pursuing the addition of new public space that could include a public park, a public tot lot, and a 10,000 square foot community building. The redevelopment of these properties requires the demolition of approximately 30,243 square feet of building area, on eleven City/Agency-owned parcels. With the exception of the redevelopment of the 49 City/Agency-owned parcels, there are no specific development projects were proposed within the TZC area.

The City's General Plan was amended to permit the new land uses proposed by the approved TZC and amend the Zoning Code to establish development standards that implement the approved TZC. For the purposes of this Addendum to the 2010 Final Environmental Impact Report (FEIR), the approved TZC is used as the baseline for the analysis since it represents what is currently permitted for development at the project site.

Discretionary Approvals

Discretionary approvals granted to the approved TZC included the following:

- Certification of the EIR
- Adoption of Statement of Overriding Considerations
- Adoption of Findings of Fact
- Adoption of Mitigation Monitoring and Reporting Program
- Adoption of the TZC
- Approval of Specific Development 84A and Specific Development 84B.
- General Plan Amendment (GPA)—to allow the implementation of the Industrial Overlay (IO) Zone on properties within the TZC that are currently zoned M1 and M2 and to expand District Center area.
- Amendments to Santa Ana Municipal Code
- Zoning Map Amendment (ZMA)—to change the zoning map to reflect the TZC.
- Approval of Water Supply Assessment (WSA)
- Site Plan Approval of The Related Company's development project
- Agreement to Develop Agency/Authority owned property (DDA)with The Related Company
- Designation of Park and Community Facilities, including park site, tot lot, and community center

CEQA Process/Environmental Impact Report for the Transit Zoning Code

The 2010 FEIR was prepared for the approved TZC in accordance with Section 15087 of the CEQA Guidelines. A Notice of Preparation (NOP) was filed with the California Office of Planning and Research and distributed to involved public agencies and interested parties for a 30-day public review period that commenced on July 20, 2006 and concluded on April 22, 2006. A Community Information and EIR Scoping Meeting for the approved TZC was also held on August 10, 2006, at Train Depot in Santa Ana. In addition, the City held two community information meetings for the TZC on January 14 and January 21, 2010, due to the length of time that the project was dormant. Copies of the Draft EIR were made available for a 45-day public review period, which commenced on February 2, 2010 and concluded on March 19, 2010.

The 2010 FEIR addressed the potential environmental effects of the proposed TZC. The scope of the 2010 FEIR included environmental issues determined to be potentially significant based on the Initial Study and responses to the NOP. The environmental analysis reflected a future build-out scenario assuming that development would occur at the highest density permitted by the Code.

The environmental study determined that the proposed project would have minimal or no impacts for the following three environmental categories: Geology and Soils, Mineral Resources, and Agriculture Resources. Because potential effects in these impact areas were found not to be significant, further analysis of these impacts was not required or provided in the 2010 FEIR.

The NOP identified potentially significant effects in the following impact areas associated with the construction or operation of the proposed project, which were addressed in detail in the 2010 FEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation and Circulation
- Utilities and Service Systems

Significant and mitigable impacts were found for all the environmental issues listed above. The EIR also recommended feasible mitigation measures, where possible. For all but five of these issues, the mitigation measures reduced the impacts to below the level of significance.

Significant and unavoidable impacts that could not be mitigated were identified in the 2010 FEIR and addressed in the adopted CEQA findings and statement of overriding considerations as follows:

Aesthetics

Development under the approved TZC would allow for a variety of building heights from low (one to two stories) to high (up to 10 or 25 stories in the Downtown and Transit Village District, respectively). Depending on the location of the proposed structures, shadows may be cast on sensitive receptors for extended periods of time (three to four hours) by the proposed high-rise structures.

According to the 2010 FEIR, the current low- to mid-rise buildings within the TZC area create limited shade and shadow patterns that are contained within a close proximity to each low- to mid-rise building. Future development of new multi-story buildings in the TZC area may create new sources of shading that could impact shadow-sensitive uses in the vicinities of the new development sites.

For the purposes of analyzing shade/shadow impacts, a significant impact would occur when shadow-sensitive uses (residential structures, schools, churches, parks, etc.) would be shaded by a project-related structure for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (PST) (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. PST (between early April and late October) (2010 FEIR, p. 4.1-27).

Air Quality

It is reasonably foreseeable that construction emissions for individual projects constructed within the TZC area may exceed the South Coast Air Quality Management District's (SCAQMD's) recommended thresholds of significance and result in short-term air quality impacts. Further, since development under the TZC may occur in multiple locations at the same time as part of multiple development projects, the cumulative emissions of those development projects may also exceed SCAQMD's thresholds of significance.

Primarily due to the increase in residential uses under the TZC, mobile source (vehicular) emissions associated with the additional development would exceed SCAQMD thresholds of significance for five criteria pollutants ($PM_{2.5,}$ VOC, NO_X, CO, and PM_{10}) for which the air basin is in non-attainment.

In conjunction with other development projects in the vicinity of the TZC, construction and operation of the proposed project would result in a cumulatively considerable net increase of criteria pollutants ($PM_{2.5,}$ VOC, NO_X, CO, and PM_{10}) for which the air basin is in nonattainment.

Cultural Resources

According to the 2010 FEIR, the TZC area includes 80 properties listed on the Santa Ana Register of Historical Properties (SARHP), five that are listed on the California Points of Historical Interest (PHI) and one that is listed on the California Historical Landmarks (CHL). The South Central Coastal Information Center (SCCIC) records search identified a total of 238 properties listed on the California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP) that are within the project area and a one-half-mile radius beyond the project area boundaries. There is also one NRHP district found within the project area, which is known as the Downtown National Register District. As such, adoption of the approved TZC could result in new development, which, depending on the site chosen for development, may involve the reuse, relocation, or demolition of designated or potentially historic structures, including those identified as potentially eligible to the (SARHP) by the Historic Resource Survey conducted for the approved TZC or within identified historic districts. While the City of Santa Ana would implement the applicable General Plan policies and additional mitigation measures provided herein, the policies and mitigation measures afford only limited protection to historic structures and cannot ultimately prevent the demolition of a historic building or structure. The feasibility of retaining a historic structure/resource is determined on a case-by-case basis, and within the planning horizon of the approved TZC, it is reasonably foreseeable that development may occur where the retention/preservation of a historic resource/structure may not be feasible.

Noise

Instantaneous noise levels associated with train horns, which occur periodically throughout a given day and which must be used at at-grade crossings, would exceed the standards of the City's Noise Ordinance at sensitive receptors that could be located in the vicinity of the AT&SF rail line. The 2010 FEIR found that with the establishment of a Quiet Zone, impacts would be mitigated; however, until

such time, the use of train horns would be considered a significant and unavoidable impact on sensitive receptors developed as part of the TZC. In 2012, the Orange County Transportation Authority (OCTA) completed railroad crossing safety enhancements at 50 crossings throughout the County, including in Santa Ana, and established quiet zones (Molina 2012; OCTA 2017).

Should pile-driving be required during development within the approved TZC, construction activities associated with the proposed project could generate or expose persons or structures located in the vicinity to temporary levels of groundborne vibration in excess of established thresholds. It should be noted that pile-driving is not currently proposed within the approved TZC area, but it is reasonably foreseeable that pile-driving may occur.

Transportation and Traffic

Adoption of the approved TZC could cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. All of the potential impacts attributable to the proposed project are mitigable. However, two of the mitigation measures require the approval/cooperation of the California Department of Transportation (Caltrans). Because two of the improvements require a discretionary action of an agency outside of the City's purview, the implementation of the two measures cannot be guaranteed. Should the measures be implemented in cooperation with Caltrans, the traffic impacts of the approved TZC would be reduced to less than significant.

Adoption of the approved TZC could result in impacts related to street segment capacity on roadways within and adjacent to the approved TZC. As described above, because two of the improvements require a discretionary action of an agency outside of the City's jurisdiction, the implementation of the two mitigation measures cannot be guaranteed. Should the measures be implemented in cooperation with Caltrans, the traffic impacts of the approved TZC would be reduced to less than significant.

Adoption of the approved TZC could increase the level of traffic at the I-5 northbound off-ramp at Santa Ana Boulevard to an unacceptable level of service. The potential impact is mitigable but requires a discretionary action by Caltrans, which is outside the purview of the City's jurisdiction. Should the mitigation measure be implemented in cooperation with Caltrans, the traffic impacts of the approved TZC would be reduced to less than significant.

Final EIR

The 2010 FEIR was completed in May of 2010. On May 27, 2010 the Planning Commission recommended the following:

- Adopt a resolution certifying the Final Environmental Impact Report No. 2006-02 prepared for the proposed Transit Zoning Code (SD 84A and 84B) and the proposed redevelopment of properties owned by the Santa Ana Redevelopment Agency in the Station District (collectively, the Proposed Project); adopt the Mitigation Monitoring and Reporting Program, adopt the CEQA Facts, Findings and a Statement of Overriding Considerations; and approve the Proposed Project.
- Adopt a resolution approving General Plan Amendment No. 2010-01.
- Adopt an ordinance approving amendments to various zoning provisions of Santa Ana Municipal Code Chapter 41 (ZOA No. 2010-01).
- Adopt an ordinance approving the creation of Specific Development No. 84, approving the rezoning of properties from various zones to Specific Development No. 84, repealing Specific

Development No. 30, 37, 47 and 71, and amending the height exemption areas map (AA No. 2005-09).

- Adopt a resolution approving Transit Zoning Code Architectural Style Guidelines and Transit Zoning Code Street Network Concepts.

On June 7, 2010 the City Council certified the EIR and adopted the mitigation monitoring program prior to adoption of the TZC.

2.2 Proposed Project

Project Location

The proposed project would involve construction of a mixed-use residential and commercial development on two adjacent city blocks ("Block A" and "Block B") in downtown Santa Ana, within the TZC area. Block A is located at 409 East 4th Street, while Block B is located at 509 East 4th Street. The project site consists of ten parcels, identified by Assessor Parcel Numbers (APNs) 398-325-01 and, 398-330-02, -03, -04, -05, -06, -07, -09 and -10. The site is regionally accessible from I-5 and the State Route 55 (SR-55) and locally accessible by 4th Street, French Street, and Mortimer Street. The site is in an urban area, has been previously graded and developed, and is surrounded by roads and urban structures (office buildings, residential buildings, and commercial buildings). Figure 2-3 shows the location of the site in its neighborhood context.

Existing Conditions

The project site is located in Downtown Santa Ana adjacent to the historical 4th Street shopping district which is characterized by multi-story urban building types accommodating a mixture of retail, office, light service, and residential uses. The project site is developed with the Northgate Gonzalez Market and a surface parking lot on Block A and Ming's Auto Corporation, Munoz Auto Repair & Tire Service, and parking lot on Block B. As shown in Figure 2-3, the Ming's Auto Corporation building is not part of the project, but the Munoz Auto Repair & Tire Service building would be demolished as part of the proposed project. Block A and Block B are approximately 1.423 and 1.292 acres in size, respectively. The project site is bordered by 5th Street and commercial and residential development to the north, North Minter Street and commercial and residential development to the east, 4th Street and commercial development to the south, and French Street, commercial development and a public parking structure to the west.

The project site has a General Plan designation of District Center-Downtown District on Block A and Urban Neighborhood on Block B and is zoned Special District-84 (SD-84). The District Center-Downtown District land use designation accommodates high-rise office, commercial, and mixed-use residential uses. There is an emphasis on streets that accommodate all modes of transportation for this land use designation. The SD-84 district is defined in the TZC as having its own set of development regulations and requirements, specifically for each subzone (Article XIX of the City of Santa Ana Municipal Code). The TZC is broken down into nine subzones. Block A is in the Downtown (DT) subzone and Block B is in the Urban Neighborhood 2 (UN-2) subzone. The DT subzone permits a mix of retail, office, light service, and residential uses while promoting transit-oriented development. The UN-2 subzone applies to residential areas intended to accommodate a variety of housing types, with some opportunities for live-work, neighborhood-serving retail, and cafes (Santa Ana 2010a).

Figure 2-3 Project Site Location

Imagery provided by Microsoft Bing and its licensors © 2020.

Proposed Project Characteristic

The proposed project is a modification of the approved TZC evaluated in the 2010 FEIR. The proposed project involves demolition of two existing buildings, Northgate Gonzalez Market and Muñoz Auto & Tire Repair, and ancillary structures on the project site and the development of a mixed-use residential and commercial building on Block A and a multi-family residential building on Block B. On Block A, the proposed project would develop an aboveground parking structure with approximately 230 stalls and a mixed-use residential structure containing 99 apartment units, with approximately 93,117 square feet of residential space, 8,075 square feet of leasing/amenity areas, a 3,847-square foot restaurant, and 7,514 square feet of retail space. On Block B, a 70-unit multi-family residential structure would be constructed, with 74,986 square feet of residential space, as well as an aboveground parking structure with approximately 192 stalls. Figure 2-4 shows the proposed site plan for Block A and Block B.

The proposed restaurant would be located on the first floor of the Block A building, at the corner of 4th Street and French Street. Also fronting 4th Street on Block A would be the retail space and leasing office. The building frontage of 4th Street would be seven stories. Fronting Mortimer Street at Block A would be residential units and the residential lobby. The building would be seven stories in height at the intersection of 4th Street and Mortimer Street and five-stories in height along the remaining frontage of Mortimer Street. Likewise, the building frontage along French Street would be seven stories at the intersection of French Street and 4th Street and would be five stories in height along the remaining French Street frontage. The 4.5-story parking garage on Block A would be located at the intersection of French Street and 5th Street and would be accessed by 5th Street. The building at Block A would include a pool, courtyard, and residential amenities on the third level and a rooftop deck. A total of 23,773 square feet of open space, including 8,428 square feet of private open space and 15,345 square feet of common open space, would be provided at Block A. Figure 2-7 illustrates the proposed Block A building and parking structure elevations.

The Block B residential building would be accessed by a lobby off of Mortimer Street and would be five stories in height across the site. Along the 4th Street frontage, Block B would include a courtyard and residential units. Block B would also contain a four-story aboveground parking garage at the corner of 5th Street and Minter Street, which would be accessed by 5th Street. Block B would include 16,065 square feet of open space, including 2,832 square feet of private open space and 13,233 square feet of common open space. The existing Ming's Auto Corporation building would not be impacted by the proposed changes to Block B. Figure 2-8 illustrates the proposed Block B building and parking structure elevations.

There would be a total of 422 parking spaces provided (397 residential stalls and 25 commercial visitor stalls), and a total of 169 residential units consisting of 21 studios, 38 one-bedroom, 66 two-bedroom, 9 three-bedroom, and 35 four-bedroom units. The project would provide a total of 39,838 square feet of open space, including 11,260 square feet of private open space and 28,578 square feet of common open space. Figure 2-4 through Figure 2-7 show proposed site plans, including the conceptual site plan, building elevations, and building plans. See Table 2-1 for a summary of the proposed project. See Appendix A for full site plans.

The proposed project would be constructed in one phase with demolition of the existing structures occurring concurrently, followed by construction of the parking structures and then construction of the residential and mixed-use buildings. Grading for the proposed improvements would require cut and fill to create building pads. Grading is estimated to require approximately 6,000 cubic yards (cy) of balanced cut and fill. Final grading plans would be approved by the City before the issuance of the

grading permit. All infrastructure (i.e., storm drain, water, wastewater, dry utilities, and street improvements) would be installed during grading. Construction is anticipated to take 21 to 24 months is expected to begin in September 2021.

Table 2-1 Proposed Project Summary

Site Area	Block A	Block B	Total
	1.423 acres (61,986 sf)	1.292 acres (56,280 sf)	2,715 acres (118,265 sf)
Project Floor Area			
Residential	99 units (93,117 sf)	70 units (74,986 sf)	169 units (168,103 sf)
Amenities/Leasing Office	8,075 sf	0 sf	8,075 sf
Retail	11,361 sf	0 sf	11,361 sf
Public/Common Open Space	15,345 sf	13,233 sf	28,578 sf
Private Open Space	8,428 sf	2,832 sf	11,260 sf
Parking			
Automobile	217 residential stalls, 13 commercial stalls	180 stalls 12 commercial stalls	422 stalls

sf= square feet

Source: KTGY Architecture and Planning 2020 (Appendix A)

The project site has a General Plan designation of District Center on Block A and Urban Neighborhood on Block B, and both parcels are zoned Specific Development No. 84 (SD-84) in TZC. Block A is in the Downtown (DT) subzone and Block B is in the Urban Neighborhood 2 (UN-2) subzone. This designation is the same as the project site zoning considered under the 2010 FEIR for the approved TZC.

The allowable FAR for DT zoned properties is 3.0 and the maximum building height for Lined Block buildings is ten stories as specified by the TZC. The allowable FAR for UN-2 zoned properties is 0.5 to 1.80 and the maximum building height is five stories (for Hybrid Court buildings) as specified by the TZC. The proposed project would include construction of two new Lined Block buildings, one of which would be seven stories in height with an FAR of 2.4 (Building A) and one that would be five stories in height with an FAR of 1.8 (Building B), which are in accordance with the allowed maximum building height and FAR for the DT and UN-2 subzones. However, the UN-2 subzone does not permit Lined Block buildings; therefore, the project would require a zone change on Block B. With approval of the zone change on Block B, building types, heights, FARs, and setbacks would comply with the TZC.

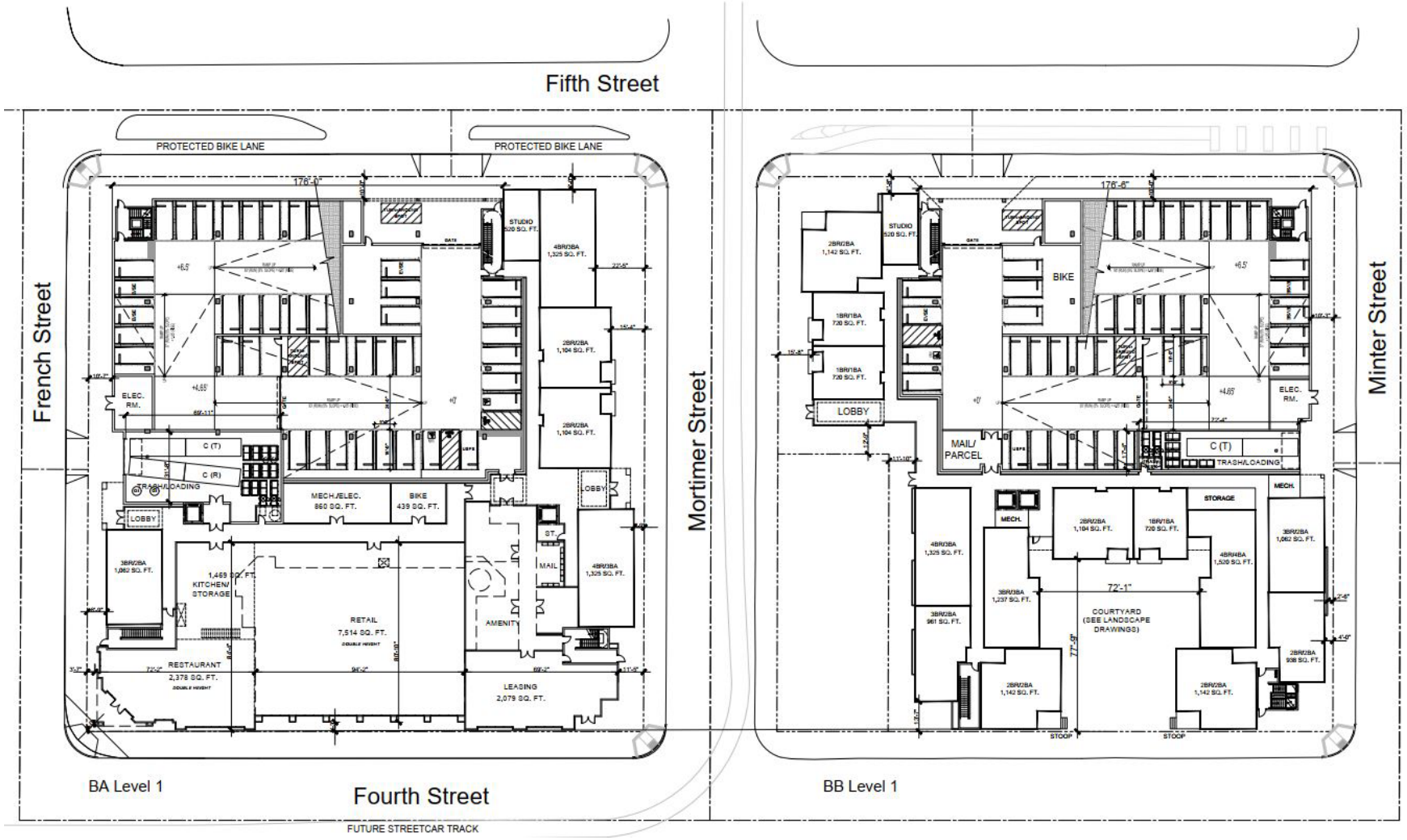
Project Discretionary Requests

The project requires the following discretionary actions that will be subject to approval by the Planning Commission and City Council: a site plan review; a zone change from Urban Neighborhood 2 (UN-2) to Urban Center (UC) for Block B; and a variance for compliance with the massing standards for Block B under Table BT-5 of Section 41-2023 of the TZC which requires the floor areas for the 3-5 floors to be 85% of the ground floor. The project is proposing 100 percent coverage on the first floor and 100 percent coverage on the second and third floors. Ministerial review will be required for a voluntary lot merger for multiple underlying legal lots on Block B.

Figure 2-4 Conceptual Site Plan

Source: KTGY Architecture and Planning 2020 (Appendix A)

Figure 2-5 Proposed Project Building Plan Level 1



Source: KTGY Architecture and Planning 2020 (Appendix A)

Figure 2-6 Proposed Project Block A Elevations (North and West Views)

Source: KTGY Architecture and Planning 2020 (Appendix A)

Figure 2-7 Block B Building Elevations (South and East Views)

Source: KTGY Architecture and Planning 2020 (Appendix A)

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3.1 Aesthetics

The 2010 FEIR concluded the approved TZC would result in significant and unavoidable aesthetics impacts regarding shade and shadows. No impact was found regarding damage to scenic resources, and less than significant impacts were found regarding scenic vistas, the surrounding visual character or quality, or light and glare. This section addresses the aesthetic impacts of the proposed project, as compared to the impacts of approved TZC. The applicant included a *Site Shadow Study* in the Development Project Review Package to identify potential impacts from shadows created by the proposed project (KTGY Architecture + Planning 2020). The Development Review Package is included as Appendix A of this Addendum.

Setting

The project site is located within the TZC area that was analyzed in the 2010 FEIR. Specifically, Block A is situated at the eastern edge of the Downtown commercial district in central Santa Ana. The 2010 FEIR notes that the Downtown District neighborhood consists of one to six-story civic, residential, and mixed-use buildings in a setting of approximately thirty 300-foot blocks, with alleys present in many blocks. The neighborhood connects the Government Center to the Lacy and French Park neighborhoods to the east. With the exception of a few super blocks and operational modifications such as one-way streets and the lack of on-street parking, the historic street grid is largely intact. Vacant land in the district is limited, with redevelopment or rehabilitation of sites and/or existing buildings the primary opportunity for new activity. New buildings in this district are generally up to five stories in height, mixed-use, and with housing and/or offices above.

