

1. Executive Summary

1.1 INTRODUCTION

This document combines the chapters of the original Draft PEIR (August 2020) and the Recirculated Draft PEIR (August 2021) to provide a complete update of the Draft PEIR. This document is Volume II, *Updated Draft PEIR*, of the Final PEIR for the Santa Ana General Plan Update (GPU). It reflects the revisions to the original Draft PEIR as described in both the original Final PEIR (November 2020) and in the Final Recirculated PEIR (October 2021). The combined appendices have been prepared as Volumes III and IV of the Final PEIR.

The chapters of this Updated Draft PEIR have been prepared with text colored according to the source of each revision. Deleted text is shown in ~~strikeout~~, and new text is shown as regular text. The following colors have been used:

- **Green** shows GPU policy and implementation action changes since distribution of the original Draft PEIR. (Note that Volume III, Appendix B-a, includes a comprehensive, updated list of GP policies and implementation actions.)
- **Red** shows changes pursuant to the original Final PEIR (corrections and changes made in response to comments on the original Draft PEIR). These changes were detailed in the November 2020 Final PEIR, Chapter 3, *Revisions to the Draft PEIR*.
- **Blue** shows changes pursuant to the Recirculated Final PEIR (Volume I of the Final PEIR).

Changes/update to appendices (Volumes III and IV) since circulation of the Draft PEIR and Recirculated Draft PEIR are summarized on the lead pages to the respective appendices.

The original Draft PEIR (State Clearinghouse No. 2020-029087) was distributed for the required 45-day public review between August 3, 2020, and September 16, 2020. The review period was subsequently extended until October 6, 2020. As described in Chapter 2, *Introduction*, and Chapter 3, *Project Description*, GPU policies and implementation measures were modified and supplemented to respond to concerns expressed by the public and agencies during the Draft PEIR public review period and during the Planning Commission public hearing held on November 9, 2020. The GPU modifications also reflect input received from an intensive, extended community outreach program conducted by the City between January and May 2021.

The Recirculated Draft PEIR provided an update of the project description, environmental setting, and impact analyses for the Air Quality, Hazards, and Recreation sections of the original Draft PEIR. It also updated the Project Alternatives section to incorporate a new alternative. The analysis for each environmental impact was quantified, as applicable, for the updated GPU in accordance with CEQA. As described in Section 1.4.4, *Recirculated Draft PEIR Format and Process*, and as allowed by CEQA, the Recirculated Draft PEIR did not include

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all the topical sections from the original Draft PEIR. Also, as encouraged by CEQA as a means of reducing paperwork, the Recirculated Draft PEIR incorporated the original Draft PEIR by reference, as appropriate. In particular, the original Draft PEIR and its appendices were referenced for long and/or technical descriptions of the environmental setting that remained applicable to the updated GPU. As required by CEQA, documents incorporated by reference in the Recirculated Draft PEIR, including the original Draft PEIR, have been made available for public review at the lead agency office (City of Santa Ana) and public libraries.

1.2 PROJECT BACKGROUND

The updated General Plan is based on a vision statement and core values established as part of an extensive, multiyear, community outreach effort. This effort culminated in the Draft General Plan Update and original Draft Program Environmental Impact Report, which were considered in a Planning Commission public hearing on November 9, 2020. A summary of events is shown in Table 1.1, *General Plan Update Chronology*.

Table 1-1 General Plan Update Chronology

Date	Activity
2015–2016	Community Outreach Program
2017	General Plan Advisory Group (GPAG)
2018	Vision Statement/Policy Framework Development
2019	Land Use Alternatives and Focus Areas
February 26, 2020, through March 27, 2020	Program EIR (PEIR) Notice of Preparation and 30-day Public Review
March 5, 2020	Public Scoping Meeting
August 3, 2020, through September 16, 2020	45-day Draft PEIR Public Review Period
September 17, 2020, to October 6, 2020	20-day extension, Draft PEIR Public Review
August 24, 2020, and September 14, 2020	Planning Commission Study Sessions
November 9, 2020	Planning Commission Public Hearing
February 2021 through May 2021	Extended Public Outreach and GPU Modifications
January 2021 through early August 2021	Preparation of Recirculated Draft PEIR
Mid-August 2021 to September 2021	Recirculated Draft PEIR Public Review
Winter 2021	Public Hearings to Consider GPU Modifications and Recirculated PEIR

1.3 ENVIRONMENTAL PROCEDURES

The Draft PEIR was prepared pursuant to CEQA to assess the environmental effects associated with implementation of the GPU, as well as anticipated future discretionary actions and approvals. The six main objectives, as established by CEQA, are listed below:

1. To disclose to decision makers and the public the significant environmental effects of proposed activities.
2. To identify ways to avoid or reduce environmental damage.
3. To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.

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4. To disclose to the public reasons for agency approval of projects with significant environmental effects.
5. To foster interagency coordination in the review of projects.
6. To enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the CEQA Guidelines and provides the information needed to assess the environmental consequences of a proposed project, to the extent feasible. An EIR is intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency must consider the information in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be avoided.

1.3.1 Original Draft PEIR Format

Section 1. Executive Summary. Summarized the background and description of the GPU, the format of the PEIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the project.

Section 2. Introduction. Described the purpose of the original Draft PEIR, background on the project, the Notice of Preparation, the use of incorporation by reference, and Final PEIR certification.

Section 3. Project Description. A detailed description of the GPU, its objectives, the plan area, approvals anticipated to be needed, the necessary environmental clearances for the project, and the intended uses of the original Draft PEIR.

Section 4. Environmental Setting. A description of the physical environmental conditions in the plan area as they existed at the time the Notice of Preparation was published, from both a local and regional perspective. The environmental setting provided baseline physical conditions from which the lead agency determined the significance of environmental impacts resulting from the GPU.

Section 5. Environmental Analysis. Provided, for each environmental parameter analyzed, a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts; the existing environmental setting; the potential adverse and beneficial effects of the GPU; the level of impact significance before mitigation; the mitigation measures; the level of significance of the adverse impacts of the GPU after mitigation is incorporated; and the potential cumulative impacts associated with the GPU and other existing, approved, and proposed development in the area.

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Section 6. Significant Unavoidable Adverse Impacts. Described the significant unavoidable adverse impacts of the GPU.

Section 7. Alternatives to the Proposed Project. Describes the impacts of the alternatives to the GPU, including the No Project Alternative and three alternative land use plans. In accordance with the CEQA Guidelines, this section identifies a superior environmental alternative among the alternatives (exclusive of the No Project alternative) and evaluates the potential for each alternative to achieve the project objectives.

Section 8. Impacts Found Not to Be Significant. Briefly described the potential impacts of the project that were determined not to be significant and were therefore not discussed in detail in Section 5.

Section 9. Significant Irreversible Changes Due to the Proposed Project. Described the significant irreversible environmental changes associated with the project.

Section 10. Growth-Inducing Impacts of the Project. Described the ways in which the GPU would cause increases in employment or population that could result in new physical or environmental impacts.

Section 11. Organizations and Persons Consulted. Listed the people and organizations that were contacted during the preparation of the original Draft PEIR for the GPU.

Section 12. Qualifications of Persons Preparing EIR. Listed the people who prepared the original Draft PEIR.

Section 13. Bibliography. A bibliography of the technical reports and other documentation used in the preparation of the original Draft PEIR for the GPU.

Appendices were in Volumes II and III of the original Draft PEIR.

