



Final Subsequent

Environmental Impact Report

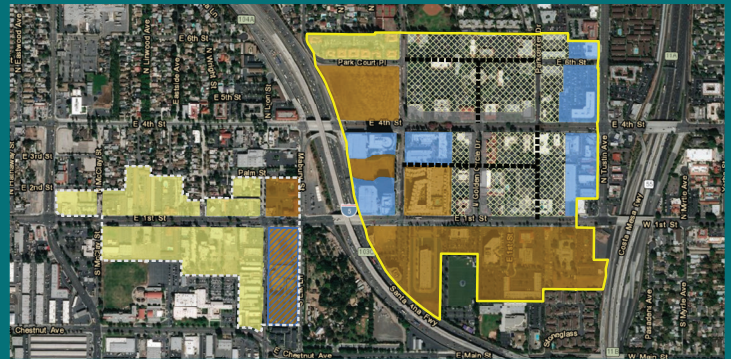
Executive Summary

Metro East
Mixed-Use Overlay District Expansion
and Elan Development Projects

August 2018

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FINAL

**METRO EAST MIXED-USE OVERLAY DISTRICT
EXPANSION AND ELAN DEVELOPMENT
PROJECTS SUBSEQUENT ENVIRONMENTAL
IMPACT REPORT – EXECUTIVE SUMMARY**

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City of Santa Ana, CA

ES.1 Purpose of the Summary

This Subsequent Environmental Impact Report (SEIR) will be used to evaluate the impacts associated with the City of Santa Ana's (City's) proposed expansion of the Metro East Mixed-Use (MEMU) Overlay Zone, including the Elan Project. Use of a Subsequent EIR provides the City, as lead agency, with the opportunity to consider any new environmental impacts that could occur with implementation of the proposed project and project alternatives, and mitigation measures that can reduce project impacts to the extent possible or to below a level of significance.

This summary includes a brief description of the proposed project, California Environmental Quality Act (CEQA) requirements, project objectives, alternatives, and an impact summary table with mitigation measures.

CEQA Requirements

An SEIR is prepared when an EIR has been certified or a negative declaration adopted for a project and the lead agency determines, on the basis of substantial evidence, that one or more of the criteria listed under Section 15162 and 15163 of the State CEQA Guidelines are met. The City, as lead agency, has determined in accordance to California Code of Regulations, Title 14, Division 6, Chapter 3, Article 11 that an SEIR is the most appropriate environmental document due to the characterization of the proposed changes to the project that was previously approved with the certified Final Environmental Impact Report (EIR) for the MEMU Overlay Zone (SCH No. 2006031041) in 2007. This SEIR has been prepared pursuant to the requirements of CEQA. It discloses the environmental impacts associated with implementing the proposed project and includes mitigation measures that can reduce potential impacts to the extent possible or to below a level of significance.

ES.2 Project Location

The proposed MEMU Overlay Zone expansion area would add 33.52 acres or approximately 48 parcels to the project area. The additional project area extends west primarily along First Street, generally bound by the Santa Ana (I-5) Freeway to the east, Grand Avenue to the west, East Chestnut Avenue to the south, and Fourth Street to the north. The existing parcels are currently developed with a variety of commercial and residential land uses or are vacant, undeveloped, or abandoned. The properties affected have frontage primarily on First Street, while others are oriented toward local collectors or Grand Avenue.

The proposed Elan Project is located on an approximately 6.4-acre site at 1660 E. First Street fronting First Street between Lyon Avenue and Elk Lane, within the proposed MEMU Overlay Zone expansion area.

ES.3 Project Objectives

MEMU Overlay District Expansion Objectives

The overall objectives of the Overlay Zone are to encourage a more active commercial and residential community, provide an expanded economic base, maximize property sales tax revenues, improve the jobs/housing balance within the City, and provide for a range of housing options identified in the 2014 Housing Element. Expansion of this Overlay Zone would extend the same objectives into the new area, and implementation of the Overlay Zone is intended to fulfill the following major objectives:

- Create an active, mixed-use urban village where it is possible to live, work, shop, and play all within a short walk of each other;
- Facilitate well-designed new mixed-use development projects that combine residential and nonresidential uses through innovative and flexible design solutions;
- Achieve the harmonious integration of new mixed-use development within the existing fabric of the mid-rise and high-rise office environment;
- Encourage urban form and architecture that incorporate contemporary design styles and solutions as well as the use of sustainable building and site design concepts such as green buildings, energy-conserving building materials, and landscaping designs that reduce water consumption;
- Create highly amenitized streetscapes that provide items such as landscaping, street furniture, niche or linear parks, passive and active water features, public plazas and courtyards, public art, and public transportation shelters in a design that integrates the public realm with the private development and serves to create a distinct identity for the district;
- Provide for adequate buffering from the Santa Ana and Costa Mesa freeways;
- Create a highly integrated pedestrian system that provides for connectivity between the residential areas and public recreation amenities to the north and the Overlay Zone;
- Provide for active street life through the inclusion of dedicated pedestrian-oriented design and active uses on the ground floor at strategic locations;
- Provide for a mix of housing in order to encourage a continuum of living and a variety of household types;
- Ensure that each project includes exceptional site planning, unique architecture, high-quality building materials, extensive open space, indoor and outdoor amenities, and first-rate public improvements;
- Encourage parking solutions that provide for adequate parking to ensure the long-term quality of the project, but that are creative in their design thereby enhancing the area's urban form. Parking requirements are designed to create a level of scarcity that will discourage vehicle trips, increase pedestrian activity, and enhance the provision of high-quality building and site design;
- Facilitate project designs that encourage adequate amounts of retail or commercial space to service residents and/or employees within the development and the larger Overlay Zone;

- Allow for the development of varied residential types in a mixed-use configuration including, but not limited to, loft-style units, live/work units, attached row houses, and high-quality stacked flats;
- Provide adequate access for public safety services; and
- Stimulate investment and reinvestment in the area through the provision of a comprehensive planning framework that facilitates private-market success.

Elan Development Project Objectives

The Elan Development Project is intended to implement some of the objectives of the MEMU Overlay District Expansion. Its primary objectives include:

- Facilitate new housing opportunities and commercial opportunities within the City.
- Provide new mixed-use development that combines residential and commercial components.
- Encourage live/work opportunities within a mixed-use environment.
- Ensure high-quality architectural features as part of the site planning process.
- Provide exceptional public open space and amenities for existing and future residents.
- Develop adequate parking that maximizes space and minimizes visual screening.
- Activate First Street at a key gateway intersection into the City.
- Redevelop a vacant and blighted site/area.

ES.4 Project Description

The proposed project includes expansion of the boundaries of the MEMU Overlay Zone, modification of development standards, development of a mixed-use multi-family residential and commercial project, an amendment to the existing General Plan, and an amendment to the existing Zoning Code. Each of these is described further below.

Modifications to MEMU Boundaries

An overlay zone is generally defined as a zone or district created for the purpose of conserving natural resources or promoting certain types of development. It is imposed over existing zoning districts and contains provisions that are applicable in addition to those contained in the underlying zoning district. The overall objectives of the MEMU Overlay Zone are to encourage a more active commercial and residential community, provide an expanded economic base, maximize property sales tax revenues, improve the jobs/housing balance within the City, and provide for a range of housing options. Creation of the MEMU Overlay Zone was also envisioned to allow the City to consider subsequent actions consistent with these updates in the General Plan and Land Use designations.

The proposed MEMU Overlay Zone expansion would add an additional 33.52 acres or approximately 48 parcels to the project area. The additional project area is shown in Figure 2-2. Table ES-1 provides a comparison of the existing MEMU District to the proposed expanded MEMU District.

Table ES-1. Comparison of Existing MEMU District and Proposed Expansion

	Existing MEMU District	Proposed MEMU Expansion	Existing MEMU + Expansion Combined
<u>Acres</u>	<u>200</u>	<u>33</u>	<u>233</u>
<u>Parcels</u>	<u>77</u>	<u>48</u>	<u>129</u>
<u>Increase in residential units</u>	<u>5,551 units</u>	<u>0</u>	<u>5,551 units</u>
<u>Net increase in commercial space</u>	<u>963,000 square feet</u>	<u>0</u>	<u>963,000 square feet</u>
<u>Net increase in office space</u>	<u>690,000 square feet</u>	<u>0</u>	<u>690,000 square feet</u>

Development Capacity

The original (2007) MEMU Overlay Zone project included the following primary elements:

- A potential increase in City population of 11,102 residents.
- A potential increase in the number of available residences within City limits by 5,551 units.
- The potential development of 1,275,440 gross square feet (gsf) of commercial (retail and service) space, as well as 3,410,507 gsf of office space. This corresponds to a potential net increase of approximately 963,000 square feet (sf) of commercial space and 690,000 sf of office space.

No modifications to the MEMU Overlay Zone development capacity are proposed under the proposed project. Under the proposed project, the development capacity would remain the same; however, with expansion of the MEMU Overlay Zone boundaries, the developable area would be extended to include the expanded Overlay Zone area. The expansion of the MEMU Overlay district is expected to produce up to 1,888 residential units (3,776 residents) in the expansion area, a maximum of approximately 2,835,000 sf of building area, which includes 944,500 sf of non-residential square footage. The proposed project would create additional housing development opportunities that are consistent with opportunity sites identified in the City's 2014–2021 Housing Element.