According to the 2010 FEIR, the TZC area includes 80 properties listed on the Santa Ana Register of Historical Properties (SARHP), five that are listed on the California Points of Historical Interest (PHI) and one that is listed on the California Historical Landmarks (CHL). The South Central Coastal Information Center (SCCIC) records search identified a total of 238 properties listed on the California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP) that are within the project area and a one-half-mile radius beyond the project area boundaries. There is also one NRHP district found within the project area, which is known as the Downtown National Register District. As discussed in Section 3.3, *Cultural Resources*, recent SCCIC searches were conducted on February 27, 2019 and March 12, 2019 and collectively encompassed the project site and roughly a 0.5-mile radius around it (search radius). An independent records search was not completed for the current project given the adequate coverage provided by the previous searches and constraints surrounding COVID-19. These searches identified 46 previous studies within the search radius. None of these studies covered any portion of the project site. The searches also identified 77 previously recorded cultural resources in the search radius; these include 25 historic-period archaeological sites, 50 built-environment resources, and three historic districts. None of these resources encompass any portion of the project site.

Land uses bordering the project site include 5th Street and commercial development to the north; North Minter Street and commercial development to the east; East 4th Street and commercial development to the south; and French Street, commercial development, and a parking structure to the west. The site totals approximately 2.7-acres and is currently developed with the Northgate Gonzalez Market and a surface parking lot on Block A and Ming's Auto Corporation, Muñoz Auto Repair & Tire Service, and a parking lot on Block B.

The southwest quadrant of Block A contains ornamental landscaping, the Northgate Gonzalez Market (a single-story grocery store), and a concrete and brick sidewalk along East 4th Street. Landscaping includes a grass, palms, and shrubbery between the market and the sidewalk, and one street tree between the curb and sidewalk. The store can be accessed from the southwest quadrant of the block via a store entrance adjacent to the East 4th Street sidewalk. The store is also accessible via a main entrance that faces the interior of the site and the surface parking lot.

The northwest quadrant of Block A is characterized by ornamental landscaping, a gated and walled portion of the Northgate Gonzalez Market which contains the trash and loading area as well as the remainder of the building, and a concrete and brick sidewalk along French Street and concrete sidewalk along East 5th Street. Landscaping includes a grass, shrubbery, and mature trees between the market and the sidewalk, and one large street tree between the curb and sidewalk at the corner of East 5th Street and Mortimer Street. The parking lot is accessible via an entrance off of East 5th Street midway between French Street and Mortimer Street.

The northeast quadrant of Block A contains landscaping, a low concrete wall, a surface parking lot, and concrete sidewalks along East 5th Street and Mortimer Street. Mature street trees are planted at regular intervals along the street frontages. The parking lot is also accessible via an entrance off of Mortimer Street in the northeast quadrant of Block A.

The southeast quadrant of Block A contains the remainder of the surface parking lot, landscaping, and a brick and concrete sidewalk along East 4th Street. Landscaping includes grass, palms, and shrubbery between the market and the sidewalk, and one street tree between the curb and sidewalk.

The southwest quadrant of Block B contains the single-story Ming's Auto Repair building, a large privacy fence, a concrete and brick sidewalk along East 4th Street and concrete sidewalk along Mortimer Street, and the repair bays and auto parking area for the repair shop. There is no landscaping along the southern frontage of Block B, other than a single street tree, and the block generally lacks scenic qualities.

The northwest quadrant of Block B is characterized by vacant land with gravel, ornamental trees, and grass surrounded by a chain-link fence. A concrete sidewalk runs along East 5th Street, with parking meters and a bare dirt strip between the curb and sidewalk. Landscaping includes grass, shrubbery, and mature trees between the market and the sidewalk, and one large street tree between the curb and sidewalk at the corner of East 5th Street and Mortimer Street. Along East 5th Street, a concrete sidewalk with grass and street trees between the curb and sidewalk are present. The parking lot is accessible via an entrance off of East 5th Street midway between French Street and Mortimer Street.

The northeast quadrant of Block B contains a grassy lawn and a surface parking area enclosed by a chain-link fence. There are concrete sidewalks along East 5th Street and North Minter Street. Mature street trees are planted at regular intervals in the grassy areas between the sidewalks and curbs along these streets. The parking lot is also accessible via an entrance off of Mortimer Street in the northeast quadrant of Block A.

The southeast quadrant of Block B contains the former Muñoz Auto & Tire Service building (now vacant) and a grassy area enclosed by a chain-link fence. There is a concrete sidewalk along North Minter Street with regularly placed street trees, as well as a concrete sidewalk along East 4th Street, which contains one street tree near the southeast corner of Block B. Figure 3.1-1 through Figure 3.1-8 illustrate the current conditions of the project site.

Figure 3.1-1 Northeast View of Block A from 5th Street and Mortimer Street

Figure 3.1- 2 Northwestern View of Block A

Figure 3.1- 3 Southern View of Blocks A and B from 4th Street and Minter Street

Figure 3.1-4 Northwest View of Block B from 5th Street and Mortimer Street

Figure 3.1-5 Northeastern View of Block B from 5th Street and Minter Street

Figure 3.1-6 Southeast View of Block B from Minter Street

Figure 3.1-7 Southwest View of Block B from 4th Street and Mortimer Street

Figure 3.1-8 Southern View of Block B from 4th Street

The Orange County (OC) Streetcar is under construction and expected to begin operations in 2022. The OC Streetcar will link the Santa Ana Regional Transportation Center (SARTC) to a new multimodal hub at Harbor Boulevard/Westminster Avenue in Garden Grove. The OC Streetcar will serve the historic Downtown Santa Ana and Civic Center area and provide greater access along Santa Ana Boulevard, 4th Street, and the Pacific Electric right-of-way to Harbor Boulevard in Garden Grove (OCTA 2019). The project site is directly north of the future streetcar line that will traverse 4th Street and Mortimer Street.

Project Impacts

Scenic Views and Vistas

As concluded in the 2010 FEIR, the City does not have any State- or County-designated scenic highways, nor are there any State- or County-designated scenic highways located nearby. Within the TZC area, the City has designated 1st Street, 4th Street, and Main Street as both Major City Entries and Primary Street Corridors, with 17th and Bristol Streets having both been designated as Secondary Street Corridors. Both 4th Street and Main Street are locally-designated scenic corridors in the General Plan. As concluded in the 2010 FEIR, future development facilitated by the approved TZC would incorporate a range of architectural styles, building heights, and massing so that new projects constructed pursuant to the approved TZC would provide a visual entryway to the City from multiple locations, including along 1st, 4th, and Main Streets, as well as from the I-5. Specifically, a new skyline of varying building forms and heights could be created along these major thoroughfares by new development and would not degrade views from adjacent roadways or uses. Consequently, the 2010 FEIR determined that implementation of the approved TZC would not substantially damage scenic resources within a State scenic highway or designated city corridor, and no impact would occur.

Implementation of the proposed project would include construction of two new buildings, one of which would be seven stories and the other five stories in height. The new buildings would change the visual character of the project site, which is currently developed with single-story structures, surface parking lots, and ancillary structures. However, these changes would not degrade views from adjacent roadways or uses because they would be consistent with the goals of the approved TZC to create visual entryways with varying building heights and forms in the Downtown (DT) zone. Thus, implementation of the proposed project would not result in new significant impacts or increase the severity of impacts related to scenic resources within a State scenic highway or designated city corridor beyond those analyzed in the 2010 FEIR.

The 2010 FEIR identifies scenic resources within the TZC as being limited to distant background views of the Santa Ana Mountains and 1st,4th, and Main Streets due to their local designation as Major City Entries within the Scenic Corridors Element of the City's General Plan. With respect to scenic views and resources, as concluded in the 2010 FEIR, long-term visual characteristics of the TZC (SD-84) area would be altered with development under the approved TZC standards; however, changes under the TZC would visually enhance the area and provide the City with a distinctive entryway identity. The approved TZC also provides standards for pedestrian/roadway design and contiguous landscaped pedestrian areas throughout the TZC (SD-84) area in order to promote active street life. Thus, the 2010 FEIR determined that although views of the TZC (SD-84) area would be modified, the approved TZC would not degrade the existing visual character or quality of the Transit Zoning Code (SD-84) area or its surroundings. Rather, development under the approved TZC would contribute to the image of and add to the aesthetic quality of the City. As such, development under

the approved TZC was determined not to degrade the existing visual quality of the area or obstruct key existing views and/or vistas in the vicinity and impacts were found to be less than significant.

The proposed project would include construction of one new mixed-use building and one multi-family residential building. Upon approval of the zone change to UC on Block B, the proposed project would comply with zoning height, building setback, building type, and frontage requirements established by the TZC. Similar to the approved TZC, the proposed project would not block or obstruct views of nearby scenic resources or vistas and would contribute to the scenic quality of 4th Street. Therefore, the proposed project would not result in a new significant impact or increase the severity of impacts related to scenic vistas beyond those analyzed in the 2010 FEIR.

Pedestrian entrances to the Block A building would be located at the corners of East 4th Street and French Street and East 4th Street and Mortimer Street. There would also be a pedestrian entrance for the proposed retail store off East 4th Street. In addition, the residential lobby would be accessible via a pedestrian entrance off of Mortimer Street. Pedestrian entrances to the Block B building would be located in the courtyard area off of East 4th Street, at the corner of East 4th Street and Minter Street, and via a residential lobby entrance off of Mortimer Street. As such, the proposed project would be designed to provide an appropriate interface with the surrounding pedestrian environment.

The proposed project would include streetscape improvements by increasing the number of street trees and ornamental landscaping along street frontages and by reactivating the pedestrian environment in this portion of Downtown Santa Ana, which currently contains an auto-oriented grocery store use, an auto repair shop, and a vacant, boarded structure and parking lot. The proposed project would provide an improvement to the pedestrian and visual quality of the 4th Street locally-designated scenic corridor. For these reasons, as with the approved TCZ, the proposed project's impacts to scenic views and vistas would be less than significant. Therefore, the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact beyond those analyzed in the 2010 FEIR.

Visual Character

Long-term cumulative development in the project area, along with associated infrastructure improvements, would alter the existing visual character or quality of the TZC area. The 2010 FEIR concluded that implementation of the approved TZC would enhance the visual character of the area through the design and development standards. Although future development could result in taller buildings in certain neighborhoods compared to existing uses, the overall changes that are proposed under the approved TZC would be designed to create visually attractive and compatible uses. Additionally, future development would be required to adhere to policies identified in the City's General Plan Elements. Consequently, the 2010 FEIR determined that future development under the approved TZC would improve the existing visual character and impacts were determined to be less than significant.

The project proposes construction of a mixed-use, multi-family residential development with commercial retail and restaurant space on the first floor of Building A, which would support goals of high-density residential development in the central part of the City. One of the existing buildings on Block B of the project site is not in use, so the project site is generally underutilized with one business in operation and the majority of the site consisting of surface parking and vacant space. The proposed project would redevelop Block B for use as mixed-use residential and commercial development that would contribute to revitalization of an underused property. The mixed-use nature of the project would enhance pedestrian activity this area of Downtown Santa Ana.

The project would be consistent with policies associated with architecture, design and contributing to a cohesive neighborhood character. Neighboring buildings vary in height between two and seven stories and are constructed with various building materials and in various styles, including with cement blocks, bricks, textured stucco, and wood paneling. Building A under the proposed project would be seven stories and constructed in the Main Street Commercial and California Contemporary architectural style, while Building B would be five stories and also characterized by the California Contemporary style. The proposed project would include similar materials, including bricks and textured stucco, and similar architectural styles as the surrounding area. As such, the proposed buildings would provide visual cohesiveness with the existing buildings in the adjacent historic district of Downtown Santa Ana. The proposed project would also include artwork at the southwestern corner (4th Street and French Street) of the proposed building on Block A that would be publicly visible along 4th Street and French Street, which would be consistent with policies associated with public art installations.

The proposed project would also contribute to meetings goals and policies associated with public safety, the reduction of vandalism, and landscaping enhancements. There would be limited defined entrances to the proposed buildings, shielded security lighting to maximize visibility without creating glare, and outdoor amenities including seating for the proposed restaurant. These features would discourage loitering, vandalism, graffiti, and visual deprivation of the site, and would improve the streetscapes of adjacent streets by planting additional street trees and ornamental landscaping along 4th, 5th, Mortimer, French, and Minter Streets.

Similar to the approved TZC, the proposed project would be consistent with the applicable Santa Ana General Plan Scenic Quality Regulations. Like the approved TZC, the proposed project would result in a less than significant impact with respect to the visual character of the Downtown district. Therefore, the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact beyond those analyzed in the 2010 FEIR.

Light and Glare

The 2010 FEIR concluded that long-term cumulative development occurring pursuant to the approved TZC, and associated infrastructure improvements, could result in new sources of increased daytime glare. This is considered a potentially significant impact; however, implementation of Mitigation Measure 4.1-1 was found to reduce impacts to a less-than-significant level. Mitigation Measure 4.1-1 requires new structures to utilize textured and non-reflective exterior surfaces and non-reflective glass. As shown in the project design plans for the proposed project (see Appendix A), materials utilized on the outside of the proposed structures include brick veneer, stucco, precast wainscot, decorative metal railings and awnings, glass railing, artwork, and non-reflective glazing systems. These materials were chosen in compliance with Mitigation Measure 4.1-1 of the 2010 FEIR, as they conform to the textured and non-reflective requirements for exterior surfaces of new developments. Additionally, consistent with Mitigation Measure 4.1-1 of the 2010 FEIR, the proposed project would utilize non-reflective glass. Incorporation of these features into the project design would reduce glare to a less than significant impact and the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant related to glare beyond those analyzed in the 2010 FEIR.

With respect to spillover light from new development, the 2010 FEIR concluded that the TZC area would provide outdoor lighting standards that aim to prevent impacts on surrounding residential uses. Although the TZC area would provide outdoor light standards, future development could

create light pollution disturbances which do not presently exist. Depending on the location and design specifications of lighting on future buildings, lighting could present a potentially significant impact. As such, the approved TZC included Mitigation Measures 4.1-2 and 4.1-3, which requires exterior lighting and advertising to be shielded from adjacent properties and public rights-of-way, and submittal of a lighting plan for City review including light shielding design features, landscaping and other light screening features.

As shown in the project design plans (see Appendix A), landscaping along the project site boundaries would include planted trees, which would aid in diffusing light from the proposed structures. Minimal security lighting would be required, as adjacent roadways already provide street lighting for the safety of vehicles, bicyclists, and pedestrians along these roadways. In addition, outdoor lighting from the rooftop deck would be shielded and directed so only the terrace is lighted, consistent with 2010 FEIR Mitigation Measure 4.1-2. Incorporation of these features into the project design would prevent spillover light at off-site receptors. Therefore, the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact with respect to light and glare beyond those analyzed in the 2010 FEIR.

Shade and Shadow

The 2010 FEIR concluded that long-term cumulative development occurring pursuant to the approved TZC could result in a substantial increase in shade/shadows over sensitive uses. This is considered a potentially significant impact. Because no feasible mitigation measures are available, this impact was identified as significant and unavoidable.

Consistent with 2010 FEIR Mitigation Measure 4.1-4, a shade and shadow analysis was conducted for the proposed project and is included as Appendix A (KTGY Architecture + Planning 2020). The proposed project would involve a seven-story building on Block A and a five-story building on Block B. These structures would shade adjacent land uses, including structures to the east and southeast in the summer months, and structures to the north, northeast, and northwest in the winter months. The 2010 FEIR defines a significant shade or shadow impact as follows:

> For the purposes of analyzing shade/shadow impacts, a significant impact would occur when shadow-sensitive uses (residential structures, schools, churches, parks, etc.) would be shaded by a project-related structure for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST) (between late October and early April), or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. PST (between early April and late October).

Uses surrounding the project site are a mix of commercial and residential. The project site is bordered by 5th Street and commercial and residential development to the north, North Minter Street and commercial and residential development to the east, 4th Street and commercial development to the south, and French Street, commercial development and a public parking structure to the west. Shadow sensitive uses near the project site would be limited to the residential developments to the north and east. The Site Shadow Study indicates that none of the shadow sensitive uses would be shaded by Building A or Building B for more than three hours between 9:00 A.M. and 3:00 P.M. during the Winter Solstice. Likewise, shadow sensitive land uses would not be shaded by project structures for more than five hours between 9:00 A.M. and 5:00 P.M. during the Summer Solstice (KTGY Architecture + Planning 2020). Therefore, impacts would be less than significant. As such, the proposed project would not contribute to the significant shadow impacts identified in the 2010 FEIR, nor would it result in a new significant impact or substantially increase

the severity of a previously identified significant impact with respect to shade and shadow beyond those analyzed in the 2010 FEIR.

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3.2 Air Quality

The project site is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that State and federal ambient air quality standards (AAQS) are met and, if they are not met, to develop strategies to meet the AAQS. The 2010 FEIR concluded that the approved TZC would result in significant and unavoidable air quality impacts regarding violation of air quality standards and cumulatively considerable net increase in criteria pollutants. Less than significant impacts were found regarding objectionable odors, exposure to substantial pollutant concentrations, and obstruction of an applicable air quality plan.

This section addresses the air quality impacts of the proposed project. The analysis herein is based the *Air Quality Assessment* conducted by Kimley-Horn which utilized estimates from the California Emissions Estimator Model (CalEEmod) Version 2016.3.2. The full *Air Quality Assessment* is provided in Appendix B of this document.

Project Impacts

Consistency with an Air Quality Plan

Under State law, SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the District is designated as nonattainment. The latest Air Quality Management Plan (AQMP) from 2016 was adopted on March 3, 2017. It incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal 8-hour ozone standard of 0.070 ppm that was finalized in 2015. The Final 2016 AQMP addresses several State and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The Southern California Association of Government's (SCAG) projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) are integrated into the 2016 AQMP.

A project may be inconsistent with the AQMP if it would result in an increase in the frequency or severity of existing air quality violations or generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local general plans and the SCAG Regional Transportation Plan's (RTP) forecasts of regional population, housing, and employment growth in its own projections for managing air quality in the Basin.

As discussed further below under *Criteria Pollutant Emissions,* project construction and operational emissions would not exceed SCAQMD thresholds. Therefore, the Project would not contribute to an existing air quality violation.

The growth projections used by SCAQMD to develop the AQMP emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by SCAG in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SCAG's growth projections and/or the general plan would not conflict with SCAQMD AQMP. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the AQMP.

The 2010 FEIR concluded that the TZC would not conflict with an applicable air quality plan. The proposed project would not house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 square feet of floor area. Thus, the proposed project would not be defined as a regionally significant project under CEQA because it does not meet SCAG Intergovernmental Review criteria.

The proposed development on Block A is consistent with the assumed buildout of the TZC, including growth assumptions, as discussed in Section 3.6, *Land Use and Planning*. However, development proposed for Block B would require a zone change from Urban Neighborhood-2 (UN2) to Urban Center (UC) in order to accommodate the proposed building type and density. Nonetheless, the proposed project is consistent with the UN and District Center (DC) land use designations for the project site in the General Plan. According to the General Plan, the UN land use designation "…allows for a mix of residential uses and housing types, such as mid to low rise multiple family, townhouses and single family dwellings; with some opportunities for live-work, neighborhood serving retail and service, public places and use, and other amenities." In addition, properties designated as DC in the General Plan "…are to be developed with an urban character that includes a mixture of high-rise office, commercial, and residential uses which provide shopping, business, cultural, education, recreation, entertainment, and housing opportunities." The proposed project consists of a residential and commercial/retail mixed-use development that would provide housing and commercial/retail uses in an existing neighborhood area of the City.

The proposed project would provide a total of 169 residential units. According to the California Department of Finance (DOF), the City of Santa Ana has an estimated population of 335,052 with an average household size of 4.33 persons (DOF 2020). SCAG estimates a population increase to 343,100 by 2040 which is an increase of 2.4 percent or 8,048 persons (SCAG 2016). Assuming that all new residents moved to the city from out of town, development of the 169 units would increase the existing population by approximately 732 residents (approximately 0.22 percent) to 335,784, which would be within SCAG's 2040 population forecast. In addition, SCAG's estimate for existing households in the City in 2012 was 73,300, and estimates a housing increase to 78,000 by 2040, which is an increase of 6.4 percent, or 4,700 housing units (SCAG 2016). Construction of the proposed 169 residential units would represent approximately 3.6 percent of the projected housing stock increase, which would not exceed SCAG's 2040 housing units forecast.

Although the project would conflict with the current zoning of UN-2 on Block B and require a rezone to UC, the proposed project would not conflict with the UN land use designation nor would it generate housing or population growth that would exceed the SCAG 2040 forecasts upon which the 2016 AQMP is based. Thus, the proposed project would result in air emissions which are consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. The proposed project would not result in any new significant impact or substantial increase in the severity of impacts beyond those analyzed in the 2010 FEIR.

Criteria Pollutant Emissions

CONSTRUCTION EMISSIONS

The 2010 FEIR identified construction emissions of criteria pollutants as significant and unavoidable because construction emissions for individual projects may exceed the SCAQMD's recommended thresholds of significance. However, the 2010 FEIR identified Mitigation Measures 4.2-2 through 4.2-20 to reduce construction air quality impacts to the extent feasible. Similar to the approved TZC,

the proposed project would result in short-term air pollutant emissions during the 21- to 24-month construction period.

Construction emissions from the proposed project were modeled using CalEEMod including Mitigation Measures 4.2-2 through 4.2-20 from the 2010 FEIR, as applicable.[1] Regulatory compliance measures that apply to the proposed project include compliance with SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.) and SCAQMD Rule 1113 (low-VOC paint) and were included in the CalEEMod model.

Table 3.2-1 shows the construction emissions (both on-site and off-site) and compares them to the SCAQMD regional thresholds and Table 3.2-2 provides the on-site construction emissions and compares them to the SCAQMD Localized Significance Thresholds (LSTs). LSTs represent the maximum emissions from the project which would not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area, project size, distance to the sensitive receptor, and other factors. It should be noted that LSTs are screening thresholds and are therefore conservative. The project site is located in Source Receptor Area (SRA 17). The nearest sensitive receptors are multi-family residences located approximately 55 feet east of the project site, across Minter Street.

The SCAQMD provides LSTs for one-, two-, and five-acre project sites for receptors at 82 to 1,640 feet (25 to 500 meters) from the project site. The construction LST acreage is determined based on daily acreage disturbed. Project construction is anticipated to disturb a maximum of two acres in a single day during the site preparation phase. Although the project site is greater than two acres, the two-acre operational LSTs were conservatively used to evaluate the project's operational impacts. According to the SCAQMD's *Final LST Methodology* (2008) projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet. Therefore, the analysis below uses the LST values for 82 feet.

[1] The 2010 FEIR analyzed emissions using the Urban Emissions Model (URBEMIS) 2007 emissions inventory model. URBEMIS is a computer program used to estimate emissions associated with land use development projects. URBEMIS is no longer recommended by SCAQMD and has been replaced CalEEMod.

Table 3.2-1 Short-Term Regional Construction Emissions

Construction Phase	Estimated Maximum Daily Emissions (lbs/day)					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
2021 Maximum (lbs/day)	3.0	22.7	21.4	0.1	3.8	2.3
2022 Maximum (lbs/day)	2.7	19.3	20.8	0.1	3.1	1.3
2023 Maximum (lbs/day)	23.2	17.2	20.2	0.1	3.0	1.3
SCAQMD Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: Emission data is pulled from "mitigated" results, which include SCAQMD regulatory requirements including Rule 403 and Rule 1113. SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied.