- Appendix A-a: NOP, NOP Comment Letters, and Scoping Meeting Sign-In Sheet and Comments
- Appendix A-b: EJ Background Analysis
- Appendix B-a: Proposed General Plan Update Policies
- Appendix B-b: Santa Ana Buildout Methodology
- Appendix C: Air Quality and Greenhouse Gas Emissions Modeling
- Appendix D: Biological and Natural Resource Inventory and Assessment
- Appendix E-a: Historical Resources Technical Report
- Appendix E-b: Archeological Resources Technical Report
- Appendix F: Energy Worksheet
- Appendix G-a: Geological Background Technical Report
- Appendix G-b: Paleontological Existing Conditions Technical Report
- Appendix H-a: Infrastructure Technical Report for Hydrology, Sewer, Water, and Water Quality
- Appendix H-b: Water Supply and Demand Technical Report
- Appendix I-a: Noise Existing Condition Report
- Appendix I-b: Noise Monitoring and Modeling Data

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- Appendix J-a: Existing Conditions Report for Fire and Police Services
- Appendix J-b: Service Provider Questionnaire Responses

Volume III

- Appendix K: Transportation Impact Study
- Appendix L: Tribal Consultation Correspondence

1.3.2 Type and Purpose of the PEIR

The Draft PEIR fulfills the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as those for a Project EIR, Program EIRs are typically more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the City (as lead agency) with the opportunity to consider broad policy alternatives and programwide mitigation measures and provides the City with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis.

Agencies generally prepare Program EIRs for programs or a series of related actions that are linked geographically; are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a Program EIR has been prepared, subsequent activities in the program must be evaluated to determine whether an additional CEQA document needs to be prepared. However, if the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope, and additional environmental documents may not be required (Guidelines Section 15168[c]). When a Program EIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the Program EIR into the subsequent activities (Guidelines Section 15168[c][3]). If a subsequent activity would have effects not within the scope of the Program EIR, the lead agency must prepare an Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines (Section 15168[h]) encourage the use of Program EIRs, citing five advantages:

- Provide a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR.
- Focus on cumulative impacts that might be slighted in a case-by-case analysis.
- Avoid continual reconsideration of recurring policy issues.

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- Consider broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them.
- Reduce paperwork by encouraging the reuse of data (through tiering).

1.4 RECIRCULATED DRAFT PEIR

1.4.1 Conditions for EIR Recirculation

State CEQA Guidelines Section 15088.5 defines the circumstances under which a lead agency must recirculate an EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. Such information can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. As defined in State CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation is that which shows any of the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

1.4.2 GPU Draft PEIR: Reasons for Recirculation

At its November 9, 2020, public hearing, the Planning Commission voted not to certify the Final PEIR and to continue work on the GPU to allow additional time for outreach to Santa Ana’s environmental justice (EJ) communities. As described in Section 2.4, *Environmental Justice Outreach*, the City initiated an expanded outreach program focusing on environmental justice and specific community concerns raised in comments received on the draft GPU and the original Draft PEIR and voiced during the Planning Commission public hearing. The decision was made to prepare a Recirculated Draft PEIR to:

- Conclude that the recreation-related impacts of the proposed GPU would result in a significant impact and to define a new project alternative to reduce these impacts.
- More thoroughly discuss and evaluate impacts related to environmental justice, including air quality, hazards, and recreation/open space.

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1.4.3 Options for Recirculation

Pursuant to CEQA Guidelines Section 15088.5, if the required revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified. A Recirculated EIR requires the same noticing and consultation as the original Draft EIR (CEQA Guidelines Sections 15086 and 15087).

CEQA allows two different ways to respond to comments on the Recirculated Draft EIR:

- 1) When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period.
- 2) Or, when the EIR is only partly revised and the lead agency recirculates only the revised chapter or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapter of the earlier EIR that were revised and recirculated.

1.4.4 Recirculated DEIR Format and Process

Based on the limited number of chapters requiring modification, the City decided to only recirculate the Draft PEIR chapters that were revised. A Recirculated EIR requires the same noticing and consultation as the original Draft EIR (CEQA Guidelines Section 15086 and 15087), and therefore was distributed for a 45-day public review period. The City implemented Option 2, as described in Section 1.4.3, with respect to comments received on the Recirculated Draft PEIR. Reviewers were directed to only submit comments on the revised EIR chapters included in the Recirculated Draft PEIR. The comments in the original Final PEIR adequately address comments received on portions of the original Draft PEIR that were not recirculated.

The Recirculated Draft PEIR included the following chapters and sections:

- **Executive Summary.** This chapter described the purpose and process of a Recirculated EIR and the sections of the PEIR that were being recirculated. It also provided the background and chronology for the GPU process to date. The project description (GPU) was updated to reflect the changes in the other recirculated chapters as well as the revisions to the original Draft PEIR (mostly updated policies and implementation actions) that were included in the original Final PEIR. The Executive Summary also reflected updates to impacts, mitigation measures, and significance conclusions.
- **Introduction.** This chapter reproduced the purposes of the environmental impact report and summary of comments received during the scoping meeting and responses to the Notice of Preparation. It was supplemented to include a description of the city's EJ communities and how they are identified and a detailed description of the City's EJ outreach efforts.

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- **Project Description.** This chapter was updated to integrate the changes and refinements to the GPU since the original project description. Changes included updated policies and implementation actions as well as corrections to existing and proposed land use statistics as included in the original Final PEIR. This section also included the Mobility Element changes from the original Final PEIR.
- **Environmental Setting.** This section was updated to describe the requirements for the GPU to include an Environmental Justice element or address EJ requirements in various elements, and also to provide details on the city's EJ communities as defined by CalEnviroScreen criteria. This information provided the context to evaluate EJ-related impacts in the Recirculated Draft PEIR (air quality, hazards, recreation).
- **Air Quality.** The City of Santa Ana received several comments on the original Draft PEIR centered around the increase in air pollutant loads to EJ communities that are already exposed to high levels of contamination. In response to these concerns, the City chose to recirculate Section 5.2, *Air Quality*, of the original Draft PEIR. The existing conditions were supplemented to provide additional context for issues related to environmental justice. Additionally, this section was updated to include EJ policies and implementation actions related to air quality and an expanded impact discussion that addressed EJ-related disparities.
- **Hazards and Hazardous Materials.** Numerous comments on the original Draft PEIR were related to hazardous materials exposure in EJ communities that are already burdened with elevated contamination levels, particularly high concentrations of lead in some soils. The City therefore chose to recirculate Section 5.8, *Hazards and Hazardous Materials*, of the original Draft PEIR. The existing conditions discussion was updated with additional information related to environmental justice, and the section was supplemented with EJ policies and implementation actions related to hazardous materials. Furthermore, the section elaborated on impacts related to hazardous materials in EJ communities.
- **Recreation.** This section provided a more detailed geographic description of open space and recreation facilities for both existing and proposed conditions under implementation of the GPU and a comparison of these conditions with applicable standards. The section also included GPU policies and implementation actions added subsequent to the original Draft PEIR and included in the original Final PEIR as well as any that evolved as part of extended community outreach and participation. Impacts to recreation were reclassified to "significant."
- **Alternatives.** This chapter was supplemented to include an additional project alternative to reduce project-related impacts to recreation and open space. The potential environmental impacts of the new alternative, Reduced Park Demand, were compared to the proposed project, and the overall comparison of project alternatives was updated to reflect all the alternatives.
- **Appendices.** The following appendices were included in the Recirculated Draft PEIR:
 - Appendix added since the original Draft PEIR appendices:
 - Appendix A-b: Environmental Justice Background Analysis

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- Appendices updated and/or referenced in the Recirculated Draft PEIR:
 - Appendix A-a NOP, NOP Comment Letters, and Scoping Meeting Sign-In Sheet and Comments
 - Appendix B-a Proposed General Plan Update Policies
 - Appendix B-b Santa Ana General Plan Buildout Methodology
 - Appendix C Air Quality and Greenhouse Gas Emissions Modeling
 - Appendix D Biological and Natural Resource Inventory and Assessment
 - Appendix J-b Service Provider Questionnaire Responses
 - Appendix K Transportation Impact Study

1.5 SUMMARY OF PROPOSED PROJECT AND MODIFICATIONS

The following sections describe the proposed General Plan Update and summarize proposed revisions to policies and implementation actions subsequent to the original Draft PEIR. No land use changes or changes to the focus areas as defined in the original Draft PEIR are proposed. Sections 1.5.1 through 1.5.3 have not been modified from the original Draft PEIR. Section 1.5.4, *Proposed Policy and Implementation Action Revisions*, summarizes the revisions and additions to policies and implementation actions. The comprehensive list of the updated policies and implementation actions is provided in Appendix B-a.