Modification to Land Use Districts

The MEMU expansion project includes updating the allowable land uses to create additional housing opportunities. The existing MEMU Overlay Zone allows development to occur in accordance with four separate district designations, as described below and shown on Figure 2-5 (Existing Overlay Zone Land Use Districts). The proposed addition to the MEMU area would apply the same district concepts, using only the Neighborhood Transitional and Active Urban districts. Also, the project proposes to change a portion of the Neighborhood Transitional District located in the northern portion of the existing MEMU Overlay Zone area between Cabrillo Park Drive and Park Center Drive to Village Center District. Figure 2-6 (Proposed Overlay Zone Land Use Districts) shows all of the proposed land use districts in the existing MEMU Overlay Zone area and expansion area.

Neighborhood Transitional District

The Neighborhood Transitional District is intended to continue to provide opportunities for development and act as a transition between the single-family residential to the north and the adjacent high-intensity Active Urban District. Designated for the lowest scale and the lowest intensity of uses in the Overlay Zone, this district limits development to residential, live/work, or office uses. These uses may combine office on the ground floor with residential above or in freestanding single-use buildings on the same site at between two and four stories in height. New development in this area would be designed to provide an appropriate interface with high levels of landscaping and design features that would minimize impacts on the adjacent single-family residential area to the north.

Active Urban

The Active Urban District is intended to continue to serve as the location for well-designed, high-rise, mixed-use developments in a highly urbanized environment that capitalizes on the exposure and access provided by two adjacent freeways, I-5 and the Costa Mesa (SR-55) Freeway, and two major arterials (First Street, Fourth Street, and Tustin Avenue), as well as its proximity to the Santa Ana Regional Transportation Center. Development in this district is envisioned to reflect signature architecture that reinforces the identity and character of Metro East as a vibrant urban village that serves as a regional employment and activity center. The Active Urban District would include major office, residential, commercial, hotel, and entertainment opportunities that are more intensive in scale and design than the adjacent Village Center. Developments in this district may combine office, commercial, and residential uses within one vertical mixed-use building with commercial on the ground floor and office or residential on the upper floors, or a mix of uses within freestanding buildings on the same site. Developments would be designed to showcase an amenity-enhanced environment that provides numerous open space opportunities within this urban environment for the enjoyment of residents, employees, and visitors, and to promote pedestrian connections between this district and the Village Center as well as Cabrillo Park located north of the Overlay Zone.

Village Center

The Village Center District is intended to continue to serve as the focal point and central gathering place within the Overlay Zone in well-designed, highly connected development sites and public spaces. This district would provide a high level of neighborhood identity and activity through its central location and its emphasis on creating a vibrant, attractive, and highly interconnected pedestrian environment. Opportunities would be provided for shopping, dining, recreation, entertainment, and services accessed by extensively landscaped, wide sidewalks that would allow free flow between jobs, housing, and commercial services, or opportunities for leisure walking within the Village Center. This district would provide commercial, office, and residential uses in the same building or on the same site in mid-rise buildings of between four and ten stories in settings that would provide open spaces, niches, and areas for gatherings and activities along streets, paseos, and interconnecting walkways that would link the Village Center to adjacent districts and nearby public parks north of the district.

Office

The Office District contains existing low- to high-rise office development along Tustin Avenue and adjacent to I-5. These properties were in place prior to establishment of the Overlay Zone and will retain their exclusive office zoning in order to promote and maintain a healthy balance between office, commercial, and residential land uses within the Overlay Zone.

Modification to MEMU Development Standards

The MEMU expansion project includes updating the development standards within the existing document. The current document allows residential land uses in the Neighborhood Transitional and Active Urban land use districts. Multiple-family residential and live/work developments are prohibited in the Office District, while live/work is the only residential land use permitted in the Village Center District. The project would update the MEMU document to remove these restrictions in order to allow residential developments in each of the four land use districts.

The existing MEMU document also contains form-based design standards and design guidelines for new developments seeking to activate and build to the Metro East Mixed Use Overlay District (OZ-1) standards. The MEMU expansion project will undertake a comprehensive review of these development standards and design guidelines to identify components that require updating. Moreover, the project would update one or more of the land use districts, or create a fifth land use district, to facilitate the expansion of the OZ-1 designation in the westward MEMU expansion area along the First Street corridor. These updates are intended to facilitate infill development or redevelopment opportunities in the expansion area on First Street and to ensure that such developments are compatible with the surrounding land uses and existing development patterns. These updates would also incorporate changes to development, market demands, housing needs, and construction technology in the post–Great Recession market.

The draft MEMU Overlay Zone modifications are included in totality in Appendix A. Table ES-42 provides a summary of the proposed changes.

Table ES-12. Proposed Modifications to MEMU Overlay Zone

Current MEMU Standards	Proposed MEMU Standards
<p>Three stories maximum in Neighborhood Transitional District.</p>	<p>Four stories maximum in Neighborhood Transitional District.</p>
<p>Private/common open space required at 100 square feet per unit (sf/unit) in the Neighborhood Transitional, Village Center, and Active Urban districts.</p>	<p>Private/common open space required at 90 sf/unit in the Neighborhood Transitional, Village Center, and Active Urban districts.</p>
<p>Multiple-family residential uses are prohibited within the Village Center District.</p>	<p>Multiple-family residential uses are permitted by right within the Village Center District.</p>
<p>Churches are not currently identified as an allowable non-residential use in any district.</p>	<p>Churches uses will be identified as an allowable non-residential use in all districts, subject to a Conditional Use Permit.</p>
<p>Front building setbacks are identified for each district.</p>	<p>Clarification of front building setback distance from a public or private street.</p>
<p>Parking requirements for stand-alone residential uses within the Neighborhood Transitional District are as required at 2.25 spaces per residential unit, inclusive of guest parking.</p>	<p>Parking requirements for stand-alone residential uses within the Neighborhood Transitional District are as required at 2.0 spaces per residential unit, inclusive of guest parking.</p>
<p>Parking requirements within the Village Center District for mixed-use developments with less than 10 percent of the gross floor area devoted to a commercial activity are required to provide a minimum of 2.0 spaces per residential or live/work unit inclusive of guest parking and any nonresidential uses.</p>	<p>Parking requirements for mixed-use developments with less than 10 percent of the gross floor area devoted to a commercial activity are required to provide a minimum of 1.8 spaces per residential or live/work unit inclusive of guest parking and any nonresidential uses.</p>
<p>Parking requirements within the Active Urban District for mixed-use developments with less than 10 percent of the gross floor area devoted to a commercial activity are required to provide a minimum of 2.0 spaces per residential or live/work unit inclusive of guest parking and any nonresidential uses.</p>	<p>Parking requirements for mixed-use developments with less than 10 percent of the gross floor area devoted to a commercial activity are required to provide a minimum of 1.8 spaces per residential or live/work unit inclusive of guest parking and any nonresidential uses.*</p>
<p>Parking requirements within the Office District for office or other non-residential uses are as required by Division 3, of Article 15, Off-Street Parking Requirements, SAMC.</p>	<p>Parking requirements within the Office District for office or other non-residential uses will be 1 space/400 sf.</p>
<p>*This modification is still under consideration by the City.</p>	

Elan Mixed-Use Development

The proposed project includes redevelopment of the old Elks Club site into two mixed-use (residential and commercial) structures: one seven-story “wrap” building and one five-story building with two levels of underground parking. A site plan is shown in Figure 2-7, and architectural elevations are shown in Figures 2-8a through 2-8c.

The project includes 603 residential units and ~~approximately 8,500~~ 8,530 sf of commercial uses at the ground floor, and it would include pools, spas, courtyards, public open space, fitness rooms, and other amenities for the residents. The project would result in a residential density of 93.75 du/ac, and the proposed development would be within the capacity established by the MEMU Overlay Zone.

The 8,530 sf of leasable commercial area could be nearly doubled to 16,338 sf if a second floor or mezzanine were constructed within the large-volume commercial space. The project has been designed and conditioned to maintain the flexibility to expand the commercial floor. The development will also contain seven live/work units. Combined, the live/work units will contain 4,333 sf of commercial space consisting of ground-floor shopkeeper units and upper-level residential/work areas. Overall, the project has the capacity of approximately 19,700 sf of commercial area.

Underground parking would include 1,209 parking spaces with two access points from Elk Lane and two access points from Lyon Street. Construction would occur generally in a single phase, with completion of one building proceeding the other by a few months to facilitate staging.

Required Discretionary Actions

General Plan Amendment

The General Plan will be amended concurrent with adoption of the expanded Overlay Zone to replace the existing General Plan land use designations with the MEMU land use designation. A General Plan amendment is needed to accomplish two primary objectives of the Overlay Zone: (1) to facilitate mixed-use development within the expanded area, and (2) to increase the development intensity within the expanded area as permitted within the Overlay Zone. Specifically, the Land Use Element Policy Plan, which includes the Land Use Map and Development Intensity Standards, will be amended to include the MEMU designation within the expanded area. The General Plan land use designations for the properties located in the expansion area will be changed to UN (Urban Neighborhood) and DC (District Center), the latter being more appropriate for properties located away from existing single-family land uses and closer to I-5.

In addition, a couple of properties along the western boundary within the existing MEMU boundary are proposed for a General Plan Amendment. These include the area in the northwest bounded by Mabury Street, East Sixth Street, East Park Court Place, and North Cabrillo Drive currently designated as District Center and the area located between I-5, Cabrillo Drive, East First Street, and East Fourth Street. Both of these areas are proposed to change their designations to Urban Neighborhood and District Center, respectively.