Source: Kimley-Horn 2020a (Appendix B)

Table 3.2-2 Construction Localized Impacts Analysis

Emissions Sources	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum On-Site Emissions	20.2	14.6	3.7	2.3
Localized Significance Threshold[1]	115	715	6	4
Exceeds Threshold?	**No**	**No**	**No**	**No**

[1] The LST has been calculated for a 2-acre site in Source Receptor Area-17 at a distance of 25 meters.

Source: SCAQMD 2008; Kimley-Horn 2020a (Appendix B)

As shown in Table 3.2-1, construction of the proposed project would not exceed the SCAQMD regional thresholds of significance. In addition, Table 3.2-2 shows that the proposed project's localized construction emissions would not result in a locally significant air quality impact at the nearest sensitive receptors and would be within the on-site emissions estimated in the 2010 FEIR. The proposed project would not result in any new or substantially more severe air impacts than what was analyzed in the 2010 FEIR.

OPERATIONAL EMISSIONS

The 2010 FEIR identified operational emissions of VOC, NO_X, CO, and PM_{10} as significant and unavoidable and identified Mitigation Measures 4.2-21 through 4.2-36 to reduce the impacts to the extent feasible. Operation of the proposed project would generate criteria pollutant emissions primarily due to vehicle travel to and from the project site and area sources, such as the use of landscape maintenance equipment. Mobile source emissions were quantified based on a daily trip generation of 1,112 vehicle trips obtained from the project's *Traffic Impact Analysis* (LLG 2020). The *Air Quality Assessment* did not subtract existing emissions on the project site from the Northgate Gonzalez Market currently in operation and therefore presents a conservative estimate of project operational emissions (Kimley-Horn 2020a). Therefore, the operational mobile emissions quantified in the *Air Quality Assessment* are a conservative estimate. Table 3.2-3 shows long-term operational

emissions associated with the proposed project and Table 3.2-4 shows the proposed project's long-term localized on-site emissions.

Table 3.2-3 Long-term Operational Emissions (Maximum Pounds per Day)

	Pollutant Emissions (lbs/day)					
Source	**ROG**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area	4. 7	2.5	15.0	< 0.1	0.3	0.3
Energy	0.1	0.8	0.4	< 0.1	0.1	0.1
Mobile	1.4	4.8	18.0	0.1	6.7	1.8
Total Project Emissions	**6.2**	**8.1**	**33.5**	**0.1**	**7.0**	**2.2**
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
2010 FEIR Emissions	1,033	298	3,571	10	1,019	409

Notes: Emissions results are the highest of the summer and winter emissions from the CalEEMod output tables listed as "Mitigated Operation." Totals may not add up due to rounding. See Appendix B for project assumptions.

Source: Kimley-Horn 2020a (Appendix B)

Table 3.2-4 Long-Term Operational Localized Impacts Analysis

Emissions Sources	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions[1]	3.3	15.4	0.3	0.3
Localized Significance Threshold[2]	115	754	2	1
Exceeds Threshold?	**No**	**No**	**No**	**No**

[1] By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions include all on-site project related stationary sources and five percent of the project-related new mobile sources, which is an estimate of the amount of project-related new vehicle traffic which would occur on site.

[2] The LST has been calculated for a two-acre site in Source Receptor Area-17 at 25 meters.

Source: Kimley-Horn 2020a (Appendix B)

Despite the conservative modeling assumptions, operational emissions of ROG, NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$ would not exceed the applicable SCAQMD thresholds. As shown in Table 3.2-3, the proposed project would not generate emissions exceeding SCAQMD regional thresholds and would be within the emissions estimated in the 2010 FEIR. Table 3.2-4 shows that on-site operational emissions would not exceed the LSTs for sensitive receptors in the project area. Therefore, operation of the proposed project would not result in any new or substantially more severe significant air quality impacts beyond those analyzed in the 2010 FEIR.

Carbon Monoxide Concentrations

The 2010 FEIR concluded that carbon monoxide concentrations would be less than significant. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older

vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard.

The SCAB was re-designated as in attainment for CO in 2007 and this pollutant is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard and Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm federal standard. The project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's CO Hotspot Analysis. As the CO hotspots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections resulting from 55 net daily trips attributable to the proposed project.

Concentrations of CO are a function of vehicle idling time, meteorological conditions, and traffic flow. Enclosed parking structures may cause concern regarding CO hotspots as they may have frequent vehicle operations in cold start mode; however, open parking structures above ground would be naturally ventilated which would prevent CO hotspots. Approximately 422 parking spaces would be constructed within the parking structures. Based on the project site plans and elevations prepared for the proposed project (February 2020), the proposed parking structures would be open on two sides and would be wrapped by the residential and commercial uses on the other two sides, which would allow for sufficient ventilation and CO hotspots would not occur. Therefore, the proposed project would not result in a CO hotspot or result in a substantial increase in the severity of CO impact beyond those analyzed in the 2010 FEIR.

Construction-Related Diesel Particulate Matter

Construction would result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. DPM emissions from the 21-month construction period would represent a range of 2.5 to 19.4 percent of the typical exposure duration used in health risk assessments.

The closest sensitive receptors are located adjacent to the site, approximately 55 feet from the project site boundary. Project construction involves phased activities in several areas across the site and the project would not require the extensive use of heavy-duty construction equipment or diesel trucks in any one location over the duration of development, which would limit the exposure of any proximate individual sensitive receptor to TACs.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction activities would be temporary and transient throughout the site (i.e., move from location to location), and would not generate emissions in a fixed location for extended periods of time. Construction activities would also be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. As such, project construction DPM impacts to sensitive receptors would be less than significant and would not result in a substantial increase in the severity of DMP impacts beyond those analyzed in the 2010 FEIR

Odors

The SCAQMD *CEQA Air Quality Handbook* (1993) identifies agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding as land uses which produce odors. The *Air Quality Assessment* noted that during construction, operation of equipment could generate diesel fuel odors (Kimley-Horn 2020a). However, these odors would be temporary, would disperse rapidly and are not expected to affect a substantial number of people. Project operation would not involve any of the land uses identified by SCAQMD as substantial sources of odors. Therefore, construction and operation of the proposed project would not generate odors that would adversely affect a substantial number of people and would not result in a substantial increase in the severity of odor impacts beyond those analyzed in the 2010 FEIR.

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3.3 Cultural Resources and Tribal Cultural Resources

The 2010 Final EIR concluded that the approved TZC would result in less than significant impacts to archeological and human remains with incorporation of mitigation. The approved TZC would result in a significant and unavoidable impact related to historic resources. This section addresses the cultural resources impacts of the proposed project, as compared to the impacts of the approved TZC. The following analysis is based on the Cultural Resources Study (Study) for the 4th and Mortimer Project, Santa Ana, California, prepared by Rincon Consultants, dated April 2019 (see Appendix C).

Setting

Located in Santa Ana's Lacy neighborhood, the redevelopment project encompasses ten contiguous Orange County Assessor's parcels and occupies two city blocks between East 4th and East 5th Streets and French and Minter streets, within the TZC area that was analyzed in the 2010 FEIR. This district connects the Government Center to the Lacy and French Park neighborhoods to the east. With the exception of a few super blocks and operational modifications such as one-way streets and the lack of on-street parking, the historic street grid is largely intact. Vacant land in the district is limited with redevelopment or rehabilitation of sites and/or existing buildings the primary opportunity for new activity. The neighborhood is designated as the Lacy Neighborhood Conservation Overlay.

Historical Context

509-515 East 4th Street is located in Santa Ana's Lacy neighborhood, just west of the city's historic-period commercial center. Historically the seat of Orange County, a review of Sanborn Fire Insurance Company maps (Sanborns) dated 1885, 1887 and 1888 indicate the commercial center of Santa Ana at that time was situated along East 4th Street in the area of Main Street, roughly .18 miles west of the subject property (Sanborn Var.). By the time an 1888 Sanborn was drawn, East 4th Street was densely lined with commercial development between Broadway (historically West Street) and Bush Street. Outside of these three blocks, development was less dense and generally more residential in nature. In 1888, the subject property was undeveloped and its immediate surroundings, the block between Mortimer, Minter, 4th and 5th Streets, included just three small dwellings (Sanborn 1888) . During the lead up to and following the turn of the century, the area surrounding the subject property generally densified and filled in with residential development. By 1906 the immediate surroundings of the subject property had been divided into several rectangular residential properties (Sanborn 1906). At that time, 509 -515 East 4th remained the only undeveloped property in the block between Mortimer, Minter, 4th and 5th Streets.

As Santa Ana continued to develop into the 20th century, East 4th Street in the area of the subject property trended towards commercial and industrial development. 509-515 East 4th Street was constructed in 1921 (Les 1980), as development in the surrounding area shifted from single-family residential to various use including commercial and industrial along East 4th Street. Consistent with this trend, by 1949 many of what were formally single-family dwellings had been demolished replaced with larger industrial and/or commercial buildings (Sanborn 1949).

A review of Santa Ana City Directories, historic-period newspaper advertisements and Sanborns indicates that the subject property was associated with the auto industry in its early development. The portion of the building addressed as 515 East 4th Street in particular appears to have maintained that association for a significant period. Aside from the period between 1932-1939 when it was used

as a grain/feed supply, 515 East 4th Street functioned in an auto-related capacity from 1923 to 1972 at a minimum. Businesses that advertised 515 East 4th Street as their address include service garages, motor sales, autobody repair and auto detailing shops. La Opinión Daily Newspaper/La Opinión Periodical, a Spanish-language newspaper with potentially significant historical associations, appears to have been associated with the property for a short period in the early 1980s.

The portion of the building addressed as 509 East 4th Street also functioned in an auto-related capacity, at a minimum from 1921 to 1931. Businesses that advertised from the location include an auto upholstery shop, auto lacquer shop and car dealer. 509 East 4th Street appears to have transitioned to construction-related use in the mid-1930s, following which point it was used as a shop and storage location by various contractors, among other uses.

Cultural Resources Records Research

To identify relevant documenation and characterize the known cultural resouces sensitivity of the area surrounding the project site, Rincon reviewed the results of two recent searches of the California Historical Resources Information System (CHRIS). The purpose of the records search results review was to identify previously recorded resources and previously conducted cultural resource studies that have taken place either within or in the vicinity of the project site. The searches were conducted at the South Central Coastal Information Center (SCCIC) at the California State University, Fullterton on February 27, 2019 and March 12, 2019 and collectively encompassed the project site and roughly a 0.5-mile radius around it (search radius). An independent CHRIS records search was not completed for the current project given the adequate coverage provided by the previous searches and constraints surrounding COVID-19.

The previous CHRIS searches identified 46 previous studies within the search radius. None of these studies covered any portion of the project site. The CHRIS searches also identified 77 previously recorded cultural resources in the search radius; these include 25 historic-period archaeological sites, 50 built-environment resources, and three historic districts. None of these resources encompass any portion of the project site. No prehistoric-period archaeological resources were identified in search radius. Summary sheets from each of the CHRIS searches described above are included in the Cultural Resources Study.

Archival and Background Research

Archival and background research for this study was completed in late May and throughout June 2020. Research methodology focused on the review of a variety of primary and secondary source materials related to the history and development of the project site and its surroundings. Sources included, but were not limited to, historic maps, photographs and written histories of the area. A list of sources and repositories consulted for this study is included below and is followed by additional information regarding research methods and results.

- Historic aerial photographs accessed digitally via Nationwide Environmental Title Research (NETR) Online, Inc. and the University of California, Santa Barbara Map & Imagery Lab
- Historic photographs of the subject property and its vicinity accessed via Calisphere.org and the Orange County Archives
- Historic topographic maps accessed digitally via United States Geologic Survey
- Historic newspaper articles and advertisements from the *Santa Ana Register* accessed digitally via newspapers.com
- Santa Ana City Directories accessed digitally via Ancestry.com

- Historic Sanborn Fire Insurance Company maps accessed digitally via the Los Angeles Public Library
- Building permit history for 509-515 East 4th Street, accessed online via the City of Santa Ana Property Information Search
- Various published sources available via the Santa Ana Public Library History Room (via research request)
- *Historic and Cultural Resources Survey*, prepared by Historic Resources Group (HRG) in 2006
- A review of relevant sources at the Santa Ana History Room

Rincon performed a review of several regional historic context statements with a particular focus on those that discuss automotive history. This effort included review of the following:

- *Survey LA-Los Angeles Citywide Historic Context Statement-Context: Commercial Development, 1850-1980, Theme: Commercial Development and the Automobile, 1910-1970*
- *City of Burbank-Citywide Historic Context Report*
- *Van Ness Auto Row Support Structures-A Survey of Automobile-Related Buildings along the Van Ness Avenue Corridor*

Cultural Resources Inventory Review

Rincon referenced the following inventories of cultural resources to determine if any of the properties within the project site had been previously recorded and evaluated for historic significance.

- National Register of Historic Places (NRHP)
- California Register of Historical Resources (CRHR)
- California Points of Historical Interest (PHI) and Landmarks lists,
- California Office of Historic Preservation Archaeological Determinations of Eligibility (ADOE) and Built Environment Resources Directory (BERD) for Orange County
- Santa Ana Register of Historic Properties (RHP)

Review of the NRHP, CRHR, PHI and Landmark Lists, ADOE and the Santa Ana RHP were negative for the project site. However, review of the Orange County BERD identified one property in the project site, 509-515 East 4th Street (P-30-160420), that was recorded in 1980. Although the resource record for 509-515 East 4th Street was not identified through the CHRIS records searches, it was obtained from the SCCIC via email and is described in further detail below.

P-30-160420-SANTA ANA CAR SALON

509-515 East 4th Street was previously recorded in 1980 by Kayhleen Les. On the corresponding historic resource inventory form, 509-515 East 4th Street is referenced as "Santa Ana Car Salon." It is described as a "one-story brick and stucco Western commercial building with a double stepped parapet façade, metal cap pieces, and fixed as well as double-hung windows." The recorder goes on to note that that property has been considerably altered. While no California Historical Resource (CHR) Status Code is listed on the historic resource inventory form, the Orange County BERD lists the property with a CHR 5S2, indicating that it is eligible for local historic designation but ineligible for listing in the NRHP or CRHR. The brief evaluation included on the historic resource inventory form states that in 1980, the property was a rare example of the Western False Front Style in Santa Ana.

Three photographs were attached to the form. Little additional information about the property's history and/or significance was included. The resource record is included as a part of the Cultural Resources Study.

Native American Outreach

Rincon submitted a request to the Native American Heritage Commission (NAHC) for a Sacred Lands File (SLF) search on May 15, 2020. The NAHC responded on May 18, 2020, stating that the results of the SLF search were negative. The SLF search results and Orange County tribal consultation list are included in Cultural Resources Study. The NAHC additionally supplied a tribal consultation list for Orange County, which was provided to the City in support of their consultation under Assembly Bill 52. See the summary of the City's outreach efforts in the *Project Impacts*, below.

Interested Party Outreach

Rincon contacted several entities known to have local knowledge of cultural resources in the area of the project site. On June 19, 2020, emails were sent to the Santa Ana Historic Preservation Society (SAPHS) and the Orange County Archives (OCA) requesting any information related to and/or photographs of 509-515 East 4th Street. Rincon received responses from both organizations and continued correspondence via telephone and email. On behalf of OCA, Chris Jepsen provided a list of businesses that advertised from 509-515 East 4th Street from 1921 to 1979. Throughout June 2020, several attempts were made to contact the First American Title Orange County Historical Photo Archive via telephone. However, during that period, the archive was close due to COVID-19 and to date, no response has been received.

Intensive-Level Field Survey

Rincon cultural resouces specialist Rachel Perzel, M.A., conducted a cultural resources field survey of the project site on June 11, 2020. The survey consisted of a visual inspection of all built environment features within the project site to assess overall condition and integrity, and to identify and document any potential character-defining features. In addition, Ms. Perzel confirmed that the project site is developed with paved and gravel surfaces and little to no exposed ground surface is present. Ms. Perzel recorded field observations using detailed notes and a digital photographs.

Project Impacts

Archaeological Resources

An assessment of archaeological sensitivity indicates that the project site contains a relatively low potential to encounter intact, subsurface cultural resources deposits. The CHRIS and SLF records searches identified no known archaeological resources within or adjacent to the project site. Furthermore, there is a low potential for the discovery of intact subsurface archaeological deposits on the project site due to past development.

The following best management practice are recommended in the event of an unanticipated discovery of cultural resources during project construction. The project is required to adhere to regulations regarding the unanticipated discovery of human remains, detailed below.

UNANTICIPATED DISCOVERY OF ARCHAEOLOGICAL RESOURCES

If archaeological resources are encountered during ground-disturbing activities, work in the immediate area should be halted and an archaeologist meeting the Secretary of the Interior's

Professional Qualification Standards for archaeology (National Park Service 1983) should be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.

UNANTICIPATED DISCOVERY OF HUMAN REMAINS

The discovery of human remains is always a possibility during ground-disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access.

Historical Resources

The research and field survey performed for this study identified one property containing a historic-period building, 509-515 East 4th Street. The property was previously recorded and found locally eligible in 1980. However, the area surrounding the property was surveyed in 2006 and the property was not identified as potentially eligible at that time. The property's historical significance was reexamined as a result of this study. Since its last recordation, it has been significantly altered such that it no longer embodies a particular architectural style. It is ineligible for listing in the NRHP, CRHR and on the City of Santa Ana RHP and therefore does not qualify as a historical resource as defined by CEQA. Based on the results of the cultural resource assessment, Rincon recommends a finding of no impact to historical resources under CEQA for the 4th and Mortimer project.

Tribal Cultural Resources

Given the developed nature of the site, excavation and grading activities required for project construction are not expected to uncover tribal cultural resources. However, it is possible that intact and previously undiscovered tribal cultural resources are present at subsurface levels and could be uncovered during ground-disturbing activities. In the event such previously unknown tribal cultural resources are found, significant effects may occur to that resource if the resource is disturbed, destroyed, or otherwise improperly treated. As such, Mitigation Measure 4.4-1(a) is required in the event such tribal cultural resources are uncovered during construction.

For the purpose of Tribal consultations under AB 52 and per Public Resources Code Section 21080.3.1, the City of Santa Ana sent a Local Government Tribal Consultation List Request to the NAHC to obtain a list of Native American tribes that are culturally affiliated with the project area. The NAHC responded with a consultation list of 15 tribes to contact for their traditional and cultural affiliation with the geographic area in which the project is located. Based on this list, the City sent out consultation letters on June 8, 2020 to the listed tribes and have since received a response from the Juaneño Band of Mission Indians – Acjachemen Nation and the Gabrieleno Band of Mission Indians – Kizh Nation, requesting consultation to discuss the proposed project in further detail.

Following these requests, emails regarding the project were exchanged between City Staff and Joyce Stanfield Perry, President of the Acjachemen Nation, on June 23, 2020. She expressed concern

that, because the project is taking place in a shared territory, all affiliated tribes should be considered when it comes to monitoring and requested a revision to Mitigation Measure 4.4-1(a). As a result, the measure has been revised with deletions noted by ~~strikeout~~ and in-text insertions by underline. See Appendix K for the revised Mitigation Monitoring and Reporting Program of the 2010 FEIR.

In addition, a consultation phone call between Andrew Salas and Matthew Teutimez, representatives of the Kizh Nation, and City Staff occurred on September 9, 2020. During the phone call and in a follow up email, tribal representatives stated concern about ground disturbance associated with construction of the project. They requested additional details regarding the proposed excavation and grading of the site, the history of the site and whether the soil had been previously disturbed, and also requested the mitigation monitoring reporting program that was approved for the FEIR. This information and the MMRP were provided on September 9, 2020 and September 17, 2020. They also expressed a concern about making sure that the mitigation measure language included in the EIR identified monitoring by the applicable tribes. While the revisions to Mitigation Measure 4.4-1(a) below are broader in comparison to the original language, the revisions are more inclusive of locally affiliated tribes.

REVISIONS TO MITIGATION MEASURE 4.4-1(A) OF THE 2010 FEIR

Prior to any earth-disturbing activities (e.g., excavation, trenching, grading) that could encounter undisturbed soils, the project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology to determine if the project could result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines or disturb human remains. The investigation shall include, as determined appropriate by the archaeologist and the City of Santa Ana, an updated records search of the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS), updated Native American consultation, and a pedestrian survey of the area proposed for development. The results of the investigation shall be documented in a technical report or memorandum that identifies and evaluates any archaeological resources within the development area and includes recommendations and methods for eliminating or avoiding impacts on archaeological resources or human remains. The measures shall include, as appropriate, subsurface testing of archaeological resources and/or construction monitoring by a qualified Native American Monitor selected from a locally affiliated Tribe identified by the Native American Heritage Commission ~~professional and, if necessary, appropriate Native American monitors identified by the applicable tribe (e.g., the Gabrieliño Tongva Nation) and/or the Native American Heritage Commission~~. The methods shall also include procedures for the unanticipated discovery of human remains, which shall be in accordance with Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. The technical report or memorandum shall be submitted to the City of Santa Ana for approval. As determined necessary by the City, environmental documentation (e.g., CEQA documentation) prepared for future development within the project site shall reference or incorporate the findings and recommendations of the technical report or memorandum. The project applicant shall be responsible for implementing methods for eliminating or avoiding impacts on archaeological resources identified in the technical report or memorandum. Projects that would not encounter undisturbed soils and would therefore not be required to retain an archaeologist shall demonstrate non-disturbance to the City through the appropriate construction plans

or geotechnical studies prior to any earth-disturbing activities. Projects that would include any earth disturbance (disturbed or undisturbed soils) shall comply with MM4.4-2(b).

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3.4 Energy

The 2010 FEIR concluded the TZC would not involve a wasteful or unjustifiable use of energy, and energy for development would occur in an efficient manner. This section discusses the energy impacts of implementing the proposed project, following the guidance for evaluation of energy impacts in Appendix F and Appendix G of the CEQA Guidelines.

Setting

Southern California Edison (SCE) is responsible for providing power supply to the City of Santa Ana and the project site. SCE is one of the nation's largest electric utilities and provides service to over 15 million people over a 50,000-square mile territory that covers central, coastal, and Southern California (SCE 2020). Table 3.4-1 shows the electricity consumption by sector.

Table 3.4-1 Electricity Consumption in the SCE Service Area in 2018

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Streetlight	Total Usage
3,192.2	31,573.8	4,367.4	13,391.7	2,390.0	29,865.0	496.0	85,276.0

Notes: All usage expressed in GWh

Source: CEC 2018a

Southern California Gas (SCG) is responsible for providing power supply to the city of Santa Ana and the project site and Table 3.4-2 shows the natural gas consumption by sector.

Table 3.4-2 Natural Gas Consumption in the SCG Service Area in 2018

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Total Usage
77.6	913.0	74.5	1,714.4	229.2	2,147.4	5,156.1

Notes: All usage expressed in MMThm

Source: CEC 2018b

City of Santa Ana Climate Action Plan

The City of Santa Ana Climate Action Plan (CAP) was adopted in December 2015, following certification of the 2010 FEIR. The CAP includes a 2008 baseline and 2020 and 2035 projected greenhouse gas (GHG) emission inventories, emission reduction goals, and emission reduction measures to reduce emissions. While the CAP is targeted toward reducing citywide GHG emissions, it also identifies energy efficiency measures to reach emissions reduction targets. Emission reduction measures were developed to address emissions in five sectors:

- Transportation and Land Use
- Energy
- Solid Waste
- Water
- Wastewater

Energy-related measures described in the CAP include building efficiency strategies, conducting outreach programs and incentive programs to encourage renewable energy installation, increased transit accessibility and programs, and vehicle fuel efficiency strategies (Santa Ana 2015).