1.5.1 Project Location

Santa Ana is in the western central portion of Orange County, approximately 30 miles southwest of the city of Los Angeles and 10 miles northeast of Newport Beach (see Figure 3-1, *Regional Location*). Orange County is surrounded by the counties of Los Angeles, San Bernardino, Riverside, and San Diego and is one of six counties making up the Southern California region.

As shown in Figure 3-2, *Citywide Aerial*, Santa Ana is bordered by Orange and unincorporated areas of Orange County to the north, Tustin to the east, Irvine and Costa Mesa to the south, and Fountain Valley and Garden Grove to the west. In November 2019, the City annexed the 17th Street Island, a 24.78-acre area in the northeast portion of the city. The 17th Street Island is bounded by State Route 55 to the east, 17th Street to the south, and North Tustin Avenue to the west (see Figure 3-3, *17th Street Island and Sphere of Influence*). The city also includes a portion of the Santa Ana River Drainage Channel in its sphere of influence (SOI). The city and its SOI are defined and referred to herein as the plan area.

Regional access to the city is provided by the Garden Grove Freeway (SR-22) and the Orange Freeway (SR-57) on the north, the Santa Ana Freeway (1-5) on the northeast, the Costa Mesa Freeway (SR-55) on the east, and the San Diego Freeway (1-405) on the south.

1.5.2 Project Summary

The GPU is the comprehensive update of the Santa Ana General Plan. The purpose of the General Plan Update is to comprehensively update the 1982 plan to reflect current conditions, establish a shared vision of the community's aspirations, and create the policy direction to guide Santa Ana's long-term planning and growth over the next two decades. The General Plan Update will include the City's future development goals and will

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provide policy statements to achieve those goals. Implementation actions related to each goal or policy will be included as a separate Implementation Plan to ensure successful monitoring of progress as a community.

Focus Areas

The GPU focuses on five areas within Santa Ana that are better suited for future development or overall improvement (see Figure 3-11 *Focus Areas and Special Planning Areas*). These focus areas are:

- South Main Street
- Grand Avenue/17th Street
- West Santa Ana Boulevard
- 55 Freeway/Dyer Road
- South Bristol Street

Refer to Chapter 3, *Project Description*, for additional information regarding the GPU.

1.5.3 GPU Elements

The updated General Plan is organized into three sections: Services and Infrastructure (I), Natural Environment (II), and Built Environment (III). The proposed GPU addresses the seven topics required by state law as well as five optional topics. State law gives jurisdictions the discretion to incorporate optional topics and to address any of these topics in a single element or across multiple elements. The 12 proposed elements of the GPU will replace 16 existing elements. The GPU will incorporate the current 2014–2021 Housing Element. The topic of housing will be addressed as a separate effort in late 2021 in accordance with State law. The topic of environmental justice will be incorporated throughout the GPU, with goals and policies incorporated into multiple elements. The 12 elements of the proposed GPU are:

Mandatory Topics

- Land Use Element
- Mobility Element
- Housing Element
- Open Space Element
- Conservation Element
- Safety Element
- Noise Element

Optional Topics

- Public Services Element
- Urban Design Element
- Community Element
- Economic Prosperity Element
- Historic Preservation Element

The GPU will guide growth and development (e.g., infill development, redevelopment, and revitalization/restoration) in the plan area by designating land uses in the proposed land use map (see Figure 3-7, *Proposed General Plan Land Uses*) and through implementation of updated goals and policies of the GPU. Table 1-2 outlines the proposed land use designations under the GPU. The proposed land use map and GPU goals and policies are detailed in Section 3.3.3, *General Plan Update*.

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Table 1-2 Proposed Land Use Designations and Statistics

Land Use Designation	Acres	% of Total
Grand Avenue/17th Street	171.5	—
District Center	23.7	13.8
General Commercial	19.9	11.6
Industrial/Flex	7.1	4.1
Open Space	1.1	0.6
Urban Neighborhood	119.7	69.8
55 Freeway/Dyer Road	354.5	—
District Center	158.0	44.6
General Commercial	68.0	19.2
Industrial/Flex	127.4	35.9
Open Space	1.1	0.3
South Bristol Street	199.9	—
District Center	108.3	54.2
Open Space	6.0	3.0
Urban Neighborhood	85.7	42.9
South Main Street	312.2	—
Industrial/Flex	29.0	9.3
Institutional	19.2	6.1
Low Density Residential	162.3	52.0
Urban Neighborhood	101.7	32.6
West Santa Ana Boulevard	481.6	—
Corridor Residential	10.0	2.1
General Commercial	21.5	4.5
Industrial/Flex	87.9	18.3
Institutional	45.5	9.4
Low Density Residential	108.1	22.4
Low-Medium Density Residential	6.8	1.4
Medium Density Residential	27.0	5.6
Open Space	133.6	27.7
Professional and Administrative Office	6.2	1.3
Urban Neighborhood	35.0	7.3
Balance of City	11,598.8	—
District Center	124.2	1.1
General Commercial	424.2	3.7
Industrial	2,159.6	18.6
Institutional	886.7	7.6
Low Density Residential	6,173.3	53.2
Low-Medium Density Residential	429.0	3.7
Medium Density Residential	335.3	2.9
One Broadway Plaza District Center	4.1	0.0
Open Space	793.8	6.8
Professional and Administrative Office	260.4	2.2
Urban Neighborhood	4.1	0.0
Not Specified	4.1	0.0
Total	13,118.5	100%

Source: Figures aggregated and projected by PlaceWorks, 2020.

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Buildout Scenarios

Per CEQA requirements, the Draft PEIR has to analyze potential environmental impacts and identify feasible mitigation measures for significant impacts for the entire plan area. However, buildout in accordance with the proposed land uses for the entire plan area may not occur for 70 or 80 years. This extended time period does not allow for quantifiable, meaningful analysis. Future conditions, including potential technological advances that would modify impacts, are highly speculative. Moreover, quantified analysis for many impacts rely on models and projections from responsible and regulatory agencies that do not extend beyond 20 years (e.g., urban water management plan for water supply). Therefore, the Draft PEIR analyzes potential impacts assuming full buildout in the year 2045. The full buildout scenario is analyzed in comparison to existing conditions. Table 1-3 details buildout statistics. Similarly, the PEIR provides conclusions regarding impact significance for this scenario for both the proposed GPU and project alternatives.