Additionally, this SEIR is being used to correct the General Plan land use designations for three residential properties outside the expansion area boundaries that are currently designated as General Commercial. These include two residences at the end of Linwood Avenue and a residence outside the expansion area's northern boundary at Wright Street. All three of these properties are proposed to change to Low Density Residential (LR-7).

Figure 2-9 shows the proposed changes to the General Plan land use designations. The District Center land use designation has been described previously; the Urban Neighborhood land use designation is described as follows:

- **Urban Neighborhood (UN):** applies to primarily residential areas with pedestrian-oriented commercial uses, schools, and small parks. The Urban Neighborhood allows for a mix of residential uses and housing types, such as mid- to low-rise multiple family, townhouses, and single-family dwellings, with some opportunities for live/work, neighborhood-serving retail and service, public spaces and use, and other amenities. Either vertical or horizontal integration of uses is permitted based on zoning standards, with an emphasis on typing together the uses with pedestrian linkages and street frontages. Street connectivity is desirable, allowing for a high degree of walkability, transit options, and other forms of transportation, including pedestrian and bicycle travel. The intensity standard for the Urban Neighborhood ranges from a floor area ratio (FAR) of 0.5 to 3.0, with residential density based on a combination of FAR and zoning development standards.

Zone Change

The Zoning Code and Zoning Map will be amended concurrent with the adoption of the expanded Overlay Zone to include the MEMU Overlay Zone to be offered in addition to the existing zoning for the expanded area. The MEMU expansion project proposes to apply the OZ-1 designation to the targeted properties along the First Street corridor until Grand Avenue. Changing the underlying zoning district designations of these properties is not proposed at this time. The extension of the OZ-1 designation west along First Street is intended to facilitate additional infill housing and mixed-use development opportunities, as referenced in the City's 2014–2021 Housing Element. Any issue not specifically covered in the Overlay Zone shall be subject to the provisions of the underlying zoning district specified in Chapter 41 of the Santa Ana Municipal Code. Interpretations may be made by the applicable review authority if not specifically covered in the City's existing regulations. As proposed, property owners shall have the option to develop to the provisions of the Overlay Zone at their discretion. They may also choose to develop to the existing underlying zone.

ES.5 Project Impacts and Mitigation Measures

Summary of Project Impacts

The proposed project impacts are summarized in Table ES-23 (presented at the end of this summary). Potential environmental impacts have been classified in the following categories:

- **Less-Than-Significant (LTS)**—Results in no substantial adverse change to existing environmental conditions either with or without the implementation of mitigation measures.
- **Potentially Significant (PS)**—Constitutes a substantial adverse change to existing environmental conditions that can be mitigated to less-than-significant levels by implementation of feasible mitigation measures or by the selection of an environmentally superior project alternative.
- **Significant and Unavoidable (SU)**—Constitutes a substantial adverse change to existing environmental conditions that cannot be fully mitigated by implementation of all feasible mitigation measures or by the selection of an environmentally superior project alternative.

For potentially significant impacts, mitigation measures are identified, where feasible, to reduce the impact on environmental resources to a less-than-significant level. Where applicable, mitigation measures from the 2007 Final MEMU EIR were carried forward into this SEIR, and, for some

impacts, new mitigation measures were developed (highlighted gray on the table). Mitigation measures carried forward from the 2007 Final MEMU EIR maintained their original numbering and naming convention from the MEMU EIR and begin with “MM-OZ” in this SEIR. Refer to Chapter 4, *Environmental Analysis*, for a detailed discussion of proposed project impacts and detailed descriptions of the mitigation measures.

Significant and Unavoidable Impacts

State CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects of a project, including those that can be mitigated but not reduced to a level of insignificance. While the City has evaluated a range of potential mitigation measures to reduce significant project impacts—and will implement all feasible mitigation measures—construction and operation of the MEMU Overlay Zone would result in the following significant and unavoidable impacts:

Air Quality

- Short-term construction impacts resulting from peak daily emissions of volatile organic compounds (VOC) and nitrogen oxides (NO_x).
- Operational impacts resulting from peak daily emissions of particulate matter less than 10 microns in diameter (PM₁₀), carbon monoxide (CO), VOC, and NO_x.
- A cumulatively considerable net increase of criteria pollutants for which the proposed project region is in nonattainment under an applicable federal or state ambient air quality standard resulting from construction and operation.

Noise

- Short-term construction impacts resulting from groundborne vibration or groundborne noise levels.
- Operational impacts resulting from an increase in ambient noise levels due to increased vehicular trips.

Transportation/Traffic

- Operational impacts resulting from an exceedance of the applicable level of service (LOS) criteria for vehicle trips.
- Operational impacts resulting from an exceedance of an applicable Congestion Management Program (CMP) level of service standard.

The proposed project would be consistent with the prior findings, and significant and unavoidable environmental impacts disclosed in the MEMU EIR would remain for air quality, noise, and transportation/traffic.

The impact analysis presented in Chapter 4 has identified that the proposed project would result in the following impact that is new or substantially more severe than what was identified in the Final EIR certified in 2007:

Cultural

- Development of the Elan Project would result in a substantial adverse change to an eligible historical resource.

Because the proposed Elan Project would demolish the Santa Ana Elks Lodge, it would result in a substantial adverse change to an eligible historical resource. Mitigation measures **MM-CUL-2** through **MM-CUL-4** would reduce impacts, but not to a less-than-significant level.

All other physical, project-specific environmental impacts (project-specific and cumulative) are either less than significant or can be mitigated to a less-than-significant level. Cumulative impacts are discussed in Chapter 5.

ES.6 Alternatives

The MEMU EIR examined the following three alternatives:

- **Alternative 1—No Project/Reasonably Foreseeable Development (Continuation of Existing General Plan):** Under this alternative, development in the project area would occur under the existing General Plan and zoning designations.
- **Alternative 2—Higher Intensity Commercial Project:** This alternative would permit a higher intensity of commercial development and a corresponding decrease in residential density for projects proposed within the Overlay Zone relative to the proposed overlay plan. In general, this alternative would reduce the number of residences and increase employment opportunities as a result of more commercial/office uses in the area.
- **Alternative 3—Reduced Project:** This alternative would allow development at a maximum FAR of 1.25 for each developable parcel within the Overlay Zone without a consideration of the residential density (dwelling units per acre [du/ac]). The anticipated mix of commercial, office, and residential land uses would be identical to the proposed project; however, a maximum FAR would be established that would limit development potential. Under this alternative, there would be no differentiation between different areas (districts) of the Overlay Zone.

Each of these alternatives was dismissed upon approval of the 2007 Final EIR. These alternatives identified and analyzed are applicable to the modification of the project in this SEIR, and no additional alternatives were considered for the modification of the MEMU Overlay Zone.

In addition, the following alternatives are considered in this SEIR to attempt to reduce significant cultural resources impacts resulting from the Elan Project:

- **Alternative E1a: No Project/No Development:** Under the No Project/No Development Alternative, development of the Elan Project would not occur. The existing site would remain in its current state—the northern one-third of the property would remain vacant and undeveloped, and the Elks Lodge building would remain intact on site. As part of a separate project, the Elks Lodge operations are moving their operations to a new 52,720-square-foot facility at 1701 East Saint Andrew Place in Santa Ana. Therefore, the Elks Lodge building would be vacated and could fall into disrepair if not maintained or re-occupied with another use. All impacts associated with the proposed Elan Project would be avoided, including the significant and unavoidable cultural resources impact associated with demolition of the Elks Lodge building.

- **Alternative E1b: No Project/ Existing General Plan and Zoning.** Under the No Project/Existing General Plan and Zoning Alternative, development of the Elan Project would not occur. Instead, it may be reasonably foreseeable that that site could be developed according to the existing General Plan and Zoning. The existing General Plan designation is GC (General Commercial), and the site is zoned C2 (General Commercial). The combined GC land use designation and C2 zoning would allow for a variety of retail and service uses, professional, administrative and business offices, parking lots and structures, automobile sales, and various other commercial uses. The site could be developed with a floor area ratio (FAR) density of 0.5. At 6.4 acres, this would equate to approximately 278,784 square feet of commercial uses.

Using the same trip rates for retail/commercial uses (shopping center) as presented in the Traffic Study for Elan (Appendix G2 of the Draft SEIR), this alternative could generate 11,904 daily trips (approximately 270 AM Peak Hour Trips and approximately 1,039 PM Peak Hour Trips). Compared to the 4,648 net project trips for Elan, this represents an increase in vehicle trips by a factor of more than 2.5.

Compared to the proposed Elan project, in addition to increased traffic impacts, this alternative would result in increased air quality emissions, increased GHG emissions, and increased noise. Additionally, this alternative would not reduce or avoid the significant and unavoidable cultural resources impact associated with demolition of the Elks Lodge building.

This alternative would also not achieve many of the project objectives, including, but not limited to, facilitating well-designed new mixed-use development projects through innovative and flexible design solutions, achieving harmonious integration of new mixed-use development, creating extensive outdoor amenities, or providing new high-density hours and live/work opportunities within a mixed-use environment.