Santa Ana Municipal Code: Water Shortage Contingency Plan

Chapter 39, Article 11 of the City's Municipal Code establishes provisions for water management practices and water conservation requirements for the city. This includes water waste prevention for existing landscaped areas, prohibiting watering between the hours of 6:00 p.m. and 9:00 a.m., and prohibiting irrigation of outdoor landscapes during or within 48 hours of a measurable rainfall. The ordinance also adopts a standard to prohibit watering or irrigating any landscaped area in a manner that causes or allows excessive water flow or runoff. When less water is used, less energy is required for treatment and transport.

Santa Ana Green Building Standards Code

The City's Green Building Standards Code (Chapter 8, Article 16 of the City's Municipal Code) formally adopts the 2019 California Green Building Standards Code (CalGreen) and State of California amendments, published by the California Building Standards Commission, and all revisions and amendments adopted by the California Building Standards Commission as the Green Building Standards Code of Santa Ana. The California Energy Code is a part of the California Green Building Standards Code, and therefore a part of the City's Green Building Standards Code. The California Energy Code contains energy efficiency provisions, such as requiring energy efficient indoor light fixtures, and solar water-heating systems in certain restaurants.

Project Impacts

Energy Consumption

CONSTRUCTION ENERGY CONSUMPTION

The 2010 FEIR concluded that the approved TZC would not result in an inefficient use of energy because energy conservation efforts would occur during project construction. Energy use during construction of the proposed project would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction would be temporary in nature and similar to the approved TZC. Table 3.4-3 presents the estimated energy consumption for construction of the proposed project. Construction energy estimates represent a conservative estimate because construction equipment used in each phase of construction was assumed to be operating each day of construction.

Table 3.4-3 Proposed Project Construction Energy Use

Fuel Type	Gallons of Fuel	MMBtu[4]
Diesel Fuel (Construction Equipment)[1]	46,752	5,959
Diesel Fuel (Hauling & Vendor Trips)[2]	575	73
Other Petroleum Fuel (Worker Trips)[3]	37,939	4,165
Total	**85,266**	**10,198**

[1] Fuel demand rate for construction equipment is derived from the total hours of operation, the equipment's horse power, the equipment's load factor, and the equipment's fuel usage per horse power per hour of operation, which are all taken from CalEEMod outputs as shown in Appendix B, and from compression-ignition engine brake-specific fuel consumptions factors for engines between 0 to 100 horsepower and greater than 100 horsepower (USEPA 2018). Fuel consumed for all construction equipment is assumed to be diesel fuel.

[2] Fuel demand rate for hauling and vendor trips (cut material imports) is derived from hauling and vendor trip number, hauling and vendor trip length, and hauling and vendor vehicle class from "Trips and VMT" Table contained in Section 3.0, *Construction Detail*, of the CalEEMod results as shown in Appendix B. The fuel economy for hauling and vendor trip vehicles is derived from the United States Department of Transportation (DOT 2018). Fuel consumed for all hauling trucks is assumed to be diesel fuel.

[3] The fuel economy for worker trip vehicles is derived from the U.S. Department of Transportation National Transportation Statistics (24 mpg) (U.S. DOT 2018). Fuel consumed for all worker trips is assumed to be gasoline fuel.

[4] CaRFG CA-GREET 2.0 fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for worker trips specified above (California Air Resources Board [CARB] 2015). Low-sulfur Diesel CA-GREET 2.0 fuel specification of 127,464 Btu/gallon used to identify conversion rate for fuel energy consumption for construction equipment specified above (CARB 2015). Due to rounding, numbers may not add up precisely to the totals indicated.

Similar to the approved TZC, construction equipment used for the proposed project would be maintained to applicable standards, and construction activity and associated fuel consumption and energy use would be temporary. The proposed project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and construction energy impacts would not result in any new significant impacts or substantial increase in the severity of impacts compared to the approved TZC.

OPERATIONAL ENERGY CONSUMPTION

As concluded in the 2010 FEIR, the increase in demand from implementation of future development under the approved TZC would contribute to electricity supply and delivery constraints. However, the approved TZC would comply with all applicable building codes to reduce energy demand. Mitigation Measure 4.12-3 would reduce operational energy use for non-residential development 15 percent below Title 24 requirements and Mitigation Measure 4.12-4 would reduce electricity and natural gas demand for non-residential development.

Operation of the proposed project would require energy demand from electricity, natural gas, and gasoline consumption at the project site due to intensified land use. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the proposed project, while gasoline consumption would be used by vehicles accessing the project site.

The 2010 FEIR found that new residential and retail development facilitated by the TZC would demand approximately 28,168,837 kWh of electricity per year. The 2010 FEIR determined that energy use of the approved TZC would be within the projected electrical demands for SCE. Similar to the approved TZC, the proposed project would implement Mitigation Measure 4.12-4 to reduce electricity demand. Furthermore, due to updates to Title 24, the proposed project would be

required to include energy conservation features that that would result in reduced electricity consumption as compared to the approved TZC. According to CalEEMod estimates, the proposed project would consume approximately 1,887,356 kWh per year (Appendix D). Therefore, the proposed project would represent approximately 6.7 percent of the residential and retail energy supply and demands of the TZC and would not represent a new significant electricity demand impact. In addition, the proposed project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase. The proposed project would not result in any new significant electricity impacts or substantial increase in the severity of impacts compared to the approved TZC.

The 2010 FEIR found that new residential and retail development facilitated by the TZC would demand approximately 3.79 MMthm of natural gas per year. The 2010 FEIR determined that natural gas use of the approved TZC would be within the projected natural gas supply and demands for SCG. Estimated natural gas consumption for the proposed project would be 0.03 MMthm per year,[1] which represents 0.8 percent of the natural gas consumption of the TZC as assessed in the 2010 FEIR. Therefore, the proposed project and would not result in any new significant natural gas impacts or substantial increase in the severity of impacts compared to the approved TZC.

Operational gasoline consumption of the proposed project would be attributed to the trips generated from residents, employees, and patrons accessing the site. The estimated number of average daily trips associated with the proposed project was used to determine the energy consumption associated with fuel use from operation of the proposed project. The majority of the fuel consumption would be from motor vehicles traveling to and from the project site. According to the CalEEMod calculations, the project would result in 4,184,457 annual VMT (Appendix D).[2] Table 3.4-5 shows the estimated annual fuel consumption of the proposed project using the estimated trip generation and VMT with the assumed vehicle fleet mix.

[1] See of Appendix D for annual CalEEMod outputs for natural gas
[2] Based on the most conservative estimate of daily trip generation provided in the *Traffic Impact Analysis* (LLG 2020; see Appendix F).

Table 3.4-4 Proposed Project Annual Transportation Energy Consumption

Vehicle Type[1]	Percent of Vehicle Trips[2]	Annual Vehicle Miles Traveled[3]	Average Fuel Economy (miles/gallon)[4]	Total Annual Fuel Consumption (gallons)	Total Fuel Consumption (MMBtu)[5]
Passenger Cars	56.3	1,090,910	24.4	44,709	4,908
Light/Medium Trucks	36.2	701,563	17.9	39,193	4,996
Heavy Trucks/Other	6.9	134,238	7.5	17,898	2,281
Motorcycles	0.5	9,567	44.0	217	24
Total	**100.0**	**1,936,278**	**–**	**102,019**	**12,209**

[1] Vehicle classes provided in CalEEMod do not correspond exactly to vehicle classes in DOT fuel consumption data, except for motorcycles. It was assumed passenger cars correspond to the light-duty, short-base vehicle class, light/medium trucks correspond to the light-duty long-base vehicle class, and heavy trucks/other correspond to the single unit, 2-axle 6-tire or more class.

[2] Percent of vehicle trips from Table 4.4 "Fleet Mix" in *Greenhouse Gas Emissions Study*, CalEEMod output (see Appendix D).

[3] Mitigated annual VMT found in Table 4.2 "Trip Summary Information" in *Greenhouse Gas Emissions Study;* CalEEMod output (see Appendix D).

[4] U.S. DOT 2018.

[5] CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for Passenger Cars and Motorcycles (CARB 2015). The Low-sulfur Diesel CA-GREET 2.0 fuel specification of 127,464 Btu/gallon used to identify conversion rate for fuel energy consumption for Heavy Trucks/Other (CARB 2015).

Notes: Due to rounding, numbers may not add up precisely to the totals indicated.

As shown in Table 3.4-5, the proposed project would consume approximately 102,019 gallons of fuel, or 12,209 MMBtu, each year for transportation uses from operation under the most conservative estimate. According to the *Traffic Impact Analysis*, the proposed project would result in a net reduction of 173 daily vehicle trips to the project site compared to existing uses (LLG 2020). Therefore, vehicle trips generated by the proposed project would not result in an inefficient use of gasoline and would have reduced vehicle trips compared to existing uses. The proposed project would not result in any new significant gasoline impacts or substantial increase in the severity of impacts compared to the approved TZC.

Overall, similar to the approved TZC the proposed project would comply with standards set in CBC's Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during project operation**.** California's Green Building Standards Code (CALGreen; CBC Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards established by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The proposed project and would not result in any new significant energy impacts or substantial increase in the severity of impacts compared to the approved TZC.

Consistency with the City of Santa Ana Climate Action Plan

As discussed above, the City of Santa Ana adopted a CAP in 2015. The CAP outlines strategies to achieve a GHG reduction target of 15 percent below 2008 emissions levels by the year 2020, and

30 percent below the baseline year 2008 by 2035. The CAP includes reduction strategies in five main sectors to assist the City in achieving the reduction targets. Each sector includes several GHG reduction measures. As shown in Table 3.4-6, the proposed project would be consistent with the CAP's GHG reduction strategies that specifically target energy efficiency.

Because the CAP was adopted in 2015, the analysis included in the 2010 FEIR does not provide a discussion of the approved TZC's consistency with the CAPs energy efficiency measures. Therefore, the following consistency analysis only applies to the proposed project and does not provide a comparison with the approved TZC.

Table 3.4-5 Proposed Project Consistency with the Santa Ana Climate Action Plan

Climate Action Plan Measures	Project Consistency
Transportation and Land Use Measures	
Development of Local Retail Service Nodes	**Consistent.** The proposed project would provide a mix of housing, commercial space, and potential job opportunities close to public transportation. The proposed project would introduce new retail and restaurant space as a part of the mixed-use development near existing and future modes of public transit in the City, including the Bus Rapid Transit (BRT) lines on Main Street located 1,000 feet to the west of the project site and the OC Streetcar under construction along West 4th Street and Mortimer Avenue. Providing employment opportunities that include retail services near public transit is consistent with goals to increase public transit utilization and reduce vehicle miles traveled.
Development of Residential Nodes near Retail and Employment	**Consistent.** The proposed project would include a residential and commercial mixed-use development. This would locate potential customers and residents in areas with retail and employment opportunities and reduce the need for automobile use, allowing for more bicycle and pedestrian modes of travel. The proposed project would introduce residential nodes near retail space and existing and future modes of public transit in the City, including the OC Streetcar that is currently under construction and the Main Street BRT lines. This development would be consistent with the CAP's goal of a higher level of alternative modes of transportation.
Local Employment Nodes near Residential and Retail Areas	**Consistent.** The proposed project would co-locate commercial and restaurant uses with residential development in an area that contains a mix of residential and retail uses. This would locate potential customers and residents in areas with retail and employment opportunities and reduce the need for automobile use, allowing for more bicycle and pedestrian modes of travel. The proposed project would introduce residential nodes near retail space and existing and future modes of public transit in the city, including the OC Streetcar that is currently under construction and the Main Street BRT lines. This development would be consistent with the CAP's goal of a higher level of alternative modes of transportation.
Design Guidelines for internal Bike/Pedestrian/Transit Connectivity	**Consistent.** The proposed project would build a mixed-use development in the center of downtown Santa Ana. The location of the project site is in close proximity to several bus stops to facilitate local connectivity. The project is also adjacent to the OC Streetcar that is currently under construction. The project would also include dedicated long-term and short-term bicycle storage. This would be consistent with the City's CAP connectivity measure for new development sites. This would help to improve connectivity and reduce the need for automotive travel, thus reducing fuel consumption in the City.

Climate Action Plan Measures	Project Consistency
Energy Measures	
Title 24 Energy Efficiency Standards – Residential	**Consistent.** The proposed project would comply with Title 24 energy efficiency standards for new construction in California, in accordance with MM4.13-8 of the 2010 FEIR. This code is set by the State and enforced locally by the City of Santa Ana through the building permit review and inspection process. The proposed project would be required to implement these energy efficiency design standards prior to the issuance of building permits and would therefore be consistent with this energy measure in the City's CAP.
Solid Waste, Water, and Wastewater Measures	
AB 341 Commercial and Multifamily Recycling	**Consistent.** AB 341 was adopted by the State of California as a mandatory recycling program for businesses that generate four cubic yards or more of commercial solid waste per week and multifamily residential dwellings of five units or more. The proposed project would implement required recycling in compliance with AB 341 and would be consistent with CAP's recycling strategy to divert waste from landfills and reduce overall waste. Furthermore, the proposed project would incorporate Mitigation Measure 4.13-19, which requires that building designs incorporate exterior storage areas for recyclables and green waste and adequate recycling containers located in public/common areas.

The proposed project would be consistent with Santa Ana's CAP and the energy efficiency measures contained therein. In addition, construction and operation of the proposed project would be required to comply with relevant provisions of CalGreen and Title 24 of the California Energy Code. Furthermore, the proposed project would incorporate Mitigation Measures 4.2-34, 4.2-35, 4.12-4, 4.13-8, and 4.13-19 from the 2010 FEIR that would improve energy efficiency of the proposed project. Therefore, proposed project and would not result in any new significant impacts or substantial increase in the severity of impacts compared to the approved TZC.

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3.5 Greenhouse Gas Emissions/Climate Change

The 2010 FEIR concluded the approved TZC would result in significant and unavoidable greenhouse gas (GHG) impacts regarding long-term emissions from cumulative development and compliance with Assembly Bill (AB) 32. This section addresses the GHG impacts of the proposed project. Kimley-Horn conducted a *Greenhouse Gas Emissions Assessment* for the proposed project to identify impacts on air quality from the proposed project as compared to the approved TZC (Kimley-Horn 2020b), which is included in Appendix D.

Setting

The City of Santa Ana adopted its Climate Action Plan (CAP) in December 2015. The CAP includes goals and measures to help move Santa Ana towards becoming a more sustainable city for future generations while mitigating the City's impacts on the environment. The CAP includes emission reduction targets of:

- 15 percent below 2008 by 2020
- 30 percent below 2008 levels by 2035

While the CAP is targeted toward reducing citywide GHG emissions, it also identifies energy efficiency measures to reach emissions reduction targets. Emission reduction measures were developed to address emissions in five sectors (Santa Ana 2015):

a) Transportation and Land Use
b) Energy
c) Solid Waste
d) Water
e) Wastewater

Project Impacts

Project GHG Emissions

The 2010 FEIR identified long-term cumulative GHG emissions as significant and unavoidable and identified Mitigation Measures 4.13-1 through 4.13-24 to reduce the impacts to the extent feasible. Construction and operation of the proposed project would generate GHG emissions, with the majority of energy consumption (and associated generation of GHG emissions) occurring during operation (as opposed to during its construction). Operational and construction GHG emissions were calculated using the California Emissions Estimator Model (CalEEMod) and are shown in Table 3.5-1. Mitigation Measures 4.13-1 through 4.13-24 were applied to CalEEMod as applicable. In addition to mitigation measures listed in Section 3.2, *Air Quality*, mitigation measures applied to the proposed project. Applicable construction mitigation measures include all diesel fuel construction equipment classified U.S. Environmental Protection Agency (U.S. EPA) Tier II or better (Mitigation Measure 4.13-1), all construction equipment shut off when not in use and not idling for more than five minutes (Mitigation Measure 4.13-2), queuing of trucks will be limited (Mitigation measure 4.13-3), construction trucks shall be shut off when not in use and shall not idle for more than five minutes (Mitigation Measure 4.13-4), electrical powered equipment used to the extent feasible (Mitigation Measure 4.13-5), reuse and recycling of construction and demolition waste (Mitigation

Measure 4.13-6), and education for construction workers regarding available recycling services (Mitigation Measure 4.13-7). Mitigation measures applicable to operation of the proposed project include meeting or exceeding Title 24 requirements (Mitigation Measure 4.13-8), drought tolerant landscaping (Mitigation Measure 4.13-9), low flow showers and faucets in residences (Mitigation Measure 4.13- 10), LED lighting (Mitigation Measure 4.13-17), and incorporation of storage areas for recyclables and green waste (Mitigation Measure 4.13-19).

Table 3.5-1 Construction and Operational GHG Emissions

Source	Pollutant Emissions (MT/yr) CO_2e
Construction Emissions Amortized over 30 Years	29[1]
Operational Emissions	
Area	38
Energy	597
Waste	33
Water	29
Mobile	733
Total Project Emissions	**1,493**
Project Service Population (Residents and Employees)	747
Total Project Emissions per service population ($MTCO_2e$ per service population per year)	**2.0**
2010 FEIR Emissions	**98,414**
2010 FEIR Service Population	11,794
Total 2010 FEIR Emissions per service population ($MTCO_2e$ per service population per year)	**8.3**

[1] Total construction emissions from the proposed project would be 880 MT CO_2e. Amortized over 30 years, per SCAQMD guidance, the project would result in 29 MT CO_2e.

Notes: See Appendix D for all modeling assumptions.

Source: Kimley-Horn 2020b (Appendix D); 2010 FEIR

As shown in Table 3.5-1, the proposed project would generate approximately 1,493 $MTCO_2e$ per year or 2.0 $MTCO_2e$ per service population per year. The proposed project's annual GHG emissions per service population would be less than the emissions identified by the 2010 FEIR. In addition, there have been substantial changes in the California Building Code since the 2010 FEIR was adopted to increase efficiency and reduce GHG emissions, which contribute to achieving GHG reductions identified by AB 32. The project would comply with the California Building Code, which would reduce GHG emissions and increase efficiency, beyond what was assumed in the 2010 FEIR. Therefore, the project would not result in any new or substantially more severe GHG emissions impacts than what was analyzed in the 2010 FEIR and project GHG emissions would not be significant.

Plan Consistency

CLIMATE ACTION PLAN CONSISTENCY

The 2010 FEIR determined that the approved TZC would not be consistent with AB 32 because the approved TZC would result in a cumulative impact from development of individual projects covered by the 2010 FEIR. Since adoption of the 2010 FEIR Santa Ana has adopted a CAP to reduce citywide GHG emissions from individual projects. Refer to Section 3.4, *Energy*, Table 3.4-6 of the Energy analysis, which found that the proposed project is consistent with applicable CAP emission reduction measures.

The proposed project consists of new residential, restaurant, and retail in the downtown Santa Ana, which includes a multitude of retail shops and existing residential development. Therefore, the proposed project would locate new residences near retail and employment opportunities and new employment opportunities near existing residences. The project location is in close proximity to bus stops along Main Street and is adjacent to the currently under-construction OC Streetcar. Because the proposed project is located in downtown Santa Ana, there are sidewalks for pedestrian use in the project vicinity. Therefore, the proposed project facilitates connectivity with transit and pedestrian opportunities.

The project would comply with the latest Title 24 energy efficiency standards and supply information to future tenants to encourage energy efficiency. The project would utilize energy-efficient LED lighting, a drought tolerant plant palette, and low-flow water fixtures to increase building sustainability. In addition, recycling facilities would be included in the project design to increase waste reduction. Thus, the proposed project would be consistent with the Santa Ana CAP. The proposed project would not result in any new or substantially more severe GHG emissions impacts beyond those analyzed in the 2010 FEIR and cumulative GHG emissions would not be significant.

STATE SCOPING PLAN CONSISTENCY

The 2010 FEIR determined that the approved TZC would not be consistent with AB 32 because the approved TZC would result in a cumulative impact from development of individual projects covered by the 2010 FEIR. The California Air Resources Board's (CARB) Scoping Plan outlines the main State strategies for meeting the emission reduction targets and to reduce GHGs that contribute to global climate change. Since adoption of the 2010 FEIR, the governor signed Senate Bill 32 (SB 32) into law in September 2016. SB 32 requires the State to further reduce GHGs to 40 percent below 1990 levels by 2030. SB 32 extends AB 32, directing CARB to ensure that GHGs are reduced to 40 percent below the 1990 level by 2030. On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. A summary of the proposed project's consistency with the 2017 Scoping Plan's applicable mitigation measures identified in Appendix B of the 2017 Scoping Plan is shown in Table 3.5-2.

Table 3.5-2 Proposed Project Consistency with the 2017 Scoping Plan

2017 Scoping Plan Appendix B Measures	Project Consistency
Provide adequate, safe, convenient, and secure on-site bicycle parking and storage in multi-family residential projects and in non-residential projects.	**Consistent.** The proposed project would include secured long-term and short-term bicycle parking and storage in both of the proposed buildings.
Require each residential and commercial building to utilize low flow water fixtures such as low flow toilets and faucets.	**Consistent.** The proposed project would incorporate low-flow water fixtures throughout the residential and commercial units.
Require solar-ready roofs.	**Consistent.** The proposed project would utilize roofing materials that would permit future installation of solar panels.
Require low-water landscaping in new developments (see Cal Green Divisions 4.3 and 5.3 and the Model Water Efficient Landscape Ordinance [MWELO], which is referenced in Cal Green). Require water efficient landscape maintenance to conserve water and reduce landscape waste.	**Consistent.** The proposed project would include new low-water landscaping and trees. Additionally, water-efficient irrigation systems would be used.
Encourage new construction, including municipal building construction, to achieve third-party green building certifications, such as the GreenPoint Rated program, LEED rating system, or Living Building Challenge.	**Consistent.** The proposed project would be constructed to Title 24 Part 6 and CalGreen Code standards.
Expand urban forestry and green infrastructure in new land development.	**Consistent.** The proposed project would include new drought-tolerant landscaping and trees with water efficient irrigation systems.
Provide electric outlets to promote the use of electric landscape maintenance equipment to the extent feasible on parks and public/quasi-public lands.	**Consistent.** The proposed project would provide outdoor electric outlets to encourage electric-powered landscape equipment.
Prohibit wood-burning fireplaces in new development, and require replacement of wood-burning fireplaces for renovations over a certain size developments.	**Consistent.** The proposed project would not include wood-burning fireplaces, consistent with SCAQMD Rule 445.

Source: Kimley-Horn 2020b (Appendix D)

As shown in Table 3.5-2, the proposed project would not conflict with applicable statewide action measures and would be consistent with both AB 32 and SB 32. The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, the proposed project would not result in any new or substantially more severe GHG emissions impacts than what was analyzed in the 2010 FEIR and project impacts would not be significant.

3.6 Land Use and Planning

The 2010 FEIR concluded that the approved TZC would not physically divide an established community and therefore, this impact was considered less than significant. As part of the approved TZC, the General Plan was amended to incorporate the proposed land uses and development standards and impacts regarding plan consistency would be considered less than significant. This section analyzes the proposed project's consistency with relevant land use plans and policies, including the City of Santa Ana General Plan and Municipal Code.