Table 1-3 Buildout Statistical Summary

PLANNING AREA	BUILDOUT		
	Housing Units	Bldg. Sq. Ft. ¹	Jobs
FOCUS AREAS	23,955	15,684,285	35,044
55 Freeway/Dyer Road	9,952	6,142,283	13,302
Grand Avenue/17th Street	2,283	703,894	1,622
South Bristol Street	5,492	5,082,641	11,192
South Main Street	2,308	946,662	2,151
West Santa Ana Boulevard	3,920	2,808,805	6,777
SPECIFIC PLAN / SPECIAL ZONING	20,524	16,958,445	39,702
Adaptive Reuse Overlay Zone ²	1,260	976,935	2,567
Bristol Street Corridor Specific Plan	135	143,139	282
Harbor Mixed Use Transit Corridor Specific Plan	4,622	1,967,982	1,578
MainPlace Specific Plan	1,900	2,426,923	5,380
Metro East Mixed-Use Overlay Zone	5,551	4,685,947	12,258
Midtown Specific Plan	607	1,818,253	4,615
Transit Zoning Code	6,449	4,939,266	13,022
ALL OTHER AREAS OF THE CITY ³	70,574	40,325,086	95,670
CITYWIDE TOTAL	115,053	72,967,816	170,416

Source: City of Santa Ana 2020.

¹ Only includes nonresidential building square footage.

² The figures shown on the row for the Adaptive Reuse Overlay represent parcels that are exclusively in the Adaptive Reuse Overlay boundary. Figures for parcels that are within the boundaries of both the Adaptive Reuse Overlay Zone and a specific plan, other special zoning, or focus area boundary are accounted for in the respective specific plan, other special zoning, or focus area.

³ The City has included an assumption for growth on a small portion (5 percent) of residential parcels through the construction of second units, which are distributed throughout the City and not concentrated in a subset of neighborhoods. Additional growth includes known projects in the pipeline and an increase of 10 percent in building square footage and employment for the professional office surrounding the Orange County Global Medical Center and along Broadway north of the Midtown Specific Plan.

1.5.4 Proposed Policy and Implementation Action Revisions

The General Plan Update includes revisions to policies and implementation actions that were made after the original Draft PEIR was publicly released on August 3, 2020. Revisions related to air pollution included public investment in parks to address air quality and improving air quality in environmental justice areas. Revisions specifically emphasized the need for air quality measures in areas with the highest pollution burden. New

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implementation actions were added to promote studying health effects of environmental pollution, and community health effects from construction activities. Revisions related to hazardous materials specifically addressed hazardous soil contamination, environmental soil screening measures for lead contamination, and securing funding for soil testing and remediation. Revisions to policies and implementation actions that specifically address recreation and open space related to park master-planning, distribution of parks, serving disadvantaged communities, timing for park development, facility maintenance, and community input and partnerships.

1.6 SUMMARY OF PROJECT ALTERNATIVES

This section of the Recirculated Draft PEIR was updated to summarize an additional project alternative, the “Reduced Park Demand” alternative.

The CEQA Guidelines (Section 15126.6[a]) state that an EIR must address “a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The alternatives in the original Draft PEIR were based, in part, on their potential ability to reduce or eliminate the impacts determined to be significant and unavoidable for implementation of the Santa Ana General Plan Update. (See Table 1-5, *Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation*, for additional detail.)

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Noise
- Population and Housing

For the Recirculated Draft PEIR, Recreation was recategorized as a significant and unavoidable impact, and therefore added to this list.

As described in Chapter 7, *Alternatives*, three project alternatives were originally identified and analyzed for relative impacts compared to the proposed General Plan Update:

- No Project/Current General Plan Alternative
- Reduced Intensity Alternative
- 2020 RTP/SCS Consistency Alternative

A fourth alternative, Reduced Park Demand, was added for the Recirculated Draft PEIR.

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A statistical analysis of the alternatives is provided in Table 1-4, *Alternatives Statistical Summary*.

Table 1-4 Alternatives Statistical Summary

	Dwelling Units	Population	Employment	Nonresidential Building SF
General Plan Update	115,053	431,629	170,416	72,967,816
No Project/Current General Plan	101,858	383,202	182,003	75,633,673
Reduced Intensity	109,607	411,804	161,232	68,758,470
2020 RTP/SCS Consistent	83,538	352,941	172,545	71,241,479
Reduced Park Demand	103,828	390,393	164,482	70,194,633

Alternative buildout statistics generated by PlaceWorks.

1.6.1 No Project/Current General Plan Alternative

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of the “No Project” Alternative. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the No Project alternative is the continuation of the plan, policy, or operation into the future. Therefore, this alternative assumes that the existing General Plan (with various adoption dates for different elements between 1982 and 2014) would remain in effect. The existing General Plan also reflects amendments, including new Specific Plans and special zoning areas, that have been adopted up through the Notice of Preparation for this GPU.

1.6.2 Reduced Intensity Alternative

Under the GPU, the only areas that include revisions to land use designations to accommodate new growth are in the five focus areas. Most remaining growth, as detailed in Table 3-8 of the original Draft PEIR, would occur within previously approved Specific Plans and special zoning areas. A nominal amount of growth is assumed in other areas of the city and would not require land use amendments. The Reduced Intensity alternative would substantially reduce development capacity in two focus areas—55 Freeway/Dyer Road and South Bristol Street—that accommodate approximately 65 percent of the housing unit growth and 72 percent of the nonresidential use (by building square footage) growth projected for the combined focus areas under the GPU. Section 3.3.2.5, *General Plan Buildout Scenario*, provides a discussion of factors considered in determining assumed buildout densities for the GPU. For the focus areas, the forecast buildout is based on development at approximately 80 percent of the maximum allowed development for each respective land use designation. For this alternative, development of the 55 Freeway/Dyer Road and South Bristol Street focus areas would be reduced to approximately 50 percent of the maximum allowed per the land use designations. This alternative would reduce housing units by a total of 5,383 and would reduce total building area by approximately 4.2 million square feet, distributed between these two focus areas. Overall, this alternative would reduce the housing growth accommodated by the GPU land use changes by approximately 18 percent and reduce nonresidential building square footage by approximately 27 percent.

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1.6.3 2020 RTP Consistent Alternative

This alternative was developed to evaluate an update to the General Plan that would be consistent with the population and housing projections used to develop the Southern California Association of Regional Governments' (SCAG) RTP/SCS, now referred to as Connect SoCal (adopted May 7, 2020). As evaluated in Section 5.13, *Population and Housing*, the proposed GPU would result in a significant population and housing impact because development under the GPU would substantially exceed the projections used in Connect SoCal. SCAG uses locally prepared population and housing projections to develop the regional plan. For the City of Santa Ana, those projections were provided by the Orange County Council of Governments (OCCOG), as prepared by the Center for Demographic Research (CDR). The population/housing figures reflected for Santa Ana in the regional plan for 2045 are: population, 360,100; total housing units, 80,100; and total jobs, 176,400. Projections for the RTP/SCS (Connect SoCal) use land use designations as approved in adopted general plans. The employment projections are similar for the GPU and RTP/SCS scenarios, but the RTP/SCS projections for population and housing units are substantially lower than GPU projections (18 percent and 27 percent lower, respectively). The RTP/SCS alternative, therefore, represents the least development-intensive project alternative evaluated for this Draft PEIR.

1.6.4 Reduced Park Demand Alternative

This alternative was developed by determining which areas of the city are more deficient in park and open space and modifying the proposed project to reduce proposed residential development in these areas to reduce park demand from the proposed GPU. Overall, this alternative reduces residential growth by 11,225 units, eliminating or reducing residential land uses and intensity in the five focus areas. New residential growth under this alternative would largely be within currently planned areas or areas that are generally near a substantial number of existing park facilities. Some residential growth would be introduced into two focus areas at substantially lower intensities to reduce the potential impacts on park facilities.