- **Alternative E2: Alternative Site:** This alternative would involve development of the Elan Project on an alternative site within the MEMU Overlay Zone expansion area. The City and applicant have explored other sites within the existing and expanded MEMU Overlay Zone that could potentially accommodate a similar project. Based on recent searches, no other comparable sites are available that could accommodate a development similar to the Elan Project. Therefore, this alternative has been rejected from further consideration.
- **Alternative E3: Reduced Project/Reduced Site:** Because the Elks Lodge building and parking lot occupies approximately two-thirds of the site, this alternative would involve development of the northern one-third of the site (approximately 2 acres), thereby avoiding demolition of the Elks Lodge building. Therefore, this alternative would essentially reduce the project by two-thirds, yielding a potential development of approximately 200 residential units and approximately 2,800 sf of commercial uses on the ground floor. All impacts associated with the proposed Elan Project would be reduced, including air quality, traffic, and noise, as well as the significant and unavoidable cultural resources impact associated with demolition of the Elks Lodge building. However, as noted above, the Elks Lodge operations are moving out of the existing building to a new facility, which could result in the building falling into disrepair if not maintained or re-occupied with another use.

This alternative is not considered feasible because it would render the proposed Elan project physically unable to meet the development standards of the MEMU Overlay District for mixed-use projects on a small portion of the entire development site. It would be very difficult to disguise the parking (underground or wrap) and build a mixed-use building with all of the frontage, setbacks, open space, and other development standards on the remaining lot. This

alternative would also not achieve many of the project objectives, including, but not limited to, facilitating well-designed new mixed-use development projects through innovative and flexible design solutions, achieving harmonious integration of new mixed-use development, creating extensive outdoor amenities, or creating creative parking solutions that enhance the area's urban form. A smaller project on the northern one-third of the site, combined with the existing surrounding development and the remaining Elks Lodge building, would result in design challenges that do not achieve the City's desired planning objectives. For these reasons, this alternative has been rejected from further consideration.

ES.7 Potential Areas of Controversy/Issues to Be Resolved

Based on the discussion in Section ES.5 above, the proposed project would be consistent with the prior findings, and significant and unavoidable environmental impacts disclosed in the MEMU EIR would remain for air quality, noise, and transportation/traffic. However, the impact analysis presented in Chapter 4, *Environmental Analysis*, has identified that the proposed project would result in new or substantially more severe impacts than those identified in the Final EIR certified in 2007. Therefore, potential areas of controversy/issues to be resolve include the following:

- Development of the Elan Project would result in a substantial adverse change to a historical resource.

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Air Quality			
Impact 4.1-1: Construction of the proposed project could violate an air quality standard or contribute to an existing or projected air quality violation.	PS	<p>MM-AQ-1 All applicants proposing development of projects within the MEMU Overlay Zone and expansion area shall require their contractors, as a condition of contract, to further reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall operate on an EPA-approved Tier 4 or newer engine. Exemptions can be made for specialized equipment where Tier 4 engines are not commercially available within 200 miles of the MEMU Overlay Zone and expansion area. The construction contract must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than an EPA-approved Tier 3 engine.</p> <p>MM-AQ-2 All applicants proposing development of projects within the MEMU Overlay Zone and expansion area shall require their contractors, as a condition of contract, to use diesel trucks that have 2010 model year or newer engines. In the event that 2010 model year or newer diesel trucks cannot be obtained, the contractor must provide documentation to the City showing that a good faith effort to locate such engines was conducted.</p> <p>MM-AQ-3 All applicants proposing development of projects within the MEMU Overlay Zone and expansion area shall require their contractors, as a condition of contract, to reduce construction-related fugitive VOC emissions by ensuring that low-VOC coatings that have a VOC content of 10 grams/liter (g/L) or less are used during construction. The project applicant will submit evidence of the use of low-VOC coatings to SCAQMD prior to the start of construction.</p>	SU

¹ Original mitigation measures from the 2007 Final MEMU EIR carried forward into this SEIR maintained their original numbering and naming convention and begin with “MM-OZ.”

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>MM-OZ 4.2-2 The developer shall require by contract specifications that all diesel-powered equipment used would be retrofitted with after-treatment products (e.g., engine catalysts and other technologies available at the time construction commences) when construction activities commence. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-3 The developer shall require by contract specifications that all heavy-duty diesel-powered equipment operating and refueling at the project site would use low-NOx diesel fuel to the extent that it is readily available and cost effective (up to 125 percent of the cost of California Air Resources Board diesel) in the South Coast Air Basin at the time construction activities commence. This requirement shall not apply to diesel-powered trucks traveling to and from the project site. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-4 The developer shall require by contract specifications that alternative fuel construction equipment construction equipment (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) would be utilized to the extent feasible in the South Coast Air Basin at the time construction activities commence. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-5 The developer shall require by contract specifications that construction equipment engines will be maintained in good condition and in proper tune per manufacturer’s specification for the duration of construction. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-6 The developer shall require by contract specifications that construction-related equipment, including heavy-duty</p>	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 5 minutes. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-7 The developer shall require by contract specifications that construction operations rely on the electricity infrastructure surrounding the construction site rather than electrical generators powered by internal combustion engines to the extent feasible. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-8 The developer shall require by contract specifications that construction parking be configured to minimize traffic interference during the construction period and, therefore, reduce idling of traffic. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-9 The developer shall require by contract specifications that temporary traffic controls are provided, such as a flag person, during all phases of construction to maintain smooth traffic flow. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-10 The developer shall require by contract specifications that construction activities that affect traffic flow on the arterial system be scheduled to off-peak hours (10:00 A.M. to 4:00 P.M.). Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-11 The developer shall require by contract specifications that dedicated on-site and off-site left-turn lanes on truck hauling routes be</p>	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>utilized for movement of construction trucks and equipment on site and off site to the extent feasible during construction activities. Contract specifications shall be included in the proposed project construction documents, which shall be approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-12 Upon issuance of building or grading permits, whichever is issued earliest, notification shall be mailed to owners and occupants of all developed land uses within ¼ mile of the Overlay Zone and the individual projects within the Overlay Zone providing a schedule for major construction activities that will occur through the duration of the construction period. In addition, the notification will include the identification and contact number for a community liaison and designated construction manager that would be available on site to monitor construction activities. The construction manager shall be responsible for complying with all project requirements related to PM10 generation. The construction manager will be located at the on-site construction office during construction hours for the duration of all construction activities. Contract information for the community liaison and construction manager will be located at the construction office, City Hall, the police department, and a sign on site.</p> <p>MM-OZ 4.2-13 As required by South Coast Air Quality Management District Rule 403–Fugitive Dust, all construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of project development to reduce the amount of particulate matter entrained in the ambient air. These measures include:</p> <ul style="list-style-type: none"> • Limiting the amount of area disturbed during site grading to 10 acres per day • Application of soil stabilizers to inactive construction areas • Quick replacement of ground cover in disturbed areas • Watering of exposed surfaces three times daily • Watering of all unpaved haul roads three times daily 	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<ul style="list-style-type: none"> • Covering all stock piles with tarp • Reduction of vehicle speed on unpaved roads • Post signs on site, limiting traffic to 15 miles per hour or less • Sweep streets adjacent to the project site at the end of the day if visible soil material is carried over to adjacent roads • Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads to wash off trucks and any equipment leaving the site each trip <p>MM-OZ 4.2-14 The developer shall require by contract specifications that the architectural coating (paint and primer) products used would have a VOC rating of 100 grams per liter or less. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed and approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-15 The developer shall require by contract specifications that materials that do not require painting be used during construction to the extent feasible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed and approved by the City of Santa Ana Planning and Building Agency staff.</p> <p>MM-OZ 4.2-16 The developer shall require by contract specifications that pre-painted construction materials be used to the extent feasible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed and approved by the City of Santa Ana Planning and Building Agency staff.</p>	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Impact 4.1-2: Operation of the proposed project would violate an air quality standard or contribute to an existing or projected air quality violation.	PS	No feasible mitigation is available.	SU
Impact 4.1-3: The proposed project would result in a cumulatively considerable increase of criteria pollutant for which the project region is non-attainment.	PS	MM-AQ-1 through MM-AQ-3 , as well as MM-OZ 4.2-2 through MM-OZ 4.2-16 would apply to this impact.	SU
Impact 4.1-4: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.	LTS	No mitigation is required.	LTS
Impact 4.1-E1: Construction of the Elan Project could violate an air quality standard or contribute to an existing or projected air quality violation.	PS	MM-AQ-3 as well as MM-OZ 4.2-14 through MM-OZ 4.2-16 would apply to this impact.	LTS
Impact 4.1-E2: Operation of the Elan Project would not violate an air quality standard or contribute to an existing or projected air quality violation.	LTS	No mitigation measures are required.	LTS
Impact 4.1-E3: The proposed Elan Project would not result in a cumulatively considerable increase of criteria pollutant for which the project region is non-attainment.	PS	MM-AQ-3 would apply to this impact.	LTS
Impact 4.1-E4: The proposed Elan Project would not expose sensitive receptors to substantial pollutant concentrations.	LTS	No mitigation measures are required.	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Cultural Resources			
Impact 4.2-1. Redevelopment of sites within the MEMU Overlay Zone expansion area could result in the demolition or major modification of historically aged structures that have not yet been evaluated to determine their significance as defined by Section 15064.5 of the State CEQA Guidelines, which would be considered a significant impact.	PS	MM-OZ 4.4-1 The City of Santa Ana shall require as part of the environmental review of development projects within the Overlay Zone Expansion Area that impacts to potentially significant historical resources be considered. If any existing structures on a proposed development site are at or approaching 50 or more years of age at the time of CEQA review, the City shall retain the services of a qualified architectural historian to conduct a field survey of the structure in question and technical study to determine its potential historical potential significance and develop mitigation measures as necessary.	LTS
Impact 4.2-2. Implementation of the proposed project has the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines, and this would be considered a significant impact.	PS	MM-OZ 4.4-2 Due to the lack of cultural resource studies for the Overlay Zone Expansion Area, and in order to avoid damaging any unidentified cultural resources, a qualified archaeologist would be retained to monitor any significant ground-disturbing activities in undeveloped areas within the Expansion Area, and any deep (10" or deeper) ground-disturbing activities in all areas of the Expansion Area. MM-OZ 4.4-3 In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 100-meter radius must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume.	LTS
Impact 4.2-3. Implementation of the proposed project has the potential to directly or indirectly destroy a unique paleontological resource or site or a unique geologic feature, and this would be considered a significant impact.	PS	MM-CUL-1 A qualified paleontologist shall review the paleontological records search prepared by the Vertebrate Paleontology Section of the Los Angeles County Natural History Museum for the Elan Project. For proposed projects in the MEMU Overlay Zone expansion area, a paleontological records search from the Los Angeles County Natural History Museum shall be required if a proposed project would involve grading or excavation that could disturb older Quaternary sediments with high paleontological resource sensitivity below the uppermost few feet of younger Quaternary surface sediments. For any such project within the MEMU Overlay Zone expansion area, a qualified paleontologist shall	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>review the paleontological records search. To ensure recovery of fossil remains before they are lost or destroyed, the following additional measures shall be implemented for the Elan Project and for any projects within the MEMU Overlay Zone Expansion Area that have potential to disturb sediments with high paleontological sensitivity below the uppermost few feet of surface sediments:</p> <ul style="list-style-type: none"> • All construction activities with potential to disturb sediments below the uppermost few feet of surface sediments shall be monitored by an Orange County-certified professional paleontologist (qualified paleontologist). • A qualified paleontologist shall attend preconstruction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. All construction personnel shall receive training provided by a qualified paleontologist experienced in teaching non-specialists to ensure that they can recognize fossil materials in the event any are discovered during construction. • A qualified paleontologist shall conduct onsite paleontological monitoring of all grading and excavation activities with potential to disturb paleontologically sensitive sediments below the uppermost few feet of surface sediments. Monitoring shall include inspection of exposed surfaces and microscopic examination of matrix to determine if fossils are present. The monitor shall have authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens. Cooperation and assistance from onsite personnel will greatly assist timely resumption of work in the area of the fossil discovery. • If fossil remains are discovered during project-related construction, activities in the vicinity of the find shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and a qualified professional paleontologist can recommend appropriate treatment. Treatment may include 	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The City shall be responsible for ensuring that recommendations regarding treatment and reporting are implemented. The work shall be conducted in conformance with the Orange County guidelines as defined in Eisentraut and Cooper (2002) and meet the requirements for recovery, salvage, laboratory preparation, preparation to the point of taxonomic identification, transferal, and preparation and submittal.</p> <ul style="list-style-type: none"> • Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued. • Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections. • A final data recovery report shall be completed that outlines the results of the monitoring program. This report will include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. 	
Impact 4.2-4. Construction activities under the proposed project could result in the disturbance of human remain interred outside of formal cemeteries.	PS	MM-OZ 4.4-5 If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as consultant on how to proceed with the remains.	LTS
Impact 4.2-E1. Development of the Elan Project would result in a substantial adverse change to a historical resource.	PS	MM-CUL-2. Prior to demolition the project applicant will commission the preparation of complete archival-quality photo documentation of the architecturally significant Santa Ana Elks Lodge along with a historical profile to accompany the photo documentation. The documentation will be prepared in accordance with Historic American Building Survey (HABS) Level 2 standards as outlined in the	SU