Setting

Project Site

The project site spans two blocks in downtown Santa Ana. Block A is 1.423 acres in size and is located at 409 East 4th Street. Block B is 1.29 acre in size and is located at 509 East 4th Street. Block A is occupied by the Northgate Gonzalez Market and parking lot and is bounded by 5th Street to the north, Mortimer Street to the east, 4th Street to the south, and French Street to the west. Block B contains Ming's Auto Corporation, the vacant Munoz Auto Repair & Tire Service structure, and a vacant parking lot and is bound to the north by 5th Street, to the east by Minter Street, to the south by 4th Street, and to the west by Mortimer Street. As shown in Figure 2-2 in Section 2, *Project Description*, the project site is located in an urban area that has been previously graded and developed and is surrounded by roads and urban structures.

The project site has a General Plan designation of District Center- Downtown on Block A and Urban Neighborhood on Block B and is zoned Specific Development No. 84 (SD-84) in Transit Zoning Code – Downtown (DT) and Urban Neighborhood (UN-2) subzones. The proposed project falls within the TZC area, which is located in the central urban core of the City. The TZC is comprised of over 100 blocks and 450 acres, west of Interstate 5 (I-5), north of First Street, and between Grand Avenue and Flower Street, south of Civic Center Drive. The TZC is broken down into nine distinct subzones. The approved TZC provided new zoning for all of the properties contained within its boundary with the exception of those properties zoned M1— Light Industrial or M2—Heavy Industrial. The DT subzone, under the TZC, is applied to the historical shopping district of Santa Ana, a pedestrian-oriented area that is defined by multi-story urban building types accommodating a mixture of retail, office, light service, and residential uses. The UN subzone applies to residential areas intended to accommodate a variety of housing types, with some opportunities for live-work, neighborhood-serving retail, and cafes (Santa Ana 2010a).

As described in the 2010 FEIR, the DT subzone is applied to the historical shopping district of Santa Ana, a vital, pedestrian-oriented area that is defined by multi-story urban building types (commercial blocks, live-work, stacked dwellings, and courtyard housing in the Downtown edges) accommodating a mixture of retail, office, light service, and residential uses. The standards of this zone are intended to reinforce the form and character represented by pre-World War II buildings and recognized as a National Historic District, through restoration, rehabilitation, and context-sensitive infill. The standards also facilitate the replacement or improvement of post-war development that eliminated the pedestrian orientation of various downtown blocks. The UN subzone is applied to the land surrounding Downtown and serves as a transitional area to the nearby lower-intensity neighborhoods. The UN subzone provides for a mix of residential and community-serving commercial uses within mixed-use commercial blocks, stacked flats, rowhouses, and courtyard housing. Within both subzones, the landscape style is urban, emphasizing shading

and accent street trees in sidewalk tree wells. Parking is accommodated on street, and, pursuant to the TZC, may also be in structures with liner buildings, underground, and within block centers in surface lots not visible from streets.

The approved TZC included the amendment of existing zoning for all properties within the TZC project area boundary in the central core of Santa Ana. This provided zoning for the integration of new infill development into existing neighborhoods; to allow for the reuse of existing structures; and to provide a transit-supportive, pedestrian-oriented development framework to support the addition of new transit infrastructure. The TZC allows a maximum building height of ten stories for lined block buildings in the DT subzone. Parking standards in the DT subzone are currently mandated at two spaces per residential unit with an additional 0.15 space per unit for guest parking and one space per 400 square feet of non-residential area. The TZC allows the construction of hybrid court, courtyard housing, live-work, rowhouse, tuck-under, bungalow court, duplex/triplex/quadplex, and single-family homes in the UN-2 subzone. The project proposes a zone change to UC on Block B in order to construct a lined block building on the project site that would be five stories in height. The UC subzone requires two spaces per residential unit with an additional 0.15 space per unit for guest parking and one space per 400 square feet of non-residential area.

As discussed further below under *Impact Analysis,* the proposed project would require a site plan review, a zone change from UN-2 to Urban Center (UC) for Block B, a variance for compliance with the massing standards for Block B, and a voluntary lot merger for multiple underlying legal lots on Block B.

Surrounding Land Uses

Land uses surrounding the project site are illustrated in Figure 2-2 in Section 2, *Project Description*. Table 3.6-1 provides details about surrounding existing uses and their zoning.

Table 3.6-1 Existing Land Uses and Zoning

Direction	Existing Land Use	Existing Zoning
North of Block A	Two, one-story commercial businesses (Kudalini Yoga and Money Market)	DT
	Four-story multi-family residential structure	DT
East of Block A	Ming's Auto Corporation (not part of project)	UN-2
	Vacant Munoz Auto Repair & Tire Service building and parking lot (Block B)	UN-2
South of Block A	Two-story commercial building (Mega Furniture Superstore)	DT
	Five-Story multi-family residential structure	DT
West of Block A	Four-story parking structure	DT
	Plaza Calle Quatro and two-story commercial building	DT
North of Block B	One-story single-family residences	UN-2
East of Block B	Surface lot with construction materials storage	UN-2
	Two-story building (Occupied by Gilbert and Stearns Electrical and Dennis Mitosinka's Classic Cars & Appraisal Service)	UN-2
South of Block B	Five-Story multi-family residential structure	DT
	One-story Latino Health Access community center and park	UC
West of Block B	Northgate Gonzalez Market and surface parking lot (Block A)	DT

Source: Transit Zoning Code (SD 84A and SD 84B)

Project Impacts

Division of Established Community

As concluded in the 2010 FEIR, the intent of the TZC is to establish a regulating plan that guides the type of development that contributes to connectivity. The design and development standards contained within the TZC would guide new development such that it respects existing development and communities and aims to achieve "sensitive infill, repair, and restoration" to reinforce community character, and stabilize and enhance existing neighborhood. Each component of the TZC aims to build community and cohesiveness, from the site-specific level to the TZC area as a whole.

The proposed project would include the redevelopment of Block A within the DT subzone with a mixed-use, multi-story building. In addition, the proposed project would include the rezone of Block B to the UC subzone and development of a multi-story, multi-family residential building with a ground level courtyard. The DT subzone allows for a pedestrian-oriented area that is defined by multi-story urban building types accommodating a mixture of retail, office, light service, and residential uses, while the UC subzone allows for a variety of housing types and non-residential uses at medium intensities and densities. The proposed project would be infill development that would improve the pedestrian environment in the TZC. As such, the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact with respect to dividing an established community beyond those identified in the 2010 FEIR.

Land Use Policies and Regulations

The 2010 FEIR concludes that the approved TZC is consistent with the policies contained in applicable regional and local plans, including SCAG's 2008 RTP and the City's General Plan and Zoning Code.

The following analysis discusses the proposed project's consistency with applicable land use policies and regulations. This includes consideration of the 2010 FEIR of the approved TZC and the required rezone of Block B with implementation of the proposed project. The proposed project would require approval by the Planning Commission and City Council for discretionary actions including a site plan review, a zone change from UN-2 to UC to accommodate the proposed building type for Block B, and a variance for compliance with the massing standards for Block B under Table BT-5 of Section 41-2023 of the TZC. Ministerial approval would be required for a voluntary lot merger for multiple underlying legal lots on Block B.

2016-2040 RTP/SCS CONSISTENCY

Since adoption of the 2010 FEIR, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in April 2016. The RTP/SCS aims to balance future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The 2016-2040 RTP/SCS is intended to help guide transportation and land use decisions and public investments (SCAG 2016). Major goals of the 2016-2040 RTP/SCS include:

1. Align the plan investments and policies with improving regional economic development and competitiveness.
2. Maximize mobility and accessibility for all people and goods in the region.
3. Ensure travel safety and reliability for all people and goods in the region.
4. Preserve and ensure a sustainable regional transportation system.

5. Maximize the productivity of our transportation system.
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
7. Actively encourage and create incentives for energy efficiency, where possible.
8. Encourage land use and growth patterns that facilitate transit and active transportation.
9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

Goals of the 2016-2040 RTP/SCS that are applicable to the proposed project focus on mobility, accessibility, a strong economy, and sustainability. As concluded in the 2010 FEIR, the TZC would complement the City's transportation investments by supporting growth and intensification of land uses in an existing urban environment and do so in a manner that enhances streetscapes and facilitates increasing the use of alternative modes of transportation. Specifically, the project contains design and development standards that specifically address the ways in which new buildings "meet the street," thus ensuring an environment that is conducive to walking. Furthermore, the DT and UC subzones permit a mix of retail, office, light service, and residential uses while promoting transit-oriented development.

The proposed project is a mixed-use transit-oriented development that would include two multi-story structures in the DT subzone and UC subzone, with approval of the zone change and variance from the massing standards, that would allow for high density residential development and would introduce 7,514 square feet of retail space and 3,847 square feet of restaurant space on the ground floor of Block A as a part of the mixed-use development. The DT subzone is a commercial area that has ample job opportunities; and the project site is also near existing and future modes of public transit in the City, including the Bus Rapid Transit (BRT) lines on Main Street and the OC Streetcar that is currently under construction. The proposed project would include commercial and residential space allowing for additional potential "live-work" opportunities in the area. The proposed project would also support pedestrian access between commercial uses in the downtown core and nearby residential uses, which would encourage walking as an alternative to driving near the project site. The proposed project would overall complement the surrounding residential, retail, and commercial uses near the project site, which would benefit from increased pedestrian amenities and activity. Therefore, like the approved TZC, the proposed project would also be consistent with the goals identified in SCAG's 2016-2040 RTP/SCS.

GENERAL PLAN AND ZONING CODE CONSISTENCY

The proposed project has a General Plan designation of District Center-Downtown District on Block A and Urban Neighborhood on Block B and is zoned Specific Development No. 84 (SD-84) in Transit Zoning Code – DT and UN-2 subzones. The DT subzone is applied to the historical shopping district of Santa Ana, a pedestrian-oriented area that is defined by multi-story urban building types (commercial blocks, live-work, stacked dwellings, and courtyard housing in the Downtown edges) accommodating a mixture of retail, office, light service, and residential uses, while the UC and UN-2 subzones are applied to areas adjacent to the historical shopping district. The proposed project would require a rezone of Block B from UN-2 to UC in order to accommodate the proposed lined block building type, which is not permitted in the UN-2 subzone, but is permitted in the UC zone; and a variance for compliance with the massing standards for Block B under Table BT-5 of Section 41-2023 of the TZC.

The allowable floor area ratio (FAR) for DT zoned properties is 3.0 and the maximum building height for lined block buildings is ten stories as specified by the TZC. The allowable FAR for UN-2 zoned properties is 1.80 and the maximum height for buildings in this subzone is five stories. The allowable FAR for UC zoned properties is 0.5 to 1.80 and the maximum building height is five stories (for Hybrid Court buildings) as specified by the TZC. The proposed project would include construction of two lined block buildings, a seven-story, mixed-use building with a FAR of 2.4 on Block A and a five story, multi-family residential building with a FAR of 1.8 on Block B. The UN-2 subzone does not permit the construction of lined block buildings; therefore, in order to develop Block B with a five-story lined block building, the project would require approval of a rezone from UN-2 to UC on Block B. The proposed project would also need a variance from Section 41-2023 of the TZC for compliance with the building size and massing standards for Block B. Table BT-5 of the TZC requires the floor areas for floors 3-5 of a building to be 85 percent of the ground floor. The project is proposing 100 percent coverage on floors 1-3 which would exceed this standard on the third floor.

The proposed zone change to UC and variance on Block B are required to accommodate the proposed building type, density and massing, which was selected in order to maintain aesthetic consistency with the proposed building on Block A. In addition, under the UN-2 subzone, residential buildings with densities of up to 50 dwelling units per acre (DU/acre) are permitted. The proposed project involves development of a residential building with a density of approximately 54 DU/acre, which represents a slightly higher intensity use than the UN-2 subzone permits. As illustrated in Table 3.6-1, Block B is surrounded by properties with higher intensity developments that are zoned DT and UC to the west and south. Therefore, though the proposed project would develop Block B at a slightly higher density use than the existing TZC permits, this use would be consistent with adjacent property uses and the intent of the TZC by enhancing the pedestrian environment, creating opportunities for high density residential development in proximity to jobs and transit, and reactivating vacant land uses adjacent to the historical downtown shopping district.

With approval of the zone change and variance, the proposed project would comply with the setback, parking, landscaping, massing and FAR requirements of the TZC; and therefore, the proposed project would not result in any new significant impacts that were not previously identified in the 2010 FEIR and nor would impacts exceed those identified in the 2010 FEIR for the approved TZC.As noted in the 2010 FEIR, the TZC was found to conflict with the Santa Ana General Plan by adopting standards and land uses not previously allowed in the proposed TZC area. However, as part of the approved TZC, the General Plan was amended to incorporate the proposed land uses and development standards and provide consistency between the General Plan and the TZC. With approval of the requested discretionary actions, as discussed above, the proposed project would also be consistent with the local land designation and development standards. Consistency of the proposed project with key General Plan policies approved TZC is analyzed in Table 3.6-2.

Table 3.6-2 Proposed Project Consistency with General Plan Policies

Applicable Policies	Approved TZC Consistency	Proposed Project Consistency
Land Use Element		
Goal 1. A balance of land uses.		
Policy 1.2. Promote high-density residential development within the City's District Centers as a part of master-planned mixed-use development.	**Consistent.** The TZC allows high density residential development in mixed-use buildings in the Downtown (DT), Transit Village (TV), and Urban Center (UC) subzones.	**Consistent.** The proposed project would involve construction of a new mixed-use complex in the Downtown area that would contribute to the high-density, mixed-use environment.
Policy 1.5. Maintain ad foster a variety of residential land uses in the City.	**Consistent.** TZC provides for distinct broad range of different housing types supporting different densities within the code area.	**Consistent.** The proposed project includes a variety of residential units including 16 studios, 38 one-bedroom, 66 two-bedroom, 9 three-bedroom, and 35 four-bedroom units. This would provide several options for tenants in the new residential development.
Policy 1.6. Support "live-work" opportunities within specifically defined areas.	**Consistent.** TZC allows live-work units in all zones.	**Consistent.** The proposed project would include commercial and residential space allowing for potential additional "live-work" opportunities in the area.
Goal 2. The promotion of land uses which enhance economic vitality.		
Policy 2.2. Support commercial land uses in adequate amounts to accommodate the City's needs for goods and services.	**Consistent.** The TZC allows for a variety of commercial uses in a variety of zones that serve both regional and neighborhood needs for goods and services.	**Consistent.** The proposed project includes 7,514-square feet of retail space and 3,847 square feet of restaurant space in the mixed-use development, adding to the commercial accommodations currently available in Downtown Santa Ana.
Policy 2.4. Support pedestrian access between commercial uses and residential neighborhoods which are in close proximity. **Policy 2.6.** Encourage the creation of new development opportunities in developments which are compatible with surrounding land uses and provide a net community benefit. **Policy 2.9.** Support developments that create a business environment that is safe and attractive.	**Consistent.** Policies 2.4 2.6, and 2.9 are all implemented by the TZC emphasis on pedestrian-orientation, and mixing land uses to promote and enhance the experience of walking as a viable alternative to driving within the TZC area. Policies 2.6 and 2.9 in particular are implemented by the form-based zoning provisions of TZC, which are designed to provide appropriate transitions in scale and use between zones.	**Consistent.** The proposed project supports pedestrian access between commercial and residential uses, which would encourage walking as an alternative to driving near the project site to the community's benefit. The addition of commercial space would allow for growth within the business environment that is compatible with surrounding land uses. In addition, the project has been designed under the provisions of the TZC, which ensures that the aesthetics of the development complies with the City's vision for the project area and contributes to creating a safe and attractive business and residential environment.

Applicable Policies	Approved TZC Consistency	Proposed Project Consistency
Policy 2.10. Support new development which is harmonious in scale and character with existing development in the area.	**Consistent.** The TZC is designed to enhance and complement existing development within the area.	**Consistent.** The proposed project includes a mid-rise commercial and residential development that is consistent in scale with buildings in the surrounding area.
Goal 3. The preservation of existing neighborhoods.		
Policy 3.1. Support development which provides a positive contribution to neighborhood character and identity.	**Consistent.** These two policies are implemented by the form-based code provisions of the TZC, which provide standards for building placement, height and profile, parking placement, and building frontage and architectural type, that are consciously designed to produce the form and character of development desired in each zone.	**Consistent.** The size and form of the proposed project would be consistent with buildings in the immediate vicinity, particularly those along 4th Street, 5th Street, and French Street (i.e., the 4-story residential buildings on 5th Street and 4th Street to the north and south of the project site and 4-story parking structure opposite the project site on French Street. In addition, features, such as articulation, façade variety, and zero-setback design, integrate the project into the existing development pattern on 4th Street.
Policy 3.5. Encourage new development and/or additions to existing development that are compatible in scale, and consistent with the architectural style and character of the neighborhood.		
Goal 4. The protection of unique community assets and open space that enhance the quality of life.		
Policy 4.2. Encourage the retention and reuse of historical buildings and sites.	**Consistent.** The TZC provides standards for the retention and reuse of historical buildings and sites within the planning area. A more specific Adaptive Re-use Ordinance will be developed following the adoption of the code.	**Consistent.** The research and field survey performed for the project site identified one property containing a historic-period building at 509-515 East 4th Street. The property was previously recorded and found locally eligible in 1980. However, the area surrounding the property was surveyed in 2006 and the property was not identified as potentially eligible at that time. The property's historical significance was reexamined as a result of the proposed project. Since its last recordation, it has been significantly altered such that it no longer embodies a particular architectural style. It is ineligible for listing in the National Register of Historic Places, California Register of Historical Resources, and on the City of Santa Ana Register of Historic Properties; therefore, the building does not qualify as a historical resource as defined by CEQA, and demolition of the building under the proposed project would not conflict with this policy.

Applicable Policies	Approved TZC Consistency	Proposed Project Consistency
Policy 4.3. Support land uses which provide community and regional economic and service benefits.	**Consistent.** The TZC allows a variety of commercial, residential, and limited industrial uses meant to support a viable, regional market.	**Consistent.** The proposed project includes commercial space that would provide a community and regional economic benefit and would allow for additional services to the surrounding area. Additional residential units in Downtown also supports the economic goals of the City to create a robust, mixed-use central city.
Policy 4.4. Encourage the development of projects which promote the City's image as a regional activity center.	**Consistent.** The transit-supportive development and related land uses anticipated for the Transit Village (TV) zone implement policies 4.4 and 4.5 by providing for a significant employment center adjacent to both the rail station and the Santa Ana Freeway.	**Consistent.** The proposed project is located in the central Santa Ana Downtown area and is zoned TZC DT and UN-2 (UC with approval of the zone change on Block B), which permit and encourage mixed-use projects.
Policy 4.5. Encourage development of employment centers and mixed use projects within targeted areas adjacent to major arterial roadways and freeway corridors.		
Goal 5. The protection of the community from the impacts of future development.		
Policy 5.1. Promote development which has a net community benefit and enhances the quality of life.	**Consistent.** The TZC addresses these policies by carefully crafting standards that require new development to be of the highest quality of architectural design; allows for compatible mixes of land uses, while seeking to minimize the impacts of existing incompatible land uses; and scales development to be compatible with existing infrastructure, particularly as it relates to the existing gridded street network.	**Consistent.** The proposed project would provide additional high-density residential housing options. The nature of the infill development would produce a net community benefit of improved residential uses and enhanced quality of life in Downtown Santa Ana.
Policy 5.2. Protect the community from incompatible land uses.		**Consistent.** The proposed project includes a mid-rise commercial and residential development consistent in use and scale with buildings in the surrounding area. This would support and promote the existing land uses in the area under further development.
Policy 5.5. Encourage development which is compatible with, and supportive of surrounding land uses.		
Goal 6. Reduce residential overcrowding to promote public health and safety.		
The TZC does not directly address Goal 6 or its policies other than by providing an increase in the City's housing supply through new mixed-use development in selected locations within the TZC area, as well as increasing allowable housing densities to create the opportunity for the development of new affordable housing pursuant to the City's Housing Element.		**Consistent.** The proposed project would provide a mixed-use infill development in the Santa Ana Downtown area. This would be consistent with providing available and safe housing in the area.

The proposed project includes a zone change from UN-2 to UC on Block B, a voluntary multiple lot merger for the parcels that comprise Block B, site plan review, and a variance for compliance with the building size and massing standards for Block B under Table BT-5 of Section 41-2023 of the TZC. This would be a similar approach to the consistency applied in the 2010 FEIR for the approved TZC, as the TZC also required amending existing zoning to provide consistency for future development.

With approval of zone change on Block B, the proposed project would be consistent with the City's General Plan goals and policies and the TZC. Therefore, the proposed project would not result in any new significant impacts that were not previously identified in the 2010 FEIR and nor would impacts exceed those identified in the 2010 FEIR for the approved TZC.

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3.7 Noise

The 2010 FEIR identified construction and operational noise impacts as less than significant with mitigation and vibration impacts as less than significant. This section addresses the impact of the noise and vibration that would be generated by the proposed project on nearby noise-sensitive land uses, as well as the effect of current and future noise and vibration levels on the proposed project. The following analysis is supported by noise and vibration calculations included in Appendix E.

Setting

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive land uses include, but are not necessarily limited to, residential uses, institutional uses (i.e., hospitals, school classrooms/ playgrounds, churches, and libraries), and open space areas (Santa Ana 2010b).

Vibration-sensitive receivers, which are similar to noise-sensitive receivers, include residences and institutional uses, such as schools, churches, and hospitals. However, vibration-sensitive receivers also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studies or medical facilities with sensitive equipment).

As shown in Figure 2-3 in Section 2, *Project Description*, the nearest noise-sensitive receivers to the project site are single- and multi-family residences approximately 65 feet to the north across East 5th Street, multi-family residences approximately 85 feet to the northeast across East 5th Street and North Minter Street intersection, multi-family residences approximately 55 feet to the east across North Minter Street, and multi-family residences approximately 80 feet to the south across East 4th Street.

Project Noise Setting

The primary off-site noise sources in the project area are motor vehicles (e.g., automobiles, buses, and trucks), particularly along East 5th Street, North Minter Street, East 4th Street, French Street, and Mortimer Street. Ambient noise levels would be expected to be highest during the daytime and peak traffic hours unless congestion slows speeds substantially. In addition, noise from pedestrians, residences, and commercial uses surrounding the site influence the existing noise environment. The site is also subject to intermittent and temporary aircraft noise from airport operations.

The Federal Highway Administration (FHWA) Traffic Noise Model was used to model traffic noise along the adjacent segments of East 5th Street, North Minter Street, East 4th Street, French Street, and Mortimer Street under existing conditions to determine ambient noise levels at the project site. Model calculations use peak hour traffic data from the Traffic Impact Analysis (TIA) prepared for the project by Linscott, Law & Greenspan, Engineers (LLG) in July 2020 (Appendix F). According to the City of Santa Ana General Plan Circulation Element (2010), these roadways are classified as commuter or local commercial streets. Therefore, a vehicle mix of 97 percent automobile, two percent medium-duty, and one percent heavy-duty was assumed for each roadway. According to modeled results for these roadway segments, the ambient noise level at the eastern boundary of

the site along North Minter Street is approximately 50 dBA L_{eq}[1] while the ambient noise levels at the remaining boundaries of the site (i.e., along East 5th Street, East 4th Street, French Street, and Mortimer Street) are approximately between 59 dBA L_{eq} and 63 dBA L_{eq}. Traffic Noise Model results are included in Appendix E.

Project Impacts

Off-Site Construction Noise

The 2010 FEIR concluded that construction could result in off-site construction noise levels associated with the use of heavily loaded trucks that exceed the noise standards established in the Santa Ana Municipal Code; however, Mitigation Measure 4.8-4 was included in the 2010 EIR to require that heavily loaded trucks be routed away from residential streets to reduce this impact to a less than significant level.