- **South Main Street.** Land use designations under the current, adopted General Plan would not be modified. This focus area would remain as a commercial corridor (GC) instead of being redesignated as Urban Neighborhood (UN) and District Center (DC). In comparison to the GPU, this would reduce intensity so that there are no additional units constructed beyond existing conditions. There are several EJ communities within this focus area that are served by parks, but the existing parks are very small.
- **South Bristol Focus Area.** In comparison to the proposed GPU, the District Center (DC) areas would be changed to Urban Neighborhood (UN) to reduce intensity by 2,273 units on sites that are more than a half mile from existing parks (generally west of Bristol Street and south of Alton Parkway).
- **Grand Avenue/17th Street.** Land use designation under the current, adopted General Plan would remain. The focus area would reflect a lower density residential (LR-7) and commercial corridor (GC) to reduce intensity and eliminate residential growth beyond existing development, much of which is more than a half mile from existing parks.

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- **West Santa Ana Boulevard.** The lower density residential (LR-7) under the existing General Plan would remain instead of the proposed GPU update to the Urban Neighborhood (UN) designation. This would reduce intensity so that no additional units beyond existing conditions would be constructed. This area is characterized by a significant presence of EJ communities with areas that are farther than a half mile from existing parks.
- **55 Freeway/Dyer Road.** The proposed GPU District Center (DC) area would be changed to Urban Neighborhood (UN) to reduce intensity by 5,381 units because the entire focus area is more than a half mile from existing parks in Santa Ana; reduced intensity would also result in fewer potential impacts on adjacent parkland in the City of Tustin.

1.7 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the GPU, the major issues to be resolved include decisions by the lead agency as to:

1. Whether the Updated Draft PEIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override the environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
5. Whether other mitigation measures should be applied to the project besides those identified in this Updated Draft PEIR..
6. Whether any alternatives to the project would substantially lessen any of the significant impacts of the GPU and achieve most of the basic project objectives.

1.8 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. As presented in the next chapter, Tables 2-1 and 2-2 describe the project concerns raised in response to the Notice of Preparation (NOP) and at the public scoping meeting, respectively. Repeated comments were voiced and/or received about traffic impacts to Santa Ana's circulation network, especially as a result of the proposed increase in high density residential units; land use issues, increased densities, and overcrowding, specifically in association with the 55 Freeway/Dyer Road focus area; air quality impacts for city residents, with an emphasis on environmental justice; and adequacy of public services and utilities, mainly water and wastewater facilities, roadways, and parks

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and open space. Furthermore, agency letters in response to the NOP included requests to address topical concerns such as air quality, biological resources, transportation, and airport hazards.

Additional project controversy was expressed in comments received on the original Draft PEIR and at the Planning Commission public hearing on November 9, 2020. Comments received in writing and during the public workshop and Planning Commission hearing focused on some key issues. Opposition included comments on specific components of the GPU, primarily the scale and density of future development that would be accommodated and the lack of adequate park/recreation space. Numerous comments asserted that the process was rushed, and inadequate time was provided for the public to participate in developing the GPU and in reviewing and commenting on the EIR. Numerous comments were received regarding the potential for disproportionate impacts to communities already subject to high health risks related to industrial uses, lead hazards, and lack of parks and open space.

1.9 SUMMARY OF ENVIRONMENTAL IMPACTS

Table 1-5 summarizes the conclusions of the environmental analysis in the updated Recirculated Draft PEIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for all significant impacts. The level of significance after application of the mitigation measures is also presented. The only change to significance determination between the original and the Recirculated Draft PEIRs was to a potential GPU-related impact to recreation. This impact was reclassified from less than significant in the original Draft PEIR to significant and unavoidable impact in the Recirculated Draft PEIR. Section 5.15, *Recreation*, supplements the analysis from the original Draft PEIR and details the updated GPU policies and implementation actions proposed to address this significant project impact. No feasible mitigation measures beyond the proposed policies were found to further mitigate this significant impact.

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 AESTHETICS			
Impact 5.1-1: The proposed project would alter the visual appearance of the General Plan Update area.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.1-2: The proposed General Plan Update will not alter scenic resources within a state scenic highway.	No impact	No mitigation measures are required.	No impact
Impact 5.1-3: The proposed project would generate additional light and glare.	Less than significant	No mitigation measures are required.	Less than significant
5.2 AIR QUALITY			
Impact 5.2-1: The additional population growth forecast for the General Plan update and the associated emissions would not be consistent with the assumptions of the air quality management plan.	Potentially significant	<p>AQ-1 Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD's adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Require fugitive-dust control measures that exceed South Coast AQMD's Rule 403, such as: <ul style="list-style-type: none"> • Use of nontoxic soil stabilizers to reduce wind erosion. 	Significant and unavoidable

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Apply water every four hours to active soil-disturbing activities. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. <ul style="list-style-type: none"> ▪ Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. ▪ Ensure that construction equipment is properly serviced and maintained to the manufacturer’s standards. ▪ Limit nonessential idling of construction equipment to no more than five consecutive minutes. ▪ Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour. ▪ Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area. Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast AQMD’s website. <p>AQ-2 Prior to discretionary approval by the City of Santa Ana for development projects subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation phase-related air quality impacts to the City of Santa Ana for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD’s adopted thresholds of significance, the City of Santa Ana shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval. Possible</p>	

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>mitigation measures to reduce long-term emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> ▪ For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions. ▪ Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use. ▪ Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 § 2485). ▪ Provide changing/shower facilities as specified in Section A5.106.4.3 of the CALGreen Code (Nonresidential Voluntary Measures). ▪ Provide bicycle parking facilities per Section A4.106.9 (Residential Voluntary Measures) of the CALGreen Code and Sec. 41-1307.1 of the Santa Ana Municipal Code. ▪ Provide preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of the CALGreen Code (Nonresidential Voluntary Measures). ▪ Provide facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of the CALGreen Code. ▪ Applicant-provided appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers) shall be Energy Star–certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star–certified or equivalent appliances shall be verified by Building & Safety during plan check. 	

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Santa Ana and Orange County Transit Authority to ensure that bus pad and shelter improvements are incorporated, as appropriate. 	
<p>Impact 5.2-2: Construction activities associated with future development that would be accommodated under the General Plan update could generate short-term emissions in exceedance of the South Coast Air Quality Management District's threshold criteria.</p>	Potentially significant	Mitigation Measure AQ-1	Significant and unavoidable
<p>Impact 5.2-3: Implementation of the General Plan update would generate long-term emissions in exceedance of South Coast AQMD's threshold criteria.</p>	Potentially significant	Mitigation Measure AQ-2	Significant and unavoidable
<p>Impact 5.2-4: Operation of industrial and warehousing land uses accommodated under the General Plan Update could expose sensitive receptors to substantial toxic air contaminant concentrations.</p>	Potentially significant	<p>AQ-3 Prior to discretionary approval by the City of Santa Ana, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Santa Ana for review and approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the South Coast Air Quality Management District and shall include all applicable stationary and mobile/area source emissions generated by the proposed project at the project site. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceed the respective thresholds, as established by the South Coast AQMD at the time a project is considered (i.e., 10 in one million cancer risk and 1 hazard index), the project applicant will be required to identify and demonstrate that best available control technologies for</p>	Significant and unavoidable