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>Historic American Building Survey Guidelines for Preparing Written Historical Descriptive Data. The photographic element of the documentation will consist of 20–30 archival quality large-format black-and-white photographs of the property’s character-defining exterior and interior architectural features. If available, original architectural plans will be reproduced to archival HABS standards and will be included in the documentation package with photographs and written data. Three copies of the documentation package will be produced. One set will include original photo negatives and one set will be placed in publicly accessible archive or history collection.</p> <p>MM-CUL-3 Prior to demolition the applicant will work with the City of Santa Ana to arrange for representatives of the Elks, the Santa Ana Historical Preservation Society, Preserve Orange County, the Santa Ana Planning and Building Agency, other potentially interested parties, and members of the community to identify and undertake salvage the of Santa Ana Elks Lodge’s exterior and interior architectural features. The applicant will also consider salvaging and reusing architectural features identified as significant in the historical resource evaluation or identified as significant by interested parties that those interested parties are not able to salvage. Such significant features not salvaged by interested parties would be considered for reuse in the design and construction of a community room or other publically accessible interior or exterior space that will be incorporated into the design of the project.</p> <p>MM-CUL-4 The applicant will commission an interpretative exhibit that communicates the Santa Ana Elks’ significance as a noteworthy local expression of the important role that fraternal orders have played in American history. The exhibit will include a concise narrative explanation along with visual graphics such as historical photographs, and it will potentially make use of artifacts associated with the organization, such as regalia and other objects from the Santa Ana Elks Lodge, copies of important organization documents, or Elks-related personal items that members of the organization might be willing to donate. Before the certificate of occupancy is issued, the interpretative exhibit will be installed at a location on the project</p>	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		site accessible to the general public, potentially in a community room or other publically accessible interior or exterior space to be incorporated into the design of the project.	
Impact 4.2-E2. Implementation of the Elan Project has the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines, and this would be considered a significant impact.	PS	<p>MM-OZ 4.4-2 Due to the lack of cultural resource studies for the Overlay Zone Expansion Area, and in order to avoid damaging any unidentified cultural resources, a qualified archaeologist would be retained to monitor any significant ground-disturbing activities in undeveloped areas within the Expansion Area, and any deep (10” or deeper) ground-disturbing activities in all areas of the Expansion Area.</p> <p>MM-OZ 4.4-3 In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 100-meter radius must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume.</p>	LTS
Impact 4.2-E3. Implementation of the Elan Project has the potential to directly or indirectly destroy a unique paleontological resource or site or a unique geologic feature, and this would be considered a significant impact.	PS	MM-CUL-1 would apply to this impact.	LTS
Impact 4.2-E4. Construction of the Elan Project could result in the disturbance of human remains interred outside of formal cemeteries.	PS	MM-OZ 4.4-5 would apply to this impact.	LTS
Greenhouse Gas Emissions			
Impact 4.3-1: The proposed project could generate GHG emissions during construction and operations that may have a significant impact on the environment.	SU	MM-OZ 4.2-2 through MM-OZ 4.2-16 from the MEMU EIR and newly developed mitigation measure MM-AQ-2 as well as MM-GHG-1 through MM-GHG-6 .	SU