Construction-related trips generated by the proposed project would not exceed those analyzed as part of the approved TZC in the 2010 FEIR. The pieces of heavy equipment for construction of the project would be transported to the site and would be expected to remain on-site for the duration of construction. These individual trips, when heavy construction equipment is moved on- and off-site, would generate noise on roadways in the project vicinity. However, such noise levels would be typical of construction activities associated with development under the approved TZC. Therefore, similar to the approved TZC, noise generated by construction-related trips would not substantially add to existing traffic noise levels in the project vicinity or exceed noise standards established in the Santa Ana Municipal Code. In addition, the total number of daily vehicle trips would be minimal when compared to existing traffic volumes on the affected streets, and the long-term noise level change associated with these trips would not be perceptible. Furthermore, Mitigation Measure 4.8-4 would apply to the proposed project. Therefore, construction equipment transport noise and construction worker commute noise would be short-term and reduced near residences. Construction trips would not result in any new significant construction-related noise impact or substantial increase in the severity of construction-related noise impacts compared to the approved TZC.

On-Site Construction Noise

The 2010 FEIR concluded that on-site construction activities associated with the approved TZC could result in construction noise levels that exceed the noise standards established in the Santa Ana Municipal Code for off-site sensitive receivers. Construction of the approved TZC could generate noise levels up to 86 dBA L_{eq} at 50 feet or 107 dBA L_{eq} at 50 feet, in the event that pile drivers are used. However, Mitigation Measures 4.8-1 through 4.8-3 were included in the 2010 FEIR to require construction noise best management practices and that staging areas be located away from sensitive receivers to reduce construction-related noise impacts to a less than significant level.

Construction noise was estimated for the project using the FHWA Roadway Construction Noise Model (RCNM) (2006). Using RCNM, construction noise levels were estimated at noise-sensitive receivers nearest to the project site. Project construction phases would include demolition, site preparation, grading, building construction, architectural coating, and paving of the project site. It is

[1] The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called "A weighting" is used to adjust actual sound pressure levels so that they are consistent with the human hearing response. In this analysis, "dBA" is understood to identify the A-weighted decibel. The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period. Typically, L_{eq} is equivalent to a one-hour period.

assumed that diesel engines would power all construction equipment. For assessment purposes, the loudest phases (i.e., grading, and building construction) have been modeled under the conservative assumption that a dozer, an excavator, and a jackhammer would be operating simultaneously. Using RCNM, the construction noise level associated with these pieces of equipment was calculated at 84 dBA L_{eq} at 50 feet (see Appendix E), which is lower than the noise level of 86 dBA L_{eq} at 50 feet analyzed in the 2010 FEIR. However, construction activities associated with the project would occur at further than 50 feet from the source. The nearest sensitive receivers to the project site are multi-family residences approximately 55 feet to the east from Block B across North Minter Street. Furthermore, construction equipment would be continuously moving across the site, coming near and then moving further away from individual receivers. Therefore, due to the dynamic nature of construction, maximum hourly noise levels are calculated from the center of on-site construction activity to the nearest receivers. Based on the configuration of the project site and location of Block B, the nearest multi-family residences east of the site would be approximately 150 feet from the center of construction activities on Block B. Based on RCNM calculations, maximum hourly noise levels during project construction would be approximately 75 dBA L_{eq} at 150 feet from the source. RCMN results are included in Appendix E.

As with the approved TZC, construction impacts would be temporary and daily construction activities would be limited by the Santa Ana Municipal Code (Section 18.314[e]) and Mitigation Measure 4.8-1 to daytime hours (between 7:00 a.m. and 8:00 p.m. on weekdays and Saturdays). The project would also comply will all other noise standards established in the Santa Ana Noise Ordinance. In addition, the proposed project would incorporate Mitigation Measure 4.8-2 which requires implementation of construction best management practices such as mufflers, shutting off construction equipment if it is not in use for more than 30 minutes, and use of electric power tools; and Mitigation Measure 4.8-3 which requires, by contract specifications, that construction staging areas be located as far away from sensitive receivers as possible. Therefore, with incorporation of mitigation measures from the 2010 FEIR, the proposed project would not result in any new significant construction-related noise impacts or a substantial increase in the severity of construction-related noise impacts compared to the approved TZC.

Off-Site Operational Noise

Similar to the approved TZC analyzed in the 2010 FEIR, off-site operational impacts would result from roadway noise and the proposed project would increase the number of vehicle trips in the project vicinity, which would contribute to existing traffic noise from roadways in the vicinity of the project site. However, the 2010 FEIR determined that traffic noise from the approved TZC would not be perceptible because the increase in noise would be less than 3 dBA[2], resulting in a less than significant impact.

Traffic volume data from the TIA prepared for the project by LLG (Appendix F) was used to analyze traffic-related noise impacts from the proposed project. According to the TIA, the project is forecast to generate approximately 1,112 daily trips, with 91 trips during the a.m. peak hour and 94 trips during the p.m. peak hour on a typical weekday. Compared to trips generated by the existing on-site grocery store (i.e., 1,285 daily trips, 47 a.m. peak hour trips, and 79 p.m. peak hour trips), the project would overall generate 173 fewer daily trips, 44 more a.m. peak hour trips, and 15 more p.m. peak hour trips on local roadways. However, for a conservative estimate of traffic noise

[2] A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

impacts, this analysis considers vehicle trips generated by the project without factoring in existing trips.

Vehicle access for Blocks A and B would be provided by two parking garage driveways along 5th Street. Therefore, roadway noise impacts were assessed on 5th Street during the a.m. and p.m. peak hours because this road would collect most project-related traffic heading to and from the project site. Table 3.7-1 shows the traffic volume increases associated with project traffic during both AM and PM peak hours on both segments of 5th Street.

Table 3.7-1 Existing (2020) Traffic Volumes With and Without the Proposed Project

Roadway Segment	Peak Hour	Without Project Traffic	Project Traffic	With Project Traffic	Increase in Traffic Volume (%)	Increase in Traffic Noise (dBA)
5th Street between French Street and Mortimer Street	a.m.	449	45	494	10.0	0.4
	p.m.	665	46	711	6.9	0.3
5th Street between Mortimer Street and Minter Street	a.m.	141	46	187	32.6	1.2
	p.m.	166	48	214	28.9	1.1

Source: LLG 2020. See Appendices E and F.

As shown in Table 3.7-1, trips generated by the project would increase peak hour traffic by at most by approximately 33 percent on 5th Street between Mortimer Street and Minter Street, which would result in an approximate 1-dBA increase in traffic noise on this roadway. Therefore, similar to the approved TZC, the project would not create a perceptible 3-dBA increase in traffic noise. The proposed project would not result in a new significant impact related to traffic noise, nor would it substantially increase a significant impact compared to the approved TZC.

On-Site Operational Noise

The 2010 FEIR concluded that on-site operational noise impacts from heating, ventilation, and air conditioning (HVAC) equipment could exceed the City's noise standards established in the Santa Ana Municipal Code for off-site sensitive receivers. However, Mitigation Measure 4.8-7 was included in the 2010 FEIR to require that proper shielding for all new HVAC systems on residential and mixed-use buildings achieve an attenuation of at least 15 dBA at 50 feet from the equipment to minimize HVAC operational noise to a less than significant level.

Similar to the approved TZC, the proposed project would expose off-site uses to stationary source noise impacts from on-site HVAC equipment. According to the 2010 FEIR, HVAC systems that would be installed for new residential development associated with the approved TZC could result in noise levels that average between 50 and 65 dBA L_{eq} at 50 feet from the equipment. The nearest noise-sensitive receivers, consisting of multi-family residences to the east across North Minter Street, would be located at least 72 feet from the nearest rooftop-mounted HVAC equipment based on the approximate 47-foot roof-level height of the easternmost proposed building plus the site's approximately 55-foot distance from nearest off-site residences. Because noise from HVAC

equipment would attenuate at a rate of approximately 6 dBA[3] per doubling of distance from the source, rooftop-mounted equipment would generate noise levels in the range of 47 dBA L_{eq} and 62 dBA L_{eq} at 72 feet. Based on the modeled noise level of 50 dBA L_{eq} along North Minter Street, on-site operations associated with HVAC equipment could increase existing noise levels and exceed the City's noise standards. However, similar to the approved TZC, implementation of Mitigation Measure 4.8-7 would reduce noise from HVAC equipment at nearby receivers by at least 15 dBA, which would result in a maximum noise level of 47 dBA L_{eq} at 72 feet. Therefore, noise from HVAC equipment would not exceed existing noise levels as analyzed in the approved TZC and would not result in a new significant impact or increase the severity of a previously identified significant impact.

Exterior Noise Levels

The 2010 FEIR concluded that the approved TZC could result in residential development that would be exposed to noise levels that exceed 65 CNEL[4], which is the City's exterior noise standard for residential uses. However, Mitigation Measure 4.8-5 was included in the 2010 FEIR to require that residential uses exposed to noise levels in excess of 60 CNEL provide noise barriers to reduce exterior noise levels to a CNEL of 65 or less within private open space areas, resulting in a less than significant impact.

The most predominant source of noise on and around the project site is vehicular traffic from East 5th Street, North Minter Street, East 4th Street, French Street, and Mortimer Street. The FHWA Traffic Noise Model was used to model traffic noise along these roads under Existing Plus Project traffic conditions to determine noise levels at the project site upon implementation of the project in comparison to the City's exterior noise standard of 65 CNEL. Similar to the analysis in *Project Noise Setting*, model calculations use traffic data from the TIA prepared for the project by LLG for the project (Appendix F) and a vehicle mix of 97 percent automobile, 2 percent medium-duty, and 1 percent heavy-duty for each roadway. According to modeled results for these roadway segments, the ambient noise level at the eastern boundary of the site along North Minter Street is approximately 54 CNEL while the ambient noise levels at the remaining boundaries of the site (i.e., along East 5th Street, East 4th Street, French Street, and Mortimer Street) are approximately between 62 CNEL and 64 CNEL. Traffic Noise Model results are included in Appendix E. Therefore, the project would not be exposed to noise levels in excess of the City's exterior noise standard of 65 CNEL. The proposed project would not result in a new significant impact, nor would it substantially increase a significant impact compared to the approved TZC.

Interior Noise Levels

Based on the City's interior noise level standard of 45 CNEL for residential uses, the 2010 FEIR determined that the approved TZC could result in the exposure of habitable residential units to noise levels in excess of 45 CNEL. However, Mitigation Measure 4.8-6 was included in the 2010 FEIR to require that building plans include window and door materials of sufficient Sound Transmission Class (STC) ratings to reduce the interior noise level to a CNEL of 45 or less, resulting in a less than significant impact.

[3] Noise levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013).

[4] The Community Noise Equivalent Level (CNEL) is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are typically in the 50 to 70+ CNEL range.

Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver. Structures can substantially reduce occupants' exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011). To comply with the California Energy Code (Title 24 Part 6), buildings in California are constructed with single- or double-glazed windows, which provide an exterior-to-interior noise level reduction of at least 25 dBA. Based on an exterior noise exposure level of up to 64 CNEL (as analyzed in *Exterior Noise Levels*) and a noise attenuation of 25 dBA, the interior noise level at on-site residential units would be up to 39 CNEL. Therefore, interior noise levels for the project would not exceed the City's interior noise standard of 45 CNEL. The proposed project would not result in a new significant impact, nor would it substantially increase a significant impact compared to the approved TZC.

Construction Vibration

The 2010 FEIR concluded that on-site construction activities associated with the approved TZC could result in groundborne vibration levels that would result in human annoyance and potential architectural damage to nearby structures. Mitigation Measures 4.8-1 through 4.8-4 were included in the 2010 FEIR to minimize construction-related vibration impacts. Nevertheless, construction vibration impacts would remain significant and unavoidable.

Construction activities associated with the proposed project have the potential to generate groundborne vibration levels affecting nearby receivers. Construction of the project would potentially utilize loaded trucks, jackhammers, and/or bulldozers during most construction phases. Because groundborne vibration could cause physical damage to structures, vibration impacts were modeled based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of the project site, to the edge of nearby off-site structures. Therefore, the analysis of groundborne vibrations differs from the analysis of construction noise levels in that modeled distances for vibration impacts are those distances between the project site to nearest off-site structures (regardless of sensitivity) whereas modeled distances for construction noise impacts are based on the property line of the nearest off-site sensitive receivers. Based on the distance from the project site to the nearest structures, equipment was modeled at 25 feet from Ming's Auto Corporation on Block B of the project and 55 feet from multi-family residents to the east across North Minter Street.

The City has not adopted specific standards for vibration impacts during construction. According to the 2010 FEIR, groundborne vibration impacts associated with human annoyance would be significant if vibration levels during project construction exceed 85 VdB[5], which is the vibration level that is considered by FTA to be acceptable only if there are infrequent number of events per day. In terms of groundborne vibration impacts on structures, the 2010 FEIR used the FTA's vibration damage threshold of approximately 100 VdB for fragile buildings and approximately 95 VdB for extremely fragile historic buildings Table 3.7-2 shows estimated groundborne vibration levels from project equipment. Vibration calculations are included in Appendix E.

[5] The ground motion caused by vibration is measured as particle velocity in inches per second; in the U.S., this is referenced as vibration decibels (VdB).

Table 3.7-2 Vibration Levels at Nearby Structures

Equipment	VdB	
	Ming's Auto Corporation 25 Feet	Multi-Family Residences 55 Feet
Large Bulldozer	87	79
Loaded Truck	83	75
Jack hammer	79	71
Small Bulldozer	58	50
Threshold for Building Damage[1]	**100**	**100**
Threshold for Human Annoyance	**85**	**85**
Thresholds Exceeded?	Yes (Human Annoyance)	No

See Appendix E for vibration calculations.

[1] This analysis assumes the neither Ming's Auto Corporation nor the adjacent multi-family residences are extremely fragile historic buildings that could be compared to a threshold of 95 VdB for vibration damage.

As shown in Table 3.7-2 construction activities would generate peak vibration levels of 87 VdB at the nearest commercial building on Block B and 79 VdB at the nearest residences to the east. While project construction would not result in building damage, potential use of a large bulldozer would generate vibration levels in exceedance of the 85 VdB threshold for human annoyance, which is reflective of findings from the 2010 FEIR. According to the 2010 FEIR, sensitive receivers located at or within 25 feet from construction sites could experience vibration levels from construction activities in excess of the FTA's threshold of 85 VdB for human annoyance. Nonetheless, the 2010 FEIR concluded that Mitigation Measures 4.8-3 and 4.8-4 would be required to reduce vibration impacts to the extent feasible by requiring staging areas away from sensitive receivers and route heavy trucks away from residences. While construction of the proposed project would result in vibration levels in exceedance of the threshold for human annoyance, the project would not substantially increase the severity of a significant impact compared to the approved TZC.

Operational Vibration

Similar to the approved TZC analyzed in the 2010 FEIR, groundborne vibration resulting from operation of the proposed project would primarily be generated by periodic delivery and garbage trucks. However, the 2010 FEIR determined that these types of deliveries and garbage collection services would be consistent with those already currently made in the urban TZC area and would not increase groundborne vibration above existing levels, resulting in a less than significant impact. As with the approved TZC, the types of delivery and garbage collection truck trips generated by the project would be consistent with those of the existing urban environment, particularly of surrounding residential and commercial uses and the on-site grocery store and auto shop. No substantial additional sources of groundborne vibration (i.e., heavy equipment operations) would be built as part of the proposed project. Therefore, the proposed project would not result in a new significant impact, nor would it substantially increase a significant impact compared to the approved TZC.

Airport Noise

As concluded in the 2010 FEIR, the project site is not located in the vicinity of a private airstrip nor is it located within two miles of an airport or within an airport land use plan. The nearest airport is John Wayne Airport (KSNA) located approximately five miles south of the project site. Similar to the approved TZC, the project would not result in exposure to noise from aircraft operations and airport noise would have no impact on people residing or working on-site.

3.8 Transportation

This section analyzes the potential for the proposed project to cause significant impacts to the existing circulation system and transportation facilities in the City of Santa Ana. The analysis in this section is based on a Traffic Impact Analysis (TIA) prepared for the proposed project by Linscott, Law & Greenspan, Engineers (LLG) in June 2020. The TIA is provided in Appendix F. This Addendum compares the proposed project's trip generation to the approved TZC's trip generation estimates produced by KOA Corporation in 2010.

The 2010 FEIR concluded that adoption of the approved TZC could cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system. All of the potential impacts attributable to the approved TZC are mitigable. However, two mitigation measures require the approval/cooperation of the California Department of Transportation (Caltrans). Because two of the improvements require a discretionary action of an agency outside of the City's purview, the implementation of the two mitigations cannot be guaranteed. Should the mitigation measures be implemented in cooperation with Caltrans, the traffic impacts of the approved TZC would be reduced to less than significant.

Setting

Existing Traffic Volumes

The TIA prepared for the proposed project identified six key intersections as locations to evaluate existing and future traffic operating conditions. Some portion of potential project-related traffic will pass through each of these intersections, and their analysis will reveal the expected relative impacts of the project. These key locations were selected for evaluation based on discussions with City of Santa Ana staff and in consideration of Orange County Congestion Management Plan (CMP) requirements. The six intersections considered as a part of the TIA are listed below.

KEY STUDY INTERSECTIONS

1. Fourth Street at French Street (signalized)
2. Fourth Street at Mortimer Street (unsignalized)
3. Fourth Street at Minter Street (unsignalized)
4. Fifth Street at French Street (unsignalized)
5. Fifth Street at Mortimer Street (all-way stop)
6. Fifth Street at Minter Street (unsignalized)

Existing daily, a.m. peak hour and p.m. peak hour traffic volumes were obtained for the six key study intersections Due to the COVID-19 virus, the Governor of California has issued a state-wide "stay at home" order which has ultimately resulted in a decrease in vehicle traffic. Based on these current conditions, the ability to collect traffic counts to establish baseline conditions that would be reflective of traffic conditions without "stay at home" orders in effect is not possible. As such, "baseline" traffic conditions (pre-COVID-19) were established and reviewed by City staff, utilizing available historical data, existing 2020 COVID-19 counts, and annual growth factors. The complete methodology for generating Year 2020 pre-COVID-19 baseline volumes can be found in Section 3.4 of the TIA, which is included as Appendix F of this Addendum. In addition, detailed peak hour and

daily traffic count sheets for the key intersections as a part of the TIA for the proposed project are shown in Appendix F.

Existing Intersection Levels of Service

Existing peak hour volumes and lane configurations were used to calculate the level of service (LOS) for each of the six key study intersections. Table 3.8-1 summarizes the existing peak hour service level calculations for the six key study intersections based on existing traffic volumes and current street geometrics. Review of Table 3.8-1 indicates that all the key study intersections currently operate at an acceptable level of service during the a.m. and p.m. peak hours.

Table 3.8-1 Existing Peak Hour Intersection Capacity Analysis

Key Intersection	Minimal Acceptable LOS	Control Type	Peak Hour	Delay	
				ICU/HCM	LOS
1. Fourth Street at French Street	E	2 ØTraffic Signal	a.m.	0.371	A
			p.m.	0.441	A
2. Fourth Street at Mortimer Street	E	One-Way Stop	a.m.	10.2 s/v	B
			p.m.	12.7 s/v	B
3. Fourth Street at Minter Street	D	Two-Way Stop	a.m.	10.3 s/v	B
			p.m.	12.9 s/v	B
4. Fifth Street at French Street	E	Two-Way Stop	a.m.	14.3 s/v	B
			p.m.	21.4 s/v	C
5. Fifth Street at Mortimer Street	E	All-Way Stop	a.m.	9.7 s/v	A
			p.m.	15.2 s/v	C
6. Fifth Street at Minter Street	D	Two-Way Stop	a.m.	9.3 s/v	A
			p.m.	9.4 s/v	A

Ø=Traffic Signal Phase

s/v= seconds/vehicle

Source: LLG 2020 (see Appendix F for the full Traffic Impact Analysis)

2010 and 2020 Project Traffic Conditions

KOA prepared a revised TIA for the TZC FEIR in April of 2010 (TZC TIA). Of the six study intersections listed above, the Fourth Street at French Street and Fifth Street at Minter Street intersections are a part of the study intersections evaluated in the TZC TIA. Given their proximity to the proposed project, the Fourth Street at Mortimer Street, Fourth Street at Minter Street, Fifth Street at French Street, and Fifth Street at Mortimer Street intersections were included in the TIA for the proposed project. Table 3.8-2 shows the traffic conditions at the key intersections compared to the LOS evaluated at the intersections in the TZC TIA prepared for the 2010 FEIR for the approved TZC.

Table 3.8-2 Comparison of Intersection Operations in TZC TIA and Proposed Project TIA (2020)

Key Intersection	Control Type	Peak Hour	Delay	
			TZC TIA LOS	Proposed Project TIA LOS
1. Fourth Street at French Street	2 ØTraffic Signal	a.m.	A	B
		p.m.	A	A
2. Fourth Street at Mortimer Street	One-Way Stop	a.m.	--	A
		p.m.	--	B
3. Fourth Street at Minter Street	Two-Way Stop	a.m.	--	A
		p.m.	--	A
4. Fifth Street at French Street	Two-Way Stop	a.m.	--	C
		p.m.	--	C
5. Fifth Street at Mortimer Street	All-Way Stop	a.m.	A	A
		p.m.	C	A
6. Fifth Street at Minter Street	Two-Way Stop	a.m.	--	A
		p.m.	--	A

Ø=Traffic Signal Phase
Source: LLG June 2020 (see Appendix F for the full Traffic Impact Analysis); TZC TIA 2010

Project Impacts

Existing a.m. and p.m. peak hour operating conditions for the six key study intersections were evaluated using the intersection Capacity Utilization (ICU) methodology for signalized intersections and the methodology outlined in the *Highway Capacity Manual 6* (HCM 6) for unsignalized intersections, both of which were consistent with the analysis methodologies used in the approved TZC's TIA. All six key intersections are under the jurisdiction of the City of Santa Ana.

Plan and Policy Consistency

The proposed project would not conflict with adopted policies, plans, ordinances, or programs supporting the circulation system, including alternative transportation. Consistent with the findings in the 2010 FEIR for the approved TZC, the proposed project would comply with City of Santa Ana Municipal Code requirements and would provide bicycle racks, and access to local bike lanes along Civic Center Drive, Santa Ana Boulevard, and Main Street. In addition, the project is intended to provide a residential and commercial mixed-use development that would reduce daily vehicle trips, thereby encouraging alternative transportation via pedestrian and bicycle traffic. This would be consistent with the City's Bicycle Master Plan and its goals to create a safe bicycle network throughout Santa Ana.

Pedestrian connections would be provided via existing public sidewalks along French, Mortimer, Minter, Fifth, and Fourth streets within the vicinity of the project frontage, which would connect to the project site. The proposed project would protect the existing sidewalk along project frontage, and if necessary, would repair or reconstruct sidewalks along the project frontage at the City's request. The existing sidewalk system within the project vicinity provides direct connectivity throughout downtown Santa Ana, inclusive of the Santa Ana Metrolink Station located on Santa Ana Boulevard east of Santiago Street, as well as the downtown Commercial District and Civic Center District located to the west, across Main Street. The pedestrian access to these local transit facilities

is consistent with Goal 3.0 in the City's General Plan Circulation Element to provide a full spectrum of travel alternatives for the community's residents, employees, and visitors.