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>toxics (T-BACTs), including appropriate enforcement mechanisms, are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include, but are not limited to, restricting idling on-site, electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.</p>	
<p>Impact 5.2-5: Development and operation of land uses accommodated by the General Plan Update could generate emissions that exceed the localized significance thresholds and expose sensitive receptors to substantial concentrations of criteria air pollutants.</p>	Potentially significant	Mitigation Measures AQ-1 and AQ-2.	Significant and unavoidable
<p>Impact 5.2-6: Industrial land uses accommodated under the General Plan update could create other emissions, such as those leading to objectionable odors, that would adversely affect a substantial number of people.</p>	Potentially significant	<p>AQ-4</p> <p>Prior to discretionary approval by the City of Santa Ana, if it is determined that a development project has the potential to emit nuisance odors beyond the property line, an odor management plan shall be prepared by the project applicant and submitted to the City of Santa Ana for review and approval. Facilities that have the potential to generate nuisance odors include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Wastewater treatment plants ▪ Composting, green waste, or recycling facilities ▪ Fiberglass manufacturing facilities ▪ Painting/coating operations ▪ Large-capacity coffee roasters ▪ Food-processing facilities <p>The odor management plan shall demonstrate compliance with the South Coast Air Quality Management District’s Rule 402 for nuisance odors. The Odor</p>	Less than significant

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>Management Plan shall identify the best available control technologies for toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document prepared for the development project and/or incorporated into the project's site plan.</p>	
5.3 BIOLOGICAL RESOURCES			
<p>Impact 5.3-1: Implementation of the General Plan Update could result in adverse impacts to candidate, sensitive, or special-status species</p>	Potentially significant	<p>BIO-1 For development or redevelopment projects that would disturb vegetated land and major streams and are subject to CEQA, a qualified biologist shall conduct an initial screening to determine whether a site-specific biological resource report is warranted. If needed, a qualified biologist shall conduct a field survey for the site and prepare a biological resource assessment for the project, including an assessment of potential impacts to sensitive species, habitats, and jurisdictional waters. The report shall recommend mitigation measures, as appropriate, to avoid or limit potential biological resource impacts to less than significant.</p>	Less than significant
<p>Impact 5.3-2: Development pursuant to the General Plan Update would not impact riparian habitat or other sensitive natural communities.</p>	Less than significant	No mitigation measures are required.	Less than significant
<p>Impact 5.3-3: Development pursuant to the General Plan Update would not impact wetlands and jurisdictional waterways.</p>	Less than significant	No mitigation measures are required.	Less than significant
<p>Impact 5.3-4: The General Plan Update could affect wildlife movement and impact migratory birds.</p>	Potentially significant	Mitigation Measure BIO-1.	Less than significant

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
<p>Impact 5.3-5: The proposed project would not conflict with an adopted NCCP/HCP or local policies or ordinances protecting biological resources.</p>	<p>Less than significant</p>	<p>No mitigation measures are required.</p>	<p>Less than significant</p>
<p>5.4 CULTURAL RESOURCES</p>			
<p>Impact 5.4-1: Buildout consistent with the General Plan Update could impact an identified historic resource.</p>	<p>Potentially significant</p>	<p>CUL-1 Identification of Historical Resources and Potential Project Impacts. For structures 45 years or older, a Historical Resources Assessment (HRA) shall be prepared by an architectural historian or historian meeting the Secretary of the Interior’s Professional Qualification Standards. The HRA shall include: definition of a study area or area of potential effect, which will encompass the affected property and may include surrounding properties or historic district(s); an intensive level survey of the study area to identify and evaluate under federal, State, and local criteria significance historical resources that might be directly or indirectly affected by the proposed project; and an assessment of project impacts. The HRA shall satisfy federal and State guidelines for the identification, evaluation, and recordation of historical resources. An HRA is not required if an existing historic resources survey and evaluation of the property is available; however, if the existing survey and evaluation is more than five years old, it shall be updated.</p> <p>CUL-2 Use of the Secretary of the Interior’s Standards. The Secretary of the Interior’s Standards for the Treatment of Historic Properties shall be used to the maximum extent practicable to ensure that projects involving the relocation, conversion, rehabilitation, or alteration of a historical resource and its setting or related new construction will not impair the significance of the historical resource. Use of the Standards shall be overseen by an architectural historian or historic architect meeting the Secretary of the Interior’s Professional Qualification Standards. Evidence of compliance with the Standards shall be provided to the City in the form of a report identifying and photographing character-defining features and spaces and specifying how the proposed treatment of character-defining features</p>	<p>Significant and unavoidable</p>

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>and spaces and related construction activities will conform to the Standards. The Qualified Professional shall monitor the construction and provide a report to the City at the conclusion of the project. Use of the Secretary’s Standards shall reduce the project impacts on historical resources to less than significant.</p> <p>CUL-3 Documentation, Education, and Memorialization. If the City determines that significant impacts to historical resources cannot be avoided, the City shall require, at a minimum, that the affected historical resources be thoroughly documented before issuance of any permits and may also require additional public education efforts and/or memorialization of the historical resource. Though demolition or alteration of a historical resource such that its significance is materially impaired cannot be mitigated to a less than significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian, historian, or historic architect meeting the Secretary of the Interior’s Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; archival photographic documentation; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as the Santa Ana Library History Room, the South Central Coastal Information Center at California State University, Fullerton, and/or the HABS collection housed in the Library of Congress. Depending on the significance of the adversely affected historical resource, the City, at its discretion, may also require public education about the historical resource in the form of an exhibit, web page, brochure, or other format and/or memorialization of the historical resource on or near the proposed project site. If memorialized, such memorialization shall be a permanent installation,</p>	

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		such as a mural, display, or other vehicle that recalls the location, appearance, and historical significance of the affected historical resource, and shall be designed in conjunction with a qualified architectural historian, historian, or historic architect.	
<p>Impact 5.4-2: Development in accordance with the General Plan Update could impact archaeological resources</p>	Potentially significant	<p>CUL-4 For projects with ground disturbance—e.g., grading, excavation, trenching, boring, or demolition that extend below the current grade—prior to issuance of any permits required to conduct ground-disturbing activities, the City shall require an Archaeological Resources Assessment be conducted under the supervision of an archaeologist that meets the Secretary of the Interior’s Professionally Qualified Standards in either prehistoric or historic archaeology.</p> <p>Assessments shall include a California Historical Resources Information System records search at the South Central Coastal Information Center and of the Sacred Land Files maintained by the Native American Heritage Commission. The records searches will determine if the proposed project area has been previously surveyed for archaeological resources, identify and characterize the results of previous cultural resource surveys, and disclose any cultural resources that have been recorded and/or evaluated. If unpaved surfaces are present within the project area, and the entire project area has not been previously surveyed within the past 10 years, a Phase I pedestrian survey shall be undertaken in proposed project areas to locate any surface cultural materials that may be present.</p> <p>CUL-5 If potentially significant archaeological resources are identified, and impacts cannot be avoided, a Phase II Testing and Evaluation investigation shall be performed by an archaeologist who meets the Secretary of the Interior’s Standards to determine significance prior to any ground-disturbing activities. If resources are determined significant or unique through Phase II testing, and site avoidance is not possible, appropriate site-specific mitigation measures shall be undertaken. These might include a Phase III data recovery program implemented</p>	Less than significant

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>by a qualified archaeologist and performed in accordance with the Office of Historical Preservation's "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (OHP 1990) and "Guidelines for Archaeological Research Designs" (OHP 1991).</p> <p>CUL-6 If the archaeological assessment did not identify archaeological resources but found the area to be highly sensitive for archaeological resources, a qualified archaeologist and a Native American monitor approved by a California Native American Tribe identified by the Native American Heritage Commission as culturally affiliated with the project area shall monitor all ground-disturbing construction and pre-construction activities in areas with previously undisturbed soil of high sensitivity. The archaeologist shall inform all construction personnel prior to construction activities of the proper procedures in the event of an archaeological discovery. The training shall be held in conjunction with the project's initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. The Native American monitor shall be invited to participate in this training. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the resources are evaluated for significance by an archaeologist who meets the Secretary's Standards. and This will include tribal consultation and coordination with the Native American monitor in the case of a prehistoric archaeological resource or tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.</p> <p>CUL-7 If an Archaeological Resources Assessment does not identify potentially significant archaeological resources but the site has moderate sensitivity for</p>	