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>MM-GHG-1: Bicycle Infrastructure Improvements The following improvements should be implemented to encourage cycling within the planning area:</p> <ul style="list-style-type: none"> • Projects should be within at least 0.5 mile of an existing/planned Class I or Class II bike lane and include a network that provides connection to existing off-site facilities. Bicycle routes should also connect to all streets contiguous with the project site; the route should have minimum conflicts with automobile parking and circulation facilities. All streets internal to the project wider than 75 feet should have Class II bicycle lanes on both sides. • Bike parking should be provided at nonresidential projects (one bike rack space per 20 vehicle/employee parking spaces) and multi-unit residential projects (one long-term bicycle parking space for each unit without a garage). Long-term facilities should be provided at multi-unit residential developments and consist of a bicycle locker, locked room with standard racks, or a standard rack location that is staffed or monitored. • Non-residential projects should provide “end-of-trip” facilities, including showers, lockers, and changing spaces. • Bike-share infrastructure installation. <p>MM-GHG-2: Energy Efficiency Improvements The following improvements will be implemented, when feasible, to achieve more energy-efficient operations within the planning area:</p> <ul style="list-style-type: none"> • Projects should exceed Title 24 requirements by at least 20 percent. • Projects will, to the extent feasible, incorporate on-site renewable energy systems, including solar, wind, geothermal, low-impact hydro, and biomass and bio-gas strategies. • Projects will incorporate water and energy saving measures into the project design, including, but not limited to, the following: <ul style="list-style-type: none"> ○ Installation of low-water-use appliances, ○ Use of only natural gas or electric stoves, 	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<ul style="list-style-type: none"> ○ Installation of EnergyStar-labeled roof materials, ○ Installation of highly reflective cool roofing materials, ○ Installation of electrical outlets at exterior areas, ○ Use of energy-efficient appliances (e.g., EnergyStar), ○ Installation of shading mechanisms for windows, patios, and walkways, and ○ Installation of programmable thermostats. <ul style="list-style-type: none"> ● Projects will “weatherize” any existing structures to achieve energy savings. Weatherization strategies can include sealing air ducts, insulating, glazing windows, and tuning up or replacing air-conditioning and heating equipment. <p>MM-GHG-3: Streetlight Replacements Where feasible, SCE-owned streetlights within the planning area will be purchased by the City, and the high-pressure sodium fixtures will be replaced with LED fixtures. Those streetlights within the planning area that are currently owned by the City will also be replaced with LED fixtures.</p> <p>MM-GHG-4: Rainwater Harvesting Where feasible and applicable, projects within the planning area will incorporate rain barrels and rainwater re-use practices into project design.</p> <p>MM-GHG-5: Drought-resistant Landscaping The following measures should be implemented to reduce water use and electricity associated with water-intensive plants:</p> <ul style="list-style-type: none"> ● Drought-resistant native plants, as well as plants with low emissions and high carbon sequestration potential, should substitute landscaping with turf grass and other water-intensive vegetation. ● Vegetable gardens, bunch grass, and low-water landscaping should be encouraged for development within the planning area. <p>MM-GHG-6: Sidewalk and Pedestrian Infrastructure Improvements The following measures would be implemented by future development</p>	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		projects in the MEMU Overlay Zone to the extent practicable to improve pedestrian safety and encourage walking to and from the project area: <ul style="list-style-type: none"> • Projects shall provide a pedestrian access network that links all internal uses to all existing/planned external streets and pedestrian facilities contiguous with the project site, where applicable. The route connecting internal and external networks should have minimal conflict with parking and circulation facilities. • All internal and adjacent sidewalks associated with a project should be a minimum of 5 feet wide, with vertical curbs, where applicable. • Where feasible, pedestrian barriers should be minimized using grade separation, wider sidewalks, and traffic calming. In addition, physical barriers such as walls, landscaping, and slopes between facilities that impede pedestrian movement should be avoided. 	
Impact 4.3-2: The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.	PS	Mitigation measures MM-GHG-1 through MM-GHG-6 would apply.	LTS
Impact 4.3-E1: The proposed project would not generate GHG emissions during construction and operations that would have a significant impact on the environment.	LTS	No mitigation is required.	LTS
Impact 4.3-E2: The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.	LTS	No mitigation is required.	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Hazards and Hazardous Materials			
Impact 4.4-1. Implementation of the proposed project would not result in a significant hazard to the public or the environment through future development's routine transport, use, or disposal of hazardous materials. However, it could result in exposure of future residents to diesel exhaust emissions, which could pose a significant hazard.	LTS	No mitigation is required.	LTS
Impact 4.4-2. Construction activities associated with implementation of the proposed project could result in the release of hazardous materials to the environment through reasonably foreseeable upset and accident conditions.	PS	<p>MM-OZ 4.6-2 Prior to the issuance of grading permits on any project site, the developer(s) shall:</p> <ul style="list-style-type: none"> • Investigate the project site to determine whether it or immediately adjacent areas have a record of hazardous materials contamination via the preparation of a preliminary environmental site assessment (ESA), which shall be submitted to the City for review. If contamination is found, the report shall characterize the site according to the nature and extent of contamination that is present before development activities proceed at that site. • If contamination is determined to be onsite, the City, in accordance with appropriate regulatory agencies, shall determine the need for further investigation and/or remediation of the soils conditions on the contaminated site. If further investigation or remediation is required, it shall be the responsibility of the site developer(s) to complete such investigation and/or remediation prior to construction of the project. • If remediation is required as identified by the local oversight agency, it shall be accomplished in a manner that reduces risk to below applicable standards and shall be completed prior to issuance of any occupancy permits. <p>MM-OZ 4.6-3 In the event that previously unknown or unidentified soil and/or groundwater contamination that could be present a threat to</p>	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		human health or the environment is encountered during construction of the proposed project, construction activities in the immediate vicinity of the contamination shall cease immediately. If contamination is encountered, A Risk Management Plan shall be prepared and implemented that (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development and (2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified (e.g., City of Santa Ana Fire Department). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health Administration requirements shall be prepared and in place prior to commencement of work in any contaminated area.	
Impact 4.4-3. Implementation of the proposed project could result in the handling of hazardous materials, substances, or waste within 0.25 mile of an existing school.	LTS	No mitigation is required.	LTS
Impact 4.4-4. The proposed project area includes sites that are included on a list of hazardous materials sites and, as a result, could create a significant hazard to the public or environment	PS	MM-OZ 4.6-2 would apply to this impact.	LTS
Impact 4.4-5. Implementation of the proposed project could interfere with an adopted emergency response plan or emergency evacuation plan.	PS	MM-OZ 4.6-5 Prior to initiation of construction activities, any development within the Overlay Zone shall have a completed traffic control plan, prepared by the developer that will be implemented during construction activities. This may include, but is not limited to, the maintenance of at least one unobstructed lane in both directions on	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>surrounding roadways. At any time only a single lane is available, the developer shall provide a temporary traffic signal, signal carriers (i.e. flagpersons), or other appropriate traffic controls to allow travel in both directions. If construction activities require the complete closure of a roadway segment, the developer should provide appropriate signage indicating alternative routes.</p> <p>MM-OZ 4.6-6 The City Planning Department shall consult with the Santa Ana Police Department and the Santa Ana Fire Department to disclose temporary closures and alternative travel routes in order to ensure adequate access for emergency vehicles when construction of future projects would result in temporary land or roadway closures.</p> <p>MM-OZ 4.6-7 The Santa Ana Fire Department, in consultation with other applicable City Departments (e.g. Police), shall update their Emergency Preparedness Plan prior to occupancy of the first project developed under the Overlay Zone, to address potential for accidental release of hazardous materials that may be used, stored, and/or transported in association with operation of project implementation.</p>	
<p>Impact 4.4-E1. Development of the Elan Project would not result in a significant hazard to the public or the environment through future development’s routine transport, use, or disposal of hazardous materials.</p>	<p>LTS</p>	<p>No mitigation is required.</p>	<p>LTS</p>
<p>Impact 4.4-E2. Construction activities associated with implementation of the Elan Project could result in the release of hazardous materials to the environment through reasonably foreseeable upset and accident conditions.</p>	<p>PS</p>	<p>MM-OZ 4.6-2 and MM-OZ 4.6-3 would apply to this impact.</p>	<p>LTS</p>

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Impact 4.4-E3. Development of the Elan Project could result in the handling of hazardous materials, substances, or waste within 0.25 mile of an existing school.	LTS	No mitigation is required.	LTS
Impact 4.4-E4. The Elan Project area includes sites that are included on a list of hazardous materials sites and, as a result, could create a significant hazard to the public or environment.	LTS	No mitigation is required.	LTS
Threshold 4.8-E5. Development of the Elan Project could interfere with an adopted emergency response plan or emergency evacuation plan.	PS	MM-OZ 4.6-5 and MM-OZ 4.6-6 would apply to this impact.	LTS
Hydrology and Water Quality			
Impact 4.5-1: Implementation of the proposed project would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality.	PS	<p>MM-OZ 4.7-1 In order to comply with the 2003 DAMP, future development projects in the Overlay Zone shall prepare Storm Drain Plans, Stormwater Pollution Prevention Plans (SWPPP), and Water Quality Management Plans (WQMP) conforming to the current National Pollution Discharge Elimination System (NPDES) requirements, prepared by a Licensed Civil Engineer or Environmental Engineer, shall be submitted to the Department of Public Works for review and approval.</p> <p>(a) A SWPPP shall be prepared and updated as needed during the course of construction to satisfy the requirements of each phase of the development. The plan shall incorporate all necessary Best Management Practices (BMPs) and other City requirements to eliminate polluted runoff until all construction work for the project is completed. The SWPPP shall include treatment and disposal of all dewatering operations flows, and for nuisance flows during construction.</p> <p>(b) A WQMP shall be prepared, maintained, and updated as needed to satisfy the requirements of the adopted NPDES program. The plan</p>	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		shall incorporate water quality measures for all improved phases of the project. (c) Location of the BMPs shall not be within the public right-of-way.	
Impact 4.5-2: Future development in the MEMU Overlay Zone expansion area could alter the existing drainage pattern of the area and potentially result in erosion and siltation.	PS	MM-OZ 4.7-1 would apply to this impact.	LTS
Impact 4.5-3: Future development in the MEMU Overlay Zone expansion area could alter the existing drainage pattern and potentially result in increased downstream flooding through the addition of impervious surface, or exceeding the capacity of existing or planned stormwater drainage systems.	PS	MM-OZ 4.7-1 and MM-OZ 4.7-2 would apply to this impact. MM-OZ 4.7-2 Prior to issuance of grading permits, future development projects in the Overlay Zone shall submit a Hydrology and Hydraulic Study to the Public Works Department for review and approval. If existing facilities are not adequate to handle runoff that may be generated by the proposed development, then the applicant shall propose feasible remedies to assure that adequate drainage facilities will be available prior to issuance of occupancy permits. The applicant may propose storm drain improvements to be constructed in order to meet project needs. If necessary storm drain upgrades cannot be implemented prior to issuance of occupancy permits, on site detention facilities or other methods acceptable to the City shall be included with new development projects to ensure that post-construction runoff does not exceed pre-development quantities.	LTS
Impact 4.5-E1: Implementation of the Elan Project would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality.	PS	MM-OZ 4.7-1 would apply to this impact.	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Impact 4.5-E2: Development of the Elan Project could alter the existing drainage pattern of the site and potentially result in erosion and siltation.	PS	MM-OZ 4.7-1 would apply to this impact.	LTS
Impact 4.5-E3: Development of the Elan Project could alter the existing drainage pattern and potentially result in increased downstream flooding through the addition of impervious surfaces, or exceed the capacity of existing or planned stormwater drainage systems.	PS	MM-OZ 4.7-2 would apply to this impact.	LTS
Land Use and Planning			
Impact 4.6-1: The proposed project would not result in conflicts of use.	LTS	No mitigation is required.	LTS
Impact 4.6-2: The proposed project would not conflict with the Santa Ana General Plan or Zoning Code by modifying MEMU Overlay Zone land use districts, development standards, and land uses.	LTS	No mitigation is required.	LTS
Impact 4.6-E1: Implementation of the Elan Project would not result in conflicts of use.	LTS	No mitigation is required.	LTS
Impact 4.6-E2: Implementation of the Elan Project would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.	LTS	No mitigation is required.	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Noise			
<p>Impact 4.7-1. Construction activities associated with the proposed project would generate temporary noise levels in excess of the noise limits typically imposed by the City of Santa Ana Municipal Code.</p>	<p>PS</p>	<p>MM-OZ 4.9-1 Construction activities shall be limited to the following general restrictions. In the event that there is a conflict between the City of Santa Ana Municipal Code and the City of Tustin Municipal Code, the more restrictive measures shall be applied:</p> <ul style="list-style-type: none"> • All construction activity within the City shall be conducted in accordance with Section 18-314(e) of the City of Santa Ana Municipal Code. • All construction activity within 200 feet of the City of Tustin Border shall be conducted in accordance with Section 4617(e) of the City of Tustin Municipal Code. <p>MM-OZ 4.9-2 The project applicant shall require by contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:</p> <ul style="list-style-type: none"> • Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses within 1,000 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period. • Ensure that construction equipment is properly muffled according to industry standards and be in good working condition. • Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible. • Schedule high noise-producing activities between the hours of 8:00 A.M. and 5:00 P.M. to minimize disruption on sensitive uses. • Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources. • Use electric air compressors and similar power tools rather than diesel equipment, where feasible. 	<p>LTS</p>