The proposed project would not result in an increase in intersection traffic impacts beyond those analyzed in the 2010 FEIR for the approved TZC. The TIA for the proposed project evaluated six intersections that are in close proximity to the project site. Two of these were also evaluated for the approved TZC, with the exceptions of, Fourth Street at Mortimer Street, Fourth Street at Minter Street, Fifth Street at French Street, and Fifth Street at Mortimer Street. As discussed above, existing conditions for the project site indicate that all key study intersections currently operate at an acceptable level of service during the a.m. and p.m. peak hours.

PROPOSED PROJECT TRAFFIC GENERATION

Table 3.8-3 summarizes the trip generation rates used in forecasting the vehicular trips generated by the proposed project and also presents the project's forecast peak hour and daily traffic volumes. As shown in the upper portion of the Table 3.8-3, Institute of Transportation Engineers (ITE) Land Use 221: Multifamily Housing (Mid-Rise) trip rates were used to forecast the trip generation potential for the residential component of the Project. For the retail/commercial component of the proposed project, ITE Land Use 820: Shopping Center averages trips were used and for the proposed restaurant uses, ITE Land Use 932: High-turnover Sit-Down Restaurant were applied. For the existing Northgate Market, ITE Land Use 850: Supermarket average trip rates were applied and subtracted from the proposed project's trip generation totals, to determine the net total.

The proposed project is located within traffic analysis zone (TAZ) 4 of the 2010 FEIR for the approved TZC, which assumed 385 multifamily DU and 106,000 square feet of retail, and the removal of 100,000 square feet of commercial/office. The proposed project's proposed allocation of residential and commercial space fits within the total assumed development.

Table 3.8-3 Proposed Project Traffic Generation Forecast

Description	Units	Weekday Daily Total	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Generation Rates								
221: Multifamily Housing (Mid-Rise)	DU	5.44	26%	74%	0.36	61%	39%	0.44
820: Shopping Center	kSF	37.75	62%	38%	0.94	48%	52%	3.81
850: Supermarket	kSF	106.78	60%	40%	3.82	51%	49%	9.24
932: High-Turnover Rest.	kSF	112.18	55%	45%	9.94	62%	38%	9.77
Trip Generation Estimates								
Existing Development								
850 Supermarket	14,080 SF	1,503	32	22	54	66	64	130
Pass-By Trips		*-150*	*-3*	*-2*	*-5*	*-24*	*-23*	*-47*
Retail Subtotal		1,353	29	20	49	42	41	83
Non-Auto Trip Adjustment (5%)		*-68*	*-1*	*-1*	*-2*	*-2*	*-2*	*-4*
Net Existing Trip Generation		1,285	28	19	47	40	39	79
Proposed Project								
221: Residential	169 DU	919	16	45	61	45	29	74
Internal Capture		*-120*	*-1*	*-4*	*-5*	*-7*	*-4*	*-11*
Residential Subtotal		799	15	41	56	38	25	63
820: Retail	7,514 SF	284	4	3	7	14	15	29
Internal Capture		*-163*	*0*	*0*	*0*	*-7*	*-8*	*-15*
Retail Subtotal		121	4	3	7	7	7	14
932: High-Turnover Rest.	3,847 SF	432	21	17	38	24	14	38
Internal Capture		*-181*	*-4*	*-1*	*-5*	*-7*	*-9*	*-16*
Restaurant Subtotal		251	17	16	33	17	5	22
Total Project Trip Generation		**1,171**	**36**	**60**	**96**	**62**	**37**	**99**
Non-Auto Trip Adjustment (5%)		*-59*	*-2*	*-3*	*-5*	*-3*	*-2*	*-5*
Net Project Trip Generation		1,112	34	57	91	59	35	94

Notes: Trip generation rates and pass-by credits based on ITE Trip Generation Manual, 10th Edition, *Institute of Transportation Engineers*, unless otherwise noted; DU = dwelling unit, kSF = thousand square feet , SF = square feet; Mid-Rise Multifamily Housing consists of buildings that range between 3 and 10 levels; Project trip generation was adjusted to account for internal capture between the apartment buildings and the retail components of the Project.

Source: LLG 2020 (see Appendix F for the full Traffic Impact Analysis)

EXISTING PLUS PROPOSED PROJECT CONDITIONS

The "Existing Plus Project" traffic conditions were generated based upon existing conditions and the estimated proposed project traffic. These forecasted traffic conditions were prepared in the TIA for the proposed project, pursuant to the CEQA guidelines that require that potential impacts of a project be evaluated upon the circulation system as it currently exists (see *Existing Traffic Volumes* subsection above). This analysis was projected for the a.m. and p.m. peak hour traffic volumes at the six key intersections and the two project access driveways with the addition of the trips generate by the proposed project to existing traffic volumes.

Table 3.8-4 below summarizes the peak hour LOS results at the six key intersections for existing plus project traffic conditions, and shows the increase in ICU value and/or HCM value due to the added peak hour project trips which indicates whether the traffic associated with the project would have a significant impact based on the LOS standards and significant impact criteria defined above.

Table 3.8-4 indicates that traffic associated with the proposed project would not significantly impact any key intersections. All six study intersections would operate at acceptable LOS in both the a.m. and p.m. peak hours with the addition of the proposed project. Further calculations for the existing plus proposed project ICU/LOS and HCM/LOS are presented in the TIA (Appendix F).

FUTURE NEAR-TERM (YEAR 2024) PLUS PROPOSED PROJECT CONDITIONS

Future Near-Term (Year 2024) or Cumulative Conditions represent conditions as they are expected to occur with the buildout of the proposed project considering potential development in the project vicinity. Horizon year, background traffic growth estimates were calculated using an ambient traffic growth factor. The ambient growth factor was intended to include unknown and future related projects within the project vicinity, as well as account for regular growth in traffic volumes due to the development of projects outside of the study area considered in the TIA for the proposed project (Appendix F).

In order to make a realistic estimate of future on-street conditions prior to implementation of the proposed project, the status of other known development projects (related projects) within a two-mile radius of the proposed project was researched as a part of the TIA. Based on this research, 44 related projects in Santa Ana are being processed for approval and were included as part of the cumulative background setting. These 44 related projects are described in detail in Section 6.2 of the TIA, which is included as Appendix F.

Table 3.8-5 summarizes the peak hour LOS results at the six key study intersections for the Year 2024 horizon year including consideration of the ambient growth and related projects cumulative traffic volumes, and shows the increase in ICU value and/or HCM value due to the added peak hour proposed project trips which indicates whether the traffic associated with the proposed project would have a significant impact based on the LOS standards and significant impact criteria defined above.

An analysis of the future (Year 2024) background traffic conditions indicates that the addition of ambient traffic growth and related projects traffic will not adversely impact any of the key intersections. All six key intersections would operate at acceptable LOS in both the a.m. and p.m. peak hours.

Table 3.8-5 below indicates that traffic associated with the proposed project would not significantly impact any of the key study intersections. All six key intersections would operate at acceptable LOS in both the a.m. and p.m. peak hours with the addition of the proposed project in the buildout year of 2024.

FUTURE LONG-TERM (YEAR 2045) PLUS PROPOSED PROJECT CONDITIONS

Through coordination with City staff, the Year 2045 traffic volume forecasts for the proposed project TIA were developed using Year 2045 traffic models provided by the Orange County Transportation Authority (OCTA). Specifically, daily, a.m. peak period and p.m. peak period link traffic volumes were provided by OCTA for the existing base year and for the Year 2045 year. The Year 2045 a.m. and p.m. peak hour cumulative traffic volumes at the six key intersections were

evaluated and used to forecast a.m. and p.m. peak hour traffic volumes with the inclusion of the trips generated by the proposed project.

Table 3.8-6 summarizes the peak hour Level of Service results at the six key study intersections for the Year 2045, and shows the increase in ICU value and/or HCM value due to the added peak hour proposed project trips which indicates whether the traffic associated with the proposed project would have a significant impact based on the LOS standards and significant impact criteria.

Table 3.8-6 below shows that projected long-term (Year 2045) without project traffic would not adversely impact any of the key intersections. All six key intersections would operate at acceptable LOS in both the a.m. and p.m. peak hours. As shown in Table 3.8-6, traffic associated with the proposed project would not significantly impact any of the key study intersections. All six key intersections would operate at acceptable LOS in both the a.m. and p.m. peak hours with the addition of the proposed project in the long-term future year 2045.

The results of the intersection capacity analysis presented above shows that the proposed project would not significantly impact any of the six key study intersections under the any of the traffic scenarios evaluated. Although the project would not have a significant traffic impact at any of the key intersections, the proposed project, consistent with Mitigation Measure 4.11-4 of the 2010 FEIR for the approved TZC, would be expected to participate on a fair-share basis and contribute the implementation of recommended mitigation measures at existing intersections. With adherence to this mitigation measure, the proposed project would not result in any new significant impact or conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be less than those identified in the 2010 FEIR for the approved TZC.

In summary, the proposed project would not significantly impact any key intersections near the project site as compared to the approved TZC traffic conditions. Therefore, the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact.

Table 3.8-4 Existing Plus Proposed Project Peak Hour Intersection Capacity Analysis

Key Intersection	Minimal Acceptable LOS	Peak Hour	(1) Existing Traffic Conditions		(2) Existing Plus Proposed Project Traffic Conditions		(3) Significant Impact	
			ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No
1. Fourth Street at French Street	E	a.m.	0.371	A	0.374	A	0.003	No
		p.m.	0.441	A	0.434	A	0.000[1]	No
2. Fourth Street at Mortimer Street	E	a.m.	10.2 s/v	B	10.3 s/v	B	0.1 s/v	No
		p.m.	12.7 s/v	B	12.6 s/v	B	0.0 s/v	No
3. Fourth Street at Minter Street	D	a.m.	10.3 s/v	B	10.5 s/v	B	0.2 s/v	No
		p.m.	12.9 s/v	B	13.1 s/v	B	0.2 s/v	No
4. Fifth Street at French Street	E	a.m.	14.3 s/v	B	14.3 s/v	B	0.0 s/v	No
		p.m.	21.4 s/v	C	21.3 s/v	C	0.0 s/v	No
5. Fifth Street at Mortimer Street	E	a.m.	9.7 s/v	A	9.8 s/v	A	0.1 s/v	No
		p.m.	15.2 s/v	C	15.5 s/v	C	0.3 s/v	No
6. Fifth Street at Minter Street	D	a.m.	9.3 s/v	A	9.4 s/v	A	0.1 s/v	No
		p.m.	9.4 s/v	A	9.5 s/v	A	0.1 s/v	No

[1] A theoretical negative increase is due to the existing Northgate Market trips, which results in reduced traffic volumes for certain movements at the intersection

s/v= seconds/vehicle

Source: LLG 2020 (see Appendix F for the full Traffic Impact Analysis); TZC TIA 2010

Table 3.8-5 Year 2024 Cumulative Peak Hour Intersection Capacity Analysis

Key Intersection	Minimal Acceptable LOS	Peak Hour	(1) Year 2024 Buildout Traffic Conditions		(2) Year 2024 Buildout Plus Proposed Project Traffic Conditions		(3) Significant Impact	
			ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No
1. Fourth Street at French Street	E	a.m.	0.424	A	0.427	A	0.003	No
		p.m.	0.498	A	0.491	A	0.000[1]	No
2. Fourth Street at Mortimer Street	E	a.m.	10.9 s/v	B	11.0 s/v	B	0.1 s/v	No
		p.m.	14.3 s/v	B	14.2 s/v	B	0.0 s/v[1]	No
3. Fourth Street at Minter Street	D	a.m.	11.2 s/v	B	11.5 s/v	B	0.3 s/v	No
		p.m.	15.1 s/v	C	15.5 s/v	C	0.4 s/v	No
4. Fifth Street at French Street[2]	E	a.m.	0.294	A	0.295	A	0.001	No
		p.m.	0.435	A	0.434	A	0.000[1]	No
5. Fifth Street at Mortimer Street	E	a.m.	10.1 s/v	B	10.3 s/v	B	0.2 s/v	No
		p.m.	17.5 s/v	C	18.0 s/v	C	0.5 s/v	No
6. Fifth Street at Minter Street	D	a.m.	9.3 s/v	A	9.4 s/v	A	0.1 s/v	No
		p.m.	9.4 s/v	A	9.5 s/v	A	0.1 s/v	No

[1] A theoretical negative increase is due to the existing Northgate Market trips, which results in reduced traffic volumes for certain movements at the intersection

[2] LOS shown includes implementation of Santa Ana Boulevard/5th Street Cycle Track Improvements, inclusive of planned signal at 5th Street and French Street

s/v= seconds/vehicle

Source: LLG 2020 (see Appendix F for the full Traffic Impact Analysis); TZC TIA 2010

Table 3.8-6 Year 2045 Buildout Peak Hour Intersection Capacity Analysis

Key Intersection	Minimal Acceptable LOS	Peak Hour	(1) Year 2045 Cumulative Traffic Conditions		(2) Year 2045 Cumulative Plus Proposed Project Traffic Conditions		(3) Significant Impact	
			ICU/HCM	LOS	ICU/HCM	LOS	Increase	Yes/No
1. Fourth Street at French Street	E	a.m.	0.556	A	0.558	A	0.002	No
		p.m.	0.602	B	0.595	A	0.000[1]	No
2. Fourth Street at Mortimer Street	E	a.m.	11.6 s/v	B	11.7 s/v	B	0.1 s/v	No
		p.m.	14.8 s/v	B	14.7 s/v	B	0.0 s/v	No
3. Fourth Street at Minter Street	D	a.m.	12.3 s/v	B	12.7 s/v	B	0.4 s/v	No
		p.m.	16.1 s/v	C	16.5 s/v	C	0.4 s/v	No
4. Fifth Street at French Street[2]	E	a.m.	0.438	A	0.439	A	0.001	No
		p.m.	0.566	A	0.566	A	0.000	No
5. Fifth Street at Mortimer Street	E	a.m.	10.4 s/v	B	10.6 s/v	B	0.2 s/v	No
		p.m.	19.6 s/v	C	20.3 s/v	C	0.7 s/v	No
6. Fifth Street at Minter Street	D	a.m.	9.3 s/v	A	9.4 s/v	A	0.1 s/v	No
		p.m.	9.4 s/v	A	9.5 s/v	A	0.1 s/v	No

[1] A theoretical negative increase is due to the existing Northgate Market trips, which results in reduced traffic volumes for certain movements at the intersection

[2] LOS shown includes implementation of Santa Ana Boulevard/5th Street Cycle Track Improvements, inclusive of planned signal at 5th Street and French Street

s/v= seconds/vehicle

Source: LLG 2020 (see Appendix F for the full Traffic Impact Analysis); TZC TIA 2010

Vehicle Miles Traveled (VMT)

As of January 2019, Section 15604.3 was added to the updated CEQA Guidelines to determine the significance of transportation impacts. An analysis of VMT was not included in the 2010 TCZ EIR. A VMT assessment was prepared as part of the TIA prepared for the project (Appendix F), based on Senate Bill 743 (SB 743) requirements consistent with Technical Advisory on Evaluating Transportation Impacts in California Environmental Quality Act (CEQA), December 2018 prepared by State of California Governor's Office of Planning and Research (OPR), Local Guidelines for Implementing the California Environmental Quality Act for the City of Santa Ana dated June 2019, and the City of Santa Ana Traffic Impact Study Guidelines, dated September 2019. The City's CEQA Guidelines and Draft VMT Guidelines provides guidance for analysis of VMT assessments under SB 743. The City documents provides screening thresholds to assess whether further VMT analysis is required based on project location, size, or consistency with the SCAG Regional Transportation Plan/Sustainable Communities Strategy.

The City's CEQA Guidelines and Draft VMT Guidelines state that "Projects located within Transit Priority Areas (TPAs) or High Quality Transit Areas (HQTAs) as determined by the most recent Southern California Association of Governments (SCAG) RTP/SCS should also be exempt from VMT Analysis. TPAs are defined in the technical advisor as a ½ mile radius around an existing or planned major transit stop or an existing stop along a high quality transit corridor. HQTAs are defined in the technical advisory as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours."

Currently, the immediate study area is served by OCTA Routes 53, 55, 64, 83, 206 and 462. OCTA has transit stops located throughout Main Street, Civic Center Drive, 5th Street, Santa Ana Boulevard and First Street less than ½-mile from the site. In the vicinity of the project, the Santa Ana Metrolink Station and Santa Ana Regional Transportation Center is located less than ½ mile to the east at Santa Ana Boulevard and Santiago Street. The transit frequency at the stops along Main Street and First Street is every 15-minutes during the morning and afternoon peak commute periods and therefore qualifies as a high-quality transit corridor (Appendix F).

The project is located within a ½ mile of a high-quality transit corridor (routes along Main Street and First Street), plus the future OC Streetcar, which would further enhance mobility throughout Downtown Santa Ana, beyond the current transit opportunities that are now availability. Because the project site is within a ½ mile of a high-quality transit corridor, the VMT per capita for the project site is presumed to be less than significant. Further, since the project site is located in a TPA based on Figure 1 of the City Draft VMT Guidelines, the project would result in a less than significant VMT impact and no mitigation would be required. Therefore, the proposed project would be consistent with CEQA Guidelines Section 15064.3(b) and no new or substantially increased impacts related to VMT would occur.

Site Access

As noted in the 2010 FEIR for the approved TZC, the TZC encourages infill projects that would be suitably designed to use the existing network of regional and local roadways located within the TZC area. The proposed project is consistent with this goal as it includes the development of a mixed-use infill project in the central downtown Santa Ana area that is located on arterial roadways. The proposed project does not propose changes to road design beyond those evaluated under the approved TZC and would therefore not represent an increase in hazards associated with a design

feature. As such, impacts would be less than significant and would be consistent with those identified in the 2010 FEIR for the approved TZC.

Access to the project site could result in hazardous conditions if project driveways operate at an LOS that would prevent motorists from entering and exiting the project site safely. Vehicular access to the project's gated parking garages would be provided from 5th Street by one unsignalized right-turn only driveway west of Mortimer Street and one unsignalized full access driveway east of Mortimer Street.

According to the analysis included in the TIA for the proposed project, all driveways providing access to the site would operate at a LOS of C or better during the a.m. and p.m. peak hours. Table 3.8-7 summarizes the intersection LOS results for the two proposed project driveways under near-term (year 2024) and long-term (year 2045) traffic conditions at completion and full occupancy of the proposed project.

Table 3.8-7 Proposed Project Peak Hour Site Access Driveway Capacity Analysis

Key Intersection (Driveway)	Intersection Control	Time Period	Year 2024 Cumulative Plus Proposed Project Traffic Conditions		Year 2045 Buildout Plus Proposed Project Traffic Conditions	
			HCM (s/v)	LOS	HCM (s/v)	LOS
A. Project Driveway 1 at Fifth Street	One-Way Stop	a.m.	10.0	B	10.1	B
		p.m.	10.9	B	11.1	B
B. Project Driveway 2 at Fifth Street	One-Way Stop	a.m.	9.2	A	9.3	A
		p.m.	9.4	A	9.5	A

Notes: s/v = seconds per vehicle

Source: LLG 2020 (see Appendix F for the full Traffic Impact Analysis)

The project would be required to conform to traffic and safety regulations that specify adequate emergency access measures. The 2010 FEIR for the approved TZC requires that all projects within the TZC area meet applicable local and State regulatory standards for emergency access. Emergency access within the TZC area was addressed under Impact 4.5-7, in Section 4.5 (Hazards and Hazardous Materials) in the 2010 FEIR (City of Santa Ana 2010). In addition, the proposed project does not include permanent street closures or changes in traffic flow that differ from the approved TZC. Therefore, the proposed project would not result in any new significant impact related to emergency access and impacts would remain the same as those identified in the 2010 FEIR for the approved TZC.

Construction of the proposed project would not result in additional temporary impacts to emergency access from additional construction related traffic (truck trips and construction workers) compared to the approved TZC because construction trips for the proposed project were evaluated as a part of the traffic analysis for the approved TZC. Project driveways would provide adequate site access and would not create hazardous traffic conditions or result in inadequate emergency access as compared to the approved TZC. Therefore, the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact.

3.9 Other Issues

This section analyzes the proposed project's potential impacts to the other issues included in the environmental checklist that were addressed in the 2010 FEIR for the approved TZC.

Agriculture and Forestry Resources

As concluded in the 2010 FEIR, the TZC area is located in a dense urban environment and surrounded by existing development. The current project site is located with the Downtown (DT) and Urban Neighborhood (UN) zone of the TZC and, therefore, is not zoned for agricultural uses. Furthermore, there are no agricultural or forestry resources on-site or in the vicinity. As with the approved TZC, there would be no impact to agricultural or forestry resources under the proposed project. As such, the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact with respect to agricultural and forestry resources above those analyzed in the 2010 FEIR.

Biological Resources

The project site is in an urban area of the City. As concluded in the 2010 FEIR, no significant habitats or migratory wildlife corridors would be directly affected by the approved TZC. Similarly, the proposed project does not propose any policy changes or development that present significant impacts to endangered, threatened, or rare species or their habitats. The proposed project would not involve development or improvements that would affect a federally protected wetland; and the proposed project would not conflict with any policies or ordinances protecting biological resources. Implementation of 2010 FEIR Mitigation Measure 4.3-1 would protect avian species of concern, including migratory species and raptors, from injury or disturbance by construction activities and there would be a less than significant impact to biological resources for the proposed project, similar to the approved TZC. Therefore, the proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact with respect to biological resources above those analyzed in the 2010 FEIR.

Geology and Soils

As stated in the 2010 FEIR, the TZC area consists of minimal geologic hazards. Any development in the TZC area would be required to be designed and constructed in accordance with applicable building code requirements, which account for potential impacts associated with geology and soils, such as seismic ground shaking. Therefore, under the 2010 FEIR, potential impact associated with geology and soils were determined to be less than significant.

Like the approved TZC, the project site is characterized by minimal geologic and soils-related hazards. The project site is approximately nine miles east of the nearest mapped Alquist-Priolo fault zone and does not contain soils that are subject to liquefaction or landslides according to the California Department of Conservation (DOC) (DOC 2020a). Furthermore, to reduce geologic and seismic impacts, the City regulates development through the requirements of the California Building Code (CBC). The CBC provides standards for various aspects of construction, including but not limited to excavation, grading, earthwork, construction, preparation of the site prior to fill placement, specification of fill materials, and seismic requirements. In accordance with California law, the proposed project design and construction would be required to comply with provisions of the CBC, which would further reduce potential impacts related to geology and soils. Therefore, the

proposed project would not result in a new significant impact or substantially increase the severity of a previously identified significant impact with respect to geology and soils above those analyzed in the 2010 FEIR.

Paleontological Resources

The 2010 FEIR concluded that construction activities associated with ground disturbance within the TZC area could potentially encounter and disturb unanticipated paleontological resources. This was determined to be a potentially significant impact; however, implementation of two mitigation measures, 4.4-2(a) and 4.4-2(b), would reduce impacts to a less than significant level. These two mitigation measures require that prior to ground disturbing activities, a project applicant would retain a qualified paleontologist to determine if a proposed project could result in impacts to paleontological impacts. This would include a site-specific investigation, monitoring (as applicable), and preparation of a technical report or memorandum that identifies and evaluates any identified paleontological resources within the development area, including recommendations and methods for eliminating or avoiding impacts on paleontological resources or human remains. In addition, the mitigation measures require that if a paleontological resource is identified, a buffer would be placed around the resource and a qualified paleontologist would be retained for evaluation.