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		archaeological resources (Mitigation Measure CUL-4), an archaeologist who meets the Secretary’s Standards shall be retained on call. The archaeologist shall inform all construction personnel prior to construction activities about the proper procedures in the event of an archaeological discovery. The pre-construction training shall be held in conjunction with the project’s initial on-site safety meeting and shall explain the importance and legal basis for the protection of significant archaeological resources. In the event that archaeological resources (artifacts or features) are exposed during ground-disturbing activities, construction activities in the immediate vicinity of the discovery shall be halted while the on-call archaeologist is contacted. The resource shall be evaluated for significance and tribal consultation shall be conducted, in the case of a tribal resource. If the discovery proves to be significant, the long-term disposition of any collected materials should be determined in consultation with the affiliated tribe(s), where relevant.	
Impact 5.4-3: Development in accordance with the General Plan Update could potentially disturb human remains.	Less than significant	No mitigation measures are required.	Less than significant
5.5 ENERGY			
Impact 5.5-1: Implementation of the General Plan Update would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.5-2: The proposed General Plan Update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less than significant	No mitigation measures are required.	Less than significant

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.6 GEOLOGY AND SOILS			
Impact 5.6-1: Plan Area residents or occupants, visitors, etc. would be subject to potential seismic-related hazards.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.6-2: Unstable geologic unit or soils conditions, including soil erosion, could result from development of the project.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.6-3: Future development in the Plan Area would require connection to the City's sewer system.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.6-4: Future development in the Plan Area that would be accommodated by the General Plan Update could impact known and unknown paleontological resources.	Potentially significant	<p>GEO-1 High Sensitivity. Projects involving ground disturbances in previously undisturbed areas mapped as having "high" paleontological sensitivity shall be monitored by a qualified paleontological monitor on a full-time basis, under the supervision of the Qualified Paleontologist. Monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, if the fossils are determined to be significant, professionally and efficiently recover the fossil specimens and collect associated data. The paleontological monitor shall use field data forms to record pertinent location and geologic data, measure stratigraphic sections (if applicable), and collect appropriate sediment samples from any fossil localities.</p> <p>GEO-2 Low-to-High Sensitivity. Prior to issuance of a grading permit for projects involving ground disturbance in previously undisturbed areas mapped with "low-to-high" paleontological sensitivity (see Figure 5.6-3), the project applicant shall consult with a geologist or paleontologist to confirm whether the grading would occur at depths that could encounter highly sensitive sediments for paleontological resources. If confirmed that underlying sediments may have high sensitivity, construction activity shall be monitored by a qualified paleontologist.</p>	Less than significant

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>GEO-3</p> <p>The paleontologist shall have the authority to halt construction during construction activity as outlined in Mitigation Measure GEO-3.</p> <p>All Projects. In the event of any fossil discovery, regardless of depth or geologic formation, construction work shall halt within a 50-foot radius of the find until its significance can be determined by a Qualified Paleontologist. Significant fossils shall be recovered, prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility in accordance with the standards of the Society of Vertebrate Paleontology (2010). The most likely repository is the Natural History Museum of Los Angeles County (NHMLA). The repository shall be identified, and a curatorial arrangement shall be signed, prior to collection of the fossils.</p>	
5.7 GREENHOUSE GAS EMISSIONS			
<p>Impact 5.7-1: Implementation of the proposed General Plan Update would result in a decrease in GHG emissions in horizon year 2045 from existing baseline but may not meet the long-term GHG reduction goal under Executive Order S-03-05.</p>	<p>Potentially significant</p>	<p>GHG-1</p> <p>The City of Santa Ana shall update the Climate Action Plan (CAP) every five years to ensure the City is monitoring the plan’s progress toward achieving the City’s greenhouse gas (GHG) reduction target and to require amendment if the plan is not achieving the specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under Executive Order S-03-05 for year 2050 and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP update (e.g., Senate Bill 32 for year 2030). The CAP update shall include the following:</p> <ul style="list-style-type: none"> ▪ GHG inventories of existing and forecast year GHG levels. ▪ Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal of Executive Order S-03-05. ▪ Plan implementation guidance that includes, at minimum, the following components consistent with the proposed CAP: ▪ Administration and Staffing 	<p>Significant and unavoidable</p>

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Finance and Budgeting ▪ Timelines for Measure Implementation ▪ Community Outreach and Education ▪ Monitoring, Reporting, and Adaptive Management ▪ Tracking Tools <p>Furthermore, the following measures will be considered when the City updates the Climate Action Plan:</p> <ul style="list-style-type: none"> ▪ Measures to protect the most vulnerable populations ▪ Measure to increase carbon sinks ▪ Standards for electric vehicle parking ▪ Standards for construction projects 	
Impact 5.7-2: The General Plan Update would not conflict with the plans adopted for the purpose of reducing GHG emissions.	Less than significant	No mitigation measures are required.	Less than significant
5.8 HAZARDS AND HAZARDOUS MATERIALS			
Impact 5.8.1: Project construction and operations would involve the transport, use, and/or disposal of hazardous materials.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.8-2: The plan area includes 555 sites included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 that could create a significant hazard to the public or the environment.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.8-3: Santa Ana is in the vicinity of an airport or within the jurisdiction of an airport land use plan.	Less than significant	No mitigation measures are required.	Less than significant

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.8-4: Buildout of the General Plan Update could affect the implementation of an emergency responder or evacuation plan.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.8-5: Santa Ana is not in a designated fire hazard zone, and implementation of the General Plan Update will not expose structures and/or residences to wildland fire danger.	Less than significant	No mitigation measures are required.	Less than significant
5.9 HYDROLOGY AND WATER QUALITY			
Impact 5.9-1: Projects pursuant to the General Plan Update would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.9-2: Development pursuant to the General Plan Update would increase the demand on groundwater use but would not impede sustainable groundwater management of the basin.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.9-3: Development pursuant to the General Plan Update will increase the amount of pervious surfaces in the plan area, but could substantially increase the rate or amount of surface runoff in some focus areas in a manner which would result in flooding off-site or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.9-4: In flood hazard, tsunami, or seiche zones, development pursuant to the General Plan Update would not risk release of pollutants due to project inundation or impede or redirect flood flows.	Less than significant	No mitigation measures are required.	Less than significant

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.9-5: Development pursuant to the General Plan Update would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than significant	No mitigation measures are required.	Less than significant
5.10 LAND USE AND PLANNING			
Impact 5.10-1: Implementation of the General Plan Update would not divide an established community.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.10-2: The General Plan Update would be consistent with the Airport Environs Land Use Plan for the John Wayne Airport.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.10-3: Implementation of the General Plan Update would be consistent with the goals of the Southern California Association of Governments' RTP/SCS.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.10-4: Implementation of the General Plan Update would be consistent with the OCTA Congestion Management Plan.	Less than significant	No mitigation measures are required.	Less than significant
5.11 MINERAL RESOURCES			
Impact 5.11-1: Project implementation would not result in the loss of availability of a known mineral resource.	Less than significant	No mitigation measures are required.	Less than significant
5.12 NOISE			
Impact 5.12-1: Construction activities associated with buildout of the plan area would result in temporary noise increases at sensitive receptors.	Potentially significant	N-1 Construction contractors shall implement the following measures for construction activities conducted in the City of Santa Ana. Construction plans submitted to the City shall identify these measures on demolition, grading, and construction plans submitted to the City: The City of Santa Ana Planning and Building Agency shall verify that grading, demolition, and/or construction plans submitted to the City	Significant and unavoidable