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<ul style="list-style-type: none"> ● Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes. ● Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party. <p>Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City prior to issuance of a grading permit.</p> <p>MM-OZ 4.9-3 The project applicant shall require by contract specifications that construction staging areas along with the operation of earthmoving equipment within the project area would be located as far away from vibration and noise sensitive sites as possible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City prior to issuance of a grading permit.</p> <p>MM-OZ 4.9-4 The project applicant shall require by contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City prior to issuance of a grading permit.</p>	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
<p>Impact 4.7-2. Operation of the proposed project could expose land uses to noise levels that exceed the standards established by the City of Santa General Plan.</p>	<p>PS</p>	<p>MM-NOI-1 Where future residential uses would be constructed in areas exposed to noise, exterior noise control shall be provided as necessary to comply with the City’s exterior noise guideline of 65 dB CNEL, as specified in the Noise Element of the General Plan. The noise control requirements, if any, shall be determined by a qualified acoustical consultant as part of the final engineering design of the project and shall be included on the building plans prior to issuance of building permits. It is noted that exterior living space for multi-family developments may be provided as a combination of private space (patios, balconies, etc.) and common areas (playgrounds, pool areas, etc.). As a result, it may not be necessary to provide noise control at all private areas, provided sufficient common area is included within the project.</p> <p>MM-OZ 4.9-6 Prior to issuance of building permits, building plans shall specify the STC rating of windows and doors for all residential land uses. Window and door ratings shall be sufficient to reduce the interior noise level to a CNEL of 45 dBA or less, and shall be determined by a qualified acoustical consultant as part of the final engineering design of the project.</p> <p>MM-OZ 4.9-7 The developer shall provide proper shielding for all new HVAC systems used by the proposed residential and mixed use buildings to achieve an attenuation of 15 dBA at 50 feet from the equipment.</p>	<p>LTS</p>
<p>Impact 4.7-3. Construction activities associated with the proposed project would generate a substantial temporary increase in ambient noise levels.</p>	<p>PS</p>	<p>MM-OZ 4.9-1 through MM-OZ 4.9-4 would apply to this impact.</p>	<p>LTS</p>
<p>Impact 4.7-4. Construction of the proposed project could generate or expose persons or structures to excessive groundborne vibration.</p>	<p>PS</p>	<p>MM-OZ 4.9-1 through MM-OZ 4.9-4 would apply to this impact.</p>	<p>SU</p>

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Impact 4.7-5. Operation of the proposed project would generate increased local traffic volumes that would cause a substantial increase in ambient noise levels in the project vicinity.	SU	There is no feasible mitigation to reduce this impact.	SU
Impact 4.7-E1. Construction activities associated with the Elan Project would generate temporary noise levels in excess of the noise limits typically imposed by the City of Santa Ana Municipal Code.	PS	MM-OZ 4.9-1 through MM-OZ 4.9-4 would apply to this impact.	LTS
Impact 4.7-E2. Operation of the Elan Project could expose land uses to noise levels that exceed the standards established by the City of Santa General Plan, which would be a significant impact.	PS	MM-NOI-1 and MM-OZ 4.9-6 through MM-OZ 4.9-7 would apply to this impact.	LTS
Impact 4.7-E3. Construction activities associated with the Elan Project would generate a substantial temporary increase in ambient noise levels.	PS	MM-OZ 4.9-1 through MM-OZ 4.9-4 would apply to this impact.	LTS
Impact 4.7-E4. Construction of the Elan Project could generate or expose persons or structures to excessive groundborne vibration.	PS	MM-OZ 4.9-1 through MM-OZ 4.9-4 would apply to this impact.	SU
Impact 4.7-E5. Operation of the Elan Project would generate increased local traffic volumes.	LTS	No mitigation measures are required.	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Transportation/ Traffic			
Impact 4.8-1. Implementation of the proposed project would cause an increase in traffic that is substantial in relation to existing traffic load and capacity of the street system.	PS	<p>MM-TRA-1 The following improvements shall be installed prior to 2040, as the projected facilities are forecasted to be affected. Timing and funding of these improvements shall be based on a program as outlined in mitigation measure MM-OZ 4.12-4 (and included in the original MEMU EIR).</p> <ul style="list-style-type: none"> • Standard Avenue & First Street – widen northbound approach and reconfigure to provide one left-turn lane, two through lanes, and one right-turn lane, and widen the southbound approach and reconfigure to provide one left-turn lane and one shared through and right-turn lane, along with two receiving lanes that merge back to one lane. • Grand Avenue & Santa Ana Boulevard – convert westbound shared through and right-turn lane to a right-turn only lane and include an overlap right-turn phasing by prohibiting the southbound U-turn movement. • Grand Avenue & Fourth Street – widen northbound approach to include an additional through lane and provide an additional receiving lane on the north leg of the intersection. Convert eastbound shared through and right-turn lane to a through lane and construct a right-turn lane. • Grand Avenue & First Street – widen northbound approach to provide two left-turn lanes, three through lanes, and one right-turn lane. Widen westbound approach to provide two left-turn lanes, three through lanes, and one right-turn lane by extending the current right-turn pocket and providing a westbound right-turn overlap signal phasing. • Lyon Street & First Street – widen northbound approach to provide one left-turn lane, one shared through and left-turn lane, and one right-turn lane with a right-turn signal overlap phasing and split signal phasing for the north-south approaches. Widen eastbound approach to convert the shared through and right-turn lane into a third through lane and construct a new right-turn lane. 	SU

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<ul style="list-style-type: none"> • Mabury Street/Elk Lane & First Street – widen northbound approach to provide a second right-turn lane, widen the southbound approach to provide a second southbound right-turn lane, and widen the eastbound approach to construct a dedicated eastbound right-turn lane. • Elk Lane at Chestnut Avenue/Main Street – converted to a signalized intersection. • Tustin Avenue at Fourth Street – widen northbound approach to construct a dedicated northbound right-turn lane with a right-turn overlap signal phasing and prohibit the westbound U-turn movement. • SR-55 southbound ramp at Fourth Street – construct an eastbound free right-turn lane. Right-of-way is required for the construction of the eastbound free right-turn lane. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans. • SR-55 northbound ramps at Irvine Boulevard – restripe eastbound approach to provide two left-turn lanes and two through lanes. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans. • Yorba Street at First Street – reinstate the westbound through lane that is planned to be removed to provide the one through lane and one shared through and right-turn lane in the westbound approach as existing conditions. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans. • B Street at First Street – reinstate the westbound through lane that is planned to be removed to provide the one through lane and one shared through and right-turn lane in the westbound approach as existing conditions. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans. • El Camino Real at First Street – restripe the northbound right-turn lane to a shared left- and right-turn lane and change the northbound/southbound signal phasing from permitted to split 	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>phasing. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans.</p> <ul style="list-style-type: none"> • Prospect Avenue at First Street – reinstate the westbound through lane that is planned to be removed to provide the one through lane and one shared through and right-turn lane in the westbound approach as existing conditions. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans. • Newport Avenue at Irvine Boulevard – convert the northbound right-turn lane signal phasing to an overlap signal phasing and prohibit the westbound U-turn movement. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans. <p>MM-OZ 4.12-1 As part of the project, the City of Santa Ana and the project sponsors shall work with the transit providers to implement various transit-related measures to improve and expand bus system service within the Overlay Zone. These measures may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Adding bus stops to the Overlay Zone along existing and proposed roadways • Changing bus service headways to respond to increased demand • Changing bus service destinations to respond to changing demand • Adding local shuttle service for employees and patrons of the Overlay Zone <p>The details of bus service improvements shall be determined in coordination with OCTA. The following recommendations would help encourage public transit patronage for project related trips:</p> <ul style="list-style-type: none"> • Bus Stop Locations – Relocation of existing bus stops and the provision of additional bus stops should be considered to accommodate transit users at convenient locations. 	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<ul style="list-style-type: none"> • Days of Operation – The City should work with OCTA to consider changes to route lines to serve nighttime and weekend project visitors and employees. • Headway – The City should work with OCTA to review route headways to determine if it would be appropriate to reduce them to accommodate transit riders within the Overlay Zone. <p>MM-OZ 4.12-2 Future development within the proposed Overlay Zone shall prepare separate traffic studies specific to the individual projects that are proposed. The traffic studies for future projects shall be prepared by a qualified traffic engineer of the City’s choosing. Further, and as determined by the traffic studies, the above identified improvement measures shall be implemented as a condition of the proposed development, either through the direction construction of improvements by the project applicant or through payment of a fee, as required by the program detailed in MM-OZ 4.12-4.</p> <p>MM-OZ 4.12-3 The City of Santa Ana Planning Department, in cooperation with the Department of Public Works, shall monitor the traffic signals within the Overlay Zone Study Area once every five years to ensure that traffic signal timing is optimized.</p> <p>MM-OZ 4.12-4 The City of Santa Ana shall institute a program for systematic mitigation of impacts as development proceeds within the Overlay Zone to ensure mitigation of the individual improvements. The program shall prescribe the method of participation in the mitigation program by individual projects and guide the timely implementation of the mitigation measures. The program should include the following elements:</p> <ul style="list-style-type: none"> • A funding and improvement program should be established to identify financial resources adequate to construct all identified mitigation measures in a timely basis. • The program should allow for acquisition of entire properties including business relocation where necessary to construct mitigation measures. Funds derived from sale of surplus acquired properties should be returned to the program. 	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<ul style="list-style-type: none"> • All properties that redevelop within the Overlay Zone should participate in the program on a fair share per new development trip basis. The fair share should be based upon the total cost of all identified mitigation measures, divided by the peak hour trip generation increase forecast. This rate peak hour trip should be imposed upon the incremental traffic growth for any new development within the Overlay Zone. • The program shall include resources to conduct preliminary engineering studies to complete alignment studies and project specific environmental clearances for Tustin Avenue at Seventeenth Street and at Fourth Street. • The program should raise funds from full development of the Overlay Zone to fund all identified mitigation measures. • The program should monitor phasing development of the Overlay Zone and defer or eliminate improvements if the densities permitted in the Overlay Zone are not occurring. • Program phasing should be monitored through preparation of a specific project traffic impact studies for any project that is expected to include more than 100 dwelling units or 100,000 square feet of non-residential development. Traffic impact studies should use traffic generation rates that are deemed to be most appropriate for the actual development proposed. • The program should initiate project development to assure timely completion of the improvements identified to be needed for the First and Cabrillo Towers project by 2010 or as soon after as practically feasible. • Properties within Santa Ana and within one-half mile of the Overlay Zone that redevelop to result in higher traffic generation should also participate in the program to insure equity. 	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<ul style="list-style-type: none"> • The program should provide for full construction of projects outside of Santa Ana, if the Overlay Zone will create a traffic impacted based upon the CMP. • The program should provide fair share contribution to construction costs of other improvements outside of the Overlay Zone if they are identified in this traffic study but they are not impacted as defined by the CMP. • The fair share contribution would presume participation by other developments outside of the City of Santa Ana (generally within the City of Tustin) in proportion to traffic growth at the affected sites. • Traffic impact studies for future projects shall be prepared by a qualified traffic engineer approved or retained by the City. • The City may elect to implement appropriate mitigation measures as a condition of approval of the proposed developments, where appropriate. All or part of the costs of these improvements may be considered to be a negotiated credit toward the program, however the program must be administered in a manner that assures that it can fund necessary improvements to maintain adequate level of service at all intersections within this study. If funding of priority improvements cannot be assured, credit for construction of lower priority improvements may not be assured or may be postponed until more program funds are available. • Traffic studies for future developments within the Overlay Zone must also use trip generation rates which are specific for these projects and are approved by the City. The traffic consultant preparing traffic studies for specific projects in the Overlay Zone must use City-approved trip generation rates specific to these projects. These studies are subject to City review. 	
Impact 4.8-2. Implementation of the proposed project would exceed standards established by the Orange County	PS	MM-OZ 4.12-2 and MM-OZ 4.12-4 as well as MM-TRA-1 apply to this impact.	SU

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
Transportation Authority within the Study Area.			
Impact 4.8-E1. Implementation of the Elan Project would cause an increase in traffic that is substantial in relation to existing traffic load and capacity of the street system.	PS	<p>MM-TRA-2 Prior to project occupancy, the applicant shall construct the improvements listed below or pay a fair-share/local fee to cover the Elan Project’s fair share of the full construction costs needed to implement these mitigation measures. These mitigation shall be installed prior to 2040, as the projected facilities are forecasted to be affected.</p> <ul style="list-style-type: none"> • I-5 northbound ramps at Fourth Street: Widen and/or restripe Fourth Street to provide a second exclusive westbound right-turn lane. Modify the existing traffic signal for signing and striping improvements accordingly. This improvement is subject to the review and approval of Caltrans. • SR-55 northbound ramps at Fourth Street: Widen and/or restripe Fourth Street to provide an exclusive westbound (free) right-turn lane. Restripe to convert the third eastbound through lane to a second eastbound left-turn lane. Modify the existing traffic signal for signing and striping improvements accordingly. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans. • SR-55 northbound ramps at Fourth Street/Irvine Boulevard: Widen and/or restripe the westbound approach on Fourth Street to provide an exclusive (free) right-turn lane. Modify existing traffic signal as well as existing signing and striping improvements accordingly. This improvement is subject to the review and approval of the City of Tustin and/or Caltrans. • Lyon Street at First Street: Widen Lyon Street to provide an exclusive northbound left-turn lane. Widen and/or restripe First Street to provide an exclusive eastbound right-turn lane. Modify the existing traffic signal for split signal phasing for the northbound and southbound approaches and provide northbound right-turn overlap phasing. Remove west leg crosswalk. Modify the existing signing and striping improvements accordingly. 	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<ul style="list-style-type: none"> • Mabury Street/Elk Lane at First Street: Widen and/or restripe Elk Lane to provide a second exclusive northbound right-turn lane. Widen and/or restripe First Street to provide an exclusive eastbound right-turn lane. Modify the existing traffic signal for northbound right-turn overlap phasing and existing signing and striping improvements accordingly. • Cabrillo Park Drive at First Street: Restripe First Street to convert the second eastbound through lane to a second eastbound left-turn lane. Modify the existing traffic signal for signing and striping improvements accordingly. • Elk Lane at Chestnut Avenue/Main Street: Install a traffic signal and design for three-phase operations. Widen and/or restripe Main Street to provide an exclusive westbound right-turn lane. Modify existing signing and striping improvements. 	
Impact 4.8-E2. Implementation of the proposed Elan Project would not exceed standards established by the Orange County Transportation Authority within the Study Area.	LTS	No mitigation measures are required.	LTS
Tribal Cultural Resources			
Impact 4.9-1: Implementation of the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource listed in or eligible for listing in the CRHR, or in a local register.	No impacts	No mitigation measures are required.	No impacts
Impact 4.9-2: Implementation of the proposed project could encounter significant tribal cultural resources during construction.	PS	MM-OZ 4.4-2 Due to the lack of cultural resource studies for the Overlay Zone Expansion Area, and in order to avoid damaging any unidentified cultural resources, a qualified archaeologist would be retained to monitor any significant ground-disturbing activities in	LTS

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		<p>undeveloped areas within the Expansion Area, and any deep (10” or deeper) ground-disturbing activities in all areas of the Expansion Area.</p> <p>MM-OZ 4.4-3 In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 100-meter radius must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume.</p> <p>MM-OZ 4.4-5 If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as consultant on how to proceed with the remains.</p> <p>MM-TCR-1 In the event that a tribal cultural resource is unexpectedly identified during the course of a proposed project, and the City determines that the project may cause a substantial adverse change to a tribal cultural resource, the City will employ one or more of the following standard mitigation measures:</p> <ol style="list-style-type: none"> 1. Avoidance and preservation of the resource in place, including, but not limited to, planning and construction to avoid the resource and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resource with culturally appropriate protection and management criteria. 2. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: <ol style="list-style-type: none"> (a) Protecting the cultural character and integrity of the resource (b) Protecting the traditional use of the resource 	

Table ES-23. Summary of Environmental Effects and Mitigation Measures

Impact(s)	Level of Significance Prior to Mitigation	Mitigation Measures ¹	Level of Significance after Mitigation
		(c) Protecting the confidentiality of the resource 3. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places protecting the resource. 4. Protecting the resource.	
Impact 4.9-E1: Implementation of the Elan Project would not cause a substantial adverse change in the significance of a tribal cultural resource listed in or eligible for listing in the CRHR, or in a local register.	No impacts	No mitigation measures are required.	No impacts
Impact 4.9-E2: Implementation of the Elan Project could encounter significant tribal cultural resources during construction.	PS	MM-OZ 4.4-2, 4.4-3, and 4.4-5 from the MEMU EIR as well as MM-TCR-1 would apply to this impact.	LTS