Like the approved TZC, the proposed project would continue to require that any earth disturbances (disturbed or undisturbed soils) comply with Mitigation Measures 4.4-2(a) and 4.4-2(b) of the 2010 FEIR. No new paleontological resources have been identified on-site compared to the conditions previously analyzed in the 2010 FEIR. For these reasons, the proposed project would not result in any new significant impacts or substantially increase in the severity of impacts compared to the approved TZC.

Hazards and Hazardous Materials

As concluded in the 2010 FEIR, the TZC area contains sites which are included on a list of hazardous materials sites and as a result, could create a significant hazard to the public or environment. However, the 2010 FEIR determined that implementation of Mitigation Measures 4.5-1 and 4.5-2, which require the preparation of Environmental Site Assessments (ESAs) for any sites listed in a database of hazardous materials sites and provide for the proper handling and remediation of any soil/groundwater contamination, would ensure potential impacts would be reduced to a less-than-significant level. In addition, Mitigation Measure 4.5-3 requires the proper investigation and handling of any suspect asbestos and lead-containing building materials during demolition activities, which the 2010 FEIR determined would reduce potential impacts related to the release of hazardous materials during construction to a less than significant level. The 2010 FEIR also contained Mitigation Measure 4.5-4 related to airport safety and Mitigation Measures 4.5-6 through 4.5-8 related to emergency response and evacuation plans within the TZC area.

Partner Engineering and Science, Inc. (Partner) prepared a Phase I ESA for the current project site in July 2018 (Partner 2018; Appendix G). The Phase I ESA determined that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Furthermore, the Phase I ESA revealed no known or suspect Recognized

Environmental Conditions (RECs)[1] or Controlled RECs (CREC)[2] on the project site. However, the Phase I ESA identified a Historical REC (HREC)[3] and two environmental issues[4] on the project site.

The HREC on the project site occurred at the location of the current Northgate Market at 409 East 4th Street, where a gasoline leak was discovered during the removal of an underground storage tank (UST) in 1994. According to State Water Resources Control Board records, the leak only affected soil and a no further action letter was issued by the City of Santa Ana Fire Department on June 30, 1994. Based on the regulatory closure, the leaking UST is considered a HREC. Two environmental concerns were also noted in the Phase I ESA. Although, there are no records of impact to the subsurface from other uses Block B of the project site, previous use included vehicle repair. The City of Santa Ana Fire Department records indicate that at least one 175-gallon gasoline abandoned UST was and may remain located at 509 East 4th Street at the former auto repair site. In addition, the existing buildings on the project site are believed to have been constructed by 1938. Due to the age of the subject property buildings, there is a potential that asbestos-containing material (ACM) and/or lead-based paint (LBP) are present. The Phase I ESA notes that, overall, suspect ACMs and painted surfaces were observed in good condition and do not pose a health and safety concern to the occupants of the subject property at this time (Partner 2018; Appendix G).

Four mitigation measures in the 2010 FEIR for the approved TZC would apply to the proposed project. 2010 FEIR Mitigation Measure 4.5-2 addresses previously unknown of unidentified soil and/or groundwater contamination, if encountered during construction. 2010 FEIR Mitigation Measure 4.5-3 addresses potential hazards associated with demolition of buildings constructed before 1980. Mitigation Measure 4.5-5 requires the preparation and implementation of a traffic control plan prior to the initiation of construction activities. Mitigation Measure 4.5-8 required that project applicants submit evacuation plans for review and approval by the police and fire departments.

As there is the potential for soil contamination to exist on the project site due to the HREC and environmental conditions identified in the Phase I ESA, implementation of Mitigation Measure 4.5-2 from the 2010 FEIR would be implemented to ensure proper identification, handling, and remediation of any contamination encountered during construction. As the existing buildings on the project site are believed to have been present since at least 1938, 2010 FEIR Mitigation Measure 4.5-3 would require a thorough investigation to determine if ACMs, LBP, or polychlorinated biphenyls exist on site and provide for the proper handling and disposal of such materials. Mitigation Measures 4.5-5 and 4.5-8 would ensure that the proposed project would not impact emergency response or evacuation activities within the city. With implementation of 2010 FEIR Mitigation Measures 4.5-2, 4.5-3, 4.5-5, and 4.5-8 to reduce the potential for hazardous materials and emergency response impacts, the potential impacts associated with the proposed project would be less than significant. As such, the proposed project would not result in a new significant impact

[1] A REC is defined by the American Society for Testing and Materials (ASTM) as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment (TAGDD 2020).
[2] A CREC is defined by ASTM as a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (e.g., as evidenced by the issuance of a NFA letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., property use restrictions, AULs, institutional controls, or engineering controls) (TAGDD 2020).
[3] A HREC is defined by ASTM as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted residential use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g., property use restrictions, AULs, institutional controls, or engineering controls).
[4] An environmental issue refers to environmental concerns identified which may warrant discussion but does not qualify as a REC.

or substantially increase the severity of a previously identified significant impact with respect to hazards and hazardous materials beyond those identified in the 2010 FEIR.

Hydrology and Water Quality

The project site is located in Zone X of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map # 06059C0276J, dated December 3, 2009) (FEMA 2009). Zone X is characterized as an area determined to be outside the 0.2 percent annual chance floodplain. Therefore, the proposed project is not within a 100-year floodplain and would not cause alterations to a floodplain or expose people or structures to flood-related risks.

The project site is currently developed with commercial buildings, parking lots, and some ornamental landscaping. The proposed project would increase the amount of impervious surface on the project site, but would include a series of best management practices (BMPs) to address stormwater flows, a new landscaped courtyard area on Block B, and new street trees and landscaping around Blocks A and B in accordance with the landscaping requirements of the TZC. A preliminary Water Quality Management Plan (pWQMP) was prepared for the proposed project in accordance with 2010 FEIR Mitigation Measure 4.6-1. According to the pWQMP, under existing conditions, runoff surface flows across both the west and east parcel in a southwesterly direction, and flows enter a public storm drain system along East Fourth Street. Flows travel south before joining the Santa Ana Delhi Channel which drains to Upper and Lower Newport Bay and ultimately into the Pacific Ocean (Fuscoe 2019; Appendix H).

The proposed project would add area drains and underground infiltration galleries to the project site and flows would be routed to one of two underground infiltration galleries along Mortimer Street. Low flows and first flush runoff would be retained onsite, first passing through an isolator row for pretreatment and then into a StormTech MC 4500 chamber (or similar) for water quality treatment via infiltration. High flows would bypass the system and immediately join the public storm drain system along East Fourth Street. As under existing conditions, flows would travel south before joining the Santa Ana Delhi Channel and ultimately into the Pacific Ocean. The pWQMP determined that, with installation of the infiltration BMPs described above, stormwater flows leaving the project site would not be substantially higher than existing flows and would not present a hydrologic condition of concern with respect to downstream flooding, erosion potential of natural channels downstream, or impacts of increased flows on natural habitat pursuant to the guidelines of the Orange County Model WQMP (Fuscoe 2019; Appendix H).

The 2010 FEIR found that the approved TZC may impact water quality and groundwater recharge due to construction activities and construction of impervious surfaces. Like the approved TZC, the proposed project would also implement 2010 FEIR Mitigation Measures 4.6-3 and 4.6-4 regarding minimizing impervious surfaces and ensuring adequate storm drain capacity. With implementation of these measures, the proposed project would not result in new significant impacts, nor would it increase the severity of any previously identified impacts related to hydrology or water quality beyond those analyzed in the 2010 FEIR.

Mineral Resources

The 2010 FEIR notes that there are no mineral extraction activities occurring in the City. While oil fields and drilling operations occur in some nearby jurisdiction, the City is not known to lie above an oil or gas field and there are no active wells within the City (DOC 2020b). Similar to the approved TZC, the proposed project would have no impact to mineral resources, nor would it increase the

severity of any previously identified impacts related to mineral resources above those analyzed in the 2010 FEIR.

Population and Housing

The proposed project includes 169 residential units and 11,361-square feet of retail on a project site that does not contain existing housing units. Therefore, the proposed project would not result in the displacement of existing housing within the TZC area. Using the household size ratio from the 2010 FEIR of 3.0 persons per household, the proposed project would house approximately 507 people. The 2010 FEIR determined that future development under the TZC would add 12,225 residents to the area. The proposed project's addition of 507 residents would represent approximately 4.1 percent of the population growth for the TZC area as determined by the 2010 FEIR. Therefore, population growth generated by the proposed project would be within the projections analyzed by the 2010 FEIR. Similarly, the 2010 FEIR projected an increase of 4,025 dwelling units in the TZC area. The proposed project's 169 units would represent 4.2 percent of this housing growth and would fall within buildout projections for the approved TZC.

Based on Table 4.9-11 of the 2010 FEIR, the approved TZC also included buildout of 242,000 square feet of commercial/retail/civic use. The 11,361 square feet of retail included in the proposed project would represent 4.7 percent of the projected increase in commercial/retail/civic space in the TZC area as analyzed in the 2010 FEIR. Therefore, the proposed retail area of the proposed project would be within the projections of the approved TZC. Because the entirety of the uses of the proposed project are within the buildout projections for the approved TZC, no new impacts would result. Thus, similar to the approved TZC, there would be less than significant impacts to population and housing under the proposed project. The proposed project would not result in new significant impacts, nor would it increase the severity of any previously identified impacts with respect to population and housing above those analyzed in the 2010 FEIR.

Public Services and Recreation

Fire Services

Similar to the approved TZC, the proposed project would incrementally increase the need for fire protection at the project site. The proposed project would be required to comply with the California Fire Code, UBC, and Santa Ana Fire Department (SAFD) standards, including construction specifications for fire safety, site access, location of fire hydrants, and other design requirements. The 2010 FEIR notes the SAFD has an average response time of five minutes or less for fire suppression and emergency medical responses. With continued implementation of existing practices of the City, including compliance with the California Fire Code and the UBC and payment of development fees, the proposed project would not significantly affect community fire protection services and would not result in the need for construction of fire protection facilities.

According to the Hydraulic Analysis prepared by Fuscoe Engineering, Inc. (Fuscoe), the project site is adequately served by the existing water system and that available fire flows from hydrants within the vicinity of the project site are above 1,500 gallons per minute and meet the required evaluation criteria (Fuscoe 2020a; Appendix I). Additionally, 2010 FEIR Mitigation Measure 4.10-1 would apply to the proposed project, which would require a water supply, fire flow test and fire protection system design analysis to ensure that proposed projects are in accordance to meet standard fire protection design requirements. Therefore, the proposed project would not result in new significant

impacts to fire protection services, nor would it increase the severity of any previously identified impacts related to fire services beyond those analyzed in the 2010 FEIR.

Police Services

The Santa Ana Police Department (SAPD) has an estimated ratio of 1.1 officers per 1,000 residents (SAPD 2016; DOF 2020); which is greater than the ratio at the time of the 2010 FEIR (0.79 officers per 1,000 people), which was determined to be acceptable. The proposed project would include new residents and retail services in the City; however, the proposed project would not cause a substantial delay in police response times, degraded service ratios, or necessitate construction of new facilities, due to the project site's location in an already developed and well-served area. Additionally, 2010 FEIR Mitigation Measures 4.10-2 and 4.10-3 would also apply to the proposed project, which would require that the applicant submit site-specific security plans to the SAPD for review prior to issuance of a building permit, and prohibits the utilization of sound emitting devices with a frequency of 800 MHz, which is reserved for emergency services. Similar to the approved TZC, impacts to police services under the proposed project would be less than significant and the proposed project would not increase the severity of any previously identified impacts related to police services beyond those analyzed in the 2010 FEIR.

Schools

As concluded in 2010 FEIR, development facilitated by the approved TZC could potentially result in the generation of 437 elementary school, 226 middle school, and 205 high school students. Some Santa Ana Unified School District (SAUSD) schools are operating with modest capacity surpluses while others are at an enrollment that exceeds their capacity. However, these schools remain overcrowded from a school site size standard. The addition of new students to these schools as a result of population growth generated by new development would further contribute to the existing overcrowding. The 2010 FEIR determined that this would be considered a potentially significant impact. However, the 2010 FEIR concluded that with incorporation of Mitigation Measure 4.10-4, impacts related to schools would be reduced to less than significant.

As shown in Table 3.9-1, the proposed project would develop 169 new residential units and 11,360 square feet of retail space, which would generate fewer than five K-12 students based on the student generation rates contained in the 2010 FEIR. Therefore, the proposed project would not substantially increase the number of students at local schools, as compared to the approved TZC. Consistent with the 2010 FEIR Mitigation Measure 4.10-4, the proposed project would be required to pay a school impact fee, which would further reduce impacts to schools.

Table 3.9-1 Proposed Project Student Generation

Land Use	Elementary Students (Grades K-5)	Middle Students (Grades 6-8)	High Students (Grades 9-12)	Total Students
Multi-Family Residential (169 dwelling units)	2	1	1	4

Generation Rates based on Table 4.10-2 of the 2010 FEIR

Therefore, the proposed project would not result in a significant impact, nor would it increase the severity of any previously identified impacts related to school services beyond those analyzed in the 2010 FEIR.

Libraries

The proposed project would result in an incremental increase in the demand for library services. Local libraries are funded through the City's general fund, which taxes from the proposed project would contribute to. Thus, like the approved TZC, potential impacts to libraries would be offset by taxes paid by the proposed project and the proposed project would not it increase the severity of any previously identified impacts related to school services beyond those analyzed in the 2010 FEIR.

Recreational Facilities

The proposed project would incrementally increase the demand for recreational facilities in the project area. However, the proposed project would provide its own recreational facilities, including two courtyards, a pool, and common room. In addition, the proposed project would comply with 2010 FEIR Mitigation Measure 4.10-5, which requires new development to pay development impact fees that fund City park maintenance and improvements. Therefore, the proposed project would not result in new significant impacts, nor would it increase the severity of any previously identified impacts as compared to those analyzed in the 2010 FEIR. Similar to the approved TZC, there would be less than significant recreation impacts under the proposed project.

Utilities and Service Systems

Water and Water Quality

As concluded in the 2010 FEIR, long-term cumulative development pursuant to the approved TZC would generate an additional demand for water but would not require water supplies in excess of existing entitlements and resources or result in the need for new or expanded entitlements. The proposed uses allowed under the approved TZC would require 1,125.4 AFY of water, for a net increase of 131 acre-feet per year (AFY). Citywide water supply for year 2030 is anticipated to be 46,809 AFY, while citywide total water demand for year 2030 is projected to be 43,993 AFY. Therefore, the City would have a surplus of approximately 2,816 AFY of water by year 2030. The overall approved TZC demand represents approximately five percent of anticipated water surplus of 2,816 AFY for year 2030, which the 2010 FEIR determined would result in a less than significant impact.

The proposed project would develop 169 multi-family residential units, a 3,847-sf restaurant, and 7,514 sf of commercial space on the project site. As shown in Table 3.9-2, the proposed project would demand approximately 29.6 AFY of water, which is a net increase of 28.0 AFY compared to existing uses on the site. This would represent approximately 2.6 percent of the water demand of the TZC area as determined in the 2010 FEIR. The 2015 Urban Water Management Plan (UWMP) for the city predicts total water demand and supply under normal year, single dry year, and multiple dry year conditions will be between 40,036 and 42,438 AF in the year 2040 (Santa Ana 2016). The proposed project's net water demand would represent less than 0.1 percent of the predicted supply and demand within the city in the year 2040. Therefore, like the approved TZC, development of the proposed project would not require water supplies in excess of existing entitlements and resources or result in the need for new or expanded entitlements. For these reasons, the proposed project would not result in new significant impacts related to water demand, nor would it increase the severity of any previously identified impacts as compared to the approved those analyzed in the 2010 FEIR.

Table 3.9-2 Proposed Project Water Demand

Land Use	Amount/Unit	Demand Rate[1]	Water Demand (AFY)
Proposed Project			
Multi-Family Residential	169	150 gpd/unit	28.4
Restaurant (commercial use)	3,874	0.09 gpd/sf	0.39
Retail	7,514	0.10 gpd/sf	0.84
Total Demand			**29.6**
Existing Land Use (Northgate Gonzalez Supermarket)			
Retail	14,080	0.10 gpd/sf	1.6
Net Demand (Proposed Project-Existing)			**28.0**

[1]Rates based on Table 4.12-5 of the 2010 FEIR

gpd = gallons per day; sf = square feet; AFY = acre feet per year

As noted above under *Hydrology and Water Quality*, the pWQMP (Appendix H), prepared in compliance with 2010 FEIR Mitigation Measure 4.6-1, would ensure that water quality and waste discharge are not adversely affected by construction and operation of the proposed project. Therefore, the proposed project would not result in new significant impacts related to water quality, nor would it increase the severity of any previously identified impacts as compared to those analyzed in the 2010 FEIR.

Wastewater

As analyzed in the 2010 FEIR, the net increase in demand for wastewater conveyance and disposal under the approved TZC would be 284,018 gallons per day (gpd). Wastewater from the City's system and Orange County Sanitation District (OCSD) is treated by the OCSD at Reclamation Plant No. 1 in the City of Fountain Valley. The OCSD Treatment Plant No. 1 currently maintains a design capacity of 218 million gallons per day (mgd) and treats on average a flow of 120 mgd. Therefore, the treatment plant serving the City is operating below its design capacity by 98 mgd. The 2010 FEIR found that development facilitated by the approved TZC would represent less than one percent of the available capacity of wastewater treatment Reclamation Plant No. 1. As such, the approved TZC would not increase wastewater generation such that treatment facilities would be inadequate to serve the project's projected demand in addition to the provider's existing commitments.

In addition, as discussed in the 2010 FEIR, OCSD maintains certain trunk sewer lines that may require expansion on an as-needed basis due to incremental increases in sewage generation as a result of a new development. The City would also maintain local sewer lines and upgrades as part of individual projects. Implementation of Mitigation Measure 4.12-2 would ensure that any new development within the TZC area does not result in an exceedance of an existing sewer conveyance capacity for City and OCSD facilities and impacts under the approved would be less than significant.

As shown in Table 3.9-3, the proposed project would generate approximately 22,483 gpd of wastewater, a net increase of 21,286 gpd, which would represent less than one percent of the available capacity of wastewater treatment of Reclamation Plant No. 1. Therefore, the proposed project would not result in new significant impacts related to wastewater generation and

conveyance, nor would it increase the severity of any previously identified impacts analyzed in the 2010 FEIR.

Table 3.9-3 Proposed Project Wastewater Generation

Land Use Proposed Use	Amount/Unit	Demand Rate[1]	Wastewater Generation (gpd)
Multi-Family Residential	169	127.5 gpd/unit	21,547.5
Restaurant (commercial use)	3,874	0.0765 gpd/sf	296.4
Retail	7,514	0.085 gpd/sf	638.7
Total Demand			**22,482.6**
Existing Use (Northgate Gonzalez Supermarket)			
Retail	14,080	0.085 gpd/sf	1,196.8
Net Demand (Proposed Project-Existing)			**21,285.8**

[1]Rates based on Table 4.12-7 of the 2010 FEIR

gpd = gallons per day; sf = square feet

The project site is currently connected to the City's municipal wastewater conveyance system. A Sewer Analysis Report was prepared in compliance with 2010 FEIR Mitigation Measure 4.12-1. The Sewer Analysis Report prepared by Fuscoe determined that the Block A currently contributes 0.0884 cubic feet per second (cfs) in average wastewater flows and 0.1519 cfs in peak wastewater flows to the City's system, while Block B contributes 0.0389 cfs in average wastewater flows and 0.0665 cfs in peak wastewater flows to the City's system (Fuscoe 2020b; Appendix J). Under the proposed project, Block A would generate 0.1430 cfs in average wastewater flows and 0.3157 cfs in peak wastewater flows and Block B would generate 0.0622 cfs in average wastewater flows and 0.1364 cfs in peak wastewater flows to the City's system.

According to the Sewer Analysis Report, the City's existing eight-inch and six-inch wastewater conveyance pipelines that serve Blocks A and B, respectively, have the capacity to accept increased flows from the project site under the proposed project (Fuscoe 2020b; Appendix J). Despite the existing system having adequate capacity, the applicant would voluntarily upgrade a portion of the sewer facilities along 4th Street as part of the proposed development improvements. Therefore, the proposed project would not require any sewer system improvements and would not create any new impacts or increase the severity impacts identified in the 2010 FEIR.

Solid Waste

As discussed in the 2010 FEIR, solid waste generated by development within the TZC area would be hauled to either the Frank R. Bowerman Landfill or Olinda Alpha Landfill. The Frank R. Bowerman Landfill has a permitted daily disposal capacity of 11,500 tons per day (tpd), receives 7,593 tpd, and has a remaining capacity of 104 million tons (Los Angeles 2018). The Olinda Alpha Landfill has a permitted daily disposal capacity of 8,000 tpd, receives 6,858 tpd, and has a remaining capacity of 16 million tons (Los Angeles 2018). Therefore, together the landfills servicing the TZC area have a remaining daily capacity of 5,049 tpd.

Development facilitated by the approved TZC would result in a net increase of approximately 11,812 pounds per day of solid waste (5.906 tons per day). This would be equivalent to less than one percent of the combined remaining daily capacity of 5,049 tpd at the Frank R. Bowerman and Olinda Alpha Landfills. Compliance with the City's recycling program would further reduce long-term

solid waste disposal service impacts. As concluded in the 2010 FEIR, the approved TZC would have a less than significant impact on the landfill capacity.

As shown in Table 3.9-4, the proposed project would generate approximate 744 pounds of solid waste per day (0.37 tpd), a net increase of approximately 660 pounds per day (0.66 tpd) compared to existing uses on the project site. Similar to the approved TZC, this would also represent less than one percent of the existing combined maximum permitted capacity of 5,049 tpd at the Frank R. Bowerman Landfill and Olinda Alpha Landfill. Therefore, solid waste generated by the proposed project be within the estimated solid waste generated by the approved TZC. In addition, the proposed project would comply with the City's recycling program and, consistent with the 2010 FEIR, solid waste impacts would be less than significant. For these reasons, the proposed project would not result in new significant impacts related to solid waste generation, nor would it increase the severity of any previously identified impacts above those analyzed in the 2010 FEIR.

Table 3.9-4 Proposed Project Solid Waste Generation

Land Use	Amount/Unit	Demand Rate[1]	Solid Waste Generation (lbs/day)
Proposed Uses			
Multi-Family Residential	169	4 lbs/unit/day	676.0
Restaurant (commercial use)	3,874	0.006 lbs/sf/day	23.2
Retail	7,514	0.006 lbs/sf/day	45.1
Total Demand			**744.3**
Existing Use (Northgate Gonzalez Supermarket)			
Retail	14,080	0.006 lbs/sf/day	84.5
Net Demand (Proposed Project-Existing)			**659.8**

[1]Rates based on Table 4.12-9 of the 2010 FEIR

lbs = pounds; sf = square feet

Wildfire

As stated in Section 4.5 of the 2010 FEIR, the TZC area is located in a dense urban environment and surrounded by existing development. There are no wildland areas or wildland interfaces areas in the vicinity, and the nearest Very High Fire Hazard Severity Zone is located over five miles from the project site. Similar to the approved TZC, no wildland fires or wildfire would affect or be affected by the proposed project, as the project site is located in the TZC area analyzed in the 2010 FEIR. The proposed project would not result in new significant impacts, nor would it increase the severity of any previously identified impacts as compared to those analyzed in the 2010 FEIR.

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