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>include these notations prior to issuance of demolition, grading and/or building permits.</p> <ul style="list-style-type: none"> ▪ Construction activity is limited to the hours: Between 7 AM to 8 PM Monday through Saturday, as prescribed in Municipal Code Section 18-314(e). Construction is prohibited on Sundays. ▪ During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible. ▪ Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. ▪ Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses. ▪ Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors. ▪ Construction traffic shall be limited—to the extent feasible—to approved haul routes established by the City Planning and Building Agency. ▪ At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City’s and contractor’s authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor’s representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City. ▪ Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the 	

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.</p> <ul style="list-style-type: none"> ▪ During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws. ▪ Erect temporary noise barriers (at least as high as the exhaust of equipment and breaking line-of-sight between noise sources and sensitive receptors), as necessary and feasible, to maintain construction noise levels at or below the performance standard of 80 dBA Leq. Barriers shall be constructed with a solid material that has a density of at least 4 pounds per square foot with no gaps from the ground to the top of the barrier. 	
<p>Impact 5.12-2: Buildout of the plan area would cause a substantial traffic noise increase on local roadways and could locate sensitive receptors in areas that exceed established noise standards.</p>	<p>Potentially significant</p>	<p>No feasible mitigation measures were identified.</p>	<p>Significant and unavoidable</p>
<p>Impact 5.12-3: Buildout of the individual land uses and projects for implementation of the GPU may expose sensitive uses to excessive levels of groundborne vibration.</p>	<p>Potentially significant</p>	<p>N-2 Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered</p>	<p>Less than significant</p>

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<p>concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.</p> <p>N-3 New residential projects (or other noise sensitive uses) located within 200 feet of existing railroad lines shall be required to conduct a groundborne vibration and noise evaluation consistent with Federal Transit Administration (FTA) approved methodologies.</p> <p>N-4 During the project-level California Environmental Quality Act (CEQA) process for industrial developments under the General Plan Update or other projects that could generate substantial vibration levels near sensitive uses, a noise and vibration analysis shall be conducted to assess and mitigate potential noise and vibration impacts related to the operations of that individual development. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer and shall follow the latest CEQA guidelines, practices, and precedents.</p>	
Impact 5.12-4: The proximity of the plan area to an airport or airstrip would not result in exposure of future residents and/or workers to excessive airport-related noise.	Less than significant	No mitigation measures are required.	Less than significant
5.13 POPULATION AND HOUSING			
Impact 5.13-1: The GPU would directly induce substantial unplanned population growth.	Potentially significant	No feasible mitigation measure available.	Significant and unavoidable
Impact 5.13-2: The GPU would provide more housing opportunities than currently exist. Therefore, implementation of the GPU would not displace people and/or housing.	No impact	No mitigation measures are required.	No impact

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.14 PUBLIC SERVICES			
FIRE PROTECTION AND EMERGENCY SERVICES			
Impact 5.14-1: The General Plan Update would introduce new structures, residents, and workers into the OCFA service boundaries, thereby increasing the requirement for fire protection facilities and personnel.	Less than significant	No mitigation measures are required.	Less than significant
POLICE PROTECTION			
Impact 5.14-2: The General Plan Update would introduce new structures, residents, and workers into the Santa Ana Police Department service boundaries, thereby increasing the requirement for police protection facilities and personnel.	Less than significant	No mitigation measures are required.	Less than significant
SCHOOL SERVICES			
Impact 5.14-3: The General Plan Update would generate additional students who would impact the school enrollment capacities of the Santa Ana Unified School District, Garden Grove Unified School District, and Orange Unified School District.	Less than significant	No mitigation measures are required.	Less than significant
LIBRARY SERVICES			
Impact 5.14-4: The General Plan Update would allow for up to 22,361 additional residents in the General Plan Update plan area, increasing the service needs for the Main Library and the Newhope Library Learning Center.	Less than significant	No mitigation measures are required.	Less than significant

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Table 1-5 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.15 RECREATION			
Impact 5.15-1: The General Plan update would generate additional residents that would increase the use of existing park and recreational facilities such that substantial physical deterioration of the facility could occur or be accelerated.	Potentially significant	<p>REC-1 The City shall monitor new residential development within the Dyer/55 Fwy focus area. Development proposals for projects including 100 or more residential units shall be required to prepare a public park utilization study to evaluate the project’s potential impacts on existing public parks within a one half (1/2) mile radius to the focus area. The evaluation shall include the population increase due to the project and the potential for the new resident population to impact existing public parks within the radius. Each study shall also consider the cumulative development in the Dyer/55 Fwy and the potential for a cumulative impact on existing public parks within the radius.</p> <p>If the study determines that the project, or it’s incremental cumulative impacts would result in a significant impact (substantial physical deterioration or substantial acceleration of deterioration) to existing public parks, the project shall be required to mitigate this impact. Measures to mitigate the significant impact may include, but are not limited to land dedication and fair-share contribution to acquire new or to enhance existing public parks within the radius. Mitigation shall be completed prior to issuance of occupancy permits.</p>	Significant and Unavoidable
Impact 5.15-2: Project implementation would result in environmental impacts to provide new and/or expanded recreational facilities.	Potentially significant	No feasible mitigation measures were identified.	Significant and Unavoidable
5.16 TRANSPORTATION			
Impact 5.16-1: The General Plan Update is consistent with adopted programs, plans, and policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.16-2: General Plan Update implementation would result in a reduction of vehicle miles traveled per service population (VMT/SP) in comparison to existing City	Less than significant	No mitigation measures are required.	Less than significant

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
conditions, and would achieve a VMT/SP at least 15 percent lower than the countywide VMT/SP.			
Impact 5.16-3: Circulation improvements associated with future development that would be accommodated by the General Plan Update would be designed to adequately address potentially hazardous conditions (sharp curves, etc.), potential conflicting uses, and emergency access.	Less than significant	No mitigation measures are required.	Less than significant
5.17 TRIBAL CULTURAL RESOURCES			
Impact 5.17-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).	Potentially significant	Mitigation Measures CUL-4 through CUL-7.	Less than significant
Impact 5.17-2: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code Section 5024.1(c).	Potentially significant	Mitigation Measures CUL-4 through CUL-7.	Less than significant
5.18 UTILITIES AND SERVICE SYSTEMS			
WASTEWATER TREATMENT AND COLLECTION			
Impact 5.18-1: Development pursuant to the GPU would require or result in the relocation or construction of new or expanded wastewater facilities.	Less than significant	No mitigation measures are required.	Less than significant

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Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.18-2: OCSD and OCWD have adequate capacity to serve development pursuant to the GPU in addition to the providers existing commitments.	Less than significant	No mitigation measures are required.	Less than significant
WATER SUPPLY AND DISTRIBUTION			
Impact 5.18-3: Development pursuant to the GPU would require or result in the relocation or construction of new or expanded water facilities.	Less than significant	No mitigation measures are required.	Less than significant
Impact 5.18-4: Water supply would be adequate to meet development pursuant to the GPU.	Less than significant	No mitigation measures are required.	Less than significant
STORM DRAINAGE			
Impact 5.18-5: Existing and/or proposed stormwater drainage facilities would be able to accommodate proposed development pursuant to the GPU.	Less than significant	No mitigation measures are required.	Less than significant
SOLID WASTE			
Impact 5.18-6: Existing and/or proposed solid waste facilities would be able to accommodate development pursuant to the GPU and comply with related solid waste regulations.	Less than significant	No mitigation measures are required.	Less than significant
OTHER UTILITIES			
Impact 5.18-7: Development pursuant to the GPU would require or result in the relocation or construction of new or expanded electric power and natural gas.	Less than significant	No mitigation measures are required.	Less than significant

